

Privacy Policy

Effective Date: January 1, 2020

For more than 75 years, RHR International LLP (“RHR”) has been building relationships with our clients based on respect and integrity. We appreciate the trust and confidence you place in us when you visit our website and when you do business with us.

RHR International LLP (“RHR International,” “the Company,” “we,” “us,” or “our”) is committed to privacy and data protection. This Privacy Policy applies to personal information RHR International collects from you through the websites under the control of RHR International (collectively “Sites”), as well as how we use and protect your personal information.

All references to RHR International include not only RHR International LLP, located at 233 South Wacker Drive, 95th Floor, Chicago, IL 60606, but also our wholly owned subsidiaries, unless expressly stated otherwise.

This Privacy Policy does not apply to any third-party applications or software that integrate with our Sites, or any other third-party products, services or businesses (collectively, “Third Party Services”). Third Party Services are governed by their own privacy policies. We recommend you review the privacy policy governing any Third Party Services before using them.

This Privacy Policy is incorporated into and made a part of RHR International’s Terms of Use. If you have not done so already, please also review the [Terms of Use](#).

PERSONAL INFORMATION WE COLLECT

RHR International collects data to provide the Sites you request, ease your navigation on our Sites, communicate with you, and improve your experience using our Sites. Some of this information is provided by you directly, such as when you create an account on our Sites, through your interactions with our Sites. We collect such data using technologies like cookies and other tracking technologies, error reports, and usage data collected when you interact with RHR International Sites running on your device.

The data we collect depends on the Sites and features that you use and the information that you enter. This includes the following:

Identifiers. We may collect your first and last name, email address, postal address, phone number, employer, and other similar contact data.

Employment-Related Information. If you submit apply for a job or internship with us, we may collect your employer, and current and past job history.

Credentials. We may process passwords and related security information used for authentication and account access and information security purposes.

Your Responses. Information you provide in connection with the questionnaires, assessments, and simulations available through the Site.

Internet and Network Activity. We may collect personalized information about your use of our Sites, to better understand uses thereof and identify potential improvements, as well as to send you promotional communications or offers tailored to your use of our Sites and interest thereto.

Examples include:

- Information on the web pages you visit on and off our Sites and the search terms you enter on our Sites.
- Information regarding the performance of our Sites and any problems you may experience while using them. This information enables us to diagnose problems and offer support in resolution.
- Data about your device and the network you use to connect to our Sites, including IP address, device identifiers, and regional and language settings.

Web requests. We may collect information regarding every web request sent to the relevant servers. This information is used to provide support, as well as to assess usage and performance of our Sites. The data collected for each request can include such things as timestamps, any exception messages, user agent, IP address, email address, request time and duration, as well as files names. Note that we do not collect your project file data.

Geolocation data. We may collect your IP address and infer location such as city or postcode therefrom, when necessary in order to provide you with the Sites or to send you promotional communications or for customer relationship management purposes.

Content. We may collect the content of messages you send to us, such as feedback or questions you ask our technical support representatives, when necessary to provide you with the Sites you use. We will collect and utilize any data files you send to us for troubleshooting and improving our Sites. When you contact us, phone conversations or chat sessions with our representatives may be monitored and recorded in order to improve our services, facilitate the processing and resolution of your request or complaint.

Surveys and Studies. We may ask you to participate in a survey or study; and may request information from you. Participation is voluntary, and you have the choice of whether to disclose any requested information.

HOW WE USE PERSONAL INFORMATION

We will only use your personal information when the law allows us to. We will only use your personal information as described in the categories identified above for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

RHR International uses information that we collect from customers and visitors for the purposes of:

- providing our Sites;
- providing assessments and modules;
- providing ongoing support;
- communicating with you, including promotional communications and customer relationship management (“CRM”);
- providing information about other Sites;
- helping us run our company, for example to improve our Sites or our security, train staff or perform marketing activities, including CRM;
- complying with our legal obligations; and
- accounting and other administrative purposes.

Examples of the uses of information include:

Providing Sites. We use data to carry out your transactions with us and to provide Sites to you. Often, this includes personal information such as email, name and address.

- Customer support. We use data to diagnose and address problems and provide other customer and support services.

Providing Consultancy and Advisory Services. We use data you provide in connection with the questionnaires, assessments, and simulations available through the Sites to provide consultancy and advisory services to our clients.

Improving the Sites. We use data to continually improve our Sites, including adding new features or capabilities. Data is collected throughout your interactions with our Sites that enable us to understand customer usage and tailor future capabilities.

We track general, non-personalized information (e.g., operating system, browser version and type of device being used) to know how many people visit specific pages of our Sites or utilize specific areas of our Sites so that we may improve those Sites. We may use your IP address to customize services to your location, such as the language displayed on our Sites.

Our Cookies Policy explains how we use cookies and similar technologies to collect information about the way you use our Sites, and how to control them.

Please note that we use IP addresses on a highly restrictive basis to analyze trends, to administer the site, and to collect general information for aggregate use.

Service Communications. We use data we collect to deliver and personalize our communications with you. For example, we may contact you by email or other means to notify you of changes in information and updates to our Sites or to our Privacy Policy.

Marketing and event communication: We use personal information to deliver marketing and event communications to you across various platforms, such as email, direct mail, social media, and online via our Sites.

If we send you a marketing email, it will include instructions on how to opt out of receiving these emails in the future. We also maintain email preference centers for you to manage your information and marketing preferences. For information about managing email subscriptions and promotional communications, please visit the Your Rights Regarding Personal Information section of this privacy statement. Please remember that even if you opt out of receiving marketing emails, we may still send you important Service information related to your accounts and subscriptions.

HOW WE SHARE PERSONAL INFORMATION

It is the policy of RHR International and its subsidiaries to protect users' information both online and off-line. Access to our users' information is restricted to only those employees or agents, service providers, contractors or subcontractors of RHR International who have valid reasons to access this information to perform any service you have requested or authorized, or for any other purpose described in this Privacy Policy. We have not and will not sell any personal information

We may provide your personal information to:

- RHR International-controlled affiliates and subsidiaries, located in and outside your country;
- outsourced service providers who perform functions on our behalf, such as website hosting and analytics;
- our authorized agents and representatives;
- anyone expressly authorized by you to receive your personal information;
- anyone to whom we are required by law to disclose personal information, upon valid and enforceable request thereof.

We may also share your responses to questionnaires, assessments, and simulations in connection with the consulting and advisory services we provide to a client. The client with whom we share your responses may be your employer or prospective employer. Except with respect to the provision of consulting and advisory service, the information you provide will not be sold or rented to third parties.

Finally, we will access, disclose and preserve personal information when we have a good faith belief that doing so is necessary to:

- comply with applicable law or respond to valid legal processes, including from law enforcement or other government agencies, upon valid and enforceable request thereof; or
- operate and maintain the security of our Sites, including to prevent or stop an attack on our computer systems or networks.

Please note that some of our Sites may direct you to services of other service providers whose privacy practices differ from RHR International's. If you provide personal information to any of those services, your data is governed by their privacy statements or policies. RHR International LLP and their subsidiaries are not responsible for the privacy practices of these other websites. Please review the privacy policies for these websites to understand how they process your information.

We require RHR's service providers to only use your personal information for the specific purpose for which it was given to us and to protect the privacy of your personal information. We will only disclose your personal information to service providers who agree to keep your information confidential.

HANDLING OF PERSONAL INFORMATION

Security of Personal Information

RHR International is committed to protecting the security of your personal information. Depending on the circumstances, we may hold your information in hard copy and/or electronic form. For each medium, we use technologies and procedures to protect personal information. We review our strategies and update as necessary to meet our business needs, changes in technology, and regulatory requirements.

These measures include, but are not limited to, technical and organizational security policies and procedures, security controls and employee training.

You are responsible for maintaining the security of your account credentials for the Sites. RHR International will treat access to the Sites through your account credentials as authorized by you. Unauthorized access to password-protected or secure areas is prohibited and may lead to criminal prosecution. We may suspend your use of all or part of the Sites without notice if we

suspect or detect any breach of security. If you believe that information you provided to us is no longer secure, please notify us immediately using the contact information provided below.

If we become aware of a breach that affects the security of your personal information, we will provide you with notice as required by applicable law. To the extent permitted by applicable law, RHR International will provide any such notice that RHR International must provide to you at your account's email address. By using the Sites, you agree to accept notice electronically.

Storage and Transfer of Personal Information

Personal data collected by RHR International may be stored and processed in your region, in the United States or in any other country where RHR International, its affiliates or contractors maintain facilities. We take steps to ensure that the data we collect under this Privacy Policy is processed pursuant to the terms thereof and the requirements of applicable law wherever the data is located.

RHR International also collaborates with third parties such as cloud hosting services and suppliers located around the world to serve the needs of our business, workforce, and customers. In some cases, we may need to disclose or transfer your personal information within RHR International or to third parties in areas outside of your home country. When we do so, we take steps to ensure that personal information is processed, secured, and transferred according to applicable law.

Retention of Personal Information

RHR International retains personal information for as long as necessary to provide the services and fulfill the transactions you have requested, or for other business purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. We are required by law to keep some types of information for certain periods of time (e.g. statute of limitations). If your personal information is no longer necessary for the legal or business purposes for which it is processed, we will generally destroy or anonymize that information.

YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

RHR International respects your right to access and control your personal information. You have choices about the data we collect. When you are asked to provide personal information that is not necessary for the purposes of providing you with our Sites, you may decline. However, if you choose not to provide data that is necessary to provide a Service, you may not have access to certain features, Sites.

We aim to keep all personal information that we hold accurate, complete and up-to-date. While we will use our best efforts to do so, we encourage you to tell us if you change your contact details. If you believe that the information we hold about you is incorrect, incomplete or out-of-date, please contact dataprotection@rhrinternational.com or call (877) 888-0109.

Access to personal information: In some jurisdictions, you have the right to request access to your personal information. In these cases, we will comply, subject to any relevant legal requirements and exemptions, including identity verification procedures. Before providing data to you, we will ask for proof of identity and sufficient information about your interaction with us so that we can locate any relevant data. We may also charge you a fee for providing you with a copy of your data (except where this is not permissible under local law).

Correction and deletion: In some jurisdictions, you have the right to correct or amend your personal information if it is inaccurate or requires updating. You may also have the right to request deletion of your personal information. Please note that such a request could be refused because your personal information is required to provide you with the products or services you requested, e.g. to deliver a product or send an invoice to your email address, or that it is required by the applicable law.

Marketing preferences: If you have provided us with your contact information, we may, subject to any applicable Spam Act or similar regulation, contact you via e-mail, postal mail or telephone about RHR International products, services and events that may be of interest to you, including our newsletter.

E-mail communications you receive from RHR International will generally provide an unsubscribe link allowing you to opt-out of receiving future e-mail or to change your contact preferences. Please remember that even if you opt out of receiving marketing emails, we may still send you important Service information related to your accounts and subscriptions.

You can also request changes to your account by contacting RHR International by emailing dataprotection@rhrinternational.com.

COOKIES & SIMILAR TECHNOLOGIES

RHR International uses cookies (small, often encrypted, text files that are stored on your computer or mobile device) and similar technologies (“Cookies”) to provide our Sites and help collect data. This Cookies Policy explains how we use Cookies to collect information about the way you use our Sites, and how you can control them.

How We Use Cookies

We use Cookies to track how you use our Sites by providing usage statistics. Cookies are also used to deliver Company information (including updates) and allow product authentication to you based upon your browsing history and previous visits to the Sites. Information supplied to us using cookies helps us to provide a better online experience to our visitors and users and send marketing communications to them, as the case may be. While this information on its own may not constitute your “personal information”, we may combine the information we collect via

Cookies with personal information that we have collected from you to learn more about how you use our Sites to improve them.

Types of Cookies

We use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your device until you delete them). To make it easier for you to understand why we need them, the Cookies we use on our Sites can be grouped into the following categories:

- **Strictly Necessary:** These Cookies are necessary for the Sites to work properly. They include any essential authentication and authorization cookies for our Sites.
- **Functionality:** These Cookies enable technical performance and allow us to “remember” the choices you make while browsing our Sites, including any preferences you set. They also include sign-in and authentication cookies and IDs that enable you to return without additional sign-in.
- **Performance/Analytical:** These Cookies allow us to collect certain information about how you navigate the Sites. They help us understand which areas you use and what we can do to improve them.
- **Targeting:** These Cookies are used to deliver relevant information related to our Sites to an identified machine or other device (not a named or otherwise identifiable person) which has previously been used to visit our Sites. Some of these types of Cookies on our Sites are operated by third parties with our permission and are used to identify advertising sources that are effectively driving customers to our Sites.

Cookies Set by Third Party Services

To enhance our content and to deliver a better online experience for our users, we sometimes embed images and videos from other websites on the Sites. You may be presented with Cookies from these third-party websites. Please note that we do not control these Cookies. The privacy practices of these third parties will be governed by the parties’ own privacy statements or policies. We are not responsible for the security or privacy of any information collected by these third parties, using cookies or other means. You should consult and review the relevant third-party privacy statement or policy for information on how these cookies are used and how you can control them.

We also use Google, a third-party analytics provider, to collect information about Sites usage and the users of the Sites, including demographic and interest-level information. Google uses cookies in order to collect demographic and interest-level information and usage information from users that visit the Sites, including information about the pages where users enter and exit the Sites and what pages users view on the Sites, time spent, browser, operating system, and IP address. Cookies allow Google to recognize a user when a user visits the Sites and when the user visits other websites. Google uses the information it collects from the Sites and other

websites to share with us and other website operators' information about users including age range, gender, geographic regions, general interests, and details about devices used to visit websites and purchase items. We do not link information we receive from Google with any of your personally identifiable information. For more information regarding Google's use of cookies, and collection and use of information, see the Google Privacy Policy (available at <https://policies.google.com/privacy?hl=en>). If you would like to opt out of Google Analytics tracking, please visit the Google Analytics Opt-out Browser Add-on (available at <https://tools.google.com/dlpage/gaoptout>).

Social Sharing

We also embed social sharing icons throughout our Sites. These sharing options are designed to enable users to easily share content from our Sites with their friends using a variety of different social networks. If you choose to connect using a social networking or similar service, we may receive and store authentication information from that service to enable you to log in and other information that you may choose to share when you connect with these services. These services may collect information such as the web pages you visited and IP addresses, and may set cookies to enable features to function properly. We are not responsible for the security or privacy of any information collected by these third parties. You should review the privacy statements or policies applicable to the third-party services you connect to, use, or access. If you do not want your personal information shared with your social media account provider or other users of the social media service, please do not connect your social media account with your account for the Sites and do not participate in social sharing through the Sites.

Other Similar Technologies

RHR International web pages may use other technologies such as web beacons to help deliver cookies on our Sites and count users who have visited those Sites. We also may include web beacons in our promotional email messages or newsletters to determine whether you open and act on them as well as for statistical purposes.

In addition to standard cookies and web beacons, our services can also use other similar technologies to store and read data files on your computer. This is typically done to maintain your preferences or to improve speed and performance by storing certain files locally.

How to Control and Delete Cookies

Cookies can be controlled, blocked or restricted through your web browser settings. Information on how to do this can be found within the Help section of your browser. All Cookies are browser specific. Therefore, if you use multiple browsers or devices to access websites, you will need to manage your cookie preferences across these environments.

If you are using a mobile device to access the Sites, you will need to refer to your instruction manual or other help/settings resource to find out how you can control cookies on your device.

Please note: If you restrict, disable or block any or all Cookies from your web browser or mobile or other device, the Sites may not operate properly, and you may not have access to our Sites available through the Sites. RHR International shall not be liable for any impossibility to use the Sites or degraded functioning thereof, where such are caused by your settings and choices regarding cookies.

To learn more about cookies and web beacons, visit www.allaboutcookies.org.

Do Not Track: Some web browsers (including Safari, Internet Explorer, Firefox and Chrome) incorporate a “Do Not Track” (“DNT”) or similar feature that signals to websites that a user does not want to have his or her online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about the browser’s user. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operators, including RHR International, do not respond to DNT signals.

CALIFORNIA RESIDENTS

The section supplements the information contained in this Privacy Policy, and applies solely to visitors, users and others who reside in the State of California. California residents have specific rights regarding their personal information, including a right to access specific or categories of information RHR International may collect, to have such information deleted, to receive a copy of such information, and to not be discriminated against by RHR International for exercising the foregoing rights.

California residents can contact us with questions or comments about this notice, the ways in which we collect, use, and disclose your information described in this Privacy Policy, your choices and rights regarding such use, or if you wish to exercise your rights under California law through a “Verifiable Personal Information Request”. To submit a Verifiable Personal Information Request, please contact us or have your authorized agent contact us at dataprotection@rhrinternational.com or call (877) 888-0109. For submissions via email please use the downloadable [RHR Verifiable Consumer Request Form](#). Under California Law, we must verify your identity prior to responding to your Verifiable Personal Information Request. You may have to provide us with identity information, as described in the California Consumer Privacy Act, to enable us to verify your identity. Please let us know if you encounter accessibility barriers with regard to this Privacy Policy.

California Shine the Light Law: California Civil Code Section 1798.83 permits users who are California residents to obtain from us once a year, free of charge, a list of third parties to whom we have disclosed personal information (if any) for direct marketing purposes in the preceding calendar year. If you are a California resident and you wish to make such a request, please

send an e-mail with “California Privacy Rights” in the subject line to dataprotection@rhrinternational.com or write us at: RHR International LLP, 233 South Wacker Drive, 95th Floor, Chicago, IL 60606.

California Minors: While the Sites is not intended for anyone under the age of 18, if you are a California resident who is under age 18 and you are unable to remove publicly-available content that you have submitted to us, you may request removal by contacting us at: dataprotection@rhrinternational.com. When requesting removal, you must be specific about the information you want removed and provide us with specific information, such as the URL for each page where the information was entered, so that we can find it. We are not required to remove any content or information that: (1) federal or state law requires us or a third party to maintain; (2) was not posted by you; (3) is anonymized so that you cannot be identified; (4) you don't follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing the Content or information. Removal of your content or information from the Sites does not ensure complete or comprehensive removal of that content or information from our systems or the systems of our service providers. We are not required to delete the content or information posted by you; our obligations under California law are satisfied so long as we anonymize the content or information or render it invisible to other users and the public.

CHILDREN'S PRIVACY

Sites ARE NOT INTENDED FOR CHILDREN

You must be at least the age of majority in your place of residence to use the Sites. The Sites are not directed to or intended for use by minors. Consistent with the requirements of the U.S. Children's Online Privacy Protection Act, if we learn that we received any information directly from a child under age 13 without his or her parent's verified consent, we will use that information only to inform the child (or his or her parent or legal guardian) that he or she cannot use the Sites.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy based upon evolving Laws, regulations and industry standards, or as we may make changes to our business including our Sites. We will post changes to our Privacy Policy on this page and encourage you to review our Privacy Policy when you use our Sites to stay informed. If we make changes that materially alter your privacy rights, RHR International will provide additional notice, such as via email or through the Sites. If you disagree with the changes to this Privacy Policy, you should discontinue your use of the Sites. You may also request access and control of your personal information as outlined in the Your Rights Regarding Personal Information section of this Privacy Policy.

NOTICE TO EU RESIDENTS

This Site is not directed to or meant for use by residents of the European Union (“EU”). If you are a resident of the EU please visit our European Site located at:
<https://www.rhrinternationalconsultants.eu>.

QUESTIONS OR COMPLAINT HANDLING

We understand that you may have questions or concerns about this Privacy Policy or our privacy practices or may wish to file a complaint. In such case, please contact us in one of the following ways:

Email: dataprotection@rhrinternational.com

Phone: (877) 888-0109

Mail:

Attention: Legal Department
RHR International LLP
233 South Wacker Drive
95th Floor
Chicago, IL 60606