

RSM APPLICANT PRIVACY POLICY – El Salvador

Last Updated: July 31, 2026

1. INTRODUCTION

This privacy policy (this “Privacy Policy” or “Policy”) provides notice of personal information processing practices by RSM US SV, LIMITADA DE CAPITAL VARIABLE, with corporate address located in Calle Cortez Blanco #8, Santa Elena, Antiguo Cuscatlán, El Salvador and its affiliates (together, “RSM,” “us,” “our,” “we,” or the “Firm”), including through jobs.rsmus.com (the “Website”). Please review this Privacy Policy carefully. By submitting your application or using the Website, you acknowledge that you have read and understood this Privacy Policy. Where required by applicable law, RSM will obtain your express, written consent separately before processing your personal data.

This Privacy Policy applies to Applicants that may submit an employment application. For purposes of applicable El Salvador privacy laws, RSM is responsible for the processing of your personal information described in this Privacy Policy. This Privacy Policy does not apply to other online services that we make available but do not link to this Privacy Policy.

For information on information processed by tracking technologies (e.g., cookies) on the Website, see our [Cookie Policy](#).

Definitions

- **Data Controller:** Entity that decides the purpose and means of processing personal data. In the context of personal data processing subject to this policy, RSM is a Data Controller.
- **Data Subject:** The individual to whom personal data relates.
- **Data Processor:** Entity that processes personal data on behalf of the Data Controller.
- **Applicant:** Any individual who submits, or expresses interest in submitting, an employment application to RSM.
- **Sensitive Information:** Data revealing racial origin, political/philosophical opinions, religious beliefs, criminal records, biometric data, or health-related information sexual orientation, or trade union membership, as defined under Article 3 of El Salvador's Personal Data Protection Law (Legislative Decree No. 144, 2024).

Data Protection Officer

RSM has designated a Data Protection Officer (“DPO”) responsible for oversight of this Policy, compliance monitoring, and supporting data subjects in exercising their rights. Contact: José A. Polanco, Data Protection Officer, dataprivacyoffice@rsmus.com

2. PERSONAL INFORMATION COLLECTED

Personal information generally means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly with you. Personal information does not include information that is publicly available, de-identified, or aggregated.

We may obtain your personal information from the following sources:

- **Directly from you.** Such as when you register or maintain a website account with us, sign up to join the RSM Talent Network, or fill out online forms.
- **Tracking technologies.** Such as when you visit the Website, which may have first party and third-party technology integrations (e.g., cookies) that help facilitate and personalize your visit to the Website or to other online services. For more information see our Cookie Policy.
- **External sources.** Such as our vendors and service providers, government publicly available records, from your former employer or references, and from referrals sources such as current employees, recruiters, and job applicant platforms.

Personal information we process includes:

- **Identifiers.** This includes names, date of birth, contact information, addresses, Internet Protocol address, or other similar identifiers.
- **Personal Records.** This includes your signature, telephone number, education, and employment.
- **Sensitive Personal Data / Characteristics of Protected Classifications.** This includes age, gender, nationality or citizenship, disability, gender identity, military status, marital status, and race or ethnic origin.
- **Internet or Other Electronic Network Activity.** This includes Internet Protocol address, device identifiers, mobile network, operating system details, language preferences, referring URLs, length of visits, traffic data, pages viewed, and information regarding interactions with the Website.
- **Geolocation Data.** This includes global latitude and longitude of your location.
- **Audio, electronic, visual, or similar information.** This includes audio recordings of phone or video interviews, or CCTV should you interview in person.
- **Professional or Employment-Related Information.** This includes your resume, former employers, work history, certifications, and other professional background information.
- **Account and Profile Information.** If you register an account, you may provide information such as your name, email address, telephone number, and password and preferences related to job alerts or communication settings.
- **External Service Information.** We may obtain information about you from external services, such as where you choose to use a Website feature provided by an external party. We may also supplement certain information that we collect from you with outside records. External parties may provide us with information about you in connection with a co-marketing agreement or in connection with a tracking technology.
- **Inferences.** We may process inferences drawn from any other personal information we process to create a profile about you reflecting your preferences, intelligence, abilities, and aptitudes. We do not use these inferences to make automated decisions without human involvement, and we rely on them solely for recruitment-related purposes.
- We may maintain personal information collected from Applicant in databases, repositories and related systems used to administer our recruitment, onboarding, compliance and business operations.

3. COOKIES AND OTHER TRACKING TECHNOLOGIES

In addition to any personal information or other information that you choose to submit through the Website or offline, we and our vendors may use a variety of tracking technologies, including cookies, that collect certain information whenever you interact with the Website, such as device identifier, your IP address, location, other unique identifiers, all of the areas within the Website that you visit, and the length and time of the visit.

We may combine certain automatically-collected information with other information we obtain about you, which may include data we obtain from external parties.

You can set your browser to refuse cookies from the Website, but if you do so, you may not be able to access or use portions of the Website, or certain offerings on the Website may not function as intended or as well.

For information on information processed by tracking technologies (e.g., cookies) on the Website, see our [Cookie Policy](#).

4. HOW WE USE AND DISCLOSE PERSONAL INFORMATION

We collect, use, and disclose to service providers personal information, as described above, for the following purposes. The description below covers our current personal data processing practices.

We process your personal information based on one or more legal grounds permitted by applicable law, including your consent, the need to evaluate and process your employment application, compliance with legal obligations, and our legitimate interests in managing recruitment, preventing fraud, protecting our rights, and maintaining the security and integrity of our systems and services.

Category of Personal information	Sources of and Purposes for Collection and Use	Purposes for Disclosure to Service Providers / Processors
Identifiers	Sources: • Directly from you • Tracking Technologies • External sources Purposes: • To provide you with access to the Website features • To process job applications • To assess qualifications for a particular job or task • To determine obligations as an employer • To complete activities related to recruiting, onboarding, and employment referrals • To gather evidence for investigations or comply with applicable law • To enable external party features • To perform necessary and appropriate internal functions, such as records maintenance and developing or improving the Website • To communicate with you • To respond to your requests for technical support, online services, or to any other communication you initiate • To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations	• Helping to ensure security and integrity • Debugging to identify and repair errors in functionality • Short-term, transient use • Performing services needed to operate our business • Internal research for technological development and demonstration • Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and Website
Personal Records	Sources: • Directly from you • Tracking Technologies • External sources Purposes: • To perform necessary and appropriate internal	• Helping to ensure security and integrity • Debugging to identify and repair errors in functionality • Short-term, transient use • Performing services needed to operate our business

Category of Personal information	Sources of and Purposes for Collection and Use	Purposes for Disclosure to Service Providers / Processors
	functions, such as records maintenance • To process job applications • To assess qualifications for a particular job or task • To determine obligations as an employer • To complete activities as related to recruiting, onboarding, and employment referrals • To gather evidence for investigations or comply with applicable law • To detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity; conduct internal investigations; and help maintain and improve the safety, security, and integrity of our website, information systems, databases, and other technology assets • To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations	• Internal research for technological development and demonstration • Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and services
Characteristics of Protected Classifications	Sources: • Directly from you • Tracking Technologies • External sources Purposes • To process job applications • To assess qualifications for a particular job or task • To determine obligations as an employer • To complete activities related to recruiting, onboarding, and employment referrals	• Helping to ensure security and integrity • Short-term, transient use • Internal research for technological development and demonstration • Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and services • Performing services needed to operate our business

Category of Personal information	Sources of and Purposes for Collection and Use	Purposes for Disclosure to Service Providers / Processors
	• For business improvement, management, and planning • To determine performance requirements • To gather evidence for investigations or to comply with applicable law • To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations • To perform necessary and appropriate internal functions, such as records maintenance	
Internet or Other Electronic Network Activity	Sources: Tracking technologies Purposes: • To process job applications • To complete activities related to recruiting, onboarding, and employment referrals • For business improvement, management, and planning • To provide you with access to the Website features • To enable external party features • To perform necessary and appropriate internal functions, such as developing or improving the Website • To detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity; conduct internal investigations; and help maintain and improve the safety, security, and integrity of our website, information	• Helping to ensure security and integrity • Debugging to identify and repair errors in functionality • Short-term, transient use • Performing services needed to operate our business • Internal research for technological development and demonstration • Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and Website

Category of Personal information	Sources of and Purposes for Collection and Use	Purposes for Disclosure to Service Providers / Processors
	systems, databases, and other technology assets To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations	
Geolocation	Sources: - Tracking technologies Purposes: - To provide you with access to the Website features - To enable external party features - To perform necessary and appropriate internal functions, such as developing or improving the Website - To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations	- Helping to ensure security and integrity - Debugging to identify and repair errors in functionality - Short-term, transient use - Performing services needed to operate our business - Internal research for technological development and demonstration - Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and Website
Audio, electronic, visual, or similar information	Sources: Directly from you Purposes: - To process job applications - To assess qualifications for a particular job or task - To gather evidence for investigations or to comply with applicable law - To complete activities related to recruiting, onboarding, and employment referrals	- Helping to ensure security and integrity - Debugging to identify and repair errors in functionality - Short-term, transient use - Performing services needed to operate our business - Internal research for technological development and demonstration - Undertaking activities to verify or maintain the quality or safety of our systems and premises, and to improve,

Category of Personal information	Sources of and Purposes for Collection and Use	Purposes for Disclosure to Service Providers / Processors
	• For business improvement, management, and planning • To perform necessary and appropriate internal functions, such as records maintenance • To detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity; conduct internal investigations; and help maintain and improve the safety, security, and integrity of our website, information systems, databases, and other technology assets • To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations to comply with health and safety obligations	upgrade, or enhance our systems and Website
Professional or Employment-Related Information	Sources: • Directly from you • Our vendors • External sources Purposes: • To process job applications • To assess qualifications for a particular job or task • To determine obligations as an employer • To complete activities related to recruiting, onboarding, and employment referrals • To determine performance requirements • To gather evidence for investigations or to comply with applicable law • To perform necessary and appropriate internal	• Helping to ensure security and integrity • Short-term, transient use • Performing services needed to operate our business

Category of Personal information	Sources of and Purposes for Collection and Use	Purposes for Disclosure to Service Providers / Processors
	functions, such as records maintenance To prevent and detect fraud, verify identity, comply with a legal obligation, defend legal claims, assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations	
Account and Profile Information	Sources: - Directly from you Purposes: - To process job applications - To complete activities related to recruiting, onboarding, and employment referrals	Performing services needed to operate our business
External Service Information	Sources: - Directly from you - Our vendors - External sources Purposes: - To process job applications - To assess qualifications for a particular job or task - To complete activities related to recruiting, onboarding, and employment referrals	Performing services needed to operate our business
Inferences drawn from any of the information identified in this section to create a profile about you reflecting your preferences, intelligence, abilities, and aptitudes	Sources: - Directly from you Purposes: - To perform necessary and appropriate internal functions, such as records maintenance and developing or improving the Website	Performing services needed to operate our business

Where service providers process your personal information on our behalf, we require appropriate confidentiality and data protection commitments and will provide information regarding such service providers as required by applicable law.

Business Transactions. In the event of a business transaction, we may disclose personal information to prospective or actual purchasers, investors, or successor entities in connection with a contemplated reorganization or an actual reorganization of our business, in connection with financing, a sale, or other transaction involving the disposal of all or part of our business or assets, including for the purpose of permitting the due diligence required to decide whether to proceed with a transaction, pursuant to assurances of sufficient data handling practices and safeguards.

Legal Compliance and Safety. We may also disclose personal information for legal compliance, law enforcement, and public safety purposes. For example, to law enforcement, government or regulatory bodies, lawful authorities, or other authorized third parties in order to comply with laws, regulations, court orders, or other legal obligations or to assist in an investigation, to protect and defend our rights and property, or the rights or safety of third parties, to enforce our Terms of Use, this Privacy Policy, or agreements with third parties, or for crime-prevention purposes.

We may combine your personal information with data we obtain from our services, other users, or third parties. We reserve the right to convert, or permit others to convert, your personal information into deidentified, anonymized, or aggregated data, as permitted by law.

5. OTHER ONLINE SERVICES

The Website may contain links to, or features facilitated by, other online services. For example, you may be able to share content from the Website to your social media profile on an external online service. This Privacy Policy does not apply to the practices of companies that we do not own or control. We provide these external links merely for your convenience and we have no control over, do not review, and are not responsible for external online services.

6. YOUR CHOICES

If you have a registered account, you may be able to change your preferences as well as update your personal information through your account settings.

You may have also opted in to receive future promotional electronic communications from us. If you opt-in to receive such communications, we may use the personal information to: (i) communicate with you regarding our services; (ii) provide you with other information that you request; and/or (iii) improve our service offerings. You will always have the opportunity to “unsubscribe” from receiving any of our e-mail or other communications at any time. To unsubscribe, you can contact us at dataprivacyoffice@rsmus.com, or as otherwise described in our electronic communications to you. Where we rely on your consent to process your personal information, you may withdraw your consent in accordance with applicable law.

If you decide to unsubscribe, we will only contact you thereafter: (i) for the purposes allowed under applicable law; (ii) to send you notices of changes to this Notice; and (iii) to receive service-related messages.

7. DATA RETENTION

We keep the categories of personal information described above for as long as is necessary for the purposes described in this Notice or to achieve the purposes for which the information was collected, or as may be permitted under applicable law. This generally means holding the information for as long as one of the following apply:

- Your personal information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- Your personal information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the personal information was collected;
- Your personal information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your personal information by applicable laws or regulations.

To determine the appropriate retention period, we will consider the amount, nature, and sensitivity of the data; the potential risk of harm from unauthorized use or disclosure of the data; the purposes for which we process the data and whether we can achieve those purposes through other means; and the applicable legal requirements. Unless otherwise required by applicable law, at the end of the retention period we will remove personal information from our systems and records.

Where your personal information is used for more than one purpose, we will retain it until the purpose with the latest period expires.

8. SECURITY

We implement reasonable technological, physical, and organizational safeguards to protect against unauthorized or unlawful processing of personal information and against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal information. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of personal information. In the event of a personal data security incident that may affect your rights, we will notify you and the State Cybersecurity Agency (Agencia de Ciberseguridad del Estado, or ACE) in accordance with El Salvador's Personal Data Protection Law and Cybersecurity and Information Security Law (Legislative Decree No. 143, 2024). RSM limits access to internal systems that hold personal information to individuals who need access for a legitimate business purpose.

Moreover, no online activity is ever fully secure or error-free. While we strive to protect your information, we cannot guarantee that your personal information is absolutely secure. Please keep this in mind when disclosing any information to us.

Please also recognize that protecting your personal information is also your responsibility. We urge you to take every precaution to protect your information when you are on the Internet, or when you communicate with us and with others through the Internet.

9. YOUR PRIVACY RIGHTS

Under applicable El Salvador privacy laws, you have the following rights, which can be exercised directly or, in certain cases, through an authorized agent:

Your Rights	Description
Right to Access	You have the right, in certain circumstances, to receive a copy of the personal information we have collected about you.
Right to Rectification	You have the right to challenge the accuracy and completeness of the personal information we have collected about you and have it amended where appropriate.
Right to Cancellation	You have the right, in certain circumstances, to request the cancellation or deletion of your personal information.
Right to Opposition	You have the right, in certain circumstances, to object to the processing of your personal information.
Right to Limitation	You have the right, in certain circumstances, to request the limitation of the processing of your personal information.
Right to Portability	You have the right, in certain circumstances, to obtain your personal information in a portable format.
Right to Oblivion	You have the right, in certain circumstances, to request the deletion or removal of your personal information as provided under applicable law.
Right to Revoke Consent	Where we rely on your consent to process your personal information, you have the right to revoke that consent in accordance with applicable law.

Exercising Your Rights

You can submit any of the above types of requests through either of the two (2) options below:

Submit an online request on our website at this link. [Data Privacy Rights](#).

Call our privacy toll-free line at 1-800-274-3978.

For El Salvador privacy rights requests, you may also contact us as described in section 12 below.

How We Will Verify That It Is Really You Submitting the Request:

When you submit a request through one of the methods provided above, we will need to confirm your country of residence to determine which rights apply and then we will need to verify your identity.

We will ask you to provide some information to verify your identity and respond to your request. Specifically, we will ask you to verify information that can be used to link your identity to particular records in our possession, which will depend on the nature of your relationship and interaction with us. This process may require us to request additional personal information from you, including, but not limited to, your first name, last name, email address, phone number, and/or country. During verification, we will only request the minimum personal information necessary to correctly identify you for the purpose of fulfilling your request.

In certain circumstances, we may decline a request to exercise the rights described above, particularly where these rights are not available under applicable law, or when we are unable to verify your identity or locate your information in our systems. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with your request.

10. DATA PROCESSING IN OTHER COUNTRIES

Your personal information may be collected, used, processed, transferred, and retained in multiple countries including in Canada and the United States (and other jurisdictions) which may be outside the region in which you are situated and may have different privacy or data protection legislation, and may therefore be subject to the laws of these countries. Additionally, and as discussed above, we may also engage third parties to perform certain services on our behalf. These third parties may store, process and transfer personal information to jurisdictions that may not provide levels of data protection that are equivalent to those of your home jurisdiction. Your personal information may be subject to law enforcement requests in such jurisdictions. Personal information may also be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to the laws in those jurisdictions. For example, information may be shared in response to valid demands or requests from government authorities, courts and law enforcement officials in those countries. Subject to applicable laws in such other jurisdictions, where we transfer your personal information to an entity outside of your location, we will use reasonable efforts to ensure that appropriate contractual and other safeguards are in place as required or permitted by applicable law, including measures designed to protect your personal information in a manner consistent with applicable El Salvador privacy laws and applicable international data protection standards.

11. UPDATES TO PRIVACY POLICY

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this Privacy Policy. We may provide more specific reasonable notice at our discretion (e.g., a banner, pop up, or email to you) if we materially change this Privacy Policy, and these are the means through which we may communicate changes to this Privacy Policy. Any changes to this Privacy Policy will be effective as of the "Last Updated" date at the top of this page, unless otherwise expressly indicated.

12. CONTACTING US

You may contact us at dataprivacyoffice@rsmus.com or:

Calle Cortez Blanco #8, Santa Elena, Antiguo Cuscatlán, El Salvador

For El Salvador privacy rights requests, including requests to exercise your rights of access, rectification, cancellation, opposition, portability, oblivion, limitation, or revocation of consent, you may contact us using the contact details listed above.

The delegate responsible for receiving and processing El Salvador privacy rights requests is: José A. Polanco, Data Protection Officer, dataprivacyoffice@rsmus.com.