

## **HUMAN RESOURCES RECRUITING PRIVACY POLICY** (“Privacy Policy”)

**Last Updated March 2023**

Daniel J. Edelman Holdings, Inc. and its affiliated companies worldwide (together these are "**DJEH Group**" and each is a "**DJEH Affiliated Company**" and referred to herein as the "**Company**", "**we**", "**us**" or "**our**") are strongly committed to protecting your privacy. The Company adheres to a policy of making all employment decisions without regard to race, color, religion, national origin, age, disability, veteran status, citizenship or any other protected classification which may be applicable under the law of the particular state or locality in which you are applying for employment with the Company.

Company is committed to protecting the privacy of personal data you may provide Us on any recruitment website that We provide (the "Site") or as needed for use by the Company to perform legitimate Human Resource ("HR") functions, including information collected from or related to prospective employment applicants. We believe it is important for you to know how we treat your personal data.

We updated this Privacy Policy effective as of the date listed above and may make further updates in the future. The terms of this Privacy Policy apply solely to individuals seeking potential employment with Company as well as those whose information We process in identifying and communicating with actual and potential candidates for employment with Company. If you do not agree with the terms of this Privacy Policy, you should immediately cease the use of the Site and/or follow the instructions in Paragraph 4 below to request removal of any personal data that you may have provided.

This policy does not form part of your employment terms.

### **Application Assistance for People with Disabilities**

If you are unable or limited in your ability to use or access Company's career site or otherwise process an employment application as a result of a physical or mental impairment, you can request reasonable assistance (an "Accommodation"). We will be happy to assist you, so please send an email to [careers@djeholdings.com](mailto:careers@djeholdings.com) or call our Corporate HR department at + 1-312-517-2691 to request an Accommodation. Please leave a voice message and a member of our HR department will endeavor to call you back within 3 business days. Please note that only requests for an employment application Accommodation will be returned. If you are calling to check on the status of your application or to report a technical issue, unfortunately, we will not be able to return your call.

Company is an equal opportunity employer of all protected classes, including veterans and individuals with disabilities.

## **International Privacy Matters**

The Company has put in place measures to ensure that Personal Information that is transferred internationally is subject to an adequate level of protection in accordance with applicable data protection laws. These include use of EU Union Standard Contractual Clauses (“SCCs”) and supplementary measures to the extent applicable. Company requires all service providers who process personal data from the UK or EEA to execute SCCs and apply applicable supplementary measures as well. Company conducts assessments and maintains legal, administrative and technical measures designed to protect personal data processed as part of our business in any part of the globe.

Daniel J. Edelman Holdings has self-certified with the U.S. Department of Commerce regarding the collection, use, and retention of personal data from European Union member countries in connection with the Privacy Shield Principles as part of the Privacy Shield program. While this certification, in and of itself, is not considered by the EU authorities to provide an adequate level of protection, Daniel J. Edelman Holdings nonetheless considers that it provides protection with regard to the processing of personal data and transparency with regard to our data processing standards. To learn more about the Privacy Shield program, and to view Company’s certification, please visit <http://www.privacyshield.gov>.

### **What personal data and other information does Company collect about me?**

In order for us to consider your CV or application for employment, submitting an employment application, or responding to our outreach, you consent that the Company, and its applicable service providers, may collect and maintain (in both paper and electronic format) and use personal information about you as allowable by applicable law and where needed for HR Purposes (as defined below). Depending on the legitimate business need, such personal information includes but is not limited to name, personal contact and demographic details, employment history, employment application or resume submission, contact requests, surveys, and other activities you may provide as part of the application process, voluntarily provide, permit others to provide or make public about yourself (“Personal Information”).

In addition to the Personal Information, Our web servers, along with our service providers’ web servers, automatically identify computers by their IP addresses. Company and its service providers may use IP addresses to analyze trends, administer the Site, track users’ movement and gather broad demographic information for aggregate use. To emphasize, IP addresses are not linked to Personal Information.

Further, Our Site may use technologies such as “cookies” to provide visitors with tailored information upon each visit. Cookies are a common part of many commercial websites that allow small text files to be sent by a website, accepted by a web browser and then placed on your hard drive as recognition for repeat visits to the Site. Every time you visit Our Site, Our servers, through cookies, pixels and/or GIF files, collect basic technical information such as your domain name, the address of the last URL visited prior to clicking through to the Site, and your browser and operating system. You

do not need to enable cookies to visit Our Site; however, some parts of the Site and some services may be more difficult or impossible to use if cookies are disabled. To emphasize, cookies are not linked to any Personal Information while on this Site.

Please note that under certain circumstances our clients request background checks relating to employees who work on their premises or their accounts. Under such circumstances, the Company has a legitimate interest in performing such background checks, and they are performed in accordance with applicable law and in a confidential manner designed to protect the privacy interests of the employee. The applicant is also given the opportunity to object in advance of the background check in which case it will not be carried out. The specific results of the background check are not disclosed to the client, and the employee is also given the opportunity to object in advance of the background check.

## **1. What does Company do with the information collected?**

We will only use your Personal Information when the law allows us to. Most commonly, we will use your Personal Information in the following circumstances:

- a. Where We need to perform take steps at your request prior to entering into an employment contract or any agreement with you.
- b. Where We need to comply with a legal obligation.
- c. To defend the legal rights of an individual, Company, its service providers or clients or to obtain legal advice on behalf of Company or its service providers.
- d. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Instances where We may process your Personal Information on this basis are described below.
- e. Where you give your consent to processing.

We may also use your Personal Information in the following situations:

- a. Where We need to protect your interests (or someone else's interests).
- b. Where necessary in the public interest.

The Company considers that the following processing is necessary for its legitimate interests and Company and its service providers may use/process your Personal Information for business and human resources management purposes related to your application for employment, including but not limited to: (1) processing any employment applications and/or resumes; (2) considering your qualifications for employment opportunities within Company on a global basis; (3) registering you for online recruitment activities such as employment applications; and (4) responding to your

specific requests; and for additional purposes where permitted by law including but not limited to (5) understanding the use of the Site and making improvements; (6) protecting the security or integrity of the Site if necessary; (7) complying with applicable law or legal requirements; and (8) facilitating business transactions protecting the Company, its employees or the public against injury, theft, legal liability, fraud, abuse or other misconduct. The Company may also share your information within DJEH Companies for these purposes.

In some instances, we may be required under local employment or other laws (e.g. health and safety, anti-discrimination) to maintain records that can include sensitive personal information such as information about your race, physical and mental health, political or religious opinion, trade union membership or information in relation to offences. We may process his special category personal data in the following circumstances:

- a. with your explicit written consent;
- b. where we need to carry out our legal obligations and in line with this Privacy Policy;
- c. where necessary to carry out obligations under employment or social security law; or
- d. where it is needed in the public interest, such as for equal opportunities monitoring in line with this Privacy Policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Your Personal Information may be accessed by authorized personnel of the Company on a global basis as necessary for purposes related to the processing of your Personal Information as described. Company retains Personal Information for relevant periods.

Note that we may use a number of manual and automated systems/processes to monitor business activities in the event of suspected inappropriate activities or on a periodic basis in order to ensure ongoing compliance (as permitted by local law), including but not limited to email monitoring, Internet monitoring and video surveillance in and around our premises in order to: prevent and detect crime; protect the health and safety of employees, contingent workers, and visitors on site; manage and protect Company property (including our computer systems and confidential information) and that of employees, contingent workers, and visitors; and where applicable, for quality assurance purposes.

In the event you are ultimately employed by the Company, your Personal Information will then be maintained and processed subject to the DJEH Human Resources Privacy Policy. This will also be provided to you upon joining the firm.

## 2. With whom does Company share the information?

We may share your Personal Information within the Company, with its subsidiaries and affiliates (and any other current or future subsidiaries or affiliates) and our service providers, who have a need to know and/or process the information for the purposes set forth in this Privacy Policy. In some instances, this may require that your Personal Information be transferred to, processed, and stored on a cloud and/or central servers in the United States or sent to individuals in the United States or elsewhere. The laws regarding data privacy in the United States and other countries outside the European Union may not provide the same degree of protection for the rights and freedoms of individuals than do the laws which apply within the EU. However, your Personal Information will be processed in accordance with this Privacy Policy no matter where it is transferred and processed and we have adopted the SCCs and applied necessary supplemental measures in order to ensure that EU and UK Personal Information receives adequate protection under applicable law wherever the Personal Information is processed.

Company does not disclose any Personal Information regarding applicants or job candidates to unaffiliated third parties who are not service providers for the Company or clients of the Company or transfer, or otherwise disclose any of your Personal Information to third parties except as set forth in this Privacy Policy. Company may transfer or otherwise disclose your Personal Information to third parties under the following circumstances:

- (i) in connection with a lawful request by public authorities, such as a court order, subpoena, government investigation, or other request to meet national security or law enforcement requirements, provided that US government requests for EU and UK Personal Information shall be subject to applicable supplementary measures;
- (ii) in the event of a corporate sale, merger, acquisition, or similar or contemplated event;
- (iii) in working with third party service providers, including the provider of any recruitment Site, to support the Site's technical operation;
- (iv) in working with third party service providers, to fulfill compliance obligations;  
or
- (v) otherwise in connection with processing a submitted resume and/or employment application.

In the case of processing a submitted CV and/or employment application, Company and its affiliates may disclose your Personal Information to the provider of any Site and any other third parties as necessary to further process your resume and/or employment application. Further, Company may disclose your Personal Information to other related DJEH companies for their consideration and response for any positions within their market. In some cases, Personal Information may be shared with a client, such as situations where a candidate is being considered for a particular client engagement. In other cases, non-identifying roll-up data may be shared with clients or prospective clients to fulfill Request for Proposals or contract negotiations.

Company complies with its SCCs, supplemental measures and the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions. When it is necessary to provide your Personal Information to service providers, it is done under a contract which requires the companies to, among other things, use the information only for the limited purposes for which it is provided to them in providing services to Company, not to transfer the information to another party without Company approval, and to agree to hold the information securely and confidentially in accordance with this Privacy Policy, applicable law and the Privacy Shield privacy principles.

In addition to adhering to this Privacy Policy, and other policies and procedures regarding the privacy of personal information that Company has in place, when your Personal Information is transferred from the EU, to Company or to other entities in other countries, we require the recipient entity to enter into a contract regarding the use and processing of that information which incorporates the SCCs and necessary supplemental measures.

In the U.S., Company participates in E-Verify, a United States Department of Homeland Security system to confirm employment eligibility.

From time to time, Company may make third party activities, events or applications available to you that are managed by third parties not acting as vendors to Company. These third parties (such as social media platforms or other company websites and applications) are responsible for their own privacy practices. Be sure to read the privacy policies, supplemental notices, and settings of all websites or platforms that you visit so you can understand their privacy practices and your options.

### **3. How do I access, correct, update, limit use of or delete my Personal Information?**

You have the right to make a complaint in relation to our processing of your personal data to the relevant authorities for your country.

You have rights to obtain a copy of your personal data and in certain situations to obtain correction, erasure and restriction of processing of your personal data. You have a right of data portability. Where processing is based on your consent you have a right to withdraw this at any time.

You are able to opt-out of our processing of your personal data in relation to direct marketing or where we process on the basis that processing is necessary for our or a third party's legitimate interests unless we have compelling legitimate grounds to continue. If you wish to exercise any of these rights, then please notify your recruiter or the HR contact noted below. You may also automatically request to update or delete personal data by clicking on the link provided in our communications to you. We will promptly evaluate and respond to your request. Please note, however, that certain personal data may be exempt from such access, modification or deletion rights pursuant to applicable data protection laws.

## Notice to California Residents- California Privacy Rights:

While the Company provides comparable rights to all personnel with respect to their personal data, California law specifically requires that we provide notice to California residents that they may request from us information concerning: the categories of information we have collected; the categories of sources from which the personal information is collected; the purpose for which we collect or sell the personal information; the categories of third parties with whom we share personal information; and the specific pieces of personal information we have collected. We will not discriminate against an individual for exercising any of these rights.

If you are a California resident and would like to make such a request, please submit your request in writing to [compliance@dje Holdings.com](mailto:compliance@dje Holdings.com) or by using our CCPA Request Form [\[forms.office.com\]](https://forms.office.com).

### **4. How does Company protect the security of my Personal Information?**

Company uses and/or requires service providers to use administrative, technical, physical and organizational security measures (such as encryption and access controls) which are designed to protect all Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the Personal Information. We safeguard information according to established security standards, and periodically assess our methods of protecting information.

If you should become aware of any known or suspected incidents of unauthorized access to, use of or disclosure of any personal information, you should report them immediately to the following email address: [security@dje Holdings.com](mailto:security@dje Holdings.com). We will investigate all reported incidents.

### **5. Does Company make changes to this Privacy Policy and how are you notified?**

We may update this Privacy Policy from time to time. If we decide to make changes to this Privacy Policy, we will update this Privacy Policy with the new effective date. Check the "last updated" date at the top of this Privacy Policy to see the last time it was changed.

### **6. How does the Company assess and audit its own compliance?**

As Company's business and technology transforms, so does our privacy ecosystem. Company conducts compliance audits of its privacy practices to verify adherence to this Privacy Policy. All reported breaches or potential breaches will be investigated by appropriate personnel of Company, who will take such action as deemed appropriate based on the results of the investigation. We are open to feedback--see contact information below.

## 7. How do I contact the Company with questions or concerns?

If you have any further questions or concerns regarding this Privacy Policy and/or the use of your Personal Information, please contact your recruiter or email the Company at the HR contact noted below. DJEH will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Privacy Policy and applicable law. In addition to such investigations, we monitor adherence to this Privacy Policy and investigate suspected infractions. Any employee that is determined to be in violation of this Privacy Policy or misuses Personal Information will be subject to disciplinary action, up to and including termination where allowable by applicable law.

As the Personal Information collected and processed via the Site or otherwise as part of an employment application is considered human resources data under applicable law and the Privacy Shield Framework, Company has agreed to cooperate in investigations by, and comply with the advice of, the appropriate EU data protection authorities (“DPA”) in managing any dispute. Further, Company is also subject to the applicable investigatory and enforcement powers of the U.S. Federal Trade Commission. If you have questions or complaints regarding the use or disclosure of Personal Information in compliance with the principles of this Privacy Policy, you should contact Company first at the HR contact noted below. If contacting Company does not resolve your concern or complaint, you may raise your complaint with the relevant DPA where you live or work (see [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm) for contact information) or other applicable regulator. A Binding arbitration option is available in the event that residual complaints related to EU compliance are not resolved by any other means.

This Privacy Policy does not create or confer upon any individual any rights or impose upon Company any rights or obligations outside of, or in addition to, any rights or obligations imposed by the privacy laws applicable to such individual's personal information. Should there be, in a specific case, any inconsistency between this Privacy Policy and such privacy laws, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

**CONTACT INFORMATION: Please direct all requests, questions or concerns related to this Privacy Policy or your personal information (with the exception of potential security breaches as noted above) to your recruiter or to [applicant.privacy@djeholdings.com](mailto:applicant.privacy@djeholdings.com).**

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