

## ALVAREZ & MARSAL

### Recruitment Privacy Notice Supplement (California)

Effective Date: January 1, 2026

This **Recruitment Privacy Notice Supplement (California)** ("CCPA Notice") 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 located in the United States (together, "A&M", "we", "our", "us").

This CCPA Notice 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 and US Recruitment Privacy Supplement. In the event of any conflict between this CCPA Notice and either the Global Recruitment Privacy Notice or US Recruitment Privacy Supplement, this CCPA Notice will prevail.

This CCPA Notice applies solely to residents of the State of California ("consumers" or "you") with respect to the collection, use, storage, transmission, disclosure, and/or disposal of personal information by A&M about you in the context of your role as a job applicant to A&M (collectively, "application-related information"). For purposes of this CCPA Notice, the term "job applicant" includes individuals who (i) apply for a position with A&M, (ii) join the A&M Talent Network without applying for a specific position, (iii) are identified by A&M's search efforts, whether or not recruited by A&M, (iv) are presented as candidates to A&M by third parties, such as executive recruiters or staffing agencies, or (v) contact A&M to enquire about potential roles.

If you become an employee, officer, partner, independent contractor, or any other category of worker, we will provide you with our Global Workplace Privacy Notice, US Workplace Privacy Supplement, and California Workplace Privacy Supplement, which supersede this notice.

1. [The categories of personal information we collect.](#)
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"Applicable Data Protection Laws" specifically means the California Consumer Privacy Act of 2018, as amended, together with all applicable regulations thereunder (collectively, "CCPA").

This CCPA Notice does not constitute or form any part of any employment, ownership, directorship, 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.

## **1. Categories of Personal Information We Collect**

**“Personal information”** means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. A “household” means a group, however identified, of California residents who cohabit with one another at the same residential address and share use of common devices or services.

Personal information does **not** include:

- **Publicly available information**, meaning information that is (i) lawfully made available from federal, state, or local government records; or (ii) information that a business has a reasonable basis to believe is lawfully made available to the general public by the individual or from widely distributed media, or by the individual; or (iii) information made available by a person to whom the individual has disclosed the information if the individual has not restricted the information to a specific audience.
- **Deidentified or aggregated** consumer information.
- Information **excluded from the CCPA’s scope**, like:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), or clinical trial data; or
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA) (i.e., criminal background and credit checks conducted by a consumer reporting agency at the request of an employer in accordance with the FCRA), the Gramm- Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) (i.e., non-public financial information), and the Driver’s Privacy Protection Act of 1994.

**“Sensitive personal information”** means: (1) Personal information that reveals: (A) A consumer’s Social Security number, driver’s license, state identification card, or passport number. (B) A consumer’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account. (C) A consumer’s precise geolocation. (D) A consumer’s racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, or union membership. (E) The contents of a consumer’s mail, email, and text messages unless the business is the intended recipient of the communication. (F) A consumer’s genetic data. (G) A consumer’s neural data, which means information that is generated by measuring the activity of a consumer’s central or peripheral nervous system, and that is not inferred from nonneural information. (2) The processing of biometric information for the purpose of uniquely identifying a consumer. (3) Personal information collected and analyzed concerning a consumer’s health, sex life, or sexual orientation. (4) Personal information of consumers that the business has actual knowledge are less than 16 years of age. A business that willfully disregards the consumer’s age shall be deemed to have had actual knowledge of the consumer’s age. Sensitive personal information does not include information that is “publicly available” (as defined above).

**“Selling”** personal information means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating a consumer’s personal information by A&M to a *third party* for monetary or other valuable consideration. (As we explain in [Section 6 \(“Categories of Personal Information We Have Sold or Shared”\)](#), below, A&M does not sell application-related information).

**“Sharing”** personal information means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating a consumer’s personal information by A&M to a *third party for cross-context behavioral advertising*, whether or not for monetary or other valuable consideration. (As we explain in [Section 6 \(“Categories of Personal Information We Have Sold or Shared”\)](#), below, A&M does not share application-related information).

**“Third party”** means any person or entity who is not: (i) the business with whom consumers intentionally interacts and that collects consumers’ personal information from them as part of their interaction with the business; (ii) a service provider of A&M; or (iii) a contractor of A&M.

**Table 1**, below, (i) identifies the categories of personal information we have collected in the preceding 12 months, which for purposes of CCPA and this CCPA Notice is considered application-related information (as defined above); and (ii) indicates whether we have (a) disclosed personal information for a business purpose, or (b) sold or shared personal information, each in the preceding 12 months. For additional information, please see *Section 3 (“Business or Commercial Purposes for Collecting, Disclosing, Selling, or Sharing Personal Information”)*, *Section 5 (“Categories of Personal Information We Have Disclosed for a Business Purpose”)*, and *Section 6 (“Categories of Personal Information We Have Sold or Shared”)*, below.

[Table 1 Follows]

**TABLE 1**

<b>Category of Personal Information</b>	<b>Examples</b>	<b>Collected</b>	<b>Disclosed to a Service Provider or Contractor for a Business Purpose in the Preceding 12 Months</b>	<b>Sold or Shared to a Third Party in the Preceding 12 Months</b>
<b>A. Identifiers.</b>	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES	YES	NO
<b>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	YES	YES	NO
<b>C. Protected classification characteristics under California or federal law.</b>	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES	YES	NO
<b>D. Commercial information.</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO	NO	NO

**TABLE 1**

<b>Category of Personal Information</b>	<b>Examples</b>	<b>Collected</b>	<b>Disclosed to a Service Provider or Contractor for a Business Purpose in the Preceding 12 Months</b>	<b>Sold or Shared to a Third Party in the Preceding 12 Months</b>
E. Biometric information.	An individual's physiological, biological or behavioral characteristics, including information pertaining to an individual's DNA, that can be, is used, or is intended to be used, singly or in combination with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.	NO	NO	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	YES	NO
G. Geolocation data.	Physical location or movements.	YES	YES	NO

**TABLE 1**

<b>Category of Personal Information</b>	<b>Examples</b>	<b>Collected</b>	<b>Disclosed to a Service Provider or Contractor for a Business Purpose in the Preceding 12 Months</b>	<b>Sold or Shared to a Third Party in the Preceding 12 Months</b>
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information, such as images and audio, video or call recordings created in connection with our business activities.	YES	YES	NO
I. Professional or employment-related information.	Resume/CV and any cover letter; professional history; education; qualifications; references; licenses; certifications; language skills; professional affiliations; interview or assessment data; other information you provide as part of your recruitment; employee ID; dates of hire / separation; office (country, city); business unit; job description; category (e.g., full/part-time); reporting lines; travel; relocations; terms and conditions of your employment or other agreement; time, leave, and absence data; performance management data; disciplinary and grievance data; other information you provide or which is collected in connection with your ongoing professional and career development; and, termination and retirement data; each of the foregoing in relation to A&M or your prior employer, as the context requires.	YES	YES	NO

**TABLE 1**

<b>Category of Personal Information</b>	<b>Examples</b>	<b>Collected</b>	<b>Disclosed to a Service Provider or Contractor for a Business Purpose in the Preceding 12 Months</b>	<b>Sold or Shared to a Third Party in the Preceding 12 Months</b>
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES	YES	NO
K. Inferences.	Inferences drawn from other personal information identified above to create a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES	YES	NO
L. Sensitive Personal Information	Social Security number, driver's license, state identification card, or passport number.	YES	YES	NO
	Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.	NO	NO	NO
	Precise geolocation.	YES	YES	NO
	Racial or ethnic origin, religious or philosophical beliefs, or union membership.	YES	YES	NO
	Contents of mail, email, and text messages unless the business is the intended recipient of the communication.	YES	YES	NO

TABLE 1

Category of Personal Information	Examples	Collected	Disclosed to a Service Provider or Contractor for a Business Purpose in the Preceding 12 Months	Sold or Shared to a Third Party in the Preceding 12 Months
	Genetic data.	NO	NO	NO
	Biometric information that is processed for the purpose of uniquely identifying a person.	NO	NO	NO
	Personal information collected and analyzed concerning a person's health.	YES	YES	NO
	Personal information collected and analyzed concerning a person's sex life or sexual orientation.	YES	YES	NO

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## 2. Categories of Sources of Personal Information

Except where prohibited by (and subject to the requirements of) Applicable Laws, we may collect personal information about you from multiple sources, including:

- **Directly from you:** We collect personal information directly from you during the recruiting, application and interview processes and throughout the course of your candidacy to A&M. Please note, you must provide us with certain personal information that we require to consider your candidacy or application, including to be able to enter into an employment, partnership or other agreement with you, or to comply with our legal obligations. Failure to provide us with required information may prevent us from moving forward with your candidacy or from complying with our legal obligations.
- **External parties:** During the recruiting process, we collect personal information from your former employers, educational institutions, named referees, and our service providers (including recruitment / staffing agencies, qualifications testing consultants, background check providers). If you caused your job application or other personal information to be shared with us through a third-party application (e.g., LinkedIn or a job board), we consider that information as having come from an external party.
- **Electronic means:** We collect information from you by electronic means as described in our general online privacy notice ([here](#)) and cookies notice ([here](#)), and from access logs (e.g., security badge swipes) and security camera (CCTV) footage relating to building, office and restricted zone access (but excluding CCTV systems controlled by the buildings in which A&M offices are located).
- **Government entities:** We collect information from courts, regulators, and other government agencies.

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### **3. Business or Commercial Purposes for Collecting, Disclosing, Selling, or Sharing Personal Information**

Under CCPA, a permissible “business purpose” means a use of personal information related to a business’ (or its service providers’ or contractors’) operational or other notified purposes.

Except where prohibited by (and subject to the requirements of) Applicable Laws, we may use your personal information for the following purposes:

- Recruiting / talent acquisition (including contacting you about job opportunities (via email, SMS or through social media platforms, e.g., LinkedIn); managing the A&M talent network; managing the application, screening, shortlisting, interview, assessment (including personality or aptitude tests), and job offer processes (including contacting you via email or SMS); maintaining a record of recruitment decisions; and maintaining a pool of qualified candidates to consider for future opportunities).
- Background and reference checks.
- Emergency/incident management and communication (including to report, manage and/or communicate with you in case of emergencies that pose a public risk, such as riots, terrorism or political unrest, and natural and man-made disasters).
- Non-discrimination in hiring, equality of opportunity or treatment, promoting and maintaining an inclusive workforce, and reporting statistics to government agencies.
- Ensuring compliance with laws and A&M policies (including but not limited to non-discrimination and equal opportunity employment).
- Establishment, exercise, or defense of legal claims.
- Managing and monitoring access to A&M offices and restricted zones.
- In connection with the sale of all or a part of our business, our assets, or a reorganization or combination of our organization with another organization.
- Any other lawful purpose reasonably related to your role as a job applicant to A&M.
- For additional purposes with your consent, where consent is required by Applicable Laws.

**Please note:** A&M uses **artificial intelligence (“AI”)** tools, including internal and third-party applications (e.g., Microsoft Copilot, Jobvite Talent Fit), in accordance with Applicable Laws, for purposes including the following:

- **To record and transcribe interviews to enhance the accuracy and recall of key points discussed.** Recordings and transcripts may include personal information such as names, voices, and shared content. You will be notified when a meeting is being recorded, and such recordings are used in accordance with Applicable Laws and A&M’s internal policies. For more information regarding Microsoft Copilot see: (1) Data, Privacy, and Security for Microsoft 365 Copilot (<https://learn.microsoft.com/en-us/copilot/microsoft-365/microsoft-365-copilot-privacy>) (this page outlines how Microsoft 365 Copilot handles organizational data, privacy protections, and compliance commitments); and (2) Enterprise Data Protection in Microsoft 365 Copilot and Copilot Chat (<https://learn.microsoft.com/en-us/copilot/microsoft-365/enterprise-data-protection>) (this page details the enterprise-grade data protection measures, including encryption, access controls, and Microsoft’s role as a data processor under the Data Protection Addendum (DPA)).
- **To assist in screening applications.** A&M uses AI tools that identify information in candidate-provided resumes and CVs that is responsive to the requirements and qualifications set out in our job descriptions. The tools generate output that our team uses to identify which candidates have a skill set that matches the

open position. The decision of whether to advance an application is made by human reviewers. We take reasonable measures to help ensure that our AI recruitment tools are used in a manner intended to be fair, lawful, and non-discriminatory, including maintaining governance and risk-management practices designed to identify, assess, and mitigate reasonably foreseeable risks of unlawful bias. For more information regarding Jobvite Talent Fit, see: Talent Fit AI Brief (<https://help.jobvite.com/hc/en-us/articles/28081495482909-Talent-Fit-AI-Brief>) (this page describes Jobvite's "Talent Fit" AI-powered tool to sort candidate-provided resumes and CVs).

**To opt out of our use of AI-assisted tools in connection with your application, please contact us in writing using any of the contact methods provided in [Section 7](#).**

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#### **4. Categories of Service Providers, Contractors and Third Parties to Whom We Disclose Personal Information**

Except where prohibited by (and subject to the requirements of) Applicable Laws, we may disclose your personal information to the following categories of service providers, contractors and third parties:

- Information technology / operating systems and platforms.
- Job application / recruiting platforms.
- Recruitment and staffing agencies
- Background screening providers.
- Government entities, including courts, regulators, law enforcement, national security authorities, or tax authorities, or to other constituents in a litigation, in each case where required or permitted by law. In some cases, in accordance with Applicable Law, it may not be possible to notify you in advance about the details of such disclosures. A&M will use reasonable efforts to disclose the minimum personal information necessary in such cases.
- Our accountants, lawyers, and other professional advisors.
- Other third parties where reasonably related to your role as a job applicant to A&M.
- Other persons or entities in connection with the sale of all or part of our business, or a reorganization or combination of our business with another organization.
- For additional purposes with your consent, where such consent is required by law.

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#### **5. Categories of Personal Information We Have Disclosed for a Business Purpose**

Please refer to Table 1 in [Section 1 \("Categories of Personal Information We Collect"\)](#), which identifies the categories of personal information that we have disclosed for a business purpose in the preceding 12 months.

We do not use or disclose sensitive personal information for purposes other than:

- To perform the services reasonably expected by an average consumer who requests services. To the extent A&M uses or discloses sensitive personal information about you, it is in relation to a recruitment-related purpose.
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those

responsible for those actions.

- To ensure the physical safety of natural persons.
- For short term transient use.
- To perform services on behalf of A&M.
- To verify or maintain the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by A&M, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by A&M.
- To collect or process sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about a consumer.

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## **6. Categories of Personal Information We Have Sold or Shared**

We do not sell or share application-related personal information and have not done so in the preceding 12 months. Without limiting the generality of the foregoing, we do not sell or share personal information about California residents who are under 16 years old.

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## **7. Your California Privacy Rights**

Subject to certain exceptions and conditions, you have the following rights:

- The right to know what personal information we have collected about you, including the categories of personal information; the categories of sources from which the personal information about you is collected; the business or commercial purpose for collecting, selling, or sharing personal information about you (if applicable); the categories of personal information about you that we disclosed for a business purpose and the categories of service providers or contractors to whom we disclosed such personal information; and the categories of third parties to whom we disclosed personal information about you. To the extent this information is the same for all job applicants, we make this information available to you by providing it within this CCPA Notice.
- The right to access the specific pieces of personal information we have collected about you.
- The right to delete personal information we have collected from you.
- The right to correct inaccurate personal information that we maintain about you.
- If we sell or share personal information, the right to opt-out of the sale or sharing of your personal information. (As we explain in Section 6 ("Categories of Personal Information We Have Sold or Shared"), above, A&M does not sell or share application-related information).
- If we use or disclose sensitive personal information for reasons other than those set forth under the CCPA, the right to limit such use or disclosure of sensitive personal information. ***As we indicate in Section 5 ("Categories of Personal Information We Have Disclosed for a Business Purpose"), A&M does not use or disclose sensitive personal information for such other purposes.***
- The right not to be retaliated against for exercising privacy rights conferred by the CCPA, including in connection with A&M's processing of your application-related information.

To exercise any of the above-specified rights, you or your authorized agent can contact us by any of the following methods:

<b>Email</b> (to A&M Talent Acquisition)	<a href="mailto:talentacquisition@alvarezandmarsal.com">talentacquisition@alvarezandmarsal.com</a>
<b>Online</b> (Data Subject Access Request form)	Available through A&M's Website Privacy Notice ("Individual Rights") ( <a href="#">here</a> ).

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to or deleting your personal information or otherwise complying with your request. We may require you to provide certain information, including: (a) name, (b) postal address, (c) email address, (d) telephone number, and (e) the nature of your relationship with us. 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 consumer whose personal information is the subject of the request.

If you designate an authorized agent to exercise your CCPA 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, where permitted by law; however, we will notify you of any fee in advance. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or that we have destroyed, erased, or made anonymous in accordance with our record retention policies and practices. If we cannot honor your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

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## **8. Retention of Personal Information**

We retain your personal information for as long as reasonably necessary to fulfill the purposes for which it was collected.

If you join the A&M Talent Network without applying for a specific position, we will retain your data for 36 months, after which we will send you a notice requesting that you opt-in for another 36 months. If you do not opt-in within 30 days of this notice, we will automatically delete your data without any further action on your part. If you opt-in, we will continue to send this notice to you bi-annually except where you otherwise request that we delete your data.

If you apply for a position or we are otherwise considering you for a role, we will retain your personal information for the duration we are considering your application or candidacy. If your application or candidacy is successful, we will retain and use your personal information in accordance with our Global Workplace Privacy Notice and any additional privacy notices and policies that we provide to you.

If your application or candidacy is unsuccessful for any reason, we will retain your personal information as follows: (i) recruiting / talent acquisition for so long as your personal information remains relevant for this purpose (including maintaining a record of recruitment decisions; and maintaining a pool of qualified candidates and contacting you about future opportunities (via email, SMS or through social media platforms, e.g., LinkedIn), provided you may request deletion from our candidate pool at any time by contacting us as specified in [Section 10](#) below); (ii) establishment, exercise, or defense of legal claims (including for the duration of any applicable statutes of limitations); (iii) any mandatory periods specified by Applicable Laws (including but not limited to labor and employment laws); and (iv) any other lawful purpose reasonably related to your role as a job applicant to A&M. Following these retention periods, we will delete your personal information in accordance with our deletion policies

and procedures, including electronic overwriting or cryptographic erasure, and/or destruction of physical storage media.

If your data is only useful for a short period (for example, CCTV footage data) we will delete it.

Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymized and de-identified data for any legitimate business purpose without further notice to you or your consent.

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#### **9. Changes**

We may update this CCPA Notice from time to time at our discretion to reflect changes to Applicable Data Protection Laws or our personal information processing practices. If we intend to use previously collected personal information for a new purpose that materially differs from the purposes described in this CCPA Notice or at the time of collection that would not otherwise be reasonably expected by you, we will provide you with additional notice and, if legally required, seek your consent.

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

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