

# Global Applicant Privacy Policy

Last Updated: April 2026

In this Applicant Privacy Policy (“**Policy**”), ORIX Corporation USA and its subsidiary companies (including Hilco Global) (“**Company**,” “**we**,” or “**us**”) provide details about the processing of personal information that we collect, use, and disclose in the context of your current or former role as a job applicant, including but not limited to processing through our careers sites (such as at <https://www.orix.com/careers/> and <https://hilcoglobal.com/careers/>) (the “**Careers Sites**”).

For the purposes of this Policy, personal information means any information about an identifiable individual applicant, which may include data collected during the recruitment, application, and interviewing process. Personal information excludes anonymous data that is not associated with a particular individual and cannot be used, directly or indirectly, to identify an individual (“**Personal Information**”).

For more information about how we collect, use and disclose Personal Information in other contexts, please visit <https://www.orix.com/privacy-policy/>.

## Sources of Personal Information

We collect this Personal Information from you and from our affiliates, referees and references you provide, prior employers or schools, recruiting and consulting firms, background check providers, social media networks, and publicly available information including databases.

## Disclosure of Personal Information

We disclose Personal Information for the purposes described below in this Policy to the following categories of third parties:

- Our affiliates. The Company entity to which you have applied for a role will remain responsible for Personal Information that is shared with affiliates. We will limit access to Personal Information to personnel that need to know the information for the purposes described in this Policy, including personnel in the recruiting, human resources, and information technology departments, and in the department responsible for the position for which you are applying.
- Our third-party service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting,

information technology, and professional advisory services, such as lawyers.

- Public and governmental authorities, such as regulatory authorities and law enforcement to respond to requests and comply with applicable law.

Some of these unaffiliated third parties will be located outside of your home jurisdiction, including in the United States, United Kingdom, European Union, Japan, Mexico, Singapore, Malaysia, Canada, and Australia, or any other country in which we or they have operations. For a list of the ORIX affiliates that process and use Personal Information (and their locations), see <https://www.orix.com/offices/> and <https://hilcoglobal.com/contact/>.

**Information for the EEA/UK:** Note that some countries are recognized by the European Commission or UK government as providing an adequate level of protection according to European Economic Area (“EEA”) and UK standards; the full list of these countries is available [here](#) for the EEA and [here](#) for the UK. For transfers from the EEA or UK to countries not considered adequate by the European Commission or the UK government, respectively, we have put in place adequate measures, such as standard contractual clauses, to protect your Personal Information. You may obtain a copy of these measures contacting us as specified under the “Contact Us” section below.

## NOTICE AT COLLECTION

### Collection and Disclosure of Personal Information

The following chart details which categories of Personal Information we collect and process, as well as which categories of Personal Information we disclose to third parties for our operational business and hiring and recruitment purposes, including within the 12 months preceding the date this Policy was last updated.

<b>Categories of Personal Information</b>	<b>Disclosed to Which Categories of Third Parties for Operational Business Purposes</b>
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<p><b>Identifiers</b>, such as name, alias, postal address, unique personal identifiers, IP address that can reasonably be linked or associated with a particular consumer or household, email address, account name, online identifiers, and government-issued identifiers (e.g., Social Security number, driver’s license, passport)</p>	<p>Our affiliates; service providers; public and governmental authorities</p>
<p><b>Categories of Personal Information</b></p>	<p><b>Disclosed to Which Categories of Third Parties for Operational Business Purposes</b></p>
<p><b>Personal information as defined in the California customer records law</b>, such as name, contact information, signature, passport number; financial, education and employment information, physical characteristics or description</p>	<p>Our affiliates; service providers; public and governmental authorities</p>
<p><b>Protected Class Information</b>, such as characteristics of protected classifications under California, federal or international law, such as sex, age, gender, race, disability, citizenship, military/veteran status, gender identity and expression, and immigration status</p>	<p>Our affiliates; service providers; public and governmental authorities</p>
<p><b>Commercial Information</b>, such as travel information and expenses</p>	<p>Our affiliates; service providers; public and governmental authorities</p>

<p><b>Internet or network activity information</b>, such as access and usage information regarding our website or online application portal, timestamp information, IP address and access and activity logs</p>	<p>Our affiliates; service providers; public and governmental authorities</p>
<p><b>Geolocation Data</b>, such as approximate location of devices used to access our website or online application portal, derived from IP address</p>	<p>Our affiliates; service providers; public and governmental authorities</p>
<p><b>Categories of Personal Information</b></p>	<p><b>Disclosed to Which Categories of Third Parties for Operational Business Purposes</b></p>
<p><b>Audio/Video Data.</b> Audio, electronic, visual and similar information, such as voicemail recordings and photographs, for example, where included on resumes</p>	<p>Our affiliates; service providers; public and governmental authorities</p>
<p><b>Education Information</b> subject to the federal Family Educational Rights and Privacy Act such as student transcripts, grade point average, grades, academic standing and confirmation of graduation</p>	<p>Our affiliates; service providers; public and governmental authorities</p>

<p><b>Employment Information.</b> Professional or employment-related information, such as work history and prior employer, information from reference checks, work experience, qualifications, training and skills, work authorization, CV, résumé, cover letter, professional and other work-related licenses, permits and certifications held, and publicly accessible information posted on your professional social media accounts</p>	<p>Our affiliates; service providers; public and governmental authorities</p>
<p><b>Inferences</b> drawn from any of the Personal Information listed above, for example, an individual’s preferences, characteristics, predispositions, and abilities</p>	<p>Our affiliates; service providers; public and governmental authorities</p>
<p><b>Sensitive Personal Information where permitted by applicable law.</b></p> <ul style="list-style-type: none"> <li>• Personal Information that reveals an individual’s Social Security, driver’s license, state or country identification</li> </ul>	<p>Our affiliates; service providers; public and governmental authorities</p>
<p><b>Categories of Personal Information</b></p>	<p><b>Disclosed to Which Categories of Third Parties for Operational Business Purposes</b></p>
<p>card, or passport number; account log-in; racial or ethnic origin, religious or philosophical beliefs, citizenship, immigration status, or union membership</p> <ul style="list-style-type: none"> <li>• Personal Information collected and analyzed concerning an individual’s health, such as data you may provide in connection with an accommodation request</li> </ul>	

We may also disclose the above categories of Personal Information to a third party in the context of any reorganization, financing transaction, merger, sale, joint venture, partnership, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

**In relation to Personal Information processed under this Policy, we do not “sell” Personal Information (including Sensitive Personal Information) and we do not “share” Personal Information (including Sensitive Personal Information) for purposes of cross-context behavioral advertising, as defined under the California Consumer Privacy Act. We have not engaged in such activities in the 12 months preceding the date this Policy was last updated.** Without limiting the foregoing, we do not “sell” or “share” Personal Information (including Sensitive Personal Information) of minors under 16 years of age.

### **Purposes for the Collection, Use, and Disclosure of Personal Information**

We collect, use, and disclose Personal Information for the purposes of operating, managing, and maintaining our business, sourcing talent and recruiting employees, and accomplishing our business purposes and objectives, including, for example, using Personal Information to:

- Receive and process job applications;
- Manage the candidate selection process;
- Evaluate your suitability for the position(s) you are applying for, including to facilitate tests and assessments;
- Communicate with you about your application, manage the virtual assistant on our Careers Sites, respond to your inquiries and notify you of applicable terms and policies;
- Conduct reference checks;
- Conduct background checks, consistent with applicable law;
- Analyze and monitor the composition and sources of job applicants, in accordance with applicable law;
- Subject to our discretion, make an offer to enter into an employment contract;
- Contact you about future career opportunities;
- Fulfill administrative functions, such as aggregate management reporting, statistical

analyses, internal training, and as generally required to conduct our business;

- Comply with law, legal process, requests from governmental or regulatory authorities, internal policies and other requirements such as record-keeping, equal employment opportunity and equality laws, work permit and immigration regulations, reporting obligations, and the exercise or defense of legal claims;
- To enforce our terms and conditions and to protect our rights, privacy, safety or property or that of our affiliates, you or others; and
- In connection with a sale or business transaction.

For job applicants, we may retain and use Personal Information about you to inform you about and consider you for other positions that may be appropriate. If you want us to consider you for other positions, you may also contact us as specified under the “Contact Us” section below.

If we hire you, Personal Information we collect in connection with your application can be incorporated into our human resources system and used to manage the new-hire process; any such information can become part of your employee file and used for other employment-related purposes.

Providing Personal Information to us in connection with a job application is voluntary. However, if you do not provide sufficient information, we may be unable to consider your employment application or, if you are hired, your subsequent promotion, transfer, or relocation.

Please see the [EEA/UK Supplement](#) at the end of this Policy for further details of the legal bases that we rely upon to process Personal Information for the purposes set out above under the EU and UK General Data Protection Regulation.

You will not be subject to decisions that have a legal or other considerable adverse effect based exclusively on an automated processing of your Personal Information, unless permitted by applicable law.

### **Purposes for the Collection, Use, and Disclosure of Sensitive Personal Information**

Where permitted by applicable law, we collect, use, and disclose Sensitive Personal Information for purposes of performing and improving services for our business, providing services as requested by you, and ensuring the security and integrity of our business, services, infrastructure and the individuals with whom we interact. This includes, without limitation, receiving and processing your job application, evaluating your suitability for the

position(s) you are applying for, conducting background checks, analyzing and monitoring the composition and sources of job applicants, in accordance with applicable law, making you an offer (subject to our discretion), fulfilling administrative functions, complying with legal obligations, legal process, or requests from governmental or regulatory authorities, exercising or defending legal claims, securing the access to, and use of, our facilities, equipment, systems, networks, applications, and infrastructure, preventing, detecting, and investigating security incidents, resisting and responding to fraud or illegal activities, ensuring the physical safety of individuals, and other collection and processing that is not for the purpose of inferring characteristics about an individual. We do not use or disclose Sensitive Personal Information for additional purposes.

### **Retention Period**

We retain each category of Personal Information (including Sensitive Personal Information) for as long as needed or permitted considering the purpose(s) for which it was collected.

The criteria used to determine our retention periods include:

- The duration of the job application process;
- Whether your job application is successful and you become an employee;
- Whether, if your application is not successful, you would like to be notified of future job opportunities with us or our affiliates;
- The length of time we have an ongoing relationship with you and the length of time thereafter during which we may have a legitimate need to reference your Personal Information to address issues that may arise;
- Whether there is a legal obligation to which we are subject (for example, certain laws may require us to keep your application records for a certain period of time) or other internal record retention policy; and
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Under some circumstances we may anonymize personal information about you so that it can no longer be associated with you. We reserve the right to use such anonymous data for any legitimate business purpose without further notice to you or your consent.

### **Security and Internal Policies**

We maintain appropriate organizational and technological safeguards to help protect

against unauthorized use, access to or accidental loss, alteration or destruction of Personal Information. We also seek to ensure our service providers do the same. While we strive to protect information about you, no method of data transmission or storage is 100% secure, and we cannot ensure or warrant the security of such information.

We will endeavor to use the least amount of Personal Information as is required for each purpose. We will employ anonymization and pseudonymization, where appropriate.

In addition to the measures to protect Personal Information described in this Policy, ORIX has internal procedures and policies regarding our handling of Personal Information to facilitate compliance with this Policy and applicable laws, including with respect to retention and access to Personal Information and complaints.

### **Individual Rights and Requests**

You may, subject to applicable law, make the following requests:

- a. To review, confirm, access, correct, update, suppress, restrict, delete, or object to or opt out of the processing of your Personal Information, or to request a copy of your Personal Information for the purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law);
- b. To issue a complaint about our processing of your Personal Information;
- c. To obtain more information about the categories and specific pieces of Personal Information we collected about you, the categories of sources from which we collected such Personal Information, the business or commercial purpose for collecting Personal Information about you and the categories of Personal Information about you that we disclosed, and the categories of third parties to whom we disclosed such Personal Information (if applicable).

We will not unlawfully retaliate against you for making a request.

To make a privacy request, please contact us at [dataprivacy@orix.com](mailto:dataprivacy@orix.com).

If you are a California resident, you may also make a privacy request by contacting 646-569-2300 or toll free at 1-833-358-2395, or by mail to ORIX Corporation USA, 280 Park Avenue, 40th Floor, New York, NY 10017, Attn: Chief Compliance Officer.

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. In order

to verify your identity and protect against fraudulent request, we may need to request additional Personal Information from you, such as the email address or phone number provided on the application. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your Personal Information. If you make a request to delete, we may ask you to confirm your request before we delete your Personal Information.

When provided by applicable law, you may also lodge a complaint with a data protection authority for your country or region, or in the place of the alleged misconduct. For example, a list of EEA data protection authorities is available at: [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en). Information regarding the UK data protection authority is available at: <https://ico.org.uk/>. Information regarding the Office of the Australian Information Commissioner is available at: <https://www.oaic.gov.au/privacy/privacy-complaints>.

### **Authorized Agents**

If you are a California resident, and an agent would like to make a request on your behalf as permitted by applicable law, the agent may use the submission methods noted in the section entitled “Individual Rights and Requests.” As part of our verification process, we may request that the agent provide, as applicable, proof concerning his or her status as an authorized agent. In addition, we may require that you verify your identity as described in the section entitled “Individual Rights and Requests” or confirm that you provided the agent permission to submit the request.

### **Equal Employment Opportunity**

In certain cases, we will ask questions about race/ethnic origin, gender, and disability of our job applicants, for monitoring equal opportunity in compliance with all laws. We may also inquire about criminal records, where permitted by applicable law. Otherwise, we ask that you avoid submitting information that may qualify as sensitive information under applicable law, except where such information is legally required. We are an equal opportunity employer, which means we offer equal treatment to all job applicants consistent with applicable law. We do not unlawfully discriminate, either directly or indirectly, based on characteristics protected by applicable law, such as: race, ethnicity, sex, gender identity, sexual orientation, nationality, national origin, ethnic origin, religion, beliefs or creed, age, disability, marital status, veteran status or genetic information in any area of recruitment.

## Applicant Obligations

Any information you submit to us must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your job application during the application process or disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights. If you provide us with Personal Information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

## Links to Third-Party Websites

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which our Careers Sites link. The inclusion of a link on our Careers Sites does not imply endorsement of the linked site or service by us or our affiliates.

## Law Applicable to Job Application

The Careers Sites allows you to apply for jobs worldwide. The Careers Sites are operated from the United States. Accordingly, any Personal Information you submit to the Careers Sites will be collected in the United States and may also be subject to U.S. laws.

If we share your Personal Information with an affiliate located in another country in its capacity as a potential employer, the affiliate will handle your Personal Information in accordance with this Policy. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where the job will be located.

## Changes to this Policy

We may change or update this Policy from time to time. When we do, we will communicate changes and updates to this Policy by posting the updated Policy on this page with a new "Last Updated" date.

## Contact Us

Please contact [dataprivacy@orix.com](mailto:dataprivacy@orix.com) if you have any questions regarding this policy.

## EEA / UK SUPPLEMENT

Purpose	Legal Basis for Processing
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Receive and process job applications	We will engage in these activities based on our legitimate interests in managing the recruitment process, assessing applicants, and maintaining efficient hiring operations, or for other purposes as permitted or required by law.
Manage the candidate selection process	We will engage in these activities based on our legitimate interests in evaluating applicants and managing recruitment logistics, or for other purposes as permitted or required by law.
Evaluate your suitability for the position(s) you are applying for, including to facilitate tests and assessments	We will engage in these activities to comply with a legal obligation or based on our legitimate interests in assessing qualifications, skills, and suitability for the role, or for other purposes as permitted or required by law.
Communicate with you about your application, respond to your inquiries and notify you of applicable terms and policies	We will engage in these activities to comply with a legal obligation or based on our legitimate interests in providing candidates with information, updates, and communications regarding their applications, or for other purposes as permitted or required by law.
Conduct reference checks	We will engage in these activities to comply with a legal obligation or based on our legitimate interests in verifying the qualifications, experience, and background of candidates where permitted by applicable law, or for other purposes as permitted or required by law.
<b>Purpose</b>	<b>Legal Basis for Processing</b>

<p>Conduct background checks, consistent with applicable law</p>	<p>We will engage in these activities to comply with a legal obligation or based on our legitimate interests in ensuring the integrity, trustworthiness, and suitability of potential employees where permitted by applicable law.</p>
<p>Analyze and monitor the composition and sources of job applicants, in accordance with applicable law</p>	<p>We will engage in these activities to comply with a legal obligation (such as equal employment opportunity and workforce reporting requirements) or based on our legitimate interests in promoting equal employment opportunity, in accordance with applicable law.</p>
<p>Subject to our discretion, make an offer to enter into an employment contract or other service relationship</p>	<p>We will engage in these activities as necessary to take steps prior to entering into a contract with you or based on our legitimate interests in extending employment offers and managing hiring decisions.</p>
<p>Contact you about future career opportunities</p>	<p>We will engage in these activities based on our legitimate interests in identifying and contacting qualified candidates for potential future roles, or where required, on the basis of your consent.</p>
<p>Fulfill administrative functions, such as aggregate management reporting, statistical analyses, internal training, and as generally required to conduct our business</p>	<p>We will engage in these activities based on our legitimate interests in managing internal operations, analyzing workforce data, and improving recruitment and HR processes, or for other purposes as permitted or required by law.</p>

<p>Comply with law, legal process, requests from governmental or regulatory authorities, internal policies and other requirements such as record-keeping, equal employment opportunity and equality laws, work permit and immigration</p>	<p>We will engage in these activities to comply with legal obligations or based on our legitimate interests in ensuring regulatory compliance and protecting our legal rights, or for other purposes as permitted or required by law.</p>
<p><b>Purpose</b></p>	<p><b>Legal Basis for Processing</b></p>
<p>regulations, reporting obligations, and the exercise or defense of legal claims</p>	
<p>To enforce our terms and conditions and to protect our rights, privacy, safety or property or that of our affiliates, you or others</p>	<p>We will engage in these activities to comply with a legal obligation or based on our legitimate interests in protecting our business, rights, and interests, as well as those of our affiliates, employees, and applicants.</p>
<p>In connection with a sale or business transaction</p>	<p>We have a legitimate interest in disclosing or transferring your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).</p>