

## Notice at Collection and Privacy Policy for California Job Applicants

### Introduction

FTI Consulting, Inc., and its subsidiaries and affiliated companies (“Company” or “FTI”), take your privacy seriously. We want you to know how we collect, use, and disclose your personal information.

### California Notice at Collection

FTI collects the personal information identified in Section 1 for the purposes identified in Section 3 and retains it for the period described in Section 5. We do not sell your personal information or disclose it for cross-context behavioral advertising (“sharing”). We also do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

### EEO Statement

FTI is an equal employment opportunity employer. FTI does not discriminate against any applicant or employee on the basis of race, color, gender, age, sexual orientation or identity, national origin, ethnicity, religion, marital status, pregnancy, physical or mental disability, veteran status, or any other consideration made unlawful by applicable federal, state, or local laws. FTI also prohibits harassment of applicants and employees based on any protected category, characteristic, or status. FTI makes employment-related decisions based on merit.

For more information about FTI’s EEO policy, click [here](#).

### Assistance for the Disabled

Alternative formats of this Privacy Policy are available to individuals with a disability. Please contact [privacy@fticonsulting.com](mailto:privacy@fticonsulting.com) for assistance.

### This Privacy Policy Explains:

- I. The categories of personal information we collect about you
- II. The categories of sources from which we collect your personal information
- III. The purposes for which we use your personal information
- IV. How we may disclose your personal information
- V. How long we keep your personal information
- VI. Your privacy rights and how to exercise them
- VII. Changes to this Privacy Policy

### Scope:

This Privacy Policy applies to the personal information of California residents in their role as job applicants to FTI (“Applicants”).

“Personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Applicant.

“Personal information” does not include:

- Information publicly available from government records or made publicly available by you or with your permission;
- Deidentified or aggregated information;
- Information excluded from the California Privacy Rights Act’s (“CPRA”) scope, such as:
  - protected health information covered by the Health Insurance Portability and Accountability Act (“HIPAA”) or the Health Information Technology for Economic and Clinical Health Act (“HITECH”) or medical information covered by California Confidentiality of Medical Information Act (“CMIA”); or
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”), or the California Financial Information Privacy Act (“FIPA”).

## I. The Categories of Personal Information We Collect About You

We may collect the following categories of personal information. Not all categories may be collected about every Applicant.

- **Identifiers**, for example: real name, nickname, telephone number, postal address, e-mail address, Social Security number, and signature.
- **Professional or Employment-Related Information**, for example: educational institutions attended, degrees and certifications, licenses, work experience and previous employers, and professional memberships and affiliations.
- **Non-public educational information**, for example: academic transcripts.
- **Commercial Information**, for example: travel expense records for an interview.
- **Internet or Other Electronic Activity Information**, for example: interactions with FTI’s Internet web site, job application, or job advertisement, and publicly available social media activity.
- **Sensory or Surveillance Data**, for example: voice-mails and footage from video surveillance cameras.
- **§ 1798.80**: personal information described under Cal. Civ. Code § 1798.80 to the extent not already included in other categories in this section, such as a photograph or health information, for example, to conduct pre-employment physical examinations.
- **Other details**, for example, hobbies and leisure activities or membership in voluntary/charitable/public organizations, for example, as stated on the Applicant’s resume.
- **Characteristics of Protected Classifications Under California or Federal Law for Applicants**, collected on a purely voluntary basis, except where collection is required by law, and used only in compliance with applicable laws and regulations, for diversity and inclusion reporting and related purposes.

**Note on inferring characteristics:** FTI does not collect or process sensitive personal information or characteristics of protected classifications for the purpose of inferring characteristics about the Applicant.

## II. The Categories of Sources from Which We Collect Your Personal Information

We may collect the following categories of personal information. Not all categories apply to every Applicant.

- **You**, for example, in your job application, forms you fill out for us, assessments you complete, surveys you complete, and any information you provide us during the course of your application and interview process.
- **Vendors and service providers**, for example, recruiters.
- **Third parties**, for example, job references, affiliated companies, professional employer organizations or staffing agencies.
- **Automated technologies** on FTI's electronic resources, for example, to track logins and activity on FTI's careers page.
- **Surveillance/recording technologies installed by FTI**, for example, video surveillance in common areas of FTI facilities, voicemail technologies, webcams, and audio/video recording technologies with consent to the extent required by law
- **Government or administrative agencies**, for example, law enforcement or public health authorities.
- **Acquired company**, if FTI acquired your employer, FTI might collect personal information from that employer.

### III. The Purposes for Which We Use Your Personal Information

We may use the personal information we collect for one or more of the following purposes:

#### A. Generally Applicable Purposes

Unless stated otherwise in section 3.B, below, we may use Applicants' personal information for the following purposes:

##### **Recruiting, including:**

- To evaluate Applicants' qualifications or suitability for employment with FTI
- To communicate with Applicants
- To conduct a pre-employment or criminal history background check
- For identification purposes
- For diversity and inclusion purposes
- To arrange and manage FTI-sponsored events
- To create a talent pool for future job openings
- To demonstrate Applicants' agreement to, or acceptance of, documents presented to them, *e.g.*, pre-employment arbitration agreement, acknowledgment of employment application, offer letter
- To evaluate and improve the recruiting process
- To promote FTI as a place to work

##### **Monitoring, Security, and Compliance, including:**

- To monitor and protect FTI facilities and information systems
- To ensure compliance with applicable laws and FTI policies
- To administer FTI's whistleblower hotline
- To report suspected criminal conduct to law enforcement and cooperate in investigations
- To exercise FTI's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel

##### **Conducting Our Business, including:**

- For training purposes or quality assurance with respect to FTI employees conducting the interviews or otherwise assisting with the recruiting and hiring process

- For travel and event planning
- To engage in crisis management
- To manage travel reimbursements

**Miscellaneous Other Purposes:**

- To manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning
- To manage litigation involving FTI, and other legal disputes and inquiries and to meet legal and regulatory requirements
- To protect the rights, property, or safety of FTI, Applicants, customers or others

**B. Purposes Specific To Certain Categories Of Personal Information**

We may use the categories of Applicants' personal information listed in Section 1 for the purposes stated below:

**Purposes For Using Applicant Health Information:**

- To the extent necessary to comply with FTI's legal obligations, such as to accommodate disabilities
- To protect the health and safety of FTI's employees and facilities, for example, to take the Applicant's temperature
- For occupational health and safety compliance and record-keeping
- To conduct pre-employment medical examinations
- To respond to an Applicant's medical emergency

**Purposes For Using Applicants' Protected Categories Of Information:**

FTI collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act, The Office of Federal Contracting Compliance Programs, and California's Fair Employment and Housing Act, and for purposes of diversity analytics.

FTI also uses this personal information for purposes including: (a) with respect to disability and/or medical condition, as necessary, to comply with federal and California law related to accommodation; and (b) with respect to age, incidentally to the use of birth date for identity verification.

FTI collects protected categories of personal information on a purely voluntary basis, except where required by law, and uses the information only in compliance with applicable laws and regulations.

**C. Deidentified Information**

At times, FTI converts personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual ("Deidentified Information"). FTI maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except that FTI may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual.

## IV. How We May Disclose Your Personal Information

FTI generally maintains personal information related to Applicants as confidential. However, from time to time, FTI may have a legitimate business need to disclose Applicants' personal information. In that event, FTI discloses your personal information listed in Section 1, above, only to the minimum extent necessary to achieve the purpose of the disclosure and only if the disclosure is permitted by the CPRA and other applicable laws.

### A. Disclosures for Business Purposes

FTI may disclose each of the categories of personal information listed in Section 1, above, to the third parties listed below for the following "business purposes" as that term is defined under the CPRA.

- **Service providers:** FTI may disclose to service providers any of the categories of personal information listed in Section 1, above, for the business purpose of performing services on FTI's behalf and, in particular, for the specific purposes described in Section 3, above.
- **Auditors, lawyers, consultants, and accountants engaged by FTI:** FTI may disclose the categories of personal information listed in Section 1, above, to these services providers or contractors for the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on the FTI's behalf.
- **Affiliated companies:** FTI may disclose any of the categories of personal information listed in Section 1, above, to other companies within the FTI family of companies for the business purposes of (a) auditing compliance with policies and applicable laws, (b) helping to ensure security and integrity, (c) debugging, (d) short-term transient use, (e) internal research, and (f) activities to maintain or improve the quality or safety of a service or device.

### B. No Sales or Sharing

FTI does not sell or "share" (disclose for cross-context behavioral advertising) your personal information in connection with the application process. In addition, we have no actual knowledge that we sell or share the personal information of individuals of any age in connection with the application process, including the personal information of children under 16.

### C. Disclosures to Others

FTI may disclose personal information to the following additional categories of third parties although these disclosures may be for purposes in Section 3, above, other than a business or commercial purpose as defined by the CPRA:

- **Your direction:** We may disclose your personal information to third parties at your direction.
- **Clients**
- **Affiliated companies:** Other companies within the FTI family of companies, for example, to evaluate an applicant for a cross-enterprise team.
- **Government or administrative agencies:** These may include, for example, the Equal Employment Opportunity Commission as required for reporting.
- **Required Disclosures:** We may be required to disclose personal information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.  
**Legal Compliance and Protections:** We may disclose personal information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of FTI, Applicants, or others.

## V. How Long We Keep Your Personal Information

If FTI hires you, the information collected about you during the job application process may become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes. FTI will retain this application information for the entire duration of your employment relationship with FTI and for as long thereafter as permitted or required by applicable law. FTI makes its document retention schedule available to employees for review.

FTI will retain information of applicants who are not hired for five (5) years after the record is collected. These records will be retained for our internal recordkeeping and reporting purposes in compliance with California Government Code § 12946. During that time, we may use your information to consider you for positions in addition to the position(s) for which you initially applied.

## VI. Your Privacy Rights and How to Exercise Them

### A. Your California Privacy Rights

Subject to applicable law, Applicants have the following rights:

- **Right to Know:** You have the right to submit a verifiable request up to twice in a 12-month period for specific pieces of your personal information obtained from you and for information about FTI's collection, use, and disclosure of your personal information.

Please note that the CPRA's right to obtain "specific pieces" does not grant a right to the whole of any document that contains personal information, but only to discrete items of personal information. Moreover, Applicants have a right to know categories of sources of personal information and categories of external recipients to which personal information is disclosed, but not the individual sources or recipients.

- **Right to Delete:** You have the right to submit a verifiable request for the deletion of personal information that you have provided to FTI.
- **Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by FTI, taking into account the nature of the personal information and the purposes of processing the personal information.

### B. How to Exercise Your Rights

FTI will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- Call: 833-708-0303 (toll free)
- Email: [privacy@fticonsulting.com](mailto:privacy@fticonsulting.com)

### C. How We Will Verify Your Request

To verify your request, we match personal information that you provide us against personal information we maintain in our files. The more risk entailed by the request (*e.g.*, a request for specific pieces of personal information), the more items of personal information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

#### **D. Authorized Agents**

You may designate an authorized agent to exercise your right to know, to correct, or to delete. If an authorized agent submits a request on your behalf, the authorized agent must submit with the request a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity. You can obtain the “Authorized Agent Designation” form by contacting us at [privacy@fticonsulting.com](mailto:privacy@fticonsulting.com). This provision does not apply if you have provided a power of attorney compliant with the California Probate Code.

#### **E. FTI’s Non-Discrimination and Non-Retaliation Policy**

FTI will not unlawfully discriminate or retaliate against you for exercising your privacy rights under the CPRA.

## **VII. Changes to This Privacy Policy**

If we change this Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal information, we will provide a prominent notice of such changes and the effective date of the changes before making them.

For questions or concerns about FTI’s privacy policies and practices, please contact us at [privacy@fticonsulting.com](mailto:privacy@fticonsulting.com).