

RSM CANADA APPLICANT PRIVACY POLICY

Last Updated: July 31, 2026

1. INTRODUCTION

This Privacy Policy provides notice of our information collection and use practices by RSM Canada LLP, and its affiliates (together, “RSM,” “us,” “our” or “we”). This Privacy Policy applies to our processing of your personal information including through jobs.rsmcanada.com/ (the “Website”). Your use of the Website constitutes your acknowledgment 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 applies to your interaction with RSM in the capacity of a job applicant only. It does not apply if you are subsequently hired as an employee, if you visit our Website in any other capacity, or if you engage with RSM through any service not linked to this Privacy Policy.

For information about how tracking technologies (e.g., cookies) are used on the Website, see our Cookie Policy.

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, sign up for job alerts, 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, and from referral sources such as current employees, recruiters and job applicant platforms.

Personal information we process includes:

- **Identifiers.** This includes names, date of birth, contact information, postal address, e-mail, Internet Protocol address, or other similar identifiers.
- **Personal records.** This includes your signature, telephone number, education and employment.
- **Characteristics or traits 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, 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.

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	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	• 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
	• 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	Sources: • Directly from you • Tracking Technologies • External sources Purposes: • 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	• 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
	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	
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 - To comply with applicable employment equity, human rights legislation, and accommodation obligations under federal and provincial law - To assess and provide reasonable accommodations for job applicants, where requested and required by law - 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	- 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
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 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	- 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
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	- 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

Category of Personal Information	Sources of and Purposes for Collection and Use	Purposes for Disclosure to Service Providers
	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	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 • 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	• 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	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 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	• Helping to ensure security and integrity • Short-term, transient use • Performing services needed to operate our business
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	• 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
	- To assess qualifications for a particular job or task - To complete activities related to recruiting, onboarding, and employment referrals	
Inferences	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

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.

To the extent RSM sends you commercial electronic messages, we do so in compliance with Canada's Anti-Spam Legislation (CASL). If you unsubscribe from promotional or marketing communications, we will cease sending you commercial electronic messages for marketing purposes. We may nevertheless continue to communicate with you where permitted or required by applicable law, including to administer or process your application, provide service-related communications, respond to your inquiries, or provide notices concerning this Privacy Policy or other matters affecting our relationship with you. Please note that opting out of marketing communications does not constitute a withdrawal of consent to RSM's use of your personal information for recruitment and applicant management purposes. If you wish to withdraw consent to the processing of your personal information for recruitment purposes, you may do so by contacting us at dataprivacyoffice@rsmus.com; however, please be aware that withdrawal of consent may limit RSM's ability to consider you for current or future employment opportunities.

7. DATA RETENTION

Consistent with the Personal Information Protection and Electronic Documents Act's ("PIPEDA") retention limitation principle, RSM retains your personal information only for as long as is reasonably necessary to fulfill the purposes described in this Privacy Policy or as required or permitted by applicable law. For unsuccessful job applicants, we generally retain application materials for two (2) years from the date of your application, unless: (i) you have provided express consent to a longer retention period, such as to be considered for future opportunities; (ii) applicable law requires a longer period; or (iii) retention is necessary in connection with a legal claim, audit, or regulatory investigation. At the end of the applicable retention period, your personal information will be securely deleted or rendered non-identifiable in accordance with our data retention standards. This generally means holding your information for as long as one of the following applies:

- 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. 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 Canadian privacy laws in Canada, depending on your province of residence, 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 Accuracy	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 Withdraw Consent	Under PIPEDA, you have the right to withdraw your consent to RSM's collection, use, or disclosure of your personal information at any time, subject to legal or contractual restrictions and upon providing reasonable notice to RSM. To withdraw consent, contact us at dataprivacyoffice@rsmus.com . Please note that withdrawal of consent may limit or prevent RSM's ability to process or advance your job application.
Right to Know	You may have the right to request information about the Firm's use of your personal information, including disclosure of that information to persons outside the Firm. This right derives from the same PIPEDA access principle as the Right to Access above; we describe it separately here because it specifically covers disclosures to third parties, which the Right to Access description above does not spell out.

If you reside in Quebec, you will have the following rights in addition to the rights set out above.

Your Rights	Description
Right to Data Portability	You have the right to obtain your computerized personal information in a structured, commonly used format.
Right to Automated Decision-Making Information	You have the right to be informed when automated decision-making (AI, profiling, etc.) is used and its impacts. You may also request information about how the decision was made and ask for the decision to be reviewed by a person
Right to be Forgotten (De-indexation Right).	You have the right to request that we stop disseminating personal information or de-index any hyperlink attached to your name giving access to information if such dissemination causes prejudice or contravenes the law or a court order.

Complaint Rights

If you are not satisfied with our response to your privacy request, or if you believe RSM has not complied with applicable Canadian privacy law, you have the right to lodge a complaint with the relevant supervisory authority, without prejudice to any other legal remedy:

- i. All Canadian residents (federal): Office of the Privacy Commissioner of Canada (OPC) — www.priv.gc.ca | 1-800-282-1376
- ii. Quebec residents: Commission d'accès à l'information (CAI) — www.cai.gouv.qc.ca | 1-888-528-7741
- iii. Alberta residents: Office of the Information and Privacy Commissioner of Alberta — www.oipc.ab.ca | 1-888-878-4044
- iv. British Columbia residents: Office of the Information and Privacy Commissioner of BC — www.oipc.bc.ca | 1-800-663-7867

Exercising Your Rights

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

1. Submit an online request on our website at [this link](#).
2. Via email at dataprivacyoffice@rsmus.com

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 province 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, province of residence, 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 in your province, 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 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 that are equivalent to those that apply in Canada.

For Quebec residents only, RSM may transfer personal information collected in the Province of Quebec to other Canadian provinces or territories, the United States, India, El Salvador, and jurisdictions in which RSM's vendors, service providers or clients are located. We will only transfer your personal information outside of Quebec for the purposes identified in this Privacy Policy and in accordance with applicable law, including Law 25. Prior to any transfer of personal information outside Quebec to a jurisdiction that does not provide an equivalent level of data protection, we will conduct a privacy impact assessment (sometimes called a transfer impact assessment, or TIA, in this specific context) and implement appropriate protective measures, including contractual safeguards.

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, or by mail at:

RSM Canada LLP
Attention: Canada Privacy Officer
11 King Street West,
Suite 700
Toronto, ON
M5H 4C7