

RSM APPLICANT PRIVACY POLICY

Last Updated: December 22, 2022

1. INTRODUCTION

This Privacy Policy provides notice of our information collection and use practices by RSM US LLP, and its affiliates (together, "RSM," "us," "our" or "we"). This Privacy Policy applies to our processing of your personal information including through jobs.rsmus.com (the "Website"). Your use of the Website indicates you agree to our collection, use, and disclosure of your information as described in this Privacy Policy. This Privacy Policy applies to applicants that may submit an employment application. 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](#).

If you are a California resident, please see section 9 below, which sets forth additional information and rights you may have under California law.

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.
- **Characteristics or traits of protective 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.

- **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.

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. Unless otherwise noted, the description below covers our activities in the twelve months preceding the Effective Date, as well as our current practices.

Category of Personal information	Sources of and Purposes for Collection and Use	Purposes for Disclosure to Service Providers
Identifiers	<p>Sources:</p> <ul style="list-style-type: none"> • Directly from you • Tracking Technologies • External sources <p>Purposes:</p> <ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> • 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 	
Personal Records	<p>Sources:</p> <ul style="list-style-type: none"> • Directly from you • Tracking Technologies • External sources <p>Purposes:</p> <ul style="list-style-type: none"> • To perform necessary and appropriate internal 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, 	<ul style="list-style-type: none"> • 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 services

Category of Personal information	Sources of and Purposes for Collection and Use	Purposes for Disclosure to Service Providers
	<p>databases, and other technology assets</p> <ul style="list-style-type: none"> 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 	
Characteristics of Protected Classifications	<p>Sources:</p> <ul style="list-style-type: none"> Directly from you Tracking Technologies External sources <p>Purposes:</p> <ul style="list-style-type: none"> 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 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 	<ul style="list-style-type: none"> 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
Internet or Other Electronic Network Activity	<p>Sources:</p> <ul style="list-style-type: none"> Tracking technologies <p>Purposes:</p> <ul style="list-style-type: none"> To process job applications 	<ul style="list-style-type: none"> Helping to ensure security and integrity Debugging to identify and repair errors in functionality Short-term, transient use

Category of Personal information	Sources of and Purposes for Collection and Use	Purposes for Disclosure to Service Providers
	<ul style="list-style-type: none"> • 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 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 	<ul style="list-style-type: none"> • 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
Geolocation	<p>Sources:</p> <ul style="list-style-type: none"> • Tracking technologies <p>Purposes:</p> <ul style="list-style-type: none"> • 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, 	<ul style="list-style-type: none"> • 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

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	assist with legal processes such as investigations, regulatory requests, litigation, and arbitration, and as required by applicable law, court order, or governmental regulations	enhance our systems and Website
Audio, electronic, visual, or similar information	<p>Sources:</p> <ul style="list-style-type: none"> • Directly from you <p>Purposes:</p> <ul style="list-style-type: none"> • 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 • 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 	<ul style="list-style-type: none"> • 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, 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
Professional or Employment-Related Information	<p>Sources:</p> <ul style="list-style-type: none"> • Directly from you • Our vendors • External sources <p>Purposes:</p> <ul style="list-style-type: none"> • 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 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 	<ul style="list-style-type: none"> • Helping to ensure security and integrity • Short-term, transient use • Performing services needed to operate our business
Account and Profile Information	<p>Sources:</p> <ul style="list-style-type: none"> • Directly from you <p>Purposes:</p> <ul style="list-style-type: none"> • To process job applications • To complete activities related to recruiting, onboarding, and employment referrals 	<ul style="list-style-type: none"> • Performing services needed to operate our business
External Service Information	<p>Sources:</p> <ul style="list-style-type: none"> • Directly from you • Our vendors • External sources <p>Purposes:</p> <ul style="list-style-type: none"> • To process job applications • To assess qualifications for a particular job or task 	<ul style="list-style-type: none"> • 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
	<ul style="list-style-type: none"> To complete activities related to recruiting, onboarding, and employment referrals 	
<p>Inferences drawn from any of the information identified in this section to create a profile about you reflecting your preferences, intelligence, abilities, and aptitudes</p>	<p>Sources:</p> <ul style="list-style-type: none"> Directly from you <p>Purposes:</p> <ul style="list-style-type: none"> To perform necessary and appropriate internal functions, such as records maintenance and developing or improving the Website 	<ul style="list-style-type: none"> Performing services needed to operate our business

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.

If you receive marketing emails from us, you may opt out through the email's instructions, as provided. Please note that regardless of your email preferences, we may send you notifications pertaining to the performance of our services, such as revision of our Terms of Use or this Privacy Policy or other formal communications relating to the status of your employment application.

If you receive marketing texts from us, you may opt out by texting “STOP” to the number contacting you.

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 appropriate administrative, technical, 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. RSM limits access to internal systems that hold personal information to individuals who need access for a legitimate business purpose.

9. ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

This section provides additional information on our processing of personal information related to California residents.

Sensitive Data. In addition to personal information described in [Section 2: Personal information Collected](#), we also collect, use, and disclose to service providers certain personal information that is considered sensitive under California law, as further described below:

Category of Sensitive Personal information	Categories of Sources and Purposes for Collection	Purposes for Disclosure to Service Providers
Account log-in, in combination with any	Sources:	<ul style="list-style-type: none">• Performing services on our behalf

Category of Sensitive Personal information	Categories of Sources and Purposes for Collection	Purposes for Disclosure to Service Providers
<p>required security or access code, password, or credentials allowing access to an account</p>	<ul style="list-style-type: none"> • Directly from you <p>Purposes:</p> <ul style="list-style-type: none"> • Service providers that help us to run our business 	<ul style="list-style-type: none"> • To detect and prevent fraud against you and/or us • Helping to ensure security and integrity of our premises and systems
<p>Personal information that reveals an Applicant’s racial or ethnic origin, religious or philosophical beliefs, or union membership</p>	<p>Sources:</p> <ul style="list-style-type: none"> • Directly from you • Our vendors <p>Purposes:</p> <ul style="list-style-type: none"> • For business improvement, management, and planning • To determine obligations as an employer • To complete activities related to recruiting, onboarding, employment referrals, and offboarding 	<ul style="list-style-type: none"> • Short-term, transient use • Performing services needed to operate our business • 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
<p>Personal information collected and analyzed concerning a consumer’s health</p>	<p>Sources:</p> <ul style="list-style-type: none"> • Directly from you <p>Purposes:</p> <ul style="list-style-type: none"> • For business improvement, management, and planning • To determine obligations as an employer • To complete activities related to recruiting, onboarding, employment referrals, and offboarding 	<ul style="list-style-type: none"> • Short-term, transient use • Performing services needed to operate our business •
<p>Information that reveals an Applicant’s social security, driver’s license, state identification card, or passport number.</p>	<p>Sources:</p> <ul style="list-style-type: none"> • Directly from you • Our vendors <p>Purposes:</p> <ul style="list-style-type: none"> • To process job applications • To assess qualifications for a particular job or task • To determine obligations as an employer 	<ul style="list-style-type: none"> • Helping to ensure security and integrity • Short-term, transient use • Performing services needed to operate our business

Category of Sensitive Personal information	Categories of Sources and Purposes for Collection	Purposes for Disclosure to Service Providers
	<ul style="list-style-type: none"> To complete activities related to recruiting, onboarding, employment referrals, and offboarding To gather evidence for investigations or to comply with applicable law 	
Personal information collected and analyzed concerning an Applicant's sex life or sexual orientation	<p>Sources:</p> <ul style="list-style-type: none"> Directly from you Our vendors <p>Purposes:</p> <ul style="list-style-type: none"> To complete activities related to recruiting, onboarding, employment referrals, and offboarding For business improvement, management, and planning To gather evidence for investigations or to comply with applicable law 	<ul style="list-style-type: none"> Short-term, transient use Performing services needed to operate our business 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

Selling and Sharing of Personal information. In accordance with the definition of “sell” and “share” under California law, we do not “sell” or “share” personal information outside of the context of using tracking technology vendors. We may disclose personal information to vendors that facilitate interest-based advertising and other advertising and marketing through cookies or other tracking technologies through the Website. For more information on tracking technologies and your choices of controlling such, see our [Cookie Policy](#) your additional rights to opt-out of this “sell” and “share” below.

California Resident Privacy Rights. If you are a California resident, you have certain rights to the personal information that we have collected about you and you may exercise those rights independently or through an authorized agent. We will comply with your request as soon as reasonably practicable. Requests to exercise your rights may be granted in whole, in part, or not at all, depending on the scope and nature of the request and applicable law. To prevent unauthorized requests related to your personal information, we take steps to verify that you are the person that is the subject of the request. Following verification of your identity, we will notify you if we are able to fulfill your request and if we are unable to fulfill your request, we will outline the reasons we are unable to honor your request at this time.

You may exercise some of these rights and choices through the Website features, such as editing your account settings or profile details when you are logged in. You may also exercise your rights to your personal information by submitting your requests via our [Privacy Rights Portal](#), by toll-free calling 1-800-274-3978, or by email to dataprivacyoffice@rsmus.com.

Right to Know: You have the right to know about your personal information. You also have the right to obtain a transportable copy of your personal information. Your right to know request may be made no more than twice in a 12-month period.

Your right to know request may encapsulate the following:

- The categories of personal information we have collected about you
- The categories of sources from which the personal information was collected
- Our business or commercial purposes for collecting, selling, or sharing your personal information
- The categories of third parties to which we disclosed your personal information
- The categories of personal information we sold or shared about you and the categories of third parties to which each category of personal information was sold or shared
- The categories of personal information we disclosed about you for a business purpose and the categories of persons to which it was disclosed
- The specific pieces of personal information we have collected about you

Right to Correct Personal information: You may request that we correct personal information that we maintain about you if you believe such personal information is inaccurate. Upon receipt of a verifiable request to correct inaccurate personal information, we will use commercially reasonable efforts to correct the information as you direct.

Right to Request Deletion of Personal information: You may request that we delete your personal information that we have collected directly from you and are currently maintaining. Please note, however, that we may have a legal basis for retaining such personal information under the California law, despite your request.

Opt-Out Rights: In accordance with the definition of “sell” and “share” under California law, we do not “sell” or “share” personal information outside of the context of using tracking technology vendors. For more information on tracking technologies and your choices of controlling such, see our [Cookie Policy](#)

You have the right to opt out of the selling or sharing of your personal information via tracking technologies (e.g., cookies) on the Website by using the cookie preference center. If you choose to use an opt-out browser signal, such as the Global Privacy Control, you will be opted out of cookie-based sales and shares. Please note that visiting our Website with an opt-out browser signal enabled will have the effect of opting you out of sales and sharing with respect to our Website. You will need to turn on the signal for each browser that you use. To submit a request to opt out of other types of sales and sharing, please use our webform.

Right to Limit Use and Disclosure of Your Sensitive Personal information: Where we use sensitive personal information to infer characteristics, you may direct us to limit the use and disclosure of your sensitive personal information to uses/disclosures that are reasonably necessary: to ensure security and integrity; to prevent fraud or illegal activity; for physical safety; for short-term, transient use, including for non-personalized advertising. Because we do not use nor disclose sensitive personal information to infer characteristics nor for other purposes not listed here, there is no need to submit a request to limit use and disclosure of your sensitive personal information.

Right to Non-Discrimination for the Exercise of Your Privacy Rights: If you choose to exercise any of your privacy rights under California law you also have the right not to receive discriminatory treatment by us.

10. ADDITIONAL INFORMATION FOR THOSE LOCATED OUTSIDE THE UNITED STATES

If you are located outside of the United States, you acknowledge that we collect, process, and store personal information in the United States, and that the data protection and privacy laws in the United States may not offer the same level of protection than the applicable laws in your jurisdiction. Where we transfer your personal information to an entity outside of your location, we take steps to comply with law in respect of that transfer, for example by ensuring that your personal information is protected by comparable safeguards to those provided under the law of your location.

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. 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 dataprivacyoffice@rsmus.com, 1-800-274-3978, or:

Attn: Data Privacy Office
200 S. Wacker Drive
Suite 3900
Chicago, IL 60606