

How personal data is processed in California, USA

Enacted: December 1, 2025

Except as otherwise indicated, this privacy policy (hereinafter referred to as "this Policy") governs the processing of personal data in California, USA.

This Policy is written in English and translated into other languages. In case of discrepancies or inconsistencies between the English and other languages, the English version shall prevail.

2. Types of Personal Data Processed

In accordance with Chapter 2, "Types of Personal Data Processed," of the MOL Group Global Privacy Policy, our group has collected the following categories of personal data from you over the past 12 months:

(1) Personal data of customers and business partners

Category of personal data	Detailed personal data items	Purpose of collection and processing of personal data
Identifiers	Name, contact information, online identifiers (cookies, IP addresses, etc.), individual numbers and identification cards issued by the government	<ul style="list-style-type: none">• Conclusion and performance of contracts with our group and other transaction management• Communication and information exchange with our group and notices and greetings based on social customs• Providing information and guidance on our group's products and services• Confirming your eligibility to use our group's products and services and verifying your identity• Compliance with legal obligations• Research, analysis, research, and auditing for marketing activities related to our group's business• Generation of statistical information and processing and analysis of personal data

		<p>for our group's use</p> <ul style="list-style-type: none"> • Responding to inquiries and comments • Response and communication in case of emergency • Performing transactions with our group appropriately and smoothly
Any personal information described in California Civil Code 1798.80 (e)	<p>Name, contact information, workplace and job information, individual numbers and identification cards issued by the government, and bank account information</p> <p>*Personal data in this category partially overlaps with those in the other categories.</p>	<ul style="list-style-type: none"> • Conclusion and performance of contracts with our group and other transaction management • Communication and information exchange with our group and notices and greetings based on social customs • Providing information and guidance on our group's products and services • Confirming your eligibility to use our group's products and services and verifying your identity • Compliance with legal obligations • Responding to inquiries and comments • Response and communication in case of emergency • Performing transactions with our group appropriately and smoothly
Characteristics of protected classifications under California or federal law	<p>Gender, date of birth, etc.</p> <p>*Personal data in this category partially overlaps with those in the other categories.</p>	<ul style="list-style-type: none"> • Conclusion and performance of contracts with our group and other transaction management • Confirming your eligibility to use our group's products and services and verifying your identity • Compliance with legal obligations • Research, analysis, research, and auditing for marketing activities related to our group's business • Generation of statistical information and processing and analysis of personal data for our group's use

Commercial information	Information such as usage history of products and services provided by our group	<ul style="list-style-type: none"> • Conclusion and performance of contracts with our group and other transaction management • Providing information and guidance on our group's products and services • Research, analysis, research, and auditing for marketing activities related to our group's business • Generation of statistical information and processing and analysis of personal data for our group's use • Responding to inquiries and comments • Response and communication in case of emergency • Performing transactions with our group appropriately and smoothly
Biometric information	Biometric information, face photo, etc.	<ul style="list-style-type: none"> • Conclusion and performance of contracts with our group and other transaction management • Confirming your eligibility to use our group's products and services and verifying your identity • Performing transactions with our group appropriately and smoothly
Internet or other electronic network activity information	Online identifiers (cookies, etc.), etc. *Personal data in this category partially overlaps with those in the other categories.	<ul style="list-style-type: none"> • Providing information and guidance on our group's products and services • Research, analysis, research, and auditing for marketing activities related to our group's business • Generation of statistical information and processing and analysis of personal data for our group's use • Performing transactions with our group appropriately and smoothly
Audio, electronic, visual, thermal,	Face photo, etc. *Personal data in this	<ul style="list-style-type: none"> • Conclusion and performance of contracts with our group and other transaction

olfactory, or similar information	category partially overlaps with those in the other categories.	<p>management</p> <ul style="list-style-type: none"> • Confirming your eligibility to use our group's products and services and verifying your identity • Performing transactions with our group appropriately and smoothly
Professional or employment-related information	<p>Workplace and job information, etc.</p> <p>*Personal data in this category partially overlaps with those in the other categories.</p>	<ul style="list-style-type: none"> • Conclusion and performance of contracts with our group and other transaction management • Communication and information exchange with our group and notices and greetings based on social customs • Providing information and guidance on our group's products and services • Research, analysis, research, and auditing for marketing activities related to our group's business • Generation of statistical information and processing and analysis of personal data for our group's use • Responding to inquiries and comments • Response and communication in case of emergency • Performing transactions with our group appropriately and smoothly
Sensitive personal information	<p>Individual numbers and identification cards issued by the government, biometric information, etc.</p> <p>*Personal data in this category partially overlaps with those in the other categories.</p>	<ul style="list-style-type: none"> • Conclusion and performance of contracts with our group and other transaction management • Confirming your eligibility to use our group's products and services and verifying your identity • Compliance with legal obligations • Performing transactions with our group appropriately and smoothly

(2) Personal data of shareholders

Category of personal data	Detailed personal data items	Purpose of collection and processing of personal data
Identifiers	Name, contact information, online identifiers (cookies, IP addresses, etc.), individual numbers and identification cards issued by the government, shareholder number, etc.	<ul style="list-style-type: none"> · Management of shareholder information and necessary communication · Provision of various lawful benefits to shareholders · Implementation of various measures and provision of information for shareholders
Any personal information described in California Civil Code 1798.80 (e)	Name, contact information, workplace and job information, individual numbers and identification cards issued by the government, bank account information, number of shares held, etc. *Personal data in this category partially overlaps with those in the other categories.	<ul style="list-style-type: none"> · Management of shareholder information and necessary communication · Provision of various lawful benefits to shareholders · Implementation of various measures and provision of information for shareholders
Commercial information	Information such as usage history of products and services provided by our group, number of shares held, etc.	<ul style="list-style-type: none"> · Management of shareholder information and necessary communication · Provision of various lawful benefits to shareholders
Sensitive personal information	Individual numbers and identification cards issued by the government, biometric	<ul style="list-style-type: none"> · Management of shareholder information and necessary communication

	information, etc. *Personal data in this category partially overlaps with those in the other categories.	
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(3) Personal data of employees (including prospective employee*)

*The following information is collected only after our group has received a signed offer letter.

Category of personal data	Detailed personal data items	Purpose of collection and processing of personal data
Identifiers	Name, contact information, online identifiers (Mac addresses, IP addresses, etc.), individual numbers and identification cards issued by the government, etc.	<ul style="list-style-type: none"> • Determination of assignment • Determination of salary increase, promotion, etc. • Determination and payment of wages, bonuses, retirement allowance, etc. • Personnel transfer (including secondment) • Attendance management • Education and training • Health management (including assessment of the capability of the role) • Awards and sanctions • Retirement and dismissal • Accident compensation • Benefits • Crisis & business continuity management • Compliance with legal obligations • Procedures and communication at the time of various ceremonial occasions • Business communication between our group companies • Planning management policies and measures, etc. • Guidance and other procedures related to onboarding for prospective employee • Personnel and labor management after onboarding for prospective employee

		<ul style="list-style-type: none"> • Other matters necessary to perform business activities or to enforce our group's rules and regulations
Any personal information described in California Civil Code 1798.80 (e)	<p>Name, contact information, workplace and job information, employment details, work experience, educational background, language, qualification information, medical examination information, medical care information, income information, bank account information, etc.</p> <p>*Personal data in this category partially overlaps with those in the other categories.</p>	<ul style="list-style-type: none"> • Determination of assignment • Determination of salary increase, promotion, etc. • Determination and payment of wages, bonuses, retirement allowance, etc. • Personnel transfer (including secondment) • Attendance management • Education and training • Health management (including assessment of the capability of the role) • Awards and sanctions • Retirement and dismissal • Accident compensation • Benefits • Crisis & business continuity management • Compliance with legal obligations • Procedures and communication at the time of various ceremonial occasions • Business communication between our group companies • Planning management policies and measures, etc. • Guidance and other procedures related to onboarding for prospective employee • Personnel and labor management after onboarding for prospective employee • Other matters necessary to perform business activities or to enforce our group's rules and regulations
Characteristics of protected classifications under California or federal	<p>Gender, date of birth, emergency contact information, employment details,</p>	<ul style="list-style-type: none"> • Determination of assignment • Determination of salary increase, promotion, etc. • Determination and payment of wages,

law	<p>medical examination information, medical care information, etc.</p> <p>*Personal data in this category partially overlaps with those in the other categories.</p>	<p>bonuses, retirement allowance, etc.</p> <ul style="list-style-type: none"> • Personnel transfer (including secondment) • Attendance management • Education and training • Health management (including assessment of the capability of the role) • Awards and sanctions • Retirement and dismissal • Accident compensation • Benefits • Crisis & business continuity management • Compliance with legal obligations • Procedures and communication at the time of various ceremonial occasions • Business communication between our group companies • Planning management policies and measures, etc. • Guidance and other procedures related to onboarding for prospective employee • Personnel and labor management after onboarding for prospective employee • Other matters necessary to perform business activities or to enforce our group's rules and regulations
Biometric information	<p>Biometric information, face photo, etc.</p>	<ul style="list-style-type: none"> • Crisis & business continuity management • Other matters necessary to perform business activities or to enforce our group's rules and regulations
Audio, electronic, visual, thermal, olfactory, or similar information	<p>Face photo, etc.</p> <p>*Personal data in this category partially overlaps with those in the other categories.</p>	<ul style="list-style-type: none"> • Determination of assignment • Personnel transfer (including secondment) • Awards and sanctions • Business communication between our group companies • Other matters necessary to perform business activities or to enforce our

		group's rules and regulations
Professional or employment-related information	<p>Workplace and job information, employment details, work experience, etc.</p> <p>*Personal data in this category partially overlaps with those in the other categories.</p>	<ul style="list-style-type: none"> • Determination of assignment • Determination of salary increase, promotion, etc. • Determination and payment of wages, bonuses, retirement allowance, etc. • Personnel transfer (including secondment) • Attendance management • Education and training • Health management (including assessment of the capability of the role) • Awards and sanctions • Retirement and dismissal • Accident compensation • Benefits • Crisis & business continuity management • Compliance with legal obligations • Procedures and communication at the time of various ceremonial occasions • Business communication between our group companies • Planning management policies and measures, etc. • Guidance and other procedures related to onboarding for prospective employee • Personnel and labor management after onboarding for prospective employee • Other matters necessary to perform business activities or to enforce our group's rules and regulations
Education information (defined as information that is not publicly available personally identifiable information as defined	<p>Educational background, language, qualification information, etc.</p> <p>*Personal data in this category partially overlaps with those in</p>	<ul style="list-style-type: none"> • Determination of assignment • Determination of salary increase, promotion, etc. • Determination and payment of wages, bonuses, retirement allowance, etc. • Personnel transfer (including secondment)

<p>in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)</p>	<p>the other categories.</p>	<ul style="list-style-type: none"> • Education and training • Awards and sanctions • Business communication between our group companies • Planning management policies and measures, etc. • Guidance and other procedures related to onboarding for prospective employee • Personnel and labor management after onboarding for prospective employee • Other matters necessary to perform business activities or to enforce our group's rules and regulations
<p>Sensitive personal information</p>	<p>Medical examination information, medical care information, individual numbers and identification cards issued by the government, biometric information, etc. *Personal data in this category partially overlaps with those in the other categories.</p>	<ul style="list-style-type: none"> • Determination of assignment • Determination of salary increase, promotion, etc. • Determination and payment of wages, bonuses, retirement allowance, etc. • Personnel transfer (including secondment) • Attendance management • Health management (including assessment of the capability of the role) • Accident compensation • Benefits • Crisis & business continuity management • Compliance with legal obligations • Business communication between our group companies • Planning management policies and measures, etc. • Guidance and other procedures related to onboarding for prospective employee • Personnel and labor management after onboarding for prospective employee • Other matters necessary to perform business activities or to enforce our

		group's rules and regulations
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(4) Personal data of candidates for employment

Category of personal data	Detailed personal data items	Purpose of collection and processing of personal data
Identifiers	Name, contact information, online identifiers (cookies, IP addresses, etc.), etc.	<ul style="list-style-type: none"> Recruitment activities and selection as well as necessary communication and provision of information Necessary communication with recruitment agencies during recruitment activities and selection Reimbursement and transfer of transportation expenses incurred during recruitment Management and examination of recruitment procedures, methods, measures, etc. Compliance with legal obligations
Any personal information described in California Civil Code 1798.80 (e)	Name, contact information, work experience, educational background, language, qualification information, aptitude test results, medical examination information, medical care information, bank account information, etc. *Personal data in this category partially overlaps with those in the other categories.	<ul style="list-style-type: none"> Recruitment activities and selection as well as necessary communication and provision of information Necessary communication with recruitment agencies during recruitment activities and selection Reimbursement and transfer of transportation expenses incurred during recruitment Management and examination of recruitment procedures, methods, measures, etc. Compliance with legal obligations
Characteristics of protected	Gender, date of birth, emergency contact	Recruitment activities and selection as well as necessary communication and provision

classifications under California or federal law	information, medical examination information, medical care information, etc. *Personal data in this category partially overlaps with those in the other categories.	of information <ul style="list-style-type: none"> • Necessary communication with recruitment agencies during recruitment activities and selection • Management and examination of recruitment procedures, methods, measures, etc. • Compliance with legal obligations
Biometric information	Face photo, etc.	<ul style="list-style-type: none"> • Recruitment activities and selection as well as necessary communication and provision of information • Necessary communication with recruitment agencies during recruitment activities and selection • Management and examination of recruitment procedures, methods, measures, etc. • Compliance with legal obligations
Internet or other electronic network activity information	Online identifiers (cookies, etc.), etc. *Personal data in this category partially overlaps with those in the other categories.	<ul style="list-style-type: none"> • Recruitment activities and selection as well as necessary communication and provision of information • Management and examination of recruitment procedures, methods, measures, etc.
Audio, electronic, visual, thermal, olfactory, or similar information	Face photo, etc. *Personal data in this category partially overlaps with those in the other categories.	<ul style="list-style-type: none"> • Recruitment activities and selection as well as necessary communication and provision of information • Necessary communication with recruitment agencies during recruitment activities and selection • Management and examination of recruitment procedures, methods, measures, etc. • Compliance with legal obligations
Professional or employment-related	Work experience, etc. *Personal data in this	<ul style="list-style-type: none"> • Recruitment activities and selection as well as necessary communication and provision

information	category partially overlaps with those in the other categories.	of information <ul style="list-style-type: none"> • Necessary communication with recruitment agencies during recruitment activities and selection • Management and examination of recruitment procedures, methods, measures, etc. • Compliance with legal obligations
Education information (defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99))	Educational background, language, qualification information, aptitude test results, etc. *Personal data in this category partially overlaps with those in the other categories.	<ul style="list-style-type: none"> • Recruitment activities and selection as well as necessary communication and provision of information • Necessary communication with recruitment agencies during recruitment activities and selection • Management and examination of recruitment procedures, methods, measures, etc. • Compliance with legal obligations
Sensitive personal information	Medical examination information, medical care information, etc. *Personal data in this category partially overlaps with those in the other categories.	<ul style="list-style-type: none"> • Recruitment activities and selection as well as necessary communication and provision of information • Necessary communication with recruitment agencies during recruitment activities and selection • Management and examination of recruitment procedures, methods, measures, etc. • Compliance with legal obligations

Please refer to Chapter 8, "Retention Period of Personal Data," of the MOL Group Global Privacy Policy for the retention period of your personal data mentioned above.

Your personal data is collected from the following sources.

- Direct collection from you (by exchanging business cards, sending and receiving emails, entering data on websites, mailing, or in person, etc.)

- Collection from our group companies and related third parties

3. Legal Basis and Purpose of Personal Data Processing

Please review Chapter 2, "Types of Personal Data Processed," of this Policy.

4. Transfer of Personal Data

(1) Disclosure of Personal Data

During the 12 months prior to the date of enactment of this Policy, our group disclosed your personal data as described in Chapter 2, "Types of Personal Data Processed," of this Policy, by category, to the following third parties:

Category of personal data	Parties to which personal data was disclosed
Identifiers	<ul style="list-style-type: none"> · Our group companies, affiliated companies, external organizations, etc. · Contractors who provide information system services, data processing services, and other services · Supervisory authorities, public institutions, attorneys, etc.
Any personal information described in California Civil Code 1798.80 (e)	
Characteristics of protected classifications under California or federal law	
Commercial information	
Biometric information	
Internet or other electronic network activity information	
Audio, electronic, visual, thermal, olfactory, or similar information	
Professional or employment-related information	
Education information (defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99))	
Sensitive personal information	

Our group does not use or disclose your sensitive personal information for purposes other than those set forth in the California Privacy Rights Act or for the purpose of inferring your characteristics.

(2) Selling and Sharing of Personal Data

In the past 12 months, our group has not sold or shared your personal data, as described in Chapter 2, under the California Privacy Rights Act.

5. International Transfer of Personal Data

Our group may transfer personal data collected from you within the country/region where you reside (hereinafter referred to as "disclosure/transfer") or to a different country/region from where you reside (hereinafter referred to as "international transfer") to process it. When our group conducts disclosure/transfer or international transfer of your personal data, our group will appropriately protect your personal data by taking the following safeguard.

- Conclusion of a data transfer agreement with the recipient: By concluding a contract between our group and the recipient of your personal data, our group ensures that the recipient has the same level of personal data protection as our group.

9. Your Rights

With respect to personal data processed by our group, you have the following rights:

- The right to request that our group deletes relevant personal data
- The right to know the relevant personal data that has been collected, disclosed, or distributed in the last 12 months
- The right not to be discriminated against in the exercise of your rights (equal services and prices)
- The right to request that our group corrects inaccurate relevant personal data
- The right to opt-out sale or sharing of the relevant personal data
- The right to limit use and disclosure of the relevant sensitive personal data

10. Procedures and Contact Points for Exercising Rights

In addition to Chapter 10, "Procedures and Contact Points for Exercising Rights," of the MOL Group Global Privacy Policy, questions regarding this Policy or the processing of your personal data, or requests for exercising your rights, etc., can be received at the following contact point.

MOL (Americas), LLC.

Phone: +1 (562) 528-7512.