

ALVAREZ & MARSAL

Recruitment Privacy Notice Supplement (Japan)

Effective Date: January 1, 2026

This **Recruitment Privacy Notice Supplement (Japan)** ("**Japan 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 under the laws of Japan (together, "**A&M**", "**we**", "**our**", "**us**").

This Japan 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 Japan Recruitment Privacy Supplement and A&M's Global Recruitment Privacy Notice, this Japan Recruitment Privacy Supplement will prevail.

This Japan 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) [Our disclosure of personal information.](#)
- 6) [Cross border transfers of personal information.](#)
- 7) [Your individual rights.](#)
- 8) [How to contact us.](#)

As used herein, "**Applicable Data Protection Laws**" specifically means all laws, rules and regulations of Japan applicable to the processing of personal information, including without limitation the Act on the Protection of Personal Information ("**APPI**") and, to the extent we handle MyNumbers, the Act on the Use of Numbers to Identify a Specific Individual in the Administrative Procedure ("**My Number Act**").

This Japan 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 Japan Workplace Privacy Supplement, which supersedes this notice.

1. The Controller of Your Personal Information

All references to "**controller**" in A&M's [Global Recruitment Privacy Notice](#) and this Japan Recruitment Privacy Supplement shall be understood to refer to the "**business handling personal information**" (APPI Art. 16(2) "data handler") regarding the "**personal data the business holds**" (APPI Art. 16(4)) on its own behalf. Depending on the nature of the processing activity, the controller will be (i) the local A&M entity considering you as a job applicant (including, as of the date of this Japan Recruitment Privacy Supplement: Alvarez & Marsal Japan GK (Alvarez & Marsal Japan 合同会社 goudou kaisha in Japanese), a limited liability company, and Alvarez & Marsal Japan Tax Corporation (A&M Japan 税理士法人 zeirishi houjin in Japanese), a licensed tax accountant corporation), (ii) our top-level entity

within Japan, 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 “**processing**” in A&M’s [Global Recruitment Privacy Notice](#) and this Japan Recruitment Privacy Supplement shall be understood to refer to the “**handling**” of personal information, including but not limited to acquisition (collection), storage, use, correction, erasure, disclosure, and cross-border transfer.

All references to “**personal information**” in A&M’s [Global Recruitment Privacy Notice](#) and this Japan Recruitment Privacy Supplement shall be understood to refer exclusively to “**personal information**” as defined under APPI Art. 2(1), specifically information relating to a living individual comprised of the following items:

- (i) information containing a name, date of birth, or other identifier or the equivalent (meaning all items (excluding individual identification codes) made by writing, recording, sound or motion, or other means, in a document, drawing, or electronic or magnetic record (this includes a record created in electronic or magnetic form (meaning electronic form, magnetic form, or any other form that cannot be perceived with the human senses; the same applies in item (ii) herein)) which can be used to identify a specific individual (this includes any information that can be easily collated with other information and thereby used to identify that specific individual); and
- (ii) those containing an individual identification code, as defined in APPI Art. 2(2).

All references to “**personal data**” in this Japan Recruitment Privacy Supplement shall be understood to refer exclusively to “**personal data**” as defined under APPI Art. 16(3), specifically:

- ✓ Personal information compiled in a personal information database or the equivalent (i.e., systematically organized so as to be searchable for particular personal information using a computer).

Notwithstanding anything in A&M’s [Global Recruitment Privacy Notice](#) to the contrary, personal information includes publicly available information.

All references to “**sensitive personal information**” in A&M’s [Global Recruitment Privacy Notice](#) shall be understood to refer exclusively to “**sensitive personal information**” (also known as “special care-required personal information”) as defined under APPI Art. 2(3), specifically:

- ✓ Personal information as to an identifiable person's race, creed, social status, medical history, criminal record, the fact of having suffered damage by a crime, or other identifiers or their equivalent prescribed by Cabinet Order as those of requiring special care so as not to cause unjust discrimination, prejudice or other disadvantages to that person. This includes descriptions or depictions of (i) a physical, mental or psychological disability, (ii) results of a health examination, (iii) the fact of receiving guidance on health, medical care, or prescription by a doctor, (iv) arrest/criminal records, and (v) juvenile protective or guardianship records.

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3. Use of Personal Information

We use your personal information for the purposes described in A&M’s [Global Recruitment Privacy Notice](#). If your personal information is Individual Numbers as defined under the My Number Act (the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (Act No. 27 of 2013, as amended)) (“**MyNumber**”), we will

process such information solely for administrative procedures explicitly stipulated by law, including social insurance filings, tax withholding procedures, legally mandated disaster response coordination, and where explicitly permitted by law or Cabinet Order.

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4. [Lawful Bases to Process Personal Information](#)

We process personal information for the purposes notified to you in A&M’s [Global Recruitment Privacy Notice](#). Please refer to [Annex 1](#) to this Japan Recruitment Privacy Supplement for additional information regarding our lawful bases to process personal information.

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5. [Disclosure of Personal Information](#)

Internal Disclosures / Joint Use

When we transfer your personal data internally within the A&M group, it is pursuant to a companywide Intra-Group Personal Data Sharing and Transfer Agreement designed to provide protections comparable to Applicable Data Protection Laws. In such cases, the controller may **disclose your personal data for joint use** to “other members of the A&M group of companies (including but not limited to A&M Inc. and its subsidiaries),” as specified in A&M’s [Global Recruitment Privacy Notice](#), as follows:

Personal data items to be used jointly	Items as stated in Section 2 “Categories of Personal Information We Collect” of A&M’s Global Recruitment Privacy Notice	
Purposes of joint use	Purposes as stated in Section 4 “Use of Personal Information” of A&M’s A&M’s Global Recruitment Privacy Notice	
Scope of joint users	Alvarez & Marsal Japan GK (Alvarez & Marsal Japan 合同会社 goudou kaisha) Alvarez & Marsal Japan Tax Corporation (A&M Japan 税理士法人 zeirishi houjin) Alvarez & Marsal Holdings, LLC, together with its subsidiaries and other members of the A&M group of companies, as defined in the Preamble	
Person responsible for managing personal data for joint use	Alvarez & Marsal Japan GK Signature Grand Green Center 7F, Gate Tower, South Building, Grand Green Osaka 5-54 Ofukacho, Kita-ku Osaka City, Osaka Prefecture, Japan 530-0011 Name: Paul Aversano, as Executive Manager of the Representative Member	Alvarez & Marsal Japan Tax Corporation Signature Grand Green Center 7F, Gate Tower, South Building, Grand Green Osaka 5-54 Ofukacho, Kita-ku Osaka City, Osaka Prefecture, Japan 530-0011 Name: Ichiro Suto, as Representative

Please refer to [Annex 1](#) to this Japan Recruitment Privacy Supplement for information regarding internal disclosures / joint use transfers.

External Disclosures

When we transfer your personal data to third parties (including, but not limited to, processors), it is our policy to ensure that recipients are bound to maintain appropriate levels of data protection, security and confidentiality, including by entering into data transfer agreements designed to provide protections comparable to Applicable Data Protection Laws. Where required by Applicable Data Protection Laws, we will also obtain your consent to such disclosures. Please refer to [Annex 1](#) to this Japan Recruitment Privacy Supplement for information regarding consent.

Please note, Applicable Data Protection Law does not define or use the term “**processor**”. Instead, for purposes of understanding A&M’s [Global Recruitment Privacy Notice](#) and this Japan Recruitment Privacy Supplement in the context of Applicable Data Protection Law, “**processor**” means “**entrusted person**” (i.e., a person entrusted by a business handling personal information with all or part of the handling of personal data, and over which the business handling personal information exercises the necessary and adequate supervision, so as to ensure the secure management of the personal data (APPI Art. 25)).

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6. 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 data outside Japan to other countries or territories where A&M, its service providers, or other third parties are located, including to countries or territories whose laws have not been determined to provide an adequate level of protection for the processing of personal data as compared to Applicable Data Protection Laws, for the purposes set out in A&M’s [Global Recruitment Privacy Notice](#).

For information on the personal information protection system of the United States, an economy that has joined the APEC CBPR, or of other countries to which we may transfer your personal data, please refer to the Japanese authority’s website (<https://www.ppc.go.jp/enforcement/infoprovision/laws/>) for details.

Internal Transfers

When we transfer your personal data within the A&M group to countries or territories outside of Japan that have not been determined to provide an adequate level of protection for the processing of personal data as compared to Applicable Data Protection Laws, it is pursuant to a companywide Intra-Group Personal Data Sharing and Transfer Agreement (and A&M policies) designed to provide protections equivalent to Applicable Data Protection Laws. Where required by Applicable Data Protection Laws, we will also obtain your consent to such transfers. Please refer to [Annex 1](#) to this Japan Recruitment Privacy Supplement for information regarding internal cross-border transfers.

External Transfers

When we transfer your personal data to third parties (including, but not limited to, processors (i.e., entrusted parties) such as our talent network and job application platform) located in countries or territories outside of Japan that have not been determined to provide an adequate level of protection for the processing of personal data as compared to Applicable Data Protection Laws, it is our policy to ensure that recipients are bound to maintain, on a continuous basis, appropriate levels of data protection, security and confidentiality, including by entering into data transfer agreements designed to provide protections equivalent to Applicable Data Protection Laws. Where required by Applicable Data Protection Laws, we will also obtain your consent to such transfers. Please refer to [Annex 1](#) to this Japan Recruitment Privacy Supplement for information regarding external cross-border transfers.

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7. Individual Rights

You have specific rights under Applicable Data Protection Laws regarding the personal data we hold (APPI Art. 16(4)) 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 (APPI Art. 21, 32).** You have the right to be notified and informed about the collection and use of your personal information (APPI Art. 21, 32). A&M's [Global Recruitment Privacy Notice](#), together with this Japan Recruitment Privacy Supplement, is part of our commitment to transparency.
- (2) Right of Access (APPI Art. 33).** You may request access to the personal data 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 the requested information is clearly already provided; disclosure is likely to harm the life, wellbeing, property, or other rights or interests of the identifiable person or a third party; disclosure is likely to seriously interfere with the proper implementation of the business of the data handler; disclosure would violate any other law or regulation; or disclosure would harm public interests. 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 Correction (APPI Art. 34).** If any of your personal data we hold is inaccurate or incomplete, you have the right to request that it be corrected or updated.
- (4) Right to cease utilization/providing or delete data (APPI Art. 35).** You may request that we: (i) cease use or delete your personal data we hold if the personal data is processed in violation of the APPI (including use beyond the notified purpose, or fomenting or inducing unlawful or unjust acts), or if the personal data was acquired by deception or other wrongful means; (ii) cease providing (sharing) personal data we hold to a third party if we are doing so in violation of the obligation to obtain your consent (other than where an exception applies) or in violation of the requirements regarding transfers to third parties in foreign countries; and (iii) cease to use or delete your personal data we hold, or cease to provide a third party (share) with your personal data we hold, if it has ceased to be necessary for us to use that personal data, if a personal data breach has occurred, or if handling that personal data we hold is likely to harm your rights and interests.
 - ✓ Please note that the right to cease utilization or delete data we hold is not absolute. We may refuse your request where complying with the request would require a costly expenditure or prove otherwise difficult, while we take the necessary alternative measures to protect your rights and interests.

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 8](#).

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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8. 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	talentacquisition@alvarezandmarsal.com
Webform	Available through A&M's Website Privacy Notice ("Individual Rights") (here).

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ANNEX 1

Legal Grounds for Processing Information

Use of Personal Information

A&M processes your personal information for the purposes described in A&M's [Global Recruitment Privacy Notice](#).

A&M will obtain your prior consent to its processing of your personal information beyond the scope necessary for achieving the purpose of use specified in A&M's [Global Recruitment Privacy Notice](#), unless an exception under Applicable Data Protection Law applies.

Notwithstanding the foregoing, A&M is not required to obtain your prior consent (and is permitted to undertake such additional processing without your prior consent) where permitted by Applicable Data Protection Law, including but not limited to cases: (i) based on laws or regulations of Japan; (ii) in which there is a need to protect the life, body, or property of an individual and it is difficult to obtain the consent of the identifiable person; or (iii) there is a need to cooperate with a Japanese government organ, local government, or a person entrusted thereby with performing functions prescribed by laws and regulations, and obtaining consent is likely to impede the performance of those functions.

Acquisition of Sensitive Personal Information

A&M processes sensitive personal information for the purposes described in A&M's [Global Recruitment Privacy Notice](#).

A&M will obtain your prior consent to its acquisition of your sensitive personal information, unless an exception under Applicable Data Protection Law applies.

Notwithstanding the foregoing, A&M is not required to obtain your prior consent (and is permitted to acquire your sensitive personal information without your prior consent) where permitted by Applicable Data Protection Law, including but not limited to cases: (i) based on laws or regulations of Japan; (ii) in which there is a need to protect the life, body, or property of an individual and it is difficult to obtain the consent of the identifiable person; or (iii) there is a need to cooperate with a Japanese government organ, local government, or a person entrusted thereby with performing functions prescribed by laws and regulations, and obtaining consent is likely to impede the performance of those functions.

Disclosures of Personal Data

A&M provides your personal information and sensitive personal information to other members of the A&M group of companies and to third parties as described in A&M's [Global Recruitment Privacy Notice](#) and this Japan Recruitment Privacy Supplement.

Where required under Applicable Data Protection Law, A&M will obtain your prior consent to disclose your personal data to other members of the A&M group of companies and to third parties located in Japan.

Notwithstanding the foregoing, A&M is not required to obtain your prior consent (and is permitted to disclose your personal data without your prior consent) where permitted by Applicable Data Protection Law, including but not limited to disclosures:

- (i) (a) based on laws and regulations of Japan; (b) in which there is a need to protect the life, wellbeing, or property of an individual, and it is difficult to obtain the consent of the identifiable person; or (c) in which there is a need to cooperate with a Japanese government organ, local government, or person

entrusted thereby with performing the functions prescribed by laws and regulations, and obtaining the consent of the identifiable person is likely to interfere with the performance of those functions; or

- (ii) specifically to a person who is: (a) entrusted by the controller with all or part of the processing of personal data within the scope necessary for achieving the purpose of use (i.e., processor or service provider); (b) a successor in connection with a merger or similar corporate transaction; or (c) a party that jointly uses personal data with the controller as described in this Japan Recruitment Privacy Supplement.

Cross-Border Transfers / Provision of Personal Data to Third Parties in Foreign Countries

A&M transfers your personal information to other members of the A&M group of companies and third parties located in foreign countries or territories as described in A&M's [Global Recruitment Privacy Notice](#) and this Japan Recruitment Privacy Supplement.

Where required under Applicable Data Protection Law, A&M will obtain your prior consent to transfer your personal data to other members of the A&M group of companies and third parties in foreign countries or territories.

Notwithstanding the foregoing, A&M is not required to obtain your prior consent (and is permitted to transfer your personal data to other members of the A&M group of companies and third parties in foreign countries or territories without your prior consent) where permitted by Applicable Data Protection Law, including but not limited to:

- (i) the laws of the recipient country or territory have been determined by Japan's Personal Information Protection Commission to provide an adequate level of protection for the processing of personal data as compared to Applicable Data Protection Laws;
- (ii) the recipient is bound to maintain, on a continuous basis, appropriate levels of data protection, security and confidentiality, including where: (a) A&M and the third party enter into a data transfer agreement designed to provide protections equivalent to Applicable Data Protection Laws; or (b) the recipient is an affiliate (other member of the A&M group of companies) that jointly uses personal information as described in this Japan Recruitment Privacy Supplement pursuant to a companywide Intra-Group Personal Data Sharing and Transfer Agreement (and A&M policies) designed to provide protections equivalent to Applicable Data Protection Laws; or
- (iii) the transfer is: (a) based on laws and regulations of Japan; (b) necessary to protect the life, wellbeing, or property of an individual, and it is difficult to obtain the consent of the identifiable person; or (c) necessary to cooperate with a Japanese government organ, local government, or person entrusted thereby with performing the functions prescribed by laws and regulations, and obtaining the consent of the identifiable person is likely to interfere with the performance of those functions.

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