Plante Moran Recruiting Website Privacy Policy

This Privacy Policy is designed to help you understand how Plante Moran ("Plante Moran," "we," "us" or "our"), collects, uses and shares personal information collected through this website. We value your privacy, and we will not share your personal information with third parties except as described in this Policy without your consent.

BY USING THIS SITE, YOU AGREE TO BE BOUND BY THIS POLICY. IF YOU DO NOT AGREE WITH ANY OF THE TERMS OF THE POLICY, PLEASE DO NOT USE THIS WEBSITE OR PROVIDE US WITH YOUR INFORMATION.

What this Policy Covers

This Policy applies to our collection, use and sharing of your personal information (a) when you visit our recruiting portal at careers.plantemoran.com (the "Site"), (b) receive our recruiting communications or participate in our online or offline recruiting activities or events, or (c) that we obtain from third parties such as social media sites.

This Policy applies only to information gathered in connection with employment applications and does not apply to any other information or websites or information collected by us by other means.

Personal Information We Collect

This section of our Policy describes the categories of personal information we collect about you and the different ways in which we collect your personal information.

<u>Information You Give Us.</u> Personal information you may provide through the Site or otherwise communicate to us includes:

- Contact information. We collect information about you when you provide contact information to us via email or through the Site, including through an application. This information may include your first and last name, email address, mailing address, phone number.
- *Correspondence*. We may collect personal information you provide when you request information, respond to surveys, or otherwise correspond with us.
- Social media information. You may (but are not required) to link your LinkedIn profiles into your personal information profile when applying.
- *Employment application information*. We may collect information about previous employment, resumes, educational information, and other records as part of your application process.
- Background check information. With your consent, we may also collect information as part of a background check, including but not limited to: criminal history, sex offender registration, motor vehicle records, consumer reports, employment history, drug testing, and education history. We will only collect such information in accordance with applicable law, and background check information is stored separately on our vendor's site and is not transferred to or stored on our own.
- Other information. We may collect other information from you that is not specifically listed here. We may use such information in accordance with this Policy.

<u>Information We Get from Others</u>. We may obtain additional information about you from third party sources, such as career centers, service providers, vendors, social media sites, and advertising agencies to provide you with more relevant information about our services. This information may include information about your application which enables us to track our return on investment from third party sites such as Indeed.

<u>Information Automatically Collected</u>. Our servers and third party service providers may automatically record cookie information in connection with your use of the Site, which includes information such as your Internet Protocol (IP) address, device and browser type, operating system, DNS, the pages or features of the Site that you browsed and the time spent on those pages or features, the frequency with which you use the Site, the links that you click on or

use, and other statistics. We collect this information in server logs and by using cookies and similar tracking technologies. See our Cookie Policy, below, for more information.

Statistical Analyses. We use tools like Google Analytics to help us gather statistical information about the visitors to our Site and how they use the Site on an anonymous, aggregate basis. We may use this information to gain a better understanding of the users of our Site, to improve our Site, and to improve our services. However, we will not associate this data with your personally identifiable data unless required to do so to cooperate with law enforcement activity or other governmental request or to comply with law. This information is collected via cookies and other identifiers that we and third parties place on our site. See our Cookie Policy, below, for more information.

Sensitive Personal Information. We may collect some sensitive personal information such as social security numbers, information related to racial or ethnic origin, citizenship status, gender, through the Site as part of your application, in accordance with applicable laws. We may also receive additional information from your application or through a background check with your consent, such as criminal history, sex offender registration, motor vehicle records, consumer reports, employment history, and education history, with your consent. If it is optional for you provide this information, it will be marked as optional, or there will be an option which enables you to decline to answer. In collecting this sensitive personal information, we respect individual privacy, protect against unauthorized access to or use of information, and comply fully with all laws and government regulations in the collection, use, storage, display, distribution, and disposal of such information. Authorized uses of sensitive information within our organization are limited to uses which are necessary to: a) meet our legal and regulatory requirements; or b) process your application.

How We Use Your Personal Information

This section of our Policy describes the different purposes for which we may use the personal information we collect about you.

To Improve our Site. We use your cookie information to:

- provide, maintain, and improve the Site;
- better understand your needs and interests, and personalize your experience with the Site; and
- perform website analytics and database management services.

<u>To Send You Communications</u>. We may use your contact information to send you newsletters, promotions, or other communications to keep you engaged with Plante Moran content, but you may opt out of receiving them as described in the Your Choices section below.

<u>To Consider You for Employment</u>. We will use the personal information you provide in connection with your application to consider you for that position.

<u>To Personalize This Site and Our Communications</u>. We may use your cookie information to personalize your Site experience and the communications you receive from us.

For Compliance, Fraud Prevention and Safety. We may use some or all of your personal information as we believe appropriate to: (a) investigate or prevent violation of the law or your agreements with us; (b) protect our, your or others' rights, privacy, safety or property (including by prosecuting and defending legal claims); (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity; (d) comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; and (e) where permitted by law in connection with a legal investigation. For example, we may share information with law enforcement to reduce the risk of fraud or if someone uses or attempts to use our site for illegal reasons.

With Your Consent. In some cases, we may ask for your consent to collect, use, or share your personal information.

How We Share your Personal Information

This section of our Policy describes the categories of personal information we share with third parties and the types of third parties with whom we share that information.

We do not sell your personal information; however, we may share your personal information with third parties for a number of reasons. For example, we may use third parties to help us design and operate the Site, provide services to support the Site, help us analyze our data, or send information on our behalf about Plante Moran content and events in which you may be interested, (such as leadership content, culture campaigns, diversity, equity, and inclusion efforts, and potential referral solicitation opportunities). Unless otherwise indicated at the time we collect your information, if we allow third parties to access the personal information we collect, we will have contractual provisions or other appropriate protections in place to ensure such access is for limited purposes and in compliance with this Policy. Specifically, we share your personal information with the following categories of third parties:

<u>Service Providers and Business Partners</u>. We may share your personal information with third party companies and individuals as needed for them to provide us with services that help us with our business activities and to promote our services to you. This information may include the information that you upload as part of your application.

<u>Compliance</u>, <u>Fraud Prevention and Safety</u>. We may disclose some or all of the personal information we have collected about you as we believe appropriate to government or law enforcement officials or private parties for the purposes described above under the section "For Compliance, Fraud Prevention and Safety."

<u>Business Transfers</u>. We may sell, transfer or otherwise share some or all of our business or assets, including all of the personal information we have collected about you, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy.

Your Choices

This section of our Policy describes your choices with respect to the personal information you provide and the marketing communications you may receive. In addition, some states may grant you additional rights as further described in the "Location-Specific Disclosures" section, below.

Opt Out of Communications. You may opt out of email notifications by changing the communication preferences in your account settings.

<u>Consequences of Not Providing Personal Information</u>. You are not required to provide all personal information identified in this Policy to use our Site or to interact with us offline, but certain functionality will not be available if you do not provide personal information. For example, if you do not provide personal information, we may not be able to process your application.

Cookie Policy

This section of our Policy describes how we and our business partners may collect and store information about you and your use of the Site through cookies and other tracking technologies.

What are Cookies? Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies set by the website are called "first party cookies." Cookies set by parties other than the website are called "third party cookies." Third party cookies enable third party features or functionality, such as website analytics, to be provided on or through the website. The parties that set these third party cookies can recognize your computer or device both when it visits the website in question and also when it visits certain other websites and/or mobile apps.

What Cookies and Other Tracking Technologies do We Use? We and our third party partners use several different kinds of cookies on this Site, including strictly necessary cookies, which are cookies that are necessary for the Site to function and cannot be switched off in our systems; performance cookies, which allow us to count visits and traffic sources so we can measure and improve the performance of our Site; and functional cookies, which enable the Site to provide enhanced functionality and personalization.

Cookies are not the only way to track visitors to a website. We may use similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Sites. These technologies often depend on cookies to function properly, and so disabling cookies may impair their functioning. If you sign up to receive our e-mails, we will also use cookies in conjunction with these emails. When your browser downloads any graphic content in the e-mail, we will also place a cookie on your computer that will tell us if you come to our website at a later date.

<u>Third Party Cookies</u>. In addition to our own cookies, we collaborate with various third party service providers who also use cookies to help us optimize our website, and to understand more about the visitors to our website. For example, we use <u>Google Analytics</u> to provide us with demographic information about our visitors and to help us analyze how people use our website. To learn more about how Google uses cookies, please click the link above or visit its website to view their privacy policies. We also use services such as Paradox, which hosts this recruiting site, and CookieBot to help manage cookies.

Google Services. We use Google Analytics to help us gather statistical information about the visitors to our Site and to market our opportunities. Specifically, we use Google products, such as Google Analytics Advertising Features, which to track what pages site visitors go through related to our careers portal. This information is collected via cookies and other identifiers that we and third parties place on our site. We and our third party partners may use this information to gain a better understanding of the users of our Site, to advertise to you, and to improve our products and services. To understand how Google collects and processes data, including through the use of cookies and other technologies, please visit https://policies.google.com/technologies/partner-sites. To opt out of the Google Analytics, we encourage you to check out Google Analytics' currently available opt-outs for the web.

How Do We Use Cookies? We and our third party partners may use cookies to gain a better understanding of the users of our Site, customize your Site experience, and to improve our Site and services. We may also use cookies to provide you with interest-based advertising, which shows interest-based ads to you on sites across the Internet. To support interest-based advertising, we, and the companies we have contracted with may use anonymous information about your visits to our and other websites and applications. If you have provided us with other personal information as described in this policy, we may associate that personal information with information gathered through cookies and other tracking technology to offer increased personalization and functionality. Third parties who place cookies and other tracking technology on our Site may also connect the information that they collect from these tools to other sources of information. To learn more about the use of cookies, pixels, or other technologies to deliver more relevant advertising, and to better understand how to manage your personal information, including access to and use by certain service providers, please visit https://www.aboutads.info/choices.

How Can You Disable Cookies and Other Tracking Technology? Depending on the type of browser and device that you use, you may have the ability to control the type of information that these tools use. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org and www.youronlinechoices.com.

Other Important Privacy Information

<u>Third Party Sites and Services</u>. The Site may contain links to other websites and services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. We do not control third party websites, applications, or services, and we are not responsible for their actions. Other websites

and services follow different rules regarding their collection, use and sharing of your personal information. We encourage you to read their privacy policies to learn more.

<u>Security</u>. The security of your personal information is important to us. We take a number of organizational, technical, and physical measures that are designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the absolute security of your personal information.

International Data Use and Cross-Border Transfers. We are located in the United States and have affiliates and service providers in other countries, and your personal information may be collected, used and stored in the United States or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country. However, we will handle your personal information in accordance with this Policy regardless of where your personal information is kept. If you reside in non-US jurisdictions, your use of the Site or provision of any personal information constitutes your consent for the transfer of such data to the United States for the purposes identified in this Policy. If you have questions about cross-border transfers, please contact us as detailed at the end of this Policy.

<u>Verifying, Changing, and Deleting Your Information</u>. If you have registered for an account through our Site, you can access, review, and manage many changes yourself via your account, including updating your profile information and changing your communication preferences. If the information you are seeking is not available within your account, you can contact us as detailed below and ask us to change, update or fix your information in certain cases, particularly if it is inaccurate. You can also request that we erase or delete all or some of your personal information or otherwise object to, limit, or restrict the use of such information (if we have no legal right or legitimate business interest in retaining such information).

Children.

The Site is not intended for use by anyone under the age of 16, nor do we knowingly collect or solicit personal information from anyone under the age of 16. If you are under 16, you should not attempt to use the Site or send any information about yourself to us.

Changes to this Policy

We reserve the right to modify this Policy at any time. If we make changes to this Policy, we will post them on the Site and indicate the effective date of the change. If we make material changes to this Policy, we will notify you by email or through the Site.

Notice to California Residents

If you are a California resident, this section applies to you in addition to the rest of this Policy.

<u>Personal Information We Collect</u>. We collect your personal information when you interact with our Site or otherwise communicate with us. In the past 12 months, we have collected the following categories of personal information from consumers and have used that information for the following purposes:

Category of personal information collected	Business purpose of collection	Source(s) of information
Identifiers such as a real name, alias, postal	To consider you for an	
address, unique personal identifier, email address,	1	
account name, social security number, driver's	running a background check	
license number, passport number, or other similar	(with additional consent).	
identifiers, contact information such as a		
telephone number or address		

Characteristics of protected classifications under	To consider you for an	Directly from you when
California or federal law.	employment position, in	you apply for a position.
	accordance with applicable law.	
Commercial information, including records of	To consider you for an	Directly from you when
personal property, products or services purchased,	employment position, in	you apply for a position.
obtained, or considered, or other purchasing or	connection with a background	
consuming histories or tendencies.	check (with additional consent).	
Internet or other electronic network activity	To provide the Site, and improve	Your browser or device.
information, including, but not limited to,	user experience, and facilitate	
browsing history, search history, and information	your application.	
regarding a consumer's interaction with an		
internet website application, or advertisement.		
Professional or employment-related information.	To consider you for an	Directly from you when
	employment position or to send	you apply for a position.
	you communications which we	
	think you may find relevant.	
Education information, defined as information	To consider you for an	Directly from you when
that is not publicly available personally	employment position or to send	you apply for a position.
identifiable information as defined in FERPA	you communications which we	
	think you may find relevant.	
Sensitive personal information and background	To consider you for an	Directly from you when
information such as criminal history, sex offender	employment position, as a	you apply for a position
registration, motor vehicle records, consumer	background check (with	and background check
reports, employment history, drug testing, and	additional consent).	services.
education history.		

We will not collect additional categories of personal information or use or retain the personal information we collected for materially different, unrelated, or incompatible business purposes without providing you notice.

<u>Retaining Your Information</u>. We will only keep your personal information in an accessible form which can identify you for as long as we need to for the purposes for which it was collected. Because retention periods vary depending on the purpose for collection, we use certain categories and criteria to determine how long we keep personal information, as further described below. Where your personal information is used for more than one purpose, we will retain your Information for the longer of those periods.

Type of Personal Information	Retention Period
Personal information processed in connection with your employment application	Unsuccessful applicants - 1 year after the date of notification that application has not been successful, unless: (a) otherwise required by applicable law; (b) you consent to us storing it for longer (for example to consider you for future roles); or (c) there is a dispute or other legitimate reason that requires it to be kept for longer. Hired applicants –Please see our Employee Handbook for details.

Type of Personal Information	Retention Period
Personal information processed for communication purposes	For as long as you have not opted out of our communication. If you ask us to no longer use your personal information for communication purposes, we will need to retain certain of your details in our database to ensure that we do not accidentally send you further material.
Personal information held in our electronic backups	Our electronic backups are retained for 120 days.

When we no longer require your personal information, we will take steps to delete or de-identify it. If the information cannot be permanently deleted or de-identified (for example when it is stored in our electronic backups), we will take appropriate steps to ensure that it is: (a) not used in connection with any decision involving you; (b) not shared with anyone except when we are legally required to do so; (c) kept secure; and (d) permanently deleted once possible.

<u>Sensitive Personal Information</u>. We do not use or disclose sensitive personal information except as necessary to consider your application or to prevent fraud/other permissible uses under 7027(m) of regs.

<u>Personal Information of Children</u>. We have no actual knowledge that we sell or share personal information of consumers under 16 years of age.

Your Rights. California residents have certain rights regarding their personal information:

- Right to Know. You may request no more than twice in a 12-month period that we provide you with copies of specific personal information we have collected, sold, or disclosed about you. However, under California law, we cannot provide you with certain sensitive information, despite your request (for example, we will not send you copies of your social security number even if it is something we collected).
- *Right to Delete*. You may request that we delete certain personal information we have collected about you, with certain exceptions.
- Right to Correct. You may request that we correct inaccurate personal information that we maintain about you.
- *Shine the Light.* Under California's "Shine the Light" law, you have the right to ask us once a year if we have shared your personal information with third parties for direct marketing purposes.

Exercising Your Rights. To exercise your rights above, please submit a request to us <a href="https://here.ncb/

We will not discriminate against you if you choose to exercise your rights.

Responding to Your Rights Request. We will try to respond to your request within 45 days. If we need more time, we will contact you with the reason we need more time and the extension period. We will deliver our written

response by mail or electronically, at your option. In response to your request to know, we will only disclose the information we have collected in the 12 months prior to our receipt of your request. Our response will also explain the reasons we cannot comply with any request, if applicable. We do not charge a fee to process or respond to your request unless your request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate prior to completing your request.

If you have any questions or concerns about our privacy practices or information practices, please contact us as detailed at the end of this Policy.

Notice to Nevada Residents

Nevada law gives Nevada consumers the right to request that a company not sell their personal information for monetary consideration to certain other parties. We do not sell your personal information for monetary consideration; however, this right still applies. If you are a Nevada consumer and wish to exercise this right, please submit your request by contacting us as detailed at the end of this Policy.

How to Contact Us

Plante & Moran, PLLC 3000 Town Center Suite 400 Southfield, MI 48075 Attn: Chief Privacy Officer United States of America

Email: privacy@plantemoran.com

Phone: (888) 404-8880

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