

ALVAREZ & MARSAL

**Recruitment Privacy Notice Supplement (Republic of Türkiye)**

**Effective Date: January 1, 2026**

This **Recruitment Privacy Notice Supplement (Republic of Türkiye)** (“**Türkiye Recruitment Privacy Supplement**”) is provided to you by Alvarez & Marsal Holdings, LLC (“**Holdings**”) on behalf of itself and its subsidiaries, and any other professional services companies operating under the Alvarez & Marsal (or A&M) brand, that are established in the Republic of Türkiye (“**Türkiye**”) (together, “**A&M**”, “**we**”, “**our**”, “**us**”).

This Türkiye Recruitment Privacy Supplement constitutes a Local Privacy Supplement as referred to in A&M’s [Global Recruitment Privacy Notice](#). It provides additional information to, and must be read in conjunction with, our Global Recruitment Privacy Notice. In the event of any conflict between this Türkiye Recruitment Privacy Supplement and A&M’s Global Recruitment Privacy Notice, this Türkiye Recruitment Privacy Supplement will prevail.

This Türkiye Recruitment Privacy Supplement provides additional information regarding the following sections of the Global Recruitment Privacy Notice:

- 1) [The controller of your personal information](#).
- 2) [The categories of personal information we collect](#).
- 3) [Our use of personal information](#).
- 4) [Our lawful bases to process personal information](#).
- 5) [Cross border transfers of personal information](#).
- 6) [Your individual rights](#).
- 7) [How to contact us](#).

As used herein, “**Applicable Data Protection Laws**” specifically means all laws, rules and regulations of Türkiye applicable to the processing of personal information, including without limitation Personal Data Protection Law No. 6698 (“**PDPL**”) and By-Law on Procedures and Principles for the Transfer of Personal Data Abroad (“**By-Laws**”).

This Türkiye Recruitment Privacy Supplement does not constitute or form any part of an employment, directorship, ownership, partnership, independent contractor or any other type of agreement with us or confer any contractual right on you or place any contractual obligations on us. If you become an employee, officer, partner, independent contractor, or any other category of worker, you will be provided with our Global Workplace Privacy Notice and Türkiye Workplace Privacy Supplement, which supersedes this notice.

**1. The Controller of Your Personal Information**

Depending on the nature of the processing activity, the controller of your personal information will be (i) the local A&M entity considering you as a job applicant (including, as of the date of this Türkiye Recruitment Privacy Supplement, AM Turkey Danışmanlık Limited Şirketi), (ii) our top-level entity within Türkiye, if different, (iii) Holdings (which is our top-level parent, located in the United States), and/or (iv) other Holdings subsidiaries and members of the A&M group.

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**2. Categories of Personal Information We Collect**

All references to “**personal information**” in the [Global Recruitment Privacy Notice](#) and this Türkiye Recruitment Privacy Supplement shall be understood to refer exclusively to “**personal data**” as defined under PDPL Art. 3(1)(d).

Notwithstanding anything in the Global Recruitment Privacy Notice to the contrary, personal information includes publicly available information.

All references to “**sensitive personal information**” in the [Global Recruitment Privacy Notice](#) and this Türkiye Recruitment Privacy Supplement shall be understood to refer exclusively to “**special categories of personal data**” as defined under PDPL Art. 6(1). Specifically, this refers to race, ethnic origin, political opinion, philosophical belief, religion, religious sect or other belief, appearance, membership to associations, foundations or trade-unions, data concerning health, sexual life, criminal convictions and security measures, and biometric and genetic data).

Notwithstanding anything in the [Global Recruitment Privacy Notice](#) to the contrary, A&M does not collect information concerning your sexual orientation.

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### **3. Use of Personal Information**

A&M does not use your personal information for automated decision making, including profiling.

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### **4. Lawful Bases to Process Personal Information**

We process personal information for the purposes described in our [Global Recruitment Privacy Notice](#). Please refer to [Annex 1](#) to this Türkiye Recruitment Privacy Supplement for additional information on our legal bases for processing.

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### **5. Cross Border Transfers of Personal Information**

A&M is a global company with offices around the world and with its parent company located in the United States. Except where prohibited by (and subject to the requirements of) Applicable Data Protection Laws, A&M may transfer your personal information outside of Türkiye to other countries or territories where A&M, its service providers, or other third parties are located, including to countries or territories that have not been determined by the Türkiye Personal Data Protection Board (“**the Board**”) to provide an adequate level of protection for the processing of personal information as compared to Applicable Data Protection Laws, for the purposes set out in A&M’s [Global Recruitment Privacy Notice](#).

#### ***Internal Transfers***

When we transfer your personal information within the A&M group to countries or territories outside of Türkiye that have not been determined to provide an adequate level of protection for the processing of personal information as compared to Applicable Data Protection Laws, it is pursuant to a companywide Intra-Group Personal Data Sharing and Transfer Agreement that complies with Applicable Data Protection Laws with respect to transfers of personal information outside of Türkiye, and incorporates standard contractual clauses (“**SCCs**”) approved by the Board (PDPL Art. 9(4)(c) and By-Laws Art. 10(1)(c), 14).

#### ***External Transfers***

When we transfer your personal information to third parties (including, but not limited to, processors such as our talent network and job application platform) located in countries or territories outside of Türkiye that have not been determined to provide an adequate level of protection for the processing of personal information as compared to Applicable Data Protection Laws, it is our policy to ensure that recipients are bound to maintain appropriate levels

of data protection, security and confidentiality, and to comply with the requirements of Applicable Data Protection Laws for transfers of personal information outside of Türkiye.

Wherever personal information is transferred to third parties outside of Türkiye, we will utilise any necessary and appropriate safeguards, including SCCs, or on occasion, where relevant and permissible, derogations under Applicable Data Protection Laws. For certain ad hoc transfers, we may rely on other exemptions such as the transfer is necessary for the performance of a contract with you. In general, we do not rely on such derogations but may do so where there is a clear lawful basis.

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## **6. Individual Rights**

You have specific rights under Applicable Data Protection Laws regarding the personal information we collect and process about you. These rights are designed to give you greater transparency and control over your personal information. In particular, you have the following rights:

- (1) Right to be Informed (PDPL Art. 10(1)).** You have the right to be informed about the collection and use of your personal information. A&M's [Global Recruitment Privacy Notice](#), together with this Türkiye Workplace Privacy Supplement, is part of our commitment to transparency.
- (2) Right of Access (PDPL Art. 11(1)(a), (b), (c)).** You may request access to the personal information we hold about you.
  - ✓ Please note: The right of access is subject to certain limitations and exemptions. Reasons that we may restrict access to personal information include, without limitation, where disclosure would adversely affect the rights and freedoms of others, or where disclosure would breach another individual's privacy rights; be subject to legal professional privilege, meaning communications between you and legal advisors or between us and our legal counsel may be exempt; interfere with ongoing investigations, disciplinary proceedings, or regulatory functions; be restricted under national laws or statutory obligations, such as those related to crime prevention, taxation, or public health; involve confidential references provided for employment or training purposes; be part of management forecasting or planning, where disclosure would prejudice the conduct of the business; or relate to negotiations with you, where disclosure would prejudice those negotiations.

We will assess each request on a case-by-case basis and inform you if any exemptions apply, along with the reasons for withholding any information.

- (3) Right to Rectification (PDPL Art. 11(d)).** If any of your personal information is inaccurate or incomplete, you have the right to request that it be corrected or updated.
- (4) Right to Erasure or Destruction (PDPL Art. 11(e)).** You may request the deletion of your personal information where the personal information is no longer necessary for the purposes for which it was originally collected or otherwise processed.

If your personal information has been made public and we are required to erase it, we will take reasonable steps, including technical measures, to inform other controllers processing the data that you have requested the erasure of any links to, or copies or replications of, that data.

- (5) Rights in Relation to Automated Decision-Making (PDPL Art. 11(g)).** You have the right to object to a decision based solely on automated processing. As noted above, A&M does not use your personal information for automated decision making, including profiling.
- (6) Right to Withdraw Consent.** If we are processing your personal information based on your consent, you have the right to withdraw consent at any time. Please note, any such withdrawal of consent will not affect

the lawfulness of our processing based on consent before such withdrawal, or where the processing of your personal information is based on another legal basis.

**(7) Right to Lodge a Complaint (PDPL Art. 14).** If you believe your data protection rights have been violated, you have the right to lodge a complaint with the relevant supervisory authority, the Board (<https://kvkk.gov.tr/en/>).

A&M will make reasonable efforts to accommodate your requests, but A&M is under no obligation to honor any specific request absent a legal requirement. If we cannot honor your request or are under no legal obligation to do so, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

To exercise any of your privacy rights, or to submit any request or complaint regarding the processing of your personal information, please contact us in writing using any of the contact methods provided in [Section 7](#).

Please note, to help protect your privacy and maintain security, we may take steps to verify your identity before complying with your request. For example, we may require you to provide your name, additional contact details, and the nature of your relationship with A&M. In addition, if you ask us to provide you with specific pieces of personal information or to delete information that we deem to be sensitive, we may require you to sign a declaration under penalty of perjury that you are the data subject whose personal information is the subject of the request. If you designate an authorized agent to exercise your privacy rights on your behalf, we may require proof (your signed permission) demonstrating that you authorized the agent to act on your behalf; and, further, we may require you to verify your own identity and confirm that you authorized the agent to submit the request on your behalf. We may deny any request submitted by an agent that does not meet these requirements. We may charge you a fee to access your personal information; however, we will notify you of any fee in advance.

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## **7. Contact Us**

To exercise any of your individual rights, or to submit any request or complaint regarding our processing of your personal information, please contact us at:

Talent Acquisition	<a href="mailto:talentacquisition@alvarezandmarsal.com">talentacquisition@alvarezandmarsal.com</a>
Webform	Available through A&M's Website Privacy Notice ("Individual Rights") ( <a href="#">here</a> ).

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## ANNEX 1

### Legal Grounds for Processing Personal Information

**Personal information:** A&M processes your personal information on the following lawful bases, as further specified in Annex 1 to our [Global Recruitment Privacy Notice](#):

- Contract
- Legal obligation
- Legitimate interests
- Vital interests
- Consent

A&M's lawful bases to process your personal information also include:

- Processing relates to data about you that you have made public (e.g., posted to publicly available social media) ("**Public data**").
- Processing is necessary for the establishment, exercise or protection of any of our legal rights (e.g., if you bring a claim against A&M, or if A&M or its clients are subject to any regulatory action and your information is relevant to that matter) ("**Legal right**").

**Sensitive personal information:** A&M processes your sensitive personal information for the purposes specified in our [Global Recruitment Privacy Notice](#) only if (in addition to having a lawful basis) one of the following special conditions or other legally permitted derogation applies:

- Explicit consent
- Legal obligation
- Vital interests
- Legal right
- Processing is necessary for the protection of public health, medical diagnosis, treatment and care services ("**Protection of health**").
- Processing is necessary for the purposes of your or our obligations and rights in relation to employment, occupational health and safety, social security, social security and social assistance ("**Employment obligations**").
- Public data, provided our processing is in consistent with your intention to make such data public.

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