

CALIFORNIA APPLICANT PRIVACY POLICY

Mitsui & Co. (U.S.A.) and its affiliates (collectively, “**Company**,” “**we**,” or “**us**”) value the trust of our applicants and endeavor to protect the privacy of their personal information. The purpose of this California Applicant Privacy Policy (the “**Policy**”) is to notify California residents (“**you**”) of the processing of information that can reasonably be linked with them and that we collect, use, retain and disclose when they apply for a job with us (“**Personal Information**”).

NOTICE AT COLLECTION

Collection and Disclosure of Personal Information

The following chart details which categories of Personal Information we collect and process, as well as which categories of Personal Information we disclose to third parties for our operational business and hiring and recruitment purposes, including within the 12 months preceding the date this Policy was last updated.

Categories of Personal Information	Disclosed to Which Categories of Recipients for Operational Business Purposes
Identifiers , such as name, alias, postal address, unique personal identifiers, IP address that can reasonably be linked or associated with a particular California resident or household, email address, account name, online identifiers, and government-issued identifiers (e.g., Social Security number, driver’s license number)	Our affiliates; service providers and contractors that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners
Personal information as defined in the California customer records law , such as name, contact information, signature; social security number, passport number; financial, education and employment information, physical characteristics or description	Our affiliates; service providers and contractors that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners
Protected Class Information , such as characteristics of protected classifications under California or federal law, such as sex, age, gender, race, disability, medical conditions, citizenship, military/veteran status, gender identity and expression, primary language, political affiliation/activities, and immigration status	Our affiliates; service providers and contractors that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners

Categories of Personal Information	Disclosed to Which Categories of Recipients for Operational Business Purposes
Commercial Information , such as travel expenses	Our affiliates; service providers and contractors that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners
Internet or network activity information , such as regarding our website or online application portal, timestamp information, and access and activity logs	Our affiliates; service providers and contractors that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners
Geolocation Data , such as device location, approximate location derived from IP address	Our affiliates; service providers and contractors that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners
Audio/Video Data . Audio, electronic, visual and similar information, such as photographs and call and video recordings	Our affiliates; service providers and contractors that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners
Education Information subject to the federal Family Educational Rights and Privacy Act such as student transcripts, grade point average, grades, academic standing, disciplinary records, and confirmation of graduation	Our affiliates; service providers and contractors that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners
Employment Information . Professional or employment-related information, such as work history and prior employer, information from reference checks, work experience, qualifications, training and skills, work	Our affiliates; service providers and contractors that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and

Categories of Personal Information	Disclosed to Which Categories of Recipients for Operational Business Purposes
authorization, CV, résumé, cover letter, professional and other work-related licenses, permits and certifications held, and publicly accessible information posted on your professional social media accounts	governmental authorities, such as regulatory authorities and law enforcement; business partners
Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences, characteristics, predispositions, and abilities	Our affiliates; service providers and contractors that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners
Sensitive Personal Information. Personal Information that reveals an individual's Social Security, driver's license, state identification card, or passport number; account log-in; racial or ethnic origin, religious or philosophical beliefs, citizenship, immigration status, or union membership	Our affiliates; service providers and contractors that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement; business partners

We may also disclose the above categories of Personal Information to a third party in the context of any reorganization, financing transaction, merger, sale, joint venture, partnership, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

We do not “sell” or “share” your Personal Information, including your Sensitive Personal Information, as defined under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (collectively, the “CCPA”). We have not engaged in such activities in the 12 months preceding the date this Policy was last updated. Without limiting the foregoing, we do not “sell” or “share” the Personal Information, including the Sensitive Personal Information, of minors under 16 years of age.

Purposes for the Collection, Use and Disclosure of Personal Information

We collect, use and disclose Personal Information for the purposes of operating, managing, and maintaining our business, sourcing talent and recruiting employees, and accomplishing our business purposes and objectives, including, for example, using Personal Information to:

- Receive and process job applications;
- Manage the candidate selection process;
- Evaluate your suitability for the position(s) you are applying for;
- Communicate with you about your application, respond to your inquiries, and notify you of applicable terms and policies;

- Conduct reference checks;
- Conduct background checks, consistent with applicable law;
- Disclose Personal Information to our service providers to enable them to provide services to us such as information technology and related infrastructure provision, email delivery, auditing, and other services;
- Subject to our discretion, make an offer to enter into an employment relationship or contract;
- Contact you about future career opportunities;
- Fulfill administrative functions, such as aggregate management reporting, statistical analyses, internal training, and as generally required to conduct our business; and
- Comply with law, legal process, requests from governmental or regulatory authorities, internal policies and other requirements such as record-keeping, equal employment opportunity laws, work permit and immigration regulations, reporting obligations, and the exercise or defense of legal claims.

Purposes for the Collection, Use and Disclosure of Sensitive Personal Information

We collect, use and disclose Sensitive Personal Information for purposes of: performing services on behalf of our business; performing services and providing goods as requested by you; ensuring the quality or safety of services we control or improving those services; ensuring the security and integrity of our infrastructure and the individuals with whom we interact; receiving and processing your job application; evaluating your suitability for the position(s) you are applying for; making you an offer (subject to our discretion); short-term transient use; securing the access to, and use of, our facilities, equipment, systems, networks, applications, and infrastructure; preventing, detecting, and investigating security incidents; resisting and responding to fraud or illegal activities; and other collection and processing that is not for the purpose of inferring characteristics about an individual. We do not use or disclose Sensitive Personal Information for additional purposes.

Retention Period

We retain each category of Personal Information including, without limitation, Sensitive Personal Information for as long as needed or permitted in light of the purpose(s) for which it was collected. The criteria used to determine our retention periods include:

- The duration of the job application process;
- Whether your job application is successful and you become an employee;
- Whether, if your application is not successful, you would like to be notified of future job opportunities with us or our affiliates;
- The length of time we have an ongoing relationship with you and the length of time thereafter during which we may have a legitimate need to reference your Personal Information to address issues that may arise;
- Whether there is a legal obligation to which we are subject (for example, certain laws may require us to keep your application records for a certain period of time); and
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Sources of Personal Information

We collect this Personal Information from you and from our affiliates, references you provide, prior employers or schools, recruiting and consulting firms, background check providers, social media networks, publicly available databases, and cooperative databases.

Individual Rights and Requests

You may, subject to applicable law, make the following requests:

1. You may request that we disclose to you the following information:
 - a. The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
 - b. The business or commercial purpose for collecting Personal Information about you;
 - c. The categories of Personal Information about you that we disclosed for a business purpose and the categories of service providers or contractors to whom we disclosed such Personal Information; and
 - d. The categories of third parties to whom we disclosed Personal Information about you (if applicable).
2. You may request to correct inaccuracies in your Personal Information.
3. You may request to have your Personal Information deleted.
4. You may request to receive a copy of your Personal Information, including specific pieces of Personal Information, including a copy of the Personal Information you provided to us in a portable format.

We will not unlawfully retaliate against you for exercising your privacy rights under the CCPA. To make a request, please contact us at [CCPA Web-form](#) or 1-888-648-5990. We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may need to request additional Personal Information from you, such as government issued ID (driver's license, passport, etc.) in order to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your Personal Information. If you make a request to delete, we may ask you to confirm your request before we delete your Personal Information.

Authorized Agents

If an agent would like to make a request on your behalf as permitted by applicable law, the agent may use the submission methods noted in the section entitled "Individual Rights and Requests." As part of our verification process, we may request that the agent provide, as applicable, proof concerning their status as an authorized agent. In addition, we may require that you verify your identity as described in the section entitled "Individual Rights and Requests" or confirm that you provided the agent permission to submit the request.

Diversity

In certain cases we will ask questions about race/ethnic origin, gender, and disability of our job applicants, for monitoring equal opportunity. We may also inquire about criminal records, where permitted by applicable law. Otherwise, we ask that you avoid submitting information that may qualify as sensitive information under applicable law, except where such information is legally required. We are an equal opportunity employer, which means we offer equal treatment to all job applicants consistent with applicable law. We do not unlawfully discriminate, either directly or indirectly, based on characteristics protected by applicable law, such as: race, ethnicity, sex, gender identity, sexual orientation, nationality, national origin, ethnic origin, religion, beliefs or creed, age, disability, marital status, veteran status or genetic information in any area of recruitment.

Applicant Obligations

Any information you submit to us must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your job application during the application process or disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights. If you provide us with Personal Information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

Changes to this California Applicant Privacy Policy

We may change or update this Policy from time to time. When we do, we will communicate changes and updates to this Policy by posting the updated Policy on this page with a new "Last Updated" date.

Accessibility

This Policy is intended to be accessible to consumers with disabilities. If you experience difficulty accessing this Policy, please contact Mitsui Human Resources/NYCAJ at K.Bateman@mitsui.com so that we may provide access to the Policy in an alternative format.

Contact Us

Please contact Mitsui Human Resources/NYCAJ at K.Bateman@mitsui.com if you have any questions regarding this Policy.