

# **Privacy Policy for California Residents**

This Privacy Policy for California Residents conforms to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (the “CCPA”) and forms part of our Privacy Policy. It applies to the processing of personal information of our consumers who are residents of California (“consumers” or “you”).

## **1. Information We Collect**

SCSK Corporation (“we”, “our” or “us”) 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.	Real name, postal address, email address, passport number, date of birth, and other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Name, address, telephone number, and passport number.
C. Characteristics of protected classifications under California or federal law.	Gender and marital status.
D. Geolocation data	GPS (Global Positioning System) data.
E. Professional and employment-related information.	Employment history.
F. Education information.	Educational background and graduation date.
G. Sensitive personal information	Passport number.

We obtain the categories of Personal Information listed above directly from you in our employment relationship with you.

## **2. Use of Personal Information**

We may use the Personal Information to carry out various procedures associated with your overseas assignment, including, but not limited to, overseas insurance subscription, overseas relocation and other operations, and overseas safety management.

We will not collect additional categories of Personal Information or use the 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 the same for any purpose except for performing the contract.

In the preceding twelve (12) months, we have disclosed the categories of Personal Information listed above to our group companies for business or commercial purposes.

#### **4. Sale or Sharing of Personal Information**

We have not sold or shared any Personal Information in the preceding twelve (12) months that we have collected from you. In this Policy, the term “sale” means disclosing, etc. your Personal Information to a third party for monetary or other valuable consideration, and the term “sharing” means disclosing your Personal Information to a third party for cross-text behavioral advertisements, regardless of monetary or other valuable consideration.

#### **5. Your Rights and Choices under Applicable Law**

The CCPA provide specific rights regarding Personal Information to consumers who are residents of California. The following parts of this Section describe your rights and explain how to exercise those rights under the CCPA.

##### **(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.

Once we receive and confirm your verifiable consumer request, we will disclose to you any or all of the following information:

- The categories of the 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 purpose for collecting, selling or sharing such Personal Information;
- The categories of third parties to whom we disclosed such Personal Information;
- The categories of Personal Information we sold or shared and the categories of third parties to whom we sold or shared each category of Personal Information;
- The categories of Personal Information we disclosed for business purposes and the categories of third parties to whom we disclosed each category of Personal Information; and
- The specific pieces of Personal Information we have collected about you.

##### **(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 notify our service providers or contractors and third parties to whom we have sold or shared such Personal Information to delete) your Personal Information from our records, unless an exception applies.

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

- Complete a transaction for which we collected the Personal Information, to fulfill the terms of a warranty or product recall made pursuant to federal law, to provide products or services requested by you, to take steps reasonably foreseeable to you within the context of an ongoing business relationship between you and us, or to otherwise perform a contract between you and us;
- Help ensure the security and integrity of consumers' Personal Information to the extent that its use is reasonably necessary and proportionate to its purpose;
- 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 that conforms or adheres to all other applicable ethics and privacy laws, when the deletion of the information may likely render impossible or seriously impair the ability to complete the research, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which the consumer provided the information; or
- Comply with legal obligations.

### (3) Right to Request Correction

If we hold inaccurate Personal Information about you, you have the right to correct such inaccurate Personal Information, taking into account the nature of the Personal Information and the purposes for which the Personal Information is processed. Upon receipt and confirmation of a verifiable request by you, we will use commercially reasonable efforts to correct the inaccurate Personal Information indicated by you in accordance with the laws and regulations.

### (4) Right to Opt-Out of Sale or Sharing

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

### (5) Right to Limit Use and Disclosure of Sensitive Personal Information

We have not used or disclosed any sensitive Personal Information in the preceding twelve (12)

months for any purposes other than those listed below:

- Performing the services reasonably expected by an average consumer who requests such services;
- Helping to ensure security and integrity;
- Conducting short-term temporary use (except those involving profiling or changes in future consumer experience);
- Providing services on our behalf; or
- Maintaining or improving the quality and safety of our services, software and devices.

#### (6) Right to Non-Discrimination

We will not discriminate against California residents for exercising any of their rights under the CCPA. Moreover, unless permitted by the CCPA, 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 with a different level or quality of goods or services;
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services; or
- Retaliate against an employee, applicant for employment, or independent contractor.

#### (7) Exercising Rights under the CCPA

To exercise your rights under the CCPA 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 8 (Contact Us).

Only you, a natural person or a person registered with the California Secretary of State that you authorize to act on your behalf, or a person who has power of attorney or is acting as your conservator, 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. name, email address, company name etc.); and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond thereto.

## **6. Retention Period**

We retain your Personal Information to the extent necessary for the purposes described in this Policy. The criteria used to determine our retention period include, but are not limited to: (i) the duration of the contractual 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 a party.

## **7. Review**

We will review and improve the contents of the above items regarding the handling of your Personal Information as appropriate. When changes are made to this Policy, an update notice will be posted on the website and will be effective as of the date posted.

## **8. Contact Us**

If you have any questions or comments about this Policy or the ways in which we collect and use your Personal Information, or you wish to exercise your rights under the CCPA, please do not hesitate to contact us at:[[Inquiry Form](#)]

Privacy Policy Last Updated and Effective: Dec.25, 2024