

## Privacy Policy for California Residents

This Privacy Policy for California Residents conforms to the California Consumer Privacy Act of 2018 and the California Privacy Rights Act of 2020 (collectively the “**California Privacy Laws**”) and forms part of our Privacy Policy. It applies to the handling of personal information of our consumers who are residents of California (“**consumers**” or “**you**”).

### 1. Information We Collect

We collect information that identifies, relates to, describes, references, and is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“**Personal Information**”). In particular, we will collect and have collected in the last twelve (12) months the following categories of Personal Information from our consumers:

<b>Category</b>	<b>Examples</b>
A. Identifiers.	Name, age, gender, postal address, email address, phone number, date of birth, social security number, driver’s license number, passport number, and other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Name, signature, social security number, address, telephone number, passport number, driver's license number, insurance policy number, education, employment history, bank account number, and any other financial information.
C. Protected classification characteristics under California or federal law.	Age, gender, etc.
D. Professional or employment-related information.	Employment history, date of hire, payment information, etc.
E. Education information.	Education record, etc.

We obtain your Personal Information listed above directly or indirectly from you in our relationship with you, including, but not limited to, (i) from your business card, (ii) from your job application form and interview and during your employment, and (iii) from the information you enter in the contact form on our website.

### 2. Use of Personal Information

We may use the Personal Information for one or more of the following business purposes indicated below:

- For recruitment and employment management, such as executing employment contracts, payroll, salary payment, reimbursement of expenses, insurance, benefits and welfare management, taxes, performance evaluation, and workplace safety management;
- For communicating with business partners and customers in business negotiations, contract negotiations, etc.;
- For carrying out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and fulfillment; and
- For responding to law enforcement requests and as required by applicable law, court order, or governmental regulations.

We will not collect additional categories of Personal Information or use Personal Information we collect for materially different, unrelated, or incompatible purposes without providing you notice thereof.

### **3. Disclosure of Personal Information**

We may disclose your Personal Information to a third party for business purposes or commercial purposes. When we disclose Personal Information to service providers or contractors for business purposes or commercial purposes, we enter into a contract that describes such purposes and requires the service providers or contractors to keep such Personal Information confidential and to not use it for any purpose except for performing the contract.

In the preceding twelve (12) months, we have shared or disclosed the following categories of Personal Information from the above list to the following categories of third parties for business purposes or commercial purposes:

- Service providers including a cloud vendor, a company providing salary payment management service and insurance company; and
- Affiliated companies.

### **4. Sales and Sharing of Personal Information**

We have not sold or shared any Personal Information in the preceding twelve (12) months.

## **5. Your Rights and Choices under the California Privacy Laws**

The California Privacy Laws provides specific rights regarding Personal Information to consumers who are residents of California. This Section 5 describes your rights and explains how to exercise those rights under the California Privacy Laws.

### (1) Right to Access Specific Information

You have the right to request that we disclose certain information to you about our collection, sharing, disclosure, or use of your Personal Information over the past twelve (12) months from the time of your request. Upon receiving and confirming your verifiable consumer request, we will disclose the following information to you:

- The categories of Personal Information we have collected about you;
- The categories of the sources of the Personal Information we have collected about you;
- Our business or commercial purposes for collecting or selling such Personal Information;
- The categories of third parties with which we sell or share that Personal Information;
- The categories of Personal Information sold by each third party that has sold Personal Information;
- The categories of Personal Information disclosed for business purposes or commercial purposes; and
- The specific pieces of Personal Information we have collected about you.

Please note that we have not sold or shared any Personal Information in the preceding twelve (12) months.

### (2) Right to Request Deletion

You have the right to request that we delete any of your Personal Information that we have collected from you and retained, subject to certain exceptions. Upon receiving and confirming your verifiable consumer request, we will delete (and direct our service providers or contractors to delete) your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers or contractors to:

- Complete the transaction for which we collected Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the rights of other consumers to exercise their free speech rights, or exercise other rights provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with legal obligations; or
- Engage in other internal and lawful uses that are compatible with the context in which you provided the information.

### (3) Right to Request Correction of Inaccurate Personal Information

You have the right to request that we correct any of your inaccurate Personal Information that we have collected from you and retained, subject to certain exceptions. Upon receiving and confirming your verifiable request, we will correct (and direct our service providers or contractors to correct) your inaccurate Personal Information from our records, unless an exception applies.

We may deny your correction request if retaining the information is necessary for us or our service providers or contractors to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the rights of other Consumers to exercise their free speech rights, or exercise other rights provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with Consumer expectations based on your relationship with us;
- Comply with legal obligations; or
- Engage in other internal and lawful uses that are compatible with the context in which you provided the information.

#### (4) Opt-Out Rights

We have not sold and shared and will not sell and share any Personal Information collected from consumers.

#### (5) Non-Discrimination

We will not discriminate against California residents for exercising any of their rights under the California Privacy Laws. Moreover, unless permitted by the California Privacy Laws, we will not:

- Deny you goods or services;

- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

#### (6) Exercising Rights under the California Privacy Laws

To exercise your rights under the California Privacy Laws to access, delete or correct your Personal Information as described above, please submit a verifiable consumer request to us by contacting us in the manner set forth in Section 7 (Contact Us).

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify that you are the person whose Personal Information we have collected or an authorized representative thereof (e.g. a copy of your passport, residence certificate, etc.); and
- Describe your request in sufficient detail to allow us to properly understand, evaluate, and respond thereto.

#### **6. Retention Period**

We retain your Personal Information for as long as needed in light of the purposes described in this Privacy Policy. The criteria used to determine our retention period includes, but not limited to: (i) duration of our ongoing relationship with you; (ii) whether there is any legal obligation to which we are subject; and (iii) whether there is a need to perform a contract to which you are party.

#### **7. Contact Us**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Information, or wish to exercise your rights under the California Privacy Laws, please do not hesitate to contact us at:

- Calling us at 800-528-3588; or
- [IAH\\_Privacy\\_Protection@idemitsu.com](mailto:IAH_Privacy_Protection@idemitsu.com)

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