

To Candidates

ID&E GROUP PRIVACY NOTICE FOR CANDIDATES

Integrated Design & Engineering Holdings Co., Ltd.

This privacy notice explains how and why Integrated Design & Engineering Holdings Co., Ltd. ("ID&E") and subsidiaries in Japan (together with ID&E, "ID&E Group") uses personal information about individuals in the European Economic Area ("EEA") who applies for a position at ID&E Group.

Please read this policy careful as it explains how and why ID&E Group collects and uses personal information, and the risks involved in Candidates transferring their personal information outside of the EEA.

For the purposes of applicable European Union ("EU") data protection law, ID&E Group will be data controllers in respect of that personal information. ID&E Group shall protect the security and confidentiality of the personal information of Candidates in accordance with this notice.

This notice explains:

1. Definition of personal information
2. Purposes of collection and use of personal information
3. Details of personal information being shared
4. Disclosure of personal information to third parties
5. Our service providers
6. International transfer risks and protections
7. Accuracy of personal information
8. Management of personal information
9. Personal information requests
10. Inquiries concerning personal information

1. Definition of personal information

In this notice "**personal information**" means any information relating to an individual that can be used to identify the individual concerned, including the name, address, phone number, email address, place of work, date of birth and any description of the individual. A piece of information relating to an individual that is not sufficient to identify her/him by itself is still considered personal information if it can be readily collated with other information and thereby used for the identification of the individual.

ID&E Group will not normally collect sensitive personal information about Candidates (meaning information about an individual's health, race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership sex life or sexual orientation, genetic or biometric identification information). However, there may be occasions when sensitive personal information is collected, for example if made known to ID&E Group or which is collected by ID&E Group when Candidates proceed to screening process.

2. Purposes of collection and use of personal information

ID&E Group will only use the personal information collected from Candidates for the purpose of employment screening and human resource management. ID&E Group will also use Candidates' personal information for related compatible purposes to those above. (such as record keeping).

The legal basis for using Candidates' personal information will be one or more of the following:

- (a) the personal information needs to be used by ID&E Group to identify each candidate;
- (b) ID&E Group needs to use Candidates' personal information when ID&E Group needs to answer inquiries from Candidates or inform Candidates of the employment screening process such as date and venue for job interviews;
- (c) ID&E Group needs to use Candidates' personal information for the purpose of personnel and human resource management when the Candidates are hired by ID&E Group; or
- (d) ID&E Group needs to use Candidates' personal information to comply with a legal obligation (including in relation to the storage or disclosure of personal information).

Occasionally, ID&E Group may use personal information on the basis of Candidates' consent. Before doing so, Candidates will be asked to consent to that specific use. Consent can be withdrawn at any time (please see section 10 of this policy for further details).

3. Details of personal information being shared

ID&E Group will use the personal information of Candidates for the purposes set out in section 2 of this notice ('*Collection, sources and uses of personal information*'). The details of this use are as follows:

- 1.) Possible recipients of Candidate's personal information
Where necessary, Candidate's personal information may be shared with third parties (as described in section 4 '*Disclosure of personal information to third parties*')
- 2.) Types of personal information collected:
 - (a) Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
 - (b) An individual's resume, curriculum vitae or other documents Candidates provide ID&E Group which could include:
 - i. date of birth;
 - ii. qualifications, training and areas of expertise;
 - iii. professional memberships;
 - iv. employment history;
 - v. educational record;
 - vi. languages spoken;
 - vii. nationality;
 - viii. medical information;
 - ix. photographs;
 - x. references; and
 - xi. supporting documents and information.

ID&E Group may request additional personal information such as right to work documentation (including passports and residence permits) about Candidates for personnel and human resources management when Candidates are hired by ID&E Group. Such personal information will also be covered by this notice.

- 3.) Personal Information Protection Manager of personal information:
The ID&E Group General Manager of the relevant department (details of whom are set out in section 10 of this notice '*Inquiries concerning personal information*').

4. Disclosure of personal information to third parties

ID&E Group will not disclose personal information submitted by Candidates to a third party (meaning a person or entity outside the ID&E Group) without that individual's consent except as set out in this section.

ID&E Group may share personal information about Candidates with the following persons to the extent required for the purposes set out in section 2 ('*Purposes of collection and use of personal information*') of this notice:

- 1) Third party outsourced service providers which process personal information on behalf of ID&E Group (see section 5 of this notice '*Our service providers*').

Except in the situations set out above, ID&E Group will only disclose personal information without the consent of the affected individual concerned in exceptional circumstances, such as those mentioned below:

- 1) When such disclosure is required by a law or regulation;
- 2) Where personal information is disclosed to a regulated professional with a duty to keep the information confidential (such as a lawyer);
- 3) When such disclosure is required to protect a person's vital interests (for example, in an emergency); or
- 4) When personal information is to be disclosed to a third party as part of a succession of a business to the party concerned, or as the result of an event such as a corporate acquisition, disposal or merger.

In the event that ID&E Group shares personal information about Candidates in the manner set out above it shall notify the affected Candidates, unless doing so would involve disproportionate effort or render impossible or risk seriously impairing the purpose for which the personal information is being disclosed. In such cases, ID&E Group shall ensure there are appropriate safeguards in place to protect the personal information.

5. Our service providers

ID&E Group may outsource all or part of the processing of personal information to a third-party processor (such as an IT services provider). ID&E Group will only use processors which have provided appropriate security guarantees and with whom ID&E Group has a contract which meets the requirements of applicable data protection law and which protects the integrity and confidentiality of the personal information being processed.

6. International transfer risks and protections

Most ID&E Group companies are established in countries outside the EEA. These countries have different laws and levels of protection for personal information and may not, from the perspective of the European Commission and EU law, provide adequate protection for personal information.

Transferring personal information outside the EEA can therefore result in additional risks to personal information. Individuals may also not have the same rights in respect of personal information (for example, rights of access or erasure, or to be informed of data breaches) or redress mechanisms as when dealing with organisations established in the EEA.

Before ID&E Group receives personal information about Candidates, it will ensure that there are measures in place to protect such information.

7. Accuracy of personal information

ID&E Group will endeavour to keep personal information provided by Candidates accurate and up to date. However, Candidates must ensure that any personal information which they supply to ID&E Group is accurate and up to date and notify ID&E Group of any changes.

8. Management of personal information

ID&E Group will only retain personal information relating to Candidates, regardless of the form of the information (either in paper or electronic forms), for so long as it is necessary for the purposes it was collected (as described in section 2 '*Purposes of collection and use of personal information*') or for related compatible purposes.

ID&E Group shall implement appropriate technical and organisational measures to prevent loss, misuse and modification of personal information and only store personal information in an environment protected by data access and password control systems. ID&E Group has put in place procedures to deal with any suspected breach of personal information and will notify the Candidates, together with any relevant regulatory body, of a breach when legally required to do so.

9. Personal information requests

EU data protection laws provide Candidates with certain rights in relation to their personal information in some situations. These are as follows:

- 1.) **The right to access personal information.**
This enables Candidates to receive a copy of their personal information.
- 2.) **The right to request correction or completion of personal information.**
This enables Candidates to have any incomplete or inaccurate personal information corrected.
- 3.) **The right to request erasure of personal information.**
This enables Candidates to ask ID&E Group to delete personal information (though this may not apply where ID&E Group has a good, lawful reason to continue using the personal information).
- 4.) **The right to object to processing of personal information.**
Candidates can object to personal information being used for legitimate interests purposes or for direct marketing.
- 5.) **The right to restrict how personal information is used.**
Candidates can limit how their personal information is used (primarily so that it is only stored or used in legal claims).
- 6.) **The right to have a portable copy or transfer personal information.**
Candidates can ask ID&E Group to provide them, or (where technically feasible) a third party, with a copy of their personal information in a structured, commonly used, machine-readable format. Note this only applies to personal information processed automatically on the basis of Candidates' consent or to perform a contract.
- 7.) **The right to withdraw consent.**
If personal information is processed on the basis of consent, Candidates can withdraw that consent at any time.

Candidates wishing to exercise any of the rights described above must contact Legal & Compliance Department, Integrated Design & Engineering Holdings Co., Ltd. by emailing: madoguchi@bx.n-koei.co.jp

Responding

ID&E Group tries to respond to all personal information requests within one month. Occasionally it may take us longer than a month if a request is particularly complex or if a number of requests are made. Please also bear in mind that there are exceptions to the rights above and some situations where they do not apply.

ID&E Group may need to request additional information to help us confirm an individual's identity. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. ID&E Group may also contact the individual making the request for clarification.

Fees for making a request

Candidates will not normally have to pay a fee to access their personal information (or to exercise other legal rights). However, ID&E Group may charge a reasonable fee if a request is unfounded, repetitive or excessive. Alternatively, ID&E Group may refuse to comply with a request in these circumstances.

The right to complain to a supervisory authority

Candidates who are not satisfied with a response to a data protection request or who consider that their personal information has been mishandled have the right to complain to a data protection supervisory authority

within the EEA member state where the Candidates resides, works, or an infringement took place. A list of the EU supervisory authorities and contact details is available here: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

10. Inquiries concerning personal information

For specific questions, complaints or to exercise data protection rights please contact Personnel Management & General Affairs Operations, Personnel Department, Integrated Design & Engineering Holdings Co., Ltd. by emailing: ssckyuyo@bx.n-koei.co.jp

I read through the above Privacy Notice and agree to it.

Date Month Year
/ /20

Candidate (signature) : _____.