



## DATA PRIVACY NOTICE

We, ITOCHU Corporation and ITOCHU International Inc., have adopted this Data Privacy Notice to inform you of our privacy practices.

**Information We Collect.** We collect personal information of employees, job applicants, independent contractors, and their respective emergency contacts and dependents, including:

- **Identifiers** such as name, address, telephone number, unique personal numbers (such as social security, insurance policy, bank account, credit card, and driver's license numbers), passport data, signature, or other similar identifiers;
- **Professional and employment-related information** such as employment history, job performance evaluations, salary and other compensation information, benefits and allowances, tenure, hours worked, terms of employment, records of any disciplinary proceedings or investigations, job responsibilities, background check information, business and travel expenses, and documentation relating to immigration status;
- **Education information** such as transcripts, certifications, skills and proficiencies, and trainings attended;
- **Demographics** such as age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, reproductive health, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, and genetic information (including familial genetic information);
- **Audio recordings** of calls made or received using ITOCHU-provided communications equipment;
- **Video recordings** of access to facilities; and
- **Internet or other similar network activity** associated with use of ITOCHU-provided equipment, networks, or other resources, including but not limited to incoming and outgoing electronic communications, browsing history, search history, interactions with websites or applications, login credentials, electronic records and files, IP addresses and other information associated with network activities, and logs of application access and use. We also may collect information via cookies placed on ITOCHU websites with which you interact.

**Use and Disclosure of Personal Information.** We may use or disclose your personal information to fulfill the purposes for which it was collected, such as:

- **Workforce Management:** Managing work activities and personnel, including recruitment, appraisals, performance management, promotions and succession planning, rehiring, administering salary, and compensation administration and reviews, wages, bonuses, and other awards, equity plan (such as stock options, stock grants, and employee stock purchase plan) participation and administration, processing accounts payable and receivable for employees healthcare benefits, pensions and savings plans, training, leave, managing disability and sickness leave, promotions, transfers, secondments, pension plans, honoring other contractual benefits, providing employment references, loans, performing workforce analysis and planning, performing employee surveys, performing background checks, managing disciplinary matters, grievances and terminations, reviewing employment decisions, making business travel arrangements, managing business expenses and reimbursements, planning and monitoring of training requirements and career



development activities and skills, and creating and maintaining one or more internal employee directories.

- **Workforce Analytics:** We use workforce analytics for succession planning, workforce management, and data security. For instance, we use workforce analytics to assist in succession planning, to ensure business continuity, to design employee retention programs and diversity initiatives, to offer training opportunities and to identify patterns in the use of technology systems and to information entrusted to us, and to protect our associates and property.
- **Communications and Emergencies:** Facilitating communication with you, ensuring business continuity, managing company-owned property (e.g., laptops and mobile phones), providing references, protecting the health and safety of associates and others, safeguarding IT infrastructure, office equipment and other property, and facilitating communication with you and your nominated contacts in an emergency.
- **Business Operations:** Operating and managing the IT and communications systems (including email collection, storage and review), managing product and service development, improving products and services, managing company assets, allocating company assets and human resources, strategic planning, project management, business continuity, compiling audit trails and other reporting tools, maintaining records relating to business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, sales, re-organizations or disposals and integrating with purchasers.
- **Compliance:** Complying with legal and other requirements, such as income tax deductions, record-keeping and reporting obligations, conducting audits, complying with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, defending litigation and managing internal complaints or claims, conducting investigations, including employee reporting of allegations of wrongdoing, policy violations, fraud, and financial reporting concerns, and complying with internal policies and procedures.
- **Monitoring Use of Technology:** We collect information about the use of our information assets and resources, including internet access, electronic communications, and application usage. We collect this information to assess compliance with applicable laws and policies, to protect our resources against unauthorized access, and to prevent crime and fraud.

**Questions.** If you have any questions or comments about this Data Privacy Notice, the ways in which we collect and use your personal information, or your choices and rights regarding such use, contact your Human Resources representative, your Compliance Officer or the Legal & Compliance Division at [compliance@itochu.com](mailto:compliance@itochu.com). You may also access our Compliance Hotline at 844-269-9218 or [itochuinternational.ethicspoint.com](http://itochuinternational.ethicspoint.com).