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	 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

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, and bank account information *Personal data in this category partially overlaps with those in the other categories.	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 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	Gender, date of birth, etc. *Personal data in this category partially overlaps with those in the other categories.	 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

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		· 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
	Information such as	for marketing activities related to our
Commercial	usage history of	group's business
information	products and services	· Generation of statistical information and
	provided by our group	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
		· Conclusion and performance of contracts
		with our group and other transaction
		management
Discontinuis information	Biometric information,	· Confirming your eligibility to use our group'
Biometric information	face photo, etc.	s products and services and verifying your
		identity
		· Performing transactions with our group
		appropriately and smoothly
		· Providing information and guidance on our
		group's products and services
	Online identifiers	· Research, analysis, research, and auditing
Internet or other electronic network activity information	(cookies, etc.), etc.	for marketing activities related to our
	*Personal data in this	group's business
	category partially	· Generation of statistical information and
	overlaps with those in	processing and analysis of personal data
	the other categories.	for our group's use
		· Performing transactions with our group
		appropriately and smoothly
Audio, electronic,	Face photo, etc.	· Conclusion and performance of contracts
visual, thermal,	*Personal data in this	with our group and other transaction

olfactory, or similar	category partially	management
information	overlaps with those in	· Confirming your eligibility to use our group'
	the other categories.	s products and services and verifying your
		identity
		· Performing transactions with our group
		appropriately and smoothly
		· 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
	Meylodaaa and iah	· Providing information and guidance on our
	Workplace and job	group's products and services
Professional or	information, etc.	· Research, analysis, research, and auditing
employment-related	*Personal data in this category partially overlaps with those in the other categories.	for marketing activities related to our
information		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
	Individual numbers and	· Conclusion and performance of contracts
Sensitive personal information	identification cards	with our group and other transaction
	issued by the	management
	government, biometric	· Confirming your eligibility to use our group'
	information, etc.	s products and services and verifying your
	*Personal data in this	identity
	category partially	· Compliance with legal obligations
	overlaps with those in	· Performing transactions with our group
	the other categories.	appropriately and smoothly

(2) Personal data of shareholders

Category of personal data	Detailed personal data items	Purpose of collection and processing of personal data
	Name, contact	· Management of shareholder information
	information, online	and necessary communication
	identifiers (cookies, IP	· Provision of various lawful benefits to
	addresses, etc.),	shareholders
T	individual numbers and	· Implementation of various measures and
Identifiers	identification cards	provision of information for shareholders
	issued by the	
	government,	
	shareholder number,	
	etc.	
	Name, contact	· Management of shareholder information
	information, workplace	and necessary communication
	and job information,	· Provision of various lawful benefits to
	individual numbers and	shareholders
	identification cards	· Implementation of various measures and
Any personal	issued by the	provision of information for shareholders
information described	government, bank	
in California Civil Code	account information,	
1798.80 (e)	number of shares held,	
	etc.	
	*Personal data in this	
	category partially	
	overlaps with those in	
	the other categories.	
	Information such as	· Management of shareholder information
	usage history of	and necessary communication
Commercial	products and services	· Provision of various lawful benefits to
information	provided by our group,	shareholders
	number of shares held,	
	etc.	
	Individual numbers and	· Management of shareholder information
Sensitive personal	identification cards	and necessary communication
information	issued by the	
	government, biometric	

information, etc.	
*Personal data in this	
category partially	
overlaps with those in	
the other categories.	

(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.	 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

Any personal information described in California Civil Code 1798.80 (e)	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. *Personal data in this category partially overlaps with those in the other categories.	 Other matters necessary to perform business activities or to enforce our group's rules and regulations 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 Personnel and labor management after onboarding for prospective employee Other matters necessary to perform business activities or to enforce our
	the other categories.	 Personnel and labor management after onboarding for prospective employee Other matters necessary to perform
Characteristics of	Gender, date of birth,	Determination of assignment
protected	emergency contact	· Determination of salary increase,
classifications under	information,	promotion, etc.
California or federal	employment details,	· Determination and payment of wages,

law	medical examination	bonuses, retirement allowance, etc.
	information, medical	Personnel transfer (including secondment)
	care information, etc.	· Attendance management
	*Personal data in this	· Education and training
	category partially	· Health management (including
	overlaps with those in	assessment of the capability of the role)
	the other categories.	· 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
		· Crisis & business continuity management
	Biometric information,	Other matters necessary to perform
Biometric information	face photo, etc.	business activities or to enforce our
		group's rules and regulations
		· Determination of assignment
	Face photo, etc.	Personnel transfer (including secondment)
Audio, electronic, visual, thermal,	*Personal data in this	· Awards and sanctions
	category partially	Business communication between our
olfactory, or similar	overlaps with those in	group companies
information	the other categories.	Other matters necessary to perform
		business activities or to enforce our
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		group's rules and regulations
		· 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
	Workplace and job	· Retirement and dismissal
	information,	· Accident compensation
Professional or	employment details,	· Benefits
employment-related	work experience, etc.	· Crisis & business continuity management
information	*Personal data in this category partially overlaps with those in the other categories.	· 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	Educational background,	· Determination of assignment
(defined as	language, qualification	· Determination of salary increase,
information that is not	information, etc.	promotion, etc.
publicly available	*Personal data in this	· Determination and payment of wages,
personally identifiable	category partially	bonuses, retirement allowance, etc.
information as defined	overlaps with those in	· Personnel transfer (including secondment)

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in the Family	the other categories.	· Education and training
Educational Rights and		· Awards and sanctions
Privacy Act (20 U.S.C.		· Business communication between our
Sec. 1232g; 34 C.F.R.		group companies
Part 99)		· 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
		· Determination of assignment
		· Determination of salary increase,
		promotion, etc.
		· Determination and payment of wages,
		bonuses, retirement allowance, etc.
		Personnel transfer (including secondment)
	Medical examination	· Attendance management
	information, medical	· Health management (including
	care information, individual numbers and identification cards	assessment of the capability of the role)
identificati Sensitive personal issued by t		· Accident compensation
		· Benefits
	issued by the	· Crisis & business continuity management
information	government, biometric	· Compliance with legal obligations
	information, etc.	Business communication between our
	*Personal data in this	group companies
	category partially	Planning management policies and
	overlaps with those in the other categories.	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.	· 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
	Name, contact	· Recruitment activities and selection as well
	information, work	as necessary communication and provision
	experience, educational	of information
	background, language,	· Necessary communication with recruitment
	qualification	agencies during recruitment activities and
	information, aptitude	selection
Any personal	test results, medical	· Reimbursement and transfer of
information described	examination	transportation expenses incurred during
in California Civil Code	information, medical	recruitment
1798.80 (e)	care information, bank	· Management and examination of
	account information,	recruitment procedures, methods,
	etc.	measures, etc.
	*Personal data in this	· Compliance with legal obligations
	category partially	
	overlaps with those in	
	the other categories.	
Characteristics of	Gender, date of birth,	· Recruitment activities and selection as well
protected	emergency contact	as necessary communication and provision

classifications under	information, medical	of information
California or federal	examination	· Necessary communication with recruitment
law	information, medical	agencies during recruitment activities and
	care information, etc.	selection
	*Personal data in this	· Management and examination of
	category partially	recruitment procedures, methods,
	overlaps with those in	measures, etc.
	the other categories.	· Compliance with legal obligations
		· Recruitment activities and selection as well
		as necessary communication and provision
		of information
		· Necessary communication with recruitment
	Face photo, etc.	agencies during recruitment activities and
Biometric information		selection
		· Management and examination of
		recruitment procedures, methods,
		measures, etc.
		· Compliance with legal obligations
Total and the second second	Online identifiers	· Recruitment activities and selection as well
	(cookies, etc.), etc.	as necessary communication and provision
Internet or other electronic network	*Personal data in this	of information
activity information	category partially	· Management and examination of
activity information	overlaps with those in	recruitment procedures, methods,
	the other categories.	measures, etc.
	Face photo, etc. *Personal data in this category partially overlaps with those in the other categories.	· Recruitment activities and selection as well
		as necessary communication and provision
		of information
Audio, electronic,		· Necessary communication with recruitment
visual, thermal,		agencies during recruitment activities and
olfactory, or similar		selection
information		· Management and examination of
		recruitment procedures, methods,
		measures, etc.
		· Compliance with legal obligations
Professional or	Work experience, etc.	· Recruitment activities and selection as well
employment-related	*Personal data in this	as necessary communication and provision

information	category partially	of information
	overlaps with those in	· Necessary communication with recruitment
	the other categories.	agencies during recruitment activities and
		selection
		· Management and examination of
		recruitment procedures, methods,
		measures, etc.
		· Compliance with legal obligations
Education information		· Recruitment activities and selection as well
(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.	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.	 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	
Any personal information described in California	
Civil Code 1798.80 (e)	
Characteristics of protected classifications	
under California or federal law	
Commercial information	Our group companies offiliated companies
Biometric information	 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.
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.

15 / 15