

DATA PROTECTION & PRIVACY NOTICE

The data privacy regulations of some countries require that a person making a report containing personal data must be notified of certain collection and retention practices regarding the information submitted by that person.

1. General

ITOCHU Corporation's internal information reporting system through TSUHO Support Center ("ITOCHU Global Hotline") is a web-based intake system provided by ITOCHU Corporation to its employees and those of its subsidiaries for reporting suspected violations of laws or regulations in relation to anti-trust law, anti-bribery law or other principal laws as well as violations of financing, accounting and auditing rules.

For the purpose of applicable laws, we are the data controller engaged in the processing of your personal data and information.

(a) Our main office address: 5-1, Kita-Aoyama 2-chome, Minato-ku, Tokyo 107-8077 Japan

(b) Our phone number: 03-3497-7317

(c) Our email address: tokco-tokco@itochu.co.jp

2. Use of the ITOCHU Global Hotline

Use of the ITOCHU Global Hotline is entirely voluntary. You are encouraged to report possible violations directly to your supervisor or manager, or to a representative of the Compliance, Legal or Human Resources Departments depending on the nature of the possible violation. If you feel that you are unable to do so and the violation is in the reporting category of ITOCHU Global Hotline, you may use the ITOCHU Global Hotline to make your report.

The ITOCHU Global Hotline is a confidential online reporting system that allows you to report suspected violations of laws, regulations or company rules to ITOCHU Corporation and its subsidiary company. If your concern pertains to a matter that, under local law, may not be accepted by ITOCHU Corporation through the ITOCHU Global Hotline, you will need to contact your supervisor or local management to report the matter.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from ITOCHU Corporation and its subsidiaries for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated. The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for us to follow up with questions we may have.

3. What personal data and information is collected and processed?

The ITOCHU Global Hotline may capture the following personal data and information that you provide when you make a report: company code, name of company, country/area where the company is located, name of whistleblower's department, name, address, telephone number and email address of whistleblower, and other data included in the report. Note that depending upon the laws of the country in which you are residing, the report may not be made anonymously; however, your personal information will be treated confidentially and will only be disclosed as set out below.

4. How will the personal data and information be processed after your report and who may access personal data and information?

The personal data and information you provide will be stored in a database which is located on servers hosted and operated in Japan by TSUHO Support Center. TSUHO Support Center has entered into contractual commitments with ITOCHU Corporation to secure the information you provide in accordance with applicable law. TSUHO Support Center is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.

For the purpose of processing and investigating your report and subject to the provisions of local law (in particular, if local law requires the processing of your personal data and information on a statutory legal basis, your personal data and information will be processed on such applicable legal basis (typically legitimate interests and compliance with legal obligations)), the personal data and information you provide may be accessed, processed and used by the relevant personnel of ITOCHU Corporation and ITOCHU group companies, including Human Resources, Finance, Internal Audit, Legal, Compliance, management, external advisors (e.g. legal advisors), or, in limited circumstances, by technical staff at TSUHO Support Center. Those individuals may be located in Japan, the United States, France or elsewhere. For reports from Russia or China, your report will be deidentified and forwarded to the appropriate in-country resource for investigation and resolution.

Personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities. The relevant bodies that receive and process personal data can be located in Japan, the US or other countries that may not provide the level of data protection available in the EU. The personal data you provide will be kept as long as necessary to process your report, or, if applicable, as long as necessary to initiate sanctions or to meet our legal or financial needs.

5. Accessing information concerning the report

In accordance with applicable laws or rules, ITOCHU Corporation or its subsidiary company may access the person who is the subject of a report to ensure the integrity of the investigation and preservation of relevant information with the exception of the identity of the reporter.

6. Your rights

In accordance with the conditions of applicable laws, you are granted various legal rights. These rights may differ depending on the applicable laws, but typically you are afforded the rights listed below in regard to your personal data and information. Please contact us using the contact information provided in Section 1 above ("General") to exercise your rights.

- (a) The right to obtain information in regard to the processing of your Personal Data, and access to your personal data and information in our possession;
- (b) The right to request that we correct your personal data and information if it is inaccurate or incomplete;
- (c) The right to request that we erase your personal data and information in certain circumstances;
- (d) The right to request that we restrict our processing of your personal data and information in certain circumstances;
- (e) The right to object to us about our processing of your personal data and information;**
- (f) The right to receive your personal data and information in a general computer-readable format and to transmit the management of your personal data and information to other organizations without such transmission being impeded; and
- (g) The right to withdraw your consent to our processing of your personal data and information at any time. Please note, however, that doing so does not affect the legitimacy of the processing and transfer of your personal data and information performed prior to the withdrawal of your consent.

You can also submit a complaint to the relevant data protection regulator if you believe that any of your rights have been infringed by us.

7. Consequences of not providing us with your Personal Data

Typically, you are not obliged to provide us with your personal data and information. However, if you are a person submitting a report and if you do not agree to provide your personal data and information to us, we may be unable to perform necessary investigations, provide you with feedback, or take other necessary actions.

8. Protection of Personal data

To safeguard your personal data and information from unauthorized access, collection, use, disclosure, copying, modification, disposal, or other similar risks, we have introduced various administrative, physical, and technical measures, such as up-to-date antivirus protection, encryption, and the use of privacy filters to secure the storage and transmission of personal data and information by us. In addition, we disclose personal data and information both internally and to our authorized third-party service providers and agents only on a need-to-know basis.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your personal data and information and are constantly reviewing and enhancing our information security measures.

9. Accuracy of Personal Data

We generally rely on personal data and information provided by you. In order to ensure that your personal data and information is current, complete, and accurate, please update us if there are changes to your personal data or information.

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