

# Global Privacy Policy

## **PART B – JURISDICTIONAL REQUIREMENTS**

### **For Those in Korea**

This addendum (Addendum) applies to those in the Republic of Korea.

#### **1. Legal Basis for Processing**

We process your personal data pursuant to the following legal basis for the purposes stated in Section 3 (Purposes of Processing Personal Data) of the Policy. Among them, the items of personal data processed on grounds other than consent are as follows:

Legal basis on which we rely to process your personal data	Items of personal data we collect
It is necessary to perform a contract with a data subject or to take actions at the request of the data subject in the process of entering into a contract (PIPA Article 15(1)(iv))	All items described in Section 2 “How We Collect Your Personal Data” of the Policy.
It is necessary for the legitimate interests of the data handler, provided that such interests clearly outweigh the rights of the data subject (this applies only when there is significant relevance to the legitimate interests of the data handler and such processing does not exceed a reasonable range) (PIPA Article 15(1)(vi))	All items described in Section 2 “How We Collect Your Personal Data” of the Policy.

#### **2. Destruction of Your Personal Data**

The process and method for destroying personal data are set forth below.

##### **(a) Destruction Process**

We select certain items of personal data to be destroyed, and destroy them with the approval of the Chief Privacy Officer.

##### **(b) Destruction Method**

We destroy personal data recorded and stored in the form of electronic files by using a technical method (e.g., low-level format) to ensure that the records may not be reproduced, while personal data recorded and stored in the form of paper documents is shredded or incinerated.

##### **(c) Periods of Retention of Personal Data in Accordance with Law**

If required to retain personal data pursuant to applicable Korean laws, such as those set forth below, we will retain personal data solely for the retention periods and purposes prescribed thereunder.

- Commercial ledgers and material documents/statements related to business operations, all ledgers on business transactions and information related to supporting documentation: 10 years for material business documents and 5 years for statements (as required under the Commercial Code, the Framework Act on National Taxes, and the Corporate Tax Act)

- Records on contracts and withdrawal of subscriptions, records on payments and supply of goods : 5 years (as required under the Act on Consumer Protection in Electronic Commerce Transactions)
- Records on consumer complaints and processing of disputes: 3 years (as required under the Act on Consumer Protection in Electronic Commerce Transactions)
- Record of logins: 3 months (as required under the Protection of Communications Secrets Act)

### **3. Country Where Your Personal Information is Processed**

Unless otherwise specified, your personal data is processed within Japan.

### **4. Transfer of Personal Data**

Regarding Section 4 (Disclosure of Personal Data to Recipients and Joint Use of Personal Data) of the Policy, Korean law distinguishes between “Provision” and “Outsourcing,” and we provide personal data to or outsource the processing thereof to third parties as specified below.

#### **(a) Cross-border transfer of personal data to third parties**

##### **(i) For job seekers**

We may disclose information about you to hiring companies only to support your job search process and the hiring companies’ recruitment and employment selection process. Before we disclose your information to the hiring companies to which you have applied, we will notify you of the specific information about the hiring companies and obtain your consent to such disclosure.

You can refuse to permit the transfer of your personal data to third parties located overseas by not agreeing to international transfers or by requesting us to discontinue cross-border transfers. However, this refusal will affect your job search process and the hiring companies’ recruitment and employment selection process, and we may not be able to provide recruitment services to you.

##### **(ii) For hiring company personnel**

We may disclose information about you to job seekers only to support the hiring company’s recruitment and employment selection process and the job seekers’ job search process.

You can refuse to permit the transfer of your personal data to third parties located overseas by not agreeing to international transfers or by requesting us to discontinue cross-border transfers. However, this refusal will affect the hiring company’s recruitment and employment selection process and the job seekers’ job search process, and we may not be able to provide recruitment services to you.

### **5. Rights and Obligations of You and Your Representative and How to Exercise them**

Despite what is stipulated under Section 6 (Your Rights) of the Policy, you may exercise any of your rights as a data subject that are guaranteed under applicable Korean laws, such as the right to access your personal data, the right to request rectification of your personal data, the right to delete your personal data, the right to request suspension of our processing of your personal data, the right to opt out of or seek an explanation for automated decisions (effective March 15, 2024), and the withdrawal of your consent to the processing of your personal data, subject to the limitations under the Personal Information Protection Act. You may do so by submitting your request in writing or via email to our Data Protection Office at the contact details stipulated under Section 8 (Contacts) of the Policy.

Requests can also be made through a representative, such as a legal representative of the information subject or a person authorized by them. In this case, a separate power of attorney must be submitted.

## **6. Security Control Measures**

Regarding Section 7 (Security Control Measures) of the Policy, we will implement technical, organizational, and physical security measures prescribed by applicable Korean laws in order to protect data, such as those listed below:

- (a) **Organizational measures:** Designation of a Privacy Officer, establishment and implementation of an internal management plan, regular training of employees on data protection, etc.;
- (b) **Technical measures:** Management of access authority to the personal data processing system, installation of an access control system, installation of security programs, etc.; and
- (c) **Physical measures:** Restriction of access to personal data storage facilities and equipment such as computer rooms and data storage rooms, etc.

## **7. Department in Charge of Personal Data Protection**

If you have any questions, comments, complaints or requests regarding the Policy, this Addendum or our processing of your information, please contact us via:

Corporate Division, Division Manager  
Email address: [globalcareer@persol.co.jp](mailto:globalcareer@persol.co.jp)

## **8. Changes to Privacy Policy**

For the previous version of the Policy or this Addendum, please refer to the below:  
None.

**Effective Date: June 1, 2024**