



KORN FERRY'S GLOBAL PRIVACY POLICY (the "Policy")

This Policy describes how Korn Ferry and its affiliates and subsidiaries (collectively "Korn Ferry," "we," "our," or "us") collect, use, transfer, and disclose your information. A list of our affiliates and subsidiaries is available from our Privacy Office as described below, or at <https://cdn.kornferry.com/privacy/subsidiariesalliances.pdf>.

"Personal Information" is information that identifies you as an individual or relates to an identifiable individual. This Policy describes our practices of processing [Personal Information](#) that we collect and use in connection with:

- Websites operated by us from which you are accessing this Policy (the "Site");
- Software platforms and applications we make available for use on or through computers or mobile devices (the "Applications");
- Our social media pages from which you are accessing this Policy (collectively, our "Social Media Pages");
- HTML-formatted email messages we send to you that link to this Policy;
- Communications, including via emails, SMS and/or text messages we send to you manually and from software that may qualify as autodialers ("Texts"); and
- Offline business interactions you have with us, including in person discussions, telephone conversations, and non-electronic communications.

Collectively, we refer to the services provided through the Site, Applications, Social Media Pages, email messages, and offline business interactions as the "Services." Note, references in this Policy to "include" or "including" mean "including without limitation."

WHO WE ARE & WHAT WE DO

Korn Ferry is a global organizational consulting firm. We help companies design their organization – the structure, the roles and responsibilities, as well as how they compensate, develop and motivate their people. We also help organizations select and hire the talent they need to execute their strategy.

Korn Ferry provides a wide range of organizational consulting services to help companies structure their organization, and some of these Services involve the collection and use of your Personal Information. For certain Services, Korn Ferry, including its subsidiaries as listed here: <https://cdn.kornferry.com/privacy/ControllerEntities.pdf>, is the company responsible (or the 'controller') for the collection and use of your Personal Information. These Services are described in this Policy. For other services, Korn Ferry collects and uses your Personal Information as a service provider (or 'processor') on behalf of and under instructions from our clients. If you have any questions about the collection and use of your Personal Information in the context of those services, please contact the company that is responsible for the collection and use of your Personal Information (e.g., the company where you applied for a position).

The Services for which Korn Ferry collects and uses your Personal Information as a controller (and which are covered by this Policy) are:

- Search Services. We maintain a talent pool to help clients find talent at the board-level, chief executive, and other senior executive positions. We also offer search Services for clients to find talent for middle to upper-level management or temporary staff.
- Compensation and Benefit Analysis Products. We provide software products and consulting Services that our clients can use to conduct compensation and benefit analysis; job architecture and organizational structuring; and mapping to Korn Ferry's proprietary job profiles.
- Credential Network. We participate in a Credential Network: a distributed ledger network that enables trusted, private, and secured exchange of career credentials between individuals and organizations. We may issue you credentials, verify your credentials exchanged on the Credential Network, or receive credentials you disclose to us.
- Learning Services and Development Products. We provide a business-to-consumer version of a software product, called KF Advance, that users can use for coaching and job-hunting preparation. In addition, we may offer e-learning and training services for individuals from time-to-time.
- Our Site. We disclose research, whitepapers, and service information on the Site; provide access to KF Store to purchase books and products; and share issues of the Briefings Magazine.

For additional controller activities, see the Processing of Personal Information section below.



The services for which Korn Ferry collects and uses your Personal Information as a processor are:

- Recruitment Process Outsourcing (RPO) Services. We provide recruitment process outsourcing and/or project recruitment services to help our clients attract top people. This involves Korn Ferry recruiting individuals on the client's behalf.
- Consulting Services. We help our clients implement their business strategy by consulting with them on strategy execution and organization design, talent strategy and work design, rewards and benefits, assessment and succession, leadership development, and other talent needs.
- Assessment and Survey Services. We help clients in their roles as the data controllers, conduct employee and candidate assessments and surveys.
- Software Products (other than Compensation and Benefit Analysis Products). In addition to the Compensation and Benefit Analysis products mentioned above, we provide other software products that our clients can use, for example, to conduct assessments, surveys, or career coaching. When we collect and use your Personal Information in relation to these software products other than the Compensation and Benefit Analysis products, we do so as a processor for our clients.

COLLECTION AND PROCESSING OF PERSONAL INFORMATION

HOW WE COLLECT PERSONAL INFORMATION

We collect Personal Information in a variety of ways, including through our Services and from other sources, as set out in the grid below. If you do not provide the information requested, we may not be able to provide the Services. We will note which Personal Information is required to provide the Services at the time of its collection.

If you disclose any Personal Information relating to other people to us, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

PROCESSING OF PERSONAL INFORMATION

Korn Ferry collects Personal Information to provide Services to you, our clients, and to operate our business. The type of Personal Information we collect about you depends on the situation at hand. Please do not provide us with any Personal Information if you do not agree with this Policy.

We use your Personal Information for legitimate business purposes as described in the overview below.

Providing our products and Services

Purpose	Examples of Processing Activities	Personal Information Categories	Legal Basis	Third Party Sources	Who Has Access to Your Personal Information
Providing our Search Services	Searching for talent at the board-level, chief executive, other senior executive positions, middle to upper level management, or other temporary staff; identifying professional opportunities that we think may be of interest to you; contacting you from time to time	Name & Contact Details; Business Contact Details; User Photographs and Videos; Professional Information; Candidate Introduction Information; and, to the extent permitted by applicable law, Background Information.	Performance of the contract, for example, the user agreement we enter into when you create a Korn Ferry candidate account. Legitimate interest, for example, to approach you regarding potential opportunities.	Third parties who introduce candidates (e.g., headhunters who contact Korn Ferry) References (individuals who can attest to candidates' skills, experience, and personality put forward by the candidate) Networking activities Public databases	Your prospective or current employer (for internal candidates or if you include your current employer as a reference) Reference sources Third party service providers and/or sub-processors involved in delivering the Search Services



	<p>regarding potential opportunities; contacting you from time to time for referrals; soliciting names of, or additional Personal Information regarding, potential candidates in connection with our Search Services to understand the market; confirming references and conducting education and background checks as appropriate; and aggregating and disclosing diversity and other statistical information regarding our candidates and placement activities. To contact you about roles relevant to you, we may compare your skills and qualifications against successful candidates in similar roles. We may contact you for these purposes by Texts, where you have opted-in or where you have initiated contact with one of our recruiters via text message. You may opt out of Texts at any time by replying STOP to a message or by contacting us as set out below.</p>			<p>Joint marketing partners Licensed databases Social media platforms Background check providers</p>	<p>As detailed in the Disclosure of Personal Information section</p>
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<p>Providing our Compensation and Benefit Analysis Products</p>	<p>Conducting surveys and compensation and benefits analysis (where permitted by law); consulting with you or our clients on rewards and benefits; preparing thought leadership materials; research, publication, development, benchmarking and norms, validation, longitudinal studies, trend analysis, to improve and enhance our Services or to develop and market new Services.</p>	<p>Name & Contact Details; Preferences; Account Information; Marketing Data; and Professional Information.</p>	<p>Performance of the contract, including the User Agreement we enter into when you create a Korn Ferry account. Consent, for example, to share the outcome of your compensation and benefit analysis with a potential employer. Legitimate interests, such as to prepare thought leadership materials. Any published product will refer only to larger aggregations of individuals and will not identify you personally or include any results attributable to you.</p>	<p>Clients to whom we provide Services Third parties who participate in an survey or compensation advisory engagement.</p>	<p>Clients to whom we provide Services As detailed in the Disclosure of Personal Information section</p>
<p>Participating in the Credential Network</p>	<p>Korn Ferry participates in a private and encrypted distributed ledger network that enables trusted, private, and secured exchange of career credentials between individuals. Korn Ferry may issue digital credentials to you once you have completed a training course; verify credentials exchanged on the Credential Network (including credentials issued between other organizations on the Credential Network);</p>	<p>Name & Contact Details; Digital Career Credentials; Course(s) Completed; Course Grade/Score.</p>	<p>Consent.</p>	<p>N/A</p>	<p>Any organization with whom you choose to share your credentials. As detailed in the Disclosure of Personal Information section</p>



	<p>receive credentials you disclose to Korn Ferry and other organizations; create a credential for you at your request; use credentials you disclose to Korn Ferry as part of a recruitment activity.</p>				
Customer service	<p>Administering customer-care services to facilitate and address inquiries, requests, comments and complaints about any of our Services (such as in person, through phone lines, Texts, email, or on Social Media Pages), for example, to send you documents or product information you request or assist you in using the Services.</p>	<p>Name & Contact Details; Business Contact Details; Account Information; Billing Information; Relationship History; Transaction Information; Device Information; Telephone Call Recordings; and Preferences.</p>	<p>Performance of the user agreement we enter into with you to provide the Services. Legitimate interests, such as responding to inquiries or complaints. Legal obligations*, such as when you submit a request to access your Personal Information.</p>	N/A	<p>As detailed in the Disclosure of Personal Information section</p>
Communicating important changes / Service messages	<p>Send you important information regarding our relationship with you, our Services, any changes to our terms, conditions, policies and procedures, and/or other administrative information via email, Texts, Social Media Pages, or other communication Applications.</p>	<p>Name & Contact Details; Business Contact Details (e.g., telephone number and email address); Account Information; Preferences; Relationship History; Transaction Information; Device Information; and Social Media Information.</p>	<p>Legitimate interests, such as to ensure our Services are used in accordance with our terms, conditions, and policies. Performance of contract, where provided in our user agreement. Legal obligations,* such as to inform you of material changes to our user agreement to comply with applicable consumer and/or data protection laws.</p>	N/A	<p>As detailed in the Disclosure of Personal Information section</p>



<p>Operations and general business</p>	<p>Administering online Services (including troubleshooting and diagnostic testing, conducting performance analyses of our systems and Services, testing new system features to evaluate their impact, system and log maintenance, technical support, system debugging, and the hosting of data); employee training and managing work activities and personnel generally; and facilitating mergers, acquisitions and other reorganizations and restructurings of our business (including prospective transactions).**</p>	<p>Personal Information as relevant for the specific business operation.</p>	<p>Legitimate interests, such as responding to customer complaints and concerns. Legal obligations,* for example, relating to financial transactions, such as the obligation to maintain books and records.</p>	<p>Third party organizations, when they share personal information with us to, for example, facilitate mergers, acquisitions and other reorganization and restructurings of our business.</p>	<p>As detailed in the Disclosure of Personal Information section</p>
<p>Candidate introductions by third parties</p>	<p>Receiving information from a third party (such as headhunters, acquaintances, friends) about suitable candidates for a position in connection with our Recruitment Services.</p>	<p>Candidate Introduction Information, Name & Contact Details; Business Contact Details; Professional Information; and Resumes.</p>	<p>Legitimate interest. Individuals who introduce candidates warrant they have the authority to share candidate personal information with Korn Ferry.</p>	<p>Third parties who introduce candidates.</p>	<p>Your prospective or current employer. Reference sources. Third party service providers and/or sub-processors involved in delivering the Search Services. As detailed in the Disclosure of Personal Information section</p>

Events and visitors



Purpose	Examples of Processing Activities	<u>Personal Information</u> Categories	Legal Basis	Third Party Sources	Who Has Access to Your Personal Information
Visits, conferences, and other online or in-person events	Facilitate and participate in conferences and events, such as trade shows or bookings at our premises (including rentals), and welcome guests and visitors to our premises.	Name & Contact Details; Business Contact Details; Account Information; Billing Information; Relationship History; Transaction Information; Preferences; Visitor and Event Information; Marketing Data; and Event Photographs and Videos.	Performance of a contract with you, such as collecting information regarding a planned event in which you participate. Legitimate interests, such as responding to customer complaints or concerns relating to an event.	Event management service providers.	As detailed in the Disclosure of Personal Information section

Marketing and engagement

Purpose	Examples of Processing Activities	<u>Personal Information</u> Categories	Legal Basis	Third Party Sources	Who Has Access to Your Personal Information
Marketing	Send you promotional information about our Services, products, articles, whitepapers, newsletters, conduct surveys, promotions, offers and other news about Korn Ferry. These materials may be sent by Texts, where you have opted-in. You may opt out of Texts at any time by replying STOP to a message or by contacting us as set out below.	Name & Contact Details; Business Contact Details; Account Information; Relationship History; Transaction Information; Preferences; Marketing Data; Event Photographs and Videos; User Content; Device Information; and Social Media Information.	Legitimate interests, such as to promote our Services and products. Consent, for example, where we would like to send you direct Texts and email marketing communications, but do not have an existing relationship with you, we will ask for and rely on your prior opt-in consent. Please note that if we obtained your Personal Information because you are using our Services at the request of your employer, you will not	Publicly available databases. Marketing / advertising service providers. Data broker service providers.	As detailed in the Disclosure of Personal Information section



			receive marketing materials as a result of the Personal Information we obtained from the Services.		
Relationship building and engagement	Facilitate and respond to any product reviews, social sharing, and posts on our Services.	Name & Contact Details; Business Contact Details; Account Information; Marketing Data; Social Media Information; and User Content.	Legitimate interests, such as engaging with individuals who post on our Social Media Pages.	Marketing / advertising service providers. Data broker service providers.	As detailed in the Disclosure of Personal Information section

Personalization and improving our products and/or Services

Purpose	Examples of Processing Activities	<u>Personal Information</u> Categories	Legal Basis	Third Party Sources	Who Has Access to Your Personal Information
Personalizing our Services	Personalize our interactions with you and provide you with information tailored to your interests, such as a tailored learning journey on our online Services as well as our website; deliver content via our Services that we believe will be relevant and interesting to you. We may recommend your learning journey and development activities based on your assessment results.	Name & Contact Details; Business Contact Details; Account Information; Marketing Data; Social Media Information; Relationship History; Transaction Information; Device Information; and Preferences.	Consent, for example, where we would like to send you trainings tailored to your specific interests and/or behavior, and such tailoring of trainings may result in profiling. Legitimate interests, such as providing tailored Services based on past usage and/or preferences, and such tailoring would be based on basic and privacy-non-intrusive segmentation.	Publicly available databases. Marketing / advertising service providers. Data broker service providers.	As detailed in the Disclosure of Personal Information section



<p>Improving and developing new products and Services</p>	<p>Conduct data analysis, for example, monitoring and analyzing usage of Services and using data analytics to improve the efficiency of our Services; develop new products and Services; consider ways for enhancing, improving, repairing, maintaining or modifying our current products and Services; identify usage trends, for example, understanding which parts of our Services are of most interest to users; determine the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users; and operate and expand our business activities, for example, understanding which parts of our Services are of most interest to our users so we can focus our energies on meeting our users' interests.</p>	<p>Name & Contact Details; Business Contact Details; Account Information; Relationship History; Transaction Information; Preferences; User Content; Device Information; Telephone Call Recordings; and Social Media Information.</p>	<p>Legitimate interests, such as developing new Services and/or products. Consent, such as when we use cookies and similar technologies and the data collected by means of such technologies qualify as Personal Information.</p>	<p>Publicly available databases. Marketing / advertising service providers. Data broker service providers.</p>	<p>As detailed in the Disclosure of Personal Information section</p>
<p>Pseudonymizing, key coding, aggregating and/or anonymizing Personal Information</p>	<p>Pseudonymizing or key-coding your Personal Information, meaning information that may directly identify you is replaced with a code to minimize unwanted or</p>	<p>Personal Information as relevant for the specific business purpose.</p>	<p>Legitimate interests, such as to generate other data for our use. We may use and disclose such data for any purpose if it no</p>	<p>N/A</p>	<p>As detailed in the Disclosure of Personal Information section</p>



	<p>unintended identification. Such key-coded information can be de-coded by using the key so that it identifies you again.</p> <p>Aggregating and/or anonymizing Personal Information so that it will no longer be considered Personal Information. For example, we may use this information to train our AI algorithms or test them for bias, generate norms by industry, geography, level, etc., enable us to understand where our Services are being utilized, conduct ongoing validation studies, compile reports, and publish journal articles to further the knowledge base of organizational and leadership science.</p>		<p>longer identifies you or any other individual.</p>		
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Security and legal reasons

Purpose	Examples of Processing Activities	<u>Personal Information</u> Categories	Legal Basis	Third Party Sources	Who Has Access to Your Personal Information
Fraud prevention and security	Conduct audits, verify that our internal processes function as intended and are compliant with legal, regulatory, or contractual	Name & Contact Details; Business Contact Details; Account Information; Billing Information; Device Information; Relationship	Legal obligations,* such as to detect and prevent cyberattacks. Legitimate interests, such as identifying	N/A	As detailed in the Disclosure of Personal Information section



	requirements; monitor for and prevent fraud; and security purposes, including system security and on-site security of our premises.	History; Telephone Call Recordings; CCTV and Site Security Information; and Transaction Information.	and/or preventing fraudulent transactions.		
Legal and compliance	Fulfil our legal and compliance-related obligations , including complying with applicable laws; complying with legal processes; responding to requests from public and government authorities; meeting national security or law enforcement requirements. Enforcing our terms and conditions; protecting our operations; protecting Korn Ferry's rights, privacy, or property; and allowing us to pursue available legal remedies, defend claims, and limit the damages that Korn Ferry may sustain.	Personal Information as relevant for the specific legal action, regulatory investigation, and/or legal processes in question, which may include: Name & Contact Details; Business Contact Details; Account Information; Billing Information; User Content; Preferences; Marketing Data; Relationship History; Transaction Information; Visitor and Event Information; User Photographs and Videos; Social Media Information; Event Photographs and Videos; CCTV and Site Security Information; Telephone Call Recordings; and Device Information.	Legal obligations*, such as complying with legal processes. Legitimate interests, such as enforcing terms and conditions to protect trademarks and bringing or defending legal claims.	Public and/or government and/or regulatory authorities, including courts, tribunals, regulators, and government authorities. Third persons (legal or natural), as relevant for the specific legal action and/or processes in question (such as lawyers, auditors, insurers, advisory firms etc.).	As detailed in the Disclosure of Personal Information section
Emergency and incident response	Ensuring the safety of on-site personnel and visitors; responding to, handling and documenting on-site accidents and medical and other emergencies;	Name & Contact Details; CCTV and Site Security Information; and Visitor and Event Information.	Legal obligations,* for example, relating to health and safety regulations and documenting on-site accidents.	N/A	As detailed in the Disclosure of Personal Information section



	actively monitoring properties to ensure adequate incident prevention, response and documentation (including CCTV); requesting assistance from emergency services; and sending notifications and alerts in the event of incidents or emergencies (such as via Texts, email, call, audio-visual device prompts, etc.).		Legitimate interests, such as monitoring properties through CCTV to ensure individuals' safety. Protect individuals' vital interests, such as contacting medical or emergency services where an individual's life is at risk.		
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*For more information on our legal obligations, please see 'Other Disclosures' section below.

** For more information on disclosure of Personal Information in connection with a sale or business transaction, please see 'Other Disclosures' section below.

PERSONAL INFORMATION

We collect the following categories of Personal Information:

A. Personal Information we receive from you and examples of that Personal Information:

Name & Contact Details	First and last name, nickname or alias, title, prefix, email address, telephone number, postal address, date of birth, gender, race, country of residence, citizenship.
Phone number	Your personal phone number (or any other number) at which you opt in/elect to receive Texts or calls .
Business Contact Details	Company name, business email address, business telephone number, business postal address, country of business.
Account Information	Your chosen username and password, and other information you share in your account.
Billing Information	Such as debit or credit card details, bank account details, billing address.
Digital Career Credentials	Digital career credentials related to certifications, course completions, or education credentials.



Professional Information	Resume information, qualifications, professional experience, employment history, education, professional credentials, memberships in professional organizations, skills, information from former employers and other references, results of candidate assessments and related data, and compensation and benefits information (where permitted by applicable law).
User Content	Reviews about our products and Services, and other content you may create or share on our Services, including posts on our Social Media Pages, blogs, and comment sections.
Preferences	Language, interests, preferred means of communication, and other customer feedback/preferences that you might express during your use of our Services.
Marketing Data	Your choices regarding our promotional emails, messages and other marketing displayed or provided to you, and preferred methods of such promotional communication.
Relationship History	Details of your communications with us, and details of your claims, complaints, and queries in general.
Transaction Information	Details of products and Services you have purchased from us.
Visitor and Event Information	Dietary restrictions, travel and accommodation details, issued identification pass to access the premises, and other details specific to a particular event or conference that you share with us.
User Photographs and Videos	Photos and videos submitted by you while using our Services or that you make publicly available on the Internet (e.g., LinkedIn).
Telephone Call Recordings	Audio recordings of telephone calls when you contact us.

B. Personal Information we collect through your use of our Services or from other sources and examples of that Personal Information:

Social Media, Industry and Professional Directories, and Job Board Information	Profile pictures, social media account ID, and other social media and job board profile information, including lists of friends/followers on social media.
Background Information	Information on, or the verification of, your employment or educational background, and behavior.
Event Photographs and Videos	Photos and videos taken at one of our events/conferences.



CCTV and Site Security Information	Images or video footage captured or recorded by CCTV and other security measures on our premises.
Device Information	Information about your devices and your use of our Services, e.g., we may log certain statistics about the traffic on our Site like the users' domains and browser types. This includes data obtained through cookies and similar technologies, as described in our cookies and similar technologies policy .
Public Record Information	Information from public business records and industry directories, for example corporate registrations.
Job Application information received from other Job Boards and Recruitment Service Providers	Information included in your resume or CV, for example, work experience, education, and skills.
Candidate Introduction Information	Name of the person who introduces a candidate, their professional relationship with the candidate, their opinion about the candidate's skills, experience, and personality, and other recommendations and information provided in this context.
Name & Contact Details	First and last name, nickname or alias, title, prefix, email address, telephone number, postal address, date of birth, gender, race, country of residence, citizenship.
Business Contact Details	Company name, business email address, business telephone number, business postal address, country of business.
Professional Information	Resume information, qualifications, professional experience, employment history, education, professional credentials, memberships in professional organizations, skills, information from former employers and other references, results of candidate assessments and related data, and compensation and benefits information (where permitted by applicable law).

Disclosure Of Personal Information

As a global organization, we have affiliates and subsidiaries around the world. To the extent permitted by law, we may share Personal Information with our affiliates and subsidiaries (see <https://cdn.kornferry.com/privacy/subsidiariesalliances.pdf>) to provide seamless Services to you and our clients. Only SENSE Solutions, Inc. (d.b.a. Korn Ferry U.S. Government Consulting Services) does not share Personal Information collected on behalf of its U.S. federal government clients outside the U.S. or with Korn Ferry affiliates and subsidiaries, except as necessary to provide the Services and as approved by the client.

From time to time, we also disclose Personal Information to our strategic alliance partners and to our network of independent consultants who provide Services on Korn Ferry's behalf.

- You can obtain a list of our strategic alliance partners by contacting our Privacy Office as described below.

Korn Ferry discloses Personal Information to third-party service providers who provide support for our Services or business operation.

- Korn Ferry works with third-party service providers who provide services that may include assessment services, including assessment validation services, website hosting and IT consulting services, data analysis, resume verification, background checking, payroll services, public relations services, marketing services, attorneys, accountants, and other administrative and back-up and security services.



- As part of providing services, these third-parties will be provided with access to Personal Information. In addition, our software development partners may use Personal Information, like usage metrics or bug issues, to modify, improve, refine, and validate their technology, research and development.

Korn Ferry may disclose certain Personal Information regarding candidates, including the results of candidate assessments and related data to your current (if applying for an internal position) or prospective employer who has engaged Korn Ferry to fulfill recruitment requests, or to reference sources.

Korn Ferry may disclose or transfer all or part of your Personal Information in the event of a sale of our company or one or more of our affiliates. We may also disclose or transfer all or part of your Personal Information in the event of a merger, joint venture, assignment, or consolidation involving our company or one or more of our affiliates. This may also occur if there is a sale or transfer or other disposition of assets or of any portion of our business or the business of one or more of our affiliates (including in connection with bankruptcy or similar proceedings). You will be notified of any such business transaction and of possible changes to the processing of your Personal Information in accordance with applicable law and the 'Updates To This Policy' section.

There may be other times that we disclose your Personal Information.

- Korn Ferry may also use or disclose Personal Information (to comply with a legal obligation or because we have legitimate interest to do so) to: (i) comply with applicable laws, (ii) respond to inquiries, requests or orders from public or government authorities, including those outside of your country of residence, or (iii) protect the rights, privacy, safety or property, of Korn Ferry and our affiliates, you or others.
- We cannot and do not assume any responsibility for the actions or omissions of third parties, such as clients, including the way they use Personal Information received either from Korn Ferry or from other independent sources.

Other Disclosures

We also disclose your Personal Information as necessary or appropriate, in particular when we have a legal obligation or legitimate interest to do so, as set out in further detail below.

Purpose	Further Detail
<p>To comply with applicable law and regulations</p>	<p>This may include laws outside your country of residence, which could give rise to a legal obligation requiring us to process your Personal Information, including:</p> <ul style="list-style-type: none"> • Civil and commercial matters: where we are in receipt of a court order, motion to compel, or subpoena to disclose information for the purposes of court proceedings, such as under Regulation (EU) No 1215/2012 on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters. • Criminal matters: to comply with requests and orders, including from US, EU and EU Member State law enforcement to provide information in relation to a criminal investigation in compliance with applicable local laws, or to take steps to report information we believe is important to law enforcement where required or advisable under applicable local laws. • Consumer matters: to comply with requests from competent authorities, including the FTC under US law or national authorities under EU or EU Member State consumer protection law, under Directive (EU) 2019/2161 and its implementing laws in EU Member States. • Corporate and taxation matters: to comply with our obligations under applicable corporate and tax legislation, such as where a national tax law requires collection of specific transactional personal information for tax purposes. • Regulatory matters: to respond to a request or to provide information we believe is necessary or appropriate to comply with our obligations to engage with regulators, including if relevant EU Member State data protection supervisory authorities initiate investigation under the General Data Protection Regulation into Korn Ferry or the California Privacy Protection Agency initiates an investigation under the California Consumer Privacy Act. These can include authorities outside of your country of residence.



	<ul style="list-style-type: none">• Compliance and internal investigations: to comply with global whistleblowing requirements, including under State whistleblower protection laws in the US and Directive (EU) 2019/1937 and its implementing laws in EU Member States.• Health and safety regulations: to comply with health and safety reporting obligations in accordance with applicable local laws, such as in relation to accidents involving members of the public on our premises.• Anti-discrimination laws: to comply with diversity reporting obligations, including the Civil Rights Act of 1964 in the US.
For other legal reasons	<ul style="list-style-type: none">• For dispute resolution purposes;• To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
In connection with a sale or business transaction	We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings). You will be notified of any such business transaction and of possible changes to the processing of your Personal Information in accordance with applicable law and the ' Updates To This Policy ' section.

OTHER INFORMATION WE COLLECT

Korn Ferry collects other information that does not reveal your specific identity ("Other Information"), such as:

- Information collected through cookies, pixel tags, and other technologies, App usage data,
- Demographic information and other information provided by you, and
- Aggregated information.

Because Other Information does not reveal your specific identity, we may use and disclose it for any purpose. If we combine Other Information with Personal Information, we will treat the combined information as Personal Information for as long as it is combined. Where we maintain or use de-identified information, we will continue to maintain and use the de-identified information only in a de-identified fashion and will not attempt to re-identify the information.

If we are required to treat Other Information as Personal Information under applicable law, we may use and disclose it for the purposes for which we use and disclose your Personal Information as detailed in this Policy.

We and our third-party service providers may collect Other Information in a variety of ways.

We use "cookies" (small text files placed on a visitor's computer hard drive) and other similar technologies to help us collect information like the type of content a visitor to the Site consumes, pages visited, mouse clicks, keystrokes, the length of time each visitor spends at any area of the Site, and other traffic data. Cookies and similar technologies enhance your experience on the Site and help us debug, identify, and fix errors that impair the intended functionality and quality of the Site. We do not currently respond to browser do-not-track signals. Please see Korn Ferry's cookie policy for more information about our use of cookies. You can access our cookie tool here:

<https://www.kornferry.com/privacy>.

If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies, or be given the choice of declining or accepting a particular cookie(s) from a particular site. Please refer to <http://www.allaboutcookies.org/manage-cookies> for information on how to manage cookies stored on your computer. If you disable cookies and similar technologies, your experience on the Site may be diminished and some features may not work as intended.



ADDITIONAL GUIDELINES

Korn Ferry may from time to time sponsor special features or promotions related to the Services and additional privacy information may be posted. Depending on the nature of the Service being utilized, your location, or our contract with our client that may have asked you to participate in a Service, you may be asked to consent to the collection, use, transfer, and disclosure of your Personal Information. You may also be shown a privacy notice before participating in a Service. That privacy notice, to the extent it conflicts with this Policy, will govern that particular Service, feature, or promotion.

Where your phone number is used for Texts, please note that message frequency varies. Message and/or data rates may apply; consult your carrier for details. Consent to receive Texts is not required and is neither a condition of purchasing a of Korn Ferry Service nor a condition to receive Services.

CHOICES AND INDIVIDUALS' RIGHTS

Click [here https://cdn.kornferry.com/privacy/DSR.pdf](https://cdn.kornferry.com/privacy/DSR.pdf) for information on how to make a privacy rights request related to your Personal Information. Your provision of Personal Information to us is voluntary, although if you do not provide certain Personal Information, you may not be able to participate in our Services. We will note which Personal Information is required for us to provide the Services at the time of its collection. Contact us at privacy@kornferry.com if you would like to:

- ask questions about how we handle your Personal Information, or if we are processing your personal information,
- withdraw your consent (which will not affect the lawfulness of processing prior to the withdrawal) to our use of your Personal Information, including information about the possibility of denying consent and the consequences of such denial,
- object to our use of your Personal Information for our legitimate business interests,
- not be subject to a decision based solely on automated processing which produces legal effects or review such decisions made solely based on automated processing of Personal Information,
- request a copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law),
- request to access, correct, update, suppress or restrict the use of your Personal Information,
 - For requests to access, correct, update, suppress or restrict the use of your Personal Information, please include all relevant email addresses, as well as the names of any Korn Ferry or Korn Ferry-related Sites, products, or Services you may have accessed in your communication to privacy@kornferry.com.
 - Although we strive to maintain accurate Personal Information, if it is determined the Personal Information is not accurate, we will work to correct it.
- request that your Personal Information be deleted
 - When requesting that we delete your Personal Information, please include all relevant email addresses as well as the names of any Korn Ferry or Korn Ferry-related Sites, products, or Services you may have accessed in your communication to privacy@kornferry.com.
 - Korn Ferry will make reasonable attempts to delete Personal Information upon your request.
 - Please note that to maintain consistency in our Services and operations, we retain backup systems. When you ask that your information be removed from Korn Ferry's databases, we may not be able to delete residual copies from our systems or from our backup systems, but they will continue to be protected as required under this Policy.

If you would like to opt-out of receiving marketing communications from us, please contact us at privacy@kornferry.com.

- If you request to opt-out of receiving marketing communications from us through an email request, please include "Remove User" in the subject line of the email, and include your full name, User ID, and telephone number in the body of the email message.
- You may also forward a copy of the email or marketing communications from which you want to opt-out.
- You may unsubscribe from Texts at any time by replying "Stop" or by contacting us as set out below.
- Please note that if you opt out of receiving marketing-related communications from us, we may still send you important administrative messages from which you cannot opt out.



We will respond to your request(s) consistent with applicable law. We may decline to process requests that in our reasonable opinion may jeopardize the privacy and safety of others or put our intellectual property at risk.

- Please note that when we perform Services at the specific request of our client, your request may need to be directed to that client. We may only be able to provide you with a redacted summary of our final assessment report because these reports contain confidential client personal information that we are not allowed to disclose.
- For your protection, we may only implement requests with respect to the Personal Information associated with the email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will comply with your request as soon as reasonably practical and may need to contact you to be sure that we understand your request.
- We also may need to retain certain Personal Information about you such as your email address to honor opt-out or similar requests.
- Specific additional rights may apply if required by applicable law. For example, please view our additional disclosures directed to residents of the [Mexico](#), [California](#), and the [People's Republic of China](#) (Excluding for the purposes of this statement Hong Kong, Macau, and Taiwan) ("PRC") in this Policy.

When the processing of your personal information is subject to privacy laws of the European Economic Area (EEA), you may also lodge a [complaint or report an alleged](#) infringement of applicable data protection law with a data protection authority for your country or region where you have your habitual residence or place of work, or where an alleged infringement of applicable data protection law has occurred. A list of data protection authorities in the European Economic Area (EEA) is available at <https://ec.europa.eu/newsroom/article29/items/612080>. If the processing of your personal information is subject to the privacy laws of the United Kingdom (UK), you may lodge a complaint with the [UK Information Commissioner's Office \(ICO\)](#). If you are not certain whether the processing of your personal information is subject to EEA or UK privacy laws, please contact us in accordance with the "Contact Us" section below.

JURISDICTION AND CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed where we have facilities (see <https://cdn.kornferry.com/privacy/subsidiariesalliances.pdf>) or where we engage service providers (see <https://cdn.kornferry.com/privacy/subprocessor.pdf>), and by using the Services you understand that your Personal Information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. We can provide a list of destination countries upon written request.

Where our Services will involve transferring your Personal Information outside the UK and/or EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Adequacy Decisions: Some of the non-EEA countries are recognized under the UK GDPR and by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).
- Standard Contractual Clauses: For transfers from the UK and/or EEA to third countries, which are not considered adequate under the UK GDPR and/or by the European Commission, we have put in place controller-to-controller and controller-to-processor standard contractual clauses, adopted under the UK GDPR and/or by the European Commission, to protect your Personal Information. You may obtain a copy of these measures and a list of third countries by contacting the Privacy Office at privacy@kornferry.com or viewing the relevant standard contractual clauses with our clients at <https://www.kornferry.com/privacy/security/scc>. "UK GDPR" has the meaning given to it in section 3(10) (as supplemented by section 205(4)) of the UK Data Protection Act 2018.

SECURITY

Korn Ferry seeks to use reasonable organizational, technical, and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure.

- If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised or your user credentials are no longer secure), please immediately notify us of the problem by contacting us as described in the "Contacting Us" section below.



RETENTION PERIOD

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by law, for example, for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

- The criteria used to determine our retention periods include:
 - The length of time we have an ongoing relationship with you or our client and provide the Services to you (for example, for as long as you have an account with us or keep using the Services),
 - A period beyond the time of the ongoing relationship if we have a legitimate internal operations need, such as a need to retain the information for analysis, record-keeping, and compliance with data retention schedules,
 - If there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period before we can delete them), or
 - If retention is advisable considering our legal position (such as regarding applicable statutes of limitations, litigation or regulatory investigations).

Where a legal obligation arises or retention is advisable in light of our legal position, in some circumstances, we will retain certain Personal Information, even after your account has been deleted and/or we no longer provide the Services to you, for example:

- To cooperate with law enforcement or public, regulatory and government authorities: If we receive a preservation order or search warrant related to your Services account, we will preserve Personal Information subject to such order or warrant after you delete your Services account.
- To comply with legal provisions on tax and accounting: We may retain your Personal Information, such as Billing Information, Relationship History, Transaction Information, Customer Invoices as permitted by applicable laws and Korn Ferry policies after you delete your Services account, as required by tax law and to comply with bookkeeping requirements.
- To pursue or defend a legal action: We may retain relevant Personal Information in the event of a legal claim or complaint, including regulatory investigations or legal proceedings about a claim related to your Personal Information, or if we reasonably believe there is a prospect of litigation (whether in respect of our relationship with you or otherwise) as permitted by applicable laws and Korn Ferry policies after the dispute has been settled or decided by a court or tribunal from which there is no further right of appeal.
- To document security or fraud incidents: We may keep and archive records of incidents for internal purposes and as documentation of steps taken.

In some circumstances and subject to applicable law, we de-identify, aggregate, pseudonymize, and/or use other technical and operational controls to anonymize your Personal Information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

THIRD PARTY SERVICES

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any other third parties, including any third party operating any website or service to which the Services link.

- You may have the opportunity to follow a link from or to other websites maintained by Korn Ferry affiliates, or other third parties. The inclusion of a link to a third party site or service from our Services does not imply our endorsement of the linked site or service by us or by our affiliates. Because these other websites may not be hosted or controlled by Korn Ferry, this Policy does not address the privacy practices of those websites. We encourage you to review the privacy policies of each of those websites.
- Please note that we are not responsible for the information collection, use, disclosure, or security policies or practices (including the data security practices) of other organizations, such as LinkedIn, Facebook, Apple, Google, Microsoft, RIM, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.



SENSITIVE INFORMATION

Unless we request it, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) through the Services or otherwise to us.

UPDATES TO THIS POLICY

Korn Ferry reviews its privacy practices regularly, and those practices are subject to change. You can determine when this Policy was last revised by checking the “Last Updated” legend at the bottom of the Policy. Any changes to the Policy will become effective upon posting of the revised Policy on the Internet.

USE OF SERVICES BY MINORS

The Services are not directed to individuals under the age of sixteen (16), and we do not knowingly collect Personal Information from individuals under 16. We request that these individuals do not provide their Personal Information through the Services.

SUMMARIES OF POLICY

This Policy is the sole authorized statement of Korn Ferry’s practices with respect to the collection of Personal Information through the Services and the usage of Personal Information. Any summaries of this Policy generated by third party software or otherwise (for example, in connection with the “Platform for Privacy Preferences” or “P3P”) have no legal effect, are in no way binding upon Korn Ferry, cannot be relied upon in substitute for this Policy, and neither supersede nor modify this Policy.

CONTACTING US

Korn Ferry (including its subsidiaries as listed here: <https://cdn.kornferry.com/privacy/ControllerEntities.pdf>), located at 1900 Avenue of the Stars, Suite 1500, Los Angeles, CA 90067, is the company responsible for collection, use, and disclosure of your Personal Information under this Policy. To submit questions regarding this Policy or to contact our Data Protection Officer (DPO), use the following contact information: via email to Korn Ferry at privacy@kornferry.com or, if by postal mail to Korn Ferry, 1900 Avenue of the Stars, Suite 1500, Los Angeles, [CA 90067](#), Attn: Privacy Office.

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.

For any inquiries regarding our compliance with EEA privacy laws and the content of this Privacy Policy, Please contact us at PrivacyEEA@kornferry.com.

ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

Pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (collectively the “CCPA”), Korn Ferry is providing the following additional details regarding the categories of Personal Information that we collect, use and disclose about California residents and California residents’ rights. This section supplements the above disclosures in this Policy.

Notice at Collection

The following chart details which categories of Personal Information about California residents we collect, as well as which categories of Personal Information we have collected and disclosed for our operational business purposes in the preceding 12 months. The chart also details the categories of Personal Information that we “sell” (the term “sale” is broadly defined under the CCPA to include an exchange of Personal Information for valuable consideration of any kind, not simply for monetary compensation), including within the preceding 12 months.



Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes	Sold to Which Categories of Third Parties
Identifiers, such as name, contact information, IP address, and other online identifiers	Our affiliated entities; trusted third-party service providers; strategic alliance partners and independent consultants	Clients (in exceptional cases, e.g., market research, recruitment strategy, or succession planning, Korn Ferry may sell name and contact information to our clients)
Personal information, as defined in the California customer records law, such as name, contact information, medical information, insurance information, education information, employment information, and government-issued ID numbers	Our affiliated entities; trusted third-party service providers; strategic alliance partners and independent consultants	Clients (in exceptional cases, e.g., market research, recruitment strategy, or succession planning, Korn Ferry may sell name, contact information, and employment information to our clients)
Protected Class Information, such as age, sex, disability status, primary language, race, citizenship, and marital status, to the extent required or permitted by applicable law	Our affiliated entities; trusted third-party service providers; strategic alliance partners and independent consultants; required government agencies	Clients (in exceptional cases, e.g., market research, recruitment strategy, or succession planning, Korn Ferry may sell age, sex, primary language, and citizenship to our clients)
Commercial information, such as transaction information and purchase history	Our affiliated entities; trusted third-party service providers; strategic alliance partners and independent consultants	None
Internet or network activity information, such as browsing history and interactions with our website	Our affiliated entities; trusted third-party service providers; strategic alliance partners and independent consultants	None
Geolocation data, such as device location and approximate location derived from IP address	Our affiliated entities; trusted third-party service providers; strategic alliance partners and independent consultants	None
Audio, electronic, visual and similar information, such as photographs or audio and video recordings created in connection with our business activities	Our affiliated entities; trusted third-party service providers; strategic	None



	alliance partners and independent consultants	
Professional or employment-related information, such as work history and prior employer, information relating to references, details of qualifications, skills and experience, human resources data, and data necessary for benefits and related administration services	Our affiliated entities; trusted third-party service providers; strategic alliance partners and independent consultants	Clients (in exceptional cases, e.g., market research, recruitment strategy, or succession planning, Korn Ferry may sell professional and employment-related information to our clients)
Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences or abilities	Our affiliated entities; trusted third-party service providers; strategic alliance partners and independent consultants	None
<p>Sensitive Personal Information</p> <ul style="list-style-type: none"> Personal Information that reveals an individual's Social Security, driver's license, state identification card, or passport number; account log-in in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, citizenship, or union membership; the contents of mail, email, and Texts unless we are the intended recipient of the communication; Personal Information collected and analyzed concerning an individual's health; Personal Information collected and analyzed concerning an individual's sex life or sexual orientation 	Our affiliated entities; trusted third-party service providers; strategic alliance partners and independent consultants	None

For information on the sources of these categories of Personal Information, please refer to the "[How we Collect Personal Information](#)" section in this Policy, above. For information on retention periods for Personal Information and Sensitive Personal Information, please refer to the "[Retention Period](#)" section in this Policy, above.

For details on how we use your Personal Information, please refer to the chart under the "Processing of Personal Information" section at the start of this Policy. In addition, we collect, process, and disclose Sensitive Personal Information for purposes of: providing goods or services as requested; ensuring safety, security, and integrity; countering wrongful or unlawful actions; short term transient use such as displaying first party, non-personalized advertising; performing services for our business, including maintaining and servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of our business; activities relating to quality and safety control or product improvement; and other collection and processing that is not for the purpose of inferring characteristics about an individual. We do not use Sensitive Personal Information beyond these purposes.

You have the right to opt out of the "sale" of your Personal Information. For more information on this right and to exercise your right to opt-out of sale, please go to Korn Ferry's California: Do Not Sell My Personal Information page located here: <https://www.kornferry.com/ccpa>.



We do not “share” Personal Information, including Sensitive Personal Information, for purposes of cross-context behavioral advertising, as defined under the CCPA, and we have not engaged in “sharing” in the 12 months preceding the date this Policy was updated. Without limiting the foregoing, we do not knowingly “sell” or “share” Personal Information, including Sensitive Personal Information, of minors under 16 years of age.

If you are a California resident, you may request that we:

- Disclose to you the following information:
 - The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
 - The specific pieces of Personal Information we collected about you;
 - The categories of Personal Information about you that we sold and the categories of third parties to whom we sold such Personal Information;
 - The business or commercial purpose for collecting or selling Personal Information about you; and
 - The categories of Personal Information about you that we otherwise disclosed, and the categories of third parties with whom we disclosed or to whom we disclosed such Personal Information (if applicable).
- Delete Personal Information we collected from you.
- Access Personal Information about yourself.
- Correct inaccurate Personal Information about yourself.
- Opt-out of the future sale of your Personal Information. For more information on this right and to exercise your right to opt-out of sale, please go to Korn Ferry’s California: Do Not Sell My Personal Information page located here: <https://www.kornferry.com/ccpa>.

To make a request for disclosures, deletion, access or correction, as described above, or to opt-out of the future sale of your Personal Information, please submit this [form](https://cdn.kornferry.com/privacy/DSR.pdf) (<https://cdn.kornferry.com/privacy/DSR.pdf>) to Privacy@KornFerry.com or call us at our toll-free number at 1-888-508-CCPA (1-888-508-2272).

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. In most cases, Korn Ferry will verify your identity by confirming that: (1) you control the email address associated with your Personal Information; and (2) your description of your interactions with Korn Ferry matches our records. If necessary, we may require additional information to verify your request.

If an agent would like to make a request on your behalf as permitted under applicable law, the agent may use the submission methods noted above. As part of our verification process, we may request that the agent provide, as applicable, proof concerning his or her status as an authorized agent. In addition, we may require that you verify your identity as described above or confirm that you provided the agent permission to submit the request. You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

ADDITIONAL INFORMATION REGARDING MEXICO

Korn Ferry México, Sociedad Civil (“Korn Ferry Mexico”), located at Prado Sur 274, Floor 4, Col. Lomas de Chapultepec, Zip Code. 11000, Miguel Hidalgo, Mexico City, Mexico, is responsible for the processing of Personal Information that is subject to the Federal Law on Protection of Personal Data Held by Private Parties and its Regulations (collectively, the “Law”). This Mexico addendum supplements this Policy, except that the information in this section replaces the information in the “Choices and Access” section of the Policy. Questions regarding this addendum should be directed to the Korn Ferry Mexico Privacy Office avisoprivacidad@kornferry.com or, if by postal mail, at the Mexico City address above.

Korn Ferry Mexico uses your Personal Information for the purposes outlined above in the “How We Use The Personal Information We Collect” section. All these purposes, except for marketing, are necessary for maintaining your relationship with Korn Ferry Mexico. If you would like to opt-out of receiving marketing communications from us, please email avisoprivacidad@kornferry.com to have your contact information removed from our marketing databases.



Korn Ferry Mexico transfers Personal Information to third parties inside and outside Mexico, as described in the “Who has Access to your Personal Information” section of the Policy. Such transfers do not require your consent, with the exception of a transfer of Personal Information in the case of a merger, consolidation, or sale of assets of Korn Ferry Mexico or of an affiliate. Korn Ferry will transfer your Personal Information in the event of a merger, consolidation, or sale of assets. Your use of the Services means you accept this transfer. If you disagree, please email avisoprivacidad@kornferry.com and inform us of your preference.

ARCO Rights: You may exercise your ARCO Rights by contacting the Korn Ferry Mexico Privacy Office by email at avisoprivacidad@kornferry.com or by telephone at 5096 0000. Your ARCO Rights are:

- Right of Access: You have the right to request to know what Personal Information Korn Ferry Mexico holds about you and the purposes for which it is processed.
- Right of Rectification: You have the right to request the correction of your Personal Information if it is outdated, inaccurate, incorrect, or incomplete.
- Right of Cancellation: You have the right to request the removal of your Personal Information from Korn Ferry’s systems if you believe that it is not being used under the principles, duties and obligations set forth in the Law. If your cancellation request is granted, your ability to use the Services may be limited. Please note that to maintain consistency in our Services and operations, we retain backup systems. When you ask that your information be removed from Korn Ferry’s databases, we may not be able to delete residual copies from our systems or from our backup systems, but they will continue to be protected as required under this notice. We may also need to retain certain Personal Information about you such as your e-mail address to honor opt-out or similar requests.
- Right of Objection: You have the right to object to Korn Ferry’s use of your Personal Information for specific purposes. If your objection request is granted, your ability to use the Services may be limited.

To exercise your ARCO rights, you may:

- send your request via email to avisoprivacidad@kornferry.com with the subject “Exercise of ARCO Rights”; or
- submit a printed request, with your handwritten signature, at the address indicated in this section.

Please specify what right(s) you would like to exercise and include sufficient detail to validate your identity and locate your information in our systems. To that end, please provide in your request:

- your name and a photocopy of your official ID;
- the email address you used to register for Korn Ferry Services;
- your user ID for Korn Ferry Services and products, if applicable;
- your interactions with Korn Ferry, including what Korn Ferry Services you used, and whether you took an assessment or survey, as well as a link to the assessment or surveys, if applicable;
- the names of Korn Ferry consultants or other personnel with whom you worked or corresponded; and
- a clear description of the Personal Information to which your request pertains.

If we require additional information to validate your identity or understand what information you would like to access, rectify, cancel, or object to, Korn Ferry Mexico may ask you to provide it within 5 days after receiving your request. You will have 10 days to respond to our request, starting from the day following the day you receive it. If you do not respond within that period, your request will be deemed not received. We will respond by email within 20 days of receiving your request or the additional information, as applicable. If applicable, we will fulfill your request within 15 days after our response.

Right to Revoke Consent to Processing: You may also revoke your consent where Korn Ferry Mexico’s processing of your Personal Information is based on consent. To do so, send your request via email providing the same information as for ARCO Rights requests, to avisoprivacidad@kornferry.com with the subject “Revocation of Consent,” or submit a printed request, with your handwritten signature, to the address indicated at the beginning of this section, stating your request succinctly and clearly. If you revoke consent, your ability to use the Services may be limited.



We will respond to your request(s) consistent with applicable law. We may decline to process requests that in our reasonable opinion may jeopardize the privacy of others or put our intellectual property at risk. Please also note that when we perform Services at the specific request of a Korn Ferry Mexico client, your request may need to be directed to that client. For example, we may only be able to provide you with a non-confidential summary of our final assessment report because these reports contain confidential client personal information that we are not allowed to disclose.

ADDITIONAL INFORMATION REGARDING CHINA

If there is any inconsistency between the below and the above Policy, the following will prevail in respect of the PRC.

Legal Basis for Processing; Consent

Notwithstanding anything contained in the above Policy to the contrary, we collect and process Personal Information about you in accordance with the legal bases provided for under the applicable laws. We will obtain your consent (where applicable, separate consent) to collect, use, share, overseas transfer, disclose or otherwise process your Personal Information if and to the extent required by the applicable laws. If we collect and process Personal Information based on your consent (where applicable, separate consent), you may withdraw your consent (where applicable, separate consent) at any time by contacting us at privacy@kornferry.com.

Sensitive Personal Information

We generally do not request sensitive Personal Information about you except in limited cases (such as when you voluntarily answer our demographic survey questions). Sensitive Personal Information means Personal Information the leakage or illegal use of which might lead to the infringement of your personal dignity or harm to personal or property safety. We may collect and process the following sensitive Personal Information as defined in the PRC laws:

- racial or ethnic origin, gender identity, religious or other beliefs, political opinions;
- facial photos, to the extent that the photos could reveal your biometric features; and/or
- undisclosed criminal records.

The processing of sensitive Personal Information is necessary to achieve the purposes described in the Policy and will be conducted in a way that would have the least impact on personal rights and interests.

International Data Transfers

For the purposes described in the above Policy and for the provision of the Services worldwide, we may, with your separate consent (if required by applicable laws), transfer your Personal Information to Korn Ferry affiliated entities (the latest list of which is available at <https://cdn.kornferry.com/privacy/subsidiariesalliances.pdf>) and third party vendors outside of mainland China, who will process your Personal Information for the purposes and in the manner as described in this Policy. Korn Ferry will take appropriate measures to ensure that cross-border data transfer and the processing of your Personal Information complies with the requirements of applicable laws and that such mechanisms are aimed at ensuring an adequate level of protection as regards your Personal Information under the applicable laws. If you wish to exercise your rights with respect to your Personal Information, please refer to the “Choice and Access” section of this Policy.