

## ALVAREZ & MARSAL

### Recruitment Privacy Notice Supplement (United Arab Emirates)

**Effective Date:** January 1, 2026

This **Recruitment Privacy Notice Supplement (United Arab Emirates)** ("**UAE 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 any Emirate of United Arab Emirates ("**UAE**"), including but not limited to Abu Dhabi ("**Abu Dhabi Mainland**"), or any of its economic free zones, including but not limited to Abu Dhabi Global Market ("**ADGM**") and Dubai International Financial Centre ("**DIFC**") (together, "**A&M**", "**we**", "**our**", "**us**").

This UAE Recruitment Privacy Supplement constitutes a Local Privacy Supplement as referred to in A&M's Global Recruitment Privacy Notice ([here](#)). 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 UAE Recruitment Privacy Supplement and A&M's Global Recruitment Privacy Notice, this UAE Recruitment Privacy Supplement will prevail.

This UAE 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 the UAE, any Emirate, including but not limited to Abu Dhabi Mainland, or any of its economic free zones, including but not limited to ADGM and DIFC, applicable to the processing of personal information, including without limitation UAE Federal Decree by Law No. (45) of 2021 Concerning the Protection of Personal Data ("**UAE DPL**"), ADGM Data Protection Regulations 2021 ("**ADGM Regulations**"), and DIFC Data Protection Law (DIFC Law No. 5 of 2020) ("**DIFC DPL**"). The Applicable Data Protection Law is determined by the location of the A&M office in which you are being considered as a job applicant.

This UAE 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 UAE 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 UAE Recruitment Privacy Supplement: Alvarez & Marsal Middle East Consultancy Limited, Alvarez & Marsal Middle East (Corporate Finance) Limited and Alvarez & Marsal Middle East Limited), (ii) our top-level entity within the UAE, 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 UAE Recruitment Privacy Supplement shall be understood to refer exclusively to “**personal data**” as defined under ADGM Regulations (Sect. 62(1)), DIFC DPL (Schedule 1, Sect. 3), and UAE DPL (Art. 1), as applicable. 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 UAE Recruitment Privacy Supplement shall be understood to refer exclusively to “**special categories of personal data**” as defined under ADGM Regulations (Sect. 62(1), 7(1)) and DIFC DPL (Schedule 1, Sect. 3), or “**sensitive personal data**” as defined under UAE DPL (Art. 1), as applicable. Specifically, this refers to racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation, and personal data relating to criminal convictions and offences or related security measures.

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 UAE 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 the Emirate (e.g., Abu Dhabi Mainland) or free zone (e.g., ADGM or DIFC) where the controller of your personal information is established to other countries or territories where A&M, its clients, service providers, or other third parties are located for the purposes set out in A&M’s [Global Recruitment Privacy Notice](#), including to countries or territories that have not been determined by the ADGM Commissioner of Data Protection (with respect to transfers outside of ADGM), the DIFC Commissioner of Data Protection (with respect to transfers outside of DIFC) or UAE Data Office (with respect to transfers outside of UAE that are not otherwise subject to ADGM Regulations or DIFC DPL), as applicable, to provide an adequate level of protection for the processing of personal information as compared to Applicable Data Protection Laws.

### ***Internal Transfers***

When we transfer your personal information within the A&M group as described in this [Section 5](#), it is pursuant to a companywide Intra-Group Personal Data Sharing and Transfer Agreement (“**IGA**”) that complies with Applicable Data Protection Laws with respect to cross-border transfers of personal information. Our IGA incorporates standard

contractual clauses (“SCCs”) approved by the ADGM Commissioner of Data Protection (ADGM Regulations Sect. 42(2)) and the DIFC Commissioner of Data Protection (DIFC DPL Art. 27(2)(c)), as applicable.

### ***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) as described in this [Section 5](#), it is our policy to comply with the requirements of Applicable Data Protection Laws for such transfers, including to ensure that recipients maintain appropriate levels of data protection, security and confidentiality. We will utilise any necessary and appropriate safeguards, including (with respect to transfers outside of ADGM and DIFC) SCCs, or on occasion, where relevant and permissible, derogations as may be permitted 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, depending on the Applicable Data Protection Law, you may have the following rights:

- (1) Right to be Informed (ADGM Regulations Sect. 11, 12; DIFC DPL Art. 29, 30; UAE DPL Art. 5).** 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 UAE Recruitment Privacy Supplement, is part of our commitment to transparency.
- (2) Right of Access (ADGM Regulations Sect. 13; DIFC DPL Art. 33(1)(a), 33(1)(b); UAE DPL Art. 13).** 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 (ADGM Regulations Sect. 14; DIFC DPL Art. 33(1)(c); UAE DPL Art. 15(1)).** 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 (ADGM Regulations Sect. 15; DIFC DPL Art. 33(2); UAE DPL Art. 15(2)).** In certain circumstances, you may request the deletion of your personal information, specifically:
  - (i) *Data No Longer Necessary.* The personal information is no longer necessary for the purposes for which it was originally collected or otherwise processed.

- (ii) *Withdrawal of Consent.* You withdraw your consent on which the processing is based, and there is no other legal ground for the processing.
- (iii) *Objection to Processing.* You object to the processing of your personal information on the basis of legitimate interests and there are no overriding legitimate grounds for the processing, or for direct marketing purposes.
- (iv) *Unlawful Processing.* The personal information has been unlawfully processed in breach of Applicable Data Protection Laws.
- (v) *Legal Obligation.* The personal information must be erased to comply with a legal obligation under Applicable Data Protection Laws.

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.

- ✓ Please note: The right of erasure is not absolute. We may refuse your request where processing is necessary: for compliance with a legal obligation or for the performance of a task carried out in the public interest; for reasons of public interest in the area of public health; for archiving purposes in the public interest, scientific or historical research, or statistical purposes, where erasure would seriously impair the achievement of the objectives of that processing; and for the establishment, exercise, or defense of legal claims.

**(5) Right to Restrict Processing (ADGM Regulations Sect. 16; DIFC DPL Art. 35; UAE DPL Art. 16).** You may request that we restrict the processing of your personal information in specific situations, such as when you contest the accuracy of the personal information or object to its processing.

**(6) Right to Data Portability (ADGM Regulations Sect. 18; DIFC DPL Art. 37; UAE DPL Art. 14).** Where applicable, you have the right to receive your personal information in a structured, commonly used, and machine-readable format and to transmit that data to another controller.

**(7) Right to Object (ADGM Regulations Sect. 19; DIFC DPL Art. 34; UAE DPL Art. 17).** You have the right to object to the processing of your personal information in certain circumstances, including (in ADGM and DIFC only) processing based on legitimate interests or for direct marketing purposes.

**(8) Rights in Relation to Automated Decision-Making and Profiling (ADGM Regulations Sect. 20; DIFC DPL Art. 38; UAE DPL Art. 18).** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects. Automated decision-making with legal or similarly significant effects on the basis of sensitive personal information is permissible only with your explicit consent or where permitted by Applicable Data Protection Laws. As noted above, A&M does not use your personal information for automated decision making, including profiling.

- ✓ Please note: The right not to be subject to automated decision making is not absolute. We may engage in automated decision making, including profiling, where the processing is either necessary for entering into or performing a contract between us and you, authorized by law (e.g., for purposes of detecting fraud), or based on your explicit consent.

**(9) Right to Withdraw Consent (ADGM Regulations Sect. 6(7); DIFC DPL Art. 32; UAE DPL Art. 6(1)(c)).** 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.

**(10) Right not to be discriminated (DIFC DPL Art. 39).** If you are exercising your rights under DIFC DPL, A&M will not discriminate against you.

**(11) Right to Lodge a Complaint (ADGM Regulations Sect. 57; DIFC DPL Art. 60; UAE DPL Art. 24).** If you believe your data protection rights have been violated, you have the right to lodge a complaint with the relevant supervisory authority, as follows:

- ADGM Office of Data Protection  
<https://www.adgm.com/operating-in-adgm/office-of-data-protection/>
- DIFC Commissioner of Data Protection  
<https://www.difc.com/business/registrars-and-commissioners/commissioner-of-data-protection>
- UAE Data Office  
<https://u.ae/en/about-the-uae/digital-uae/data/data-protection-laws>

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 (including sensitive 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](#):

UAE Federal	ADGM / DIFC
<ul style="list-style-type: none"><li>• Contract</li><li>• Legal obligation</li><li>• Data publicly available (by the data subject)</li><li>• Consent</li><li>• Initiate/defend legal claims or connected with judicial proceedings</li><li>• Occupational or preventive medicine to assess employees' ability to work</li><li>• Protection of public health</li><li>• Archival, historical and scientific purposes or statistical studies</li><li>• Data subjects' interests</li><li>• Processing necessary to carry out obligations and exercise rights in the field of employment, social security and social protection</li></ul>	<ul style="list-style-type: none"><li>• Contract</li><li>• Legal obligation</li><li>• Legitimate interests of the controller or third party</li><li>• Vital interests</li><li>• Consent</li></ul>

**Sensitive personal information (ADGM / DIFC only):** 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:

- You have given your explicit consent.
- Processing being necessary for the purposes of your or our obligations and rights in relation to employment, including but not limited to recruitment, visa or work permit processing, the performance of an employment contract, termination of employment, the conduct of proceedings relating to employment and the administration of a pension, retirement or employee money purchase benefit scheme.
- Processing is necessary to protect your or another person's vital interests where you or the other person is physically or legally incapable of giving consent.
- Processing relating to information about you that you have made public (e.g., posted to publicly available social media).
- Processing is necessary for the purpose of establishing, making or defending legal claims.
- Processing is necessary for compliance with a specific requirement of Applicable Law to which A&M is subject, and in such circumstances, we will provide you with clear notice of such processing as soon as reasonably practicable unless the obligation in question prohibits such notice being given.
- Processing is necessary to comply with Applicable Law that applies to A&M in relation to anti-money laundering or counter-terrorist financing obligations or the prevention, detection or prosecution of any crime.
- Processing being necessary for provision of health care or treatment, medical diagnosis, and assessment of your working capacity.
- Processing is required for protecting members of the public against dishonesty, malpractice, incompetence or other improper conduct of persons providing banking, insurance, investment, management consultancy, information technology services, accounting or other services or commercial activities (either in person or indirectly by means of outsourcing), including any resulting financial loss.

- Processing is proportional and necessary to protect a Data Subject from potential bias or inaccurate decision making, where such risk would be increased regardless of whether sensitive personal information is processed.
- Processing is necessary for reasons of substantial public interest, e.g., non-discrimination purposes to the extent permitted by law. You may be asked to provide diversity or other equal opportunities employment information; however, you are not required to provide any such information, and should you decide not to provide such information your employment, partnership or other working relationship with A&M will not be affected in any way.

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