

## ITOCHU EUROPE PLC PRIVACY STATEMENT

ITOCHU Europe Plc respects the privacy and rights of all individuals and takes very seriously its responsibilities under the data protection and privacy laws which apply to our business.

This privacy statement explains how and why we use personal data, and what we do to ensure that your information is kept safe and secure in accordance with the Data Protection Act 2018, the UK GDPR (being the EU General Data Protection Regulation 2016/679 (**EU GDPR**) in the amended form retained in UK law after Brexit), EU GDPR and any other applicable data protection and privacy laws (**Data Protection Laws**).

This privacy statement covers the personal data of corporate representatives, individual suppliers, job applicants, website users, visitors to our offices and other individuals whose personal data we collect and process in connection with our business.

This statement explains:

1. Who we are and how to contact us
2. How we collect and process personal data:
  - A. Business, professional and other contacts
  - B. Recruitment
  - C. CCTV
3. Website visitors
4. Recipients of personal data
5. How long we store personal data for
6. How we keep personal data safe
7. International transfers
8. Your rights as a data subject
9. Updates to this statement

### 1. WHO WE ARE AND HOW TO CONTACT US

We are ITOCHU Europe Plc (the **Company, we, our, or us**), a public limited company with registered number 02098168, having our registered office and main place of business at The Broadgate Tower, 20 Primrose Street, London, EC2A 2EW. You can contact us by writing to us at our office address or telephoning us on +44- 20-7947-8000.

For the purposes of Data Protection Laws, we are a controller in relation to much of the personal data we collect and process. This means that we are responsible for deciding how and why we use personal data, and for keeping it safe. We are registered as a data controller with the Information Commissioner's Office (**ICO**) with registration number Z5842725.

### 2. HOW WE COLLECT AND PROCESS PERSONAL DATA

#### A. BUSINESS, PROFESSIONAL AND OTHER CONTACTS

##### How we collect personal data

We collect and process personal data (meaning information which relates to an identifiable individual) relating to individual business and professional contacts and other people we engage with in the course of our business, such as the employees of our corporate customers. Usually this information is:

- provided by the individuals themselves;
- collected in the process of providing goods and services to our corporate customers (such as through correspondence and exchanging business cards);
- provided to us by third parties (such as other businesses we work with); or
- obtained from external sources.

##### The types of personal data we collect

The types of personal data we hold about these individuals typically consists of some or all of the following:

- contact information (such as name, address, telephone and email address);
- bank details (provided by a supplier and processed when we receive or make a payment).

There may of course be situations where we may process other types of personal data in the course of providing goods and services to our corporate customers, receiving goods and services from our suppliers and promoting our business. If we do, then it will be protected to the same high standards explained in this statement.

### **Why we need to use personal data**

Depending on the circumstances, and the nature of our relationship with the people involved, we may use your personal data to:

- fulfil our contractual obligations or exercise contractual rights (such as paying our suppliers);
- communicate with other organisations, advisers or intermediaries; or
- send business related communications (usually by email);
- in order to comply with our legal obligations; and
- pursue our legitimate interests in operating and promoting the success of our business, or to pursue the interests of our corporate customers in providing our goods and services.

### **Our lawful basis and purposes for processing personal data**

We typically use this personal data because it is in our legitimate interests to provide and promote our services and to build business relationships.

## **B. RECRUITMENT**

### **How we collect personal data**

We collect, store and use personal data about individuals who apply to join us.

### **The types of personal data we collect**

The information we collect about applicants may include information:

- you provide to us (such as in CVs, application forms, and through correspondence);
- you provide during an interview;
- obtained from previous employers and referees;
- provided to us by recruitment agencies; and
- received as a result of our carrying out background checks (such as checks for criminal convictions with the Disclosure and Barring Service).

The information we collect might include sensitive personal data, such as information about your health and sickness records as well as disability information. If we need to process sensitive personal data then we will ask for your explicit consent before doing so.

### **How we use applicant information and our lawful basis**

We use the personal data we collect about you to:

- assess your skills, qualifications, and suitability for a role;
- carry out background and reference checks;
- communicate with you about your application;
- keep records related to our hiring process; and
- comply with legal or regulatory requirements.

We do all of this because either it is a necessary part of entering into a contract of employment with you or because we have a legitimate interest in ensuring that you are suitable for a particular

role.

If you fail to provide personal data when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

If we need to process sensitive personal data about a job applicant, for example disability information in order to consider whether we need to provide appropriate adjustments during the recruitment process, we will ask for explicit consent to do this at the time at which we request the personal data or ensure that we satisfy another condition under Data Protection Laws for lawfully processing such personal data.

### **Retention of applicant information**

We normally retain personal data about unsuccessful candidates for no more than 6 months from the time we inform them of our hiring decision. We retain personal data for this period so that we can demonstrate, in the event of a legal claim, we have not discriminated against an applicant and that the recruitment process was fair and transparent. After this period, we will securely destroy the applicant's personal data. If we wish to retain personal data on file, in case future opportunities arise, we will contact the applicant and ask for his or her consent to do so.

If you are successful, the personal data you provided in the application process will be stored as part of your personnel file.

### **C. CCTV**

We operate a CCTV Security System on our premises for security purposes, to detect and prevent crime and protect the safety of our workers and visitors. We do not use it for any other purpose.

This means that we collect and store (for a limited period) images of visitors to our premises using our CCTV system and may have to use them in the event of a security incident. If you have any questions, please ask us.

## **3. COOKIES AND WEBSITE VISITORS**

We do not normally collect personal data about visitors to our website unless they choose to provide such information when they contact us.

We collect anonymous information about visitors to our website in order to optimise and improve the website. This might include IP addresses, browser or device details and the connection type (for example, the Internet service provider used). However, none of this information will by itself directly identify any particular user.

### **Cookies**

Web browsers place cookies on hard drives for record-keeping purposes and sometimes to track information (such as repeat visits). Our website uses Google Analytics cookies to enable us to measure how users interact with our website. Further information on the cookies and how they work can be found here:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

You can prevent these cookies by installing the Google Analytics opt-out browser extension by visiting <https://support.google.com/analytics/answer/181881?hl=en> or by adjusting your browser settings.

### **Hyperlinks to other sites**

Our website may include links to third-party websites or to other software applications or plug-ins. We are not responsible for the content or functionality of any of those external websites. If an external website requests personal information from you, the information you provide will not be covered by this statement. We suggest you read the privacy policy of any website before providing any personal information.

#### **4. RECIPIENTS OF PERSONAL DATA**

Personal data you provide to us will be kept private and confidential, and we will only disclose or share it with other data controllers where this is required:

- in connection with our business of providing goods and services and where it is in the legitimate interests of ourselves or related third parties to do so. For example, we may share your contact details with other professional advisors and parties to an actual or potential transaction that you and we are jointly involved in;
- by law, such as where we are required to comply with a court order or to share personal information with regulatory authorities (including the Information Commissioner's Office) in the event of an audit or investigation;
- where we have satisfied ourselves that we have another lawful basis for sharing your personal data; or
- in connection with a business reorganisation, merger, acquisition or other corporate transaction, in order to allow the parties to evaluate the transaction and to ensure that our clients continue to receive our goods and services without interruption.

We share your personal data with some of the third parties who provide services to our firm. This includes software and cloud service providers and IT support services. However, these third parties will only process personal data (which may include your information) on our behalf for specified purposes and in accordance with our strict instructions.

We only use third party service providers who have provided sufficient guarantees, as required by Data Protection Laws, that your personal data will be kept safe. We always ensure there is a written contract in place which protects your personal data and prevents it from being used for any purpose other than providing services to our business, in accordance with Data Protection Laws.

We may also share your personal data within the ITOCHU group of companies where this is necessary for the purposes for which it was obtained and in accordance with the safeguards explained in section 7 (International Transfers).

#### **5. HOW LONG WE STORE PERSONAL DATA FOR**

We only retain personal data for as long as is necessary for the specific purpose(s) it was collected for (or for related compatible purposes such as complying with applicable legal, accounting, or record-keeping requirements).

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from its unauthorised use or disclosure, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### **6. HOW WE KEEP PERSONAL DATA SAFE**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, damaged or destroyed, altered or disclosed. This includes both physical security measures (such as keeping paper files in secure, access-controlled premises, monitoring access control via the use of CCTV, and adhering to strict password policies) and electronic security technology (such as device encryption, digital back-ups and sophisticated anti-virus protection).

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to legal and contractual confidentiality obligations.

We have put in place reporting procedures to deal with any suspected personal data breach and will notify you and any applicable supervisory authority of a breach when we are legally required to do so.

#### **7. INTERNATIONAL TRANSFERS**

We normally only store personal data within the UK or European Economic Area (EEA). However, some of the technology and support services we use are provided by international

organisations and/or companies which are based in other countries. We may also share your personal data within the ITOCHU group of companies, which will involve transferring it to Japan and other countries outside the UK or EEA.

Before using such service providers or making such transfers to ITOCHU group companies outside the UK or EEA, we take steps to make sure that any personal data they process is adequately protected and transferred in accordance with Data Protection Laws, usually by one or more of the following methods:

- ensuring the recipient is in a country which has been approved in accordance with Data Protection Laws as providing adequate protection for personal data;
- implementing appropriate safeguards such as requiring the recipient to enter into Standard Contractual Clauses approved in accordance with Data Protection Laws; or
- Data Protection Laws otherwise permit use to make the transfer.

If you would like more detailed information on the measures and safeguards which we implement for such data transfers, then please contact us using the details set out in section 1 above.

## 8. YOUR RIGHTS AS A DATA SUBJECT

Data Protection Laws provide you with certain rights in relation to your personal data. These are as follows:

- **The right to access your personal data.** This gives you the right to receive a copy of the personal data we hold about you, subject to certain exemptions.
- **The right to request rectification of your personal data.** This gives you the right to have any incomplete or inaccurate personal data we hold about you corrected.
- **The right to request erasure of your personal data.** This allows you to ask us to delete or remove personal data. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below). In certain circumstances this right may not apply, such as where we have a good, lawful reason to continue using the information in question, and if so we shall inform you of such reasons at the relevant time.
- **The right to object to processing of your personal data.** You can object to us processing your personal data for legitimate interests' purposes. We must then stop processing your data unless we have a strong reason to continue which overrides your objection. If your objection is to direct marketing, we must always stop.
- **The right to restrict how your personal data is used.** You can limit how we use your personal data in certain circumstances. Where this applies, any processing of your personal data (other than storing it) will only be lawful with your consent or where required for legal claims, protecting certain rights or important public interest reasons.
- **The right to have a portable copy or transfer your personal data.** You can ask us to provide you, or (where technically feasible) a third party, with a copy of your personal data in a structured, commonly used, machine-readable format. Note this only applies to personal data which we obtain from you and, using automated means, process on the basis of your consent (which in practice will be rare) or in order to perform a contract with you.
- **The right to withdraw consent.** If we are relying on consent to process your personal data you have the right to withdraw that consent at any time.

Further information on the circumstances in which you may exercise the above rights, and the exemptions to them, can be found on the ICO website (see <https://ico.org.uk/your-data-matters/>).

### Responding

We try to respond to all personal data requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. Please also bear in mind that there are exceptions to the rights above and some situations where they do not apply.

We may need to request additional information from you to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to

receive it. We may also contact you to ask you to clarify your request.

### **Fees for making a request**

You will not normally have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **How to make a request**

If you want to exercise any of the rights described above, please write to Data Protection Requests, ITOCHU Europe Limited, The Broadgate Tower, 20 Primrose Street, London, EC2A 2EW.

### **Your right to complain to a supervisory authority**

You have the right to complain to the Information Commissioner's Office if you are not satisfied with our response to a data protection request or if you think your personal data has been mishandled. For further information on how to make a complaint, please visit <https://ico.org.uk>.

## **9. UPDATES TO THIS STATEMENT**

We will update this statement from time to time. The current version will always be posted on our website. This statement was last updated on 1<sup>st</sup> April 2023.