

**ORIX/HILCO GLOBAL STAFF PRIVACY POLICY  
CONFIDENTIAL****Effective: April 2026**

This Privacy Policy (“**Policy**”) explains how we, ORIX Corporation USA and its subsidiary companies (including Hilco Global) (“**ORIX**,” “**Company**,” “**we**,” “**us**,” “**our**”) handle Personal Information (as defined below) about our current and former officers, directors, employees, workers, interns and our contractors, collectively referred to as “**staff**” or “**you**” The ORIX entity that employs you or engages you is primarily responsible for processing your Personal Information and the appropriate entity will vary depending on your office location. Please [click here](#) or see the end of this Notice for a list of ORIX entities by region that employ individuals or engage contractors to provide services.

The aim of this Policy is to ensure that all staff understand what Personal Information we collect about them and why, how we handle it, and what rights our staff may have in relation to such Personal Information. **Your attention is drawn to the relevant parts in the table below about monitoring at work and our access to corporate devices, systems and communications and your personal devices used for work. All monitoring carried out by Company is further described in our information security policy and other policies.**

If you are an employee, this Policy also applies to the beneficiaries of your employment benefits, such as the individuals who are on your health plan and the beneficiaries of your retirement accounts and life insurance, as well as your emergency contacts. It is your responsibility to inform any such individuals about this Policy and ensure that you have the right to provide their Personal Information to us.

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

This Policy does not form part of any contract of employment or other contract to provide services. If you have any questions about this Policy, please contact us using the details set out below in the “**YOUR RIGHTS, QUESTIONS AND COMPLAINTS**” section of this Policy.

**1. DOES THIS POLICY APPLY TO YOU?**

The Policy applies to staff. This Policy applies to you as an individual even if you act as a representative of an organization (e.g., your contracting business).

**2. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?**

In the course of your relationship with an ORIX affiliate, we collect information about you and your working relationship with ORIX, and information about your spouse, domestic/civil partner, dependents, or other individual(s) who may be your emergency contact. We refer to such information as “**Personal Information.**” The Personal Information that we process will vary based on work location, your position, and the ORIX entity that engages you. For example, this will include general details and contact details (e.g., date of birth and email address), background information (e.g., information necessary for us to carry out right to work checks), HR administration information (e.g., business operations information, expenses information, benefits information, performance information, absence and sickness records and financial information) and monitoring information (e.g., information about how you use our corporate resources,

your IP address, online ID, log activity, CCTV footage). For more specific information regarding what Personal Information about you ORIX collects, please see the “**WHAT PERSONAL INFORMATION DO WE COLLECT AND DISCLOSE?**” section below.

In certain cases, we process certain types of special category or sensitive Personal Information (such as information that concerns health or may reveal race or ethnic origin, religious or philosophical beliefs) or criminal records information. We will only collect, use, and disclose this information if necessary to meet specific legal obligations, provide specific benefits, or monitor equal opportunity, *and* where this collection is permitted by applicable law. We do not use or disclose sensitive Personal Information for additional purposes. For more information regarding how we use and disclose sensitive Personal Information, please see the “**WHAT PERSONAL INFORMATION DO WE COLLECT AND DISCLOSE?**” and the “**FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL INFORMATION?**” sections below.

If you do not provide us with the Personal Information necessary to manage your relationship with us, we may not be able to deliver to you all the services, compensation, and benefits associated with your role or maintain our relationship with you. To the extent that you decide to provide or make available Personal Information that is not required for the purposes as described in this Policy, your decision to provide Personal Information is voluntary. If we process Personal Information based on your consent, you may withdraw your consent at any time.

### **3. HOW DO WE OBTAIN YOUR PERSONAL INFORMATION?**

Your Personal Information will come from the following sources:

- **From you**, when you send your CV, complete forms, interact with us, update your details in our HR portal, perform your work tasks, engage in working groups, and in other situations.
- **From third parties** such as recruiters, prior employers or schools, customers and clients, referees and references, background check agencies, your emergency contacts, your colleagues, public authorities (such as governmental or regulatory authorities, courts and tribunals), third parties (legal or natural) as relevant for a specific legal action, such as lawyers, auditors, insurers and advisory firms, suppliers and vendors (such as IT support service providers, facilities service providers and event management service providers), your healthcare insurance provider, pension provider and providers of other benefits and other third parties, when they share Personal Information with us to, for example, facilitate mergers, acquisitions and other reorganization and restructurings of our business.
- **From the public domain**, such as information we obtain from social media, such as LinkedIn, and other sources.

### **4. WHAT PERSONAL INFORMATION DO WE COLLECT AND DISCLOSE?**

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 employment and workforce purposes, including within the 12 months preceding the date this Policy was last updated.

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
<p><b>General details</b>, such as your name, alias, place and date of birth, gender, marital status, nationality, age, language, and similar information</p>	<p>Our affiliates; service providers; suppliers, customers, or clients, to the extent needed to provide them a means of contacting you in the normal course of business; public and governmental authorities; business partners; other individuals, to the extent it is reasonable to disclose your Personal Information in complying with an individual rights request</p>
<p><b>Contact details</b>, such as your address, telephone number, email address, location of your place of work, and similar information</p>	<p>Our affiliates; service providers; suppliers, customers, or clients, to the extent needed to provide them a means of contacting you in the normal course of business; public and governmental authorities; business partners; other individuals, to the extent it is reasonable to disclose your Personal Information in complying with an individual rights request</p>
<p><b>Personal information as defined in the California customer records law</b>, such as name, contact information, signature, passport number; medical, insurance, financial, education and employment information, physical characteristics or description</p>	<p>Our affiliates; service providers; suppliers, customers, or clients, to the extent needed to provide them a means of contacting you in the normal course of business; public and governmental authorities; business partners; other individuals, to the extent it is reasonable to disclose your Personal Information in complying with an individual rights request</p>
<p><b>Background Information</b>, such as a copy of your passport, birth certificate, and other official IDs, driver's license, your right to work documentation, references, criminal records check results, credit check, your handwritten signature, and similar information</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 or federal law, such as sex, age, gender, race, disability, citizenship, language, military/veteran status, gender identity and expression, immigration status, marital status, and requests for leave</p>	<p>Our affiliates; service providers; public and governmental authorities</p>

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
<b>Business operations information</b> , such as your work progress and communications in relation to your tasks and similar information	Our affiliates; service providers; public and governmental authorities
<b>Corporate expenses information</b> , such as your corporate credit card usage, travel expenses, and similar information	Our affiliates; service providers; public and governmental authorities
<b>CSR and team information</b> , such as information that you provide to us and which is necessary for our legitimate activities in the field of corporate social responsibility, celebrations, team building, or similar activities	Our affiliates; service providers; public and governmental authorities
<b>Employment benefits information</b> , such as your salary or fee, bonus, benefits, retirement/pension plans, compensation type, salary step within assigned grade, details on stock options, stock grants and other awards, currency of pay, pay frequency, effective date of current compensation, salary reviews, working time records (including vacation and other absence records, leave status, hours worked and department standard hours), payroll data and termination date, beneficiary information and information about your pension arrangements, health insurance coverage, and similar information	Our affiliates; service providers; public and governmental authorities
<b>Financial information</b> , such as your bank account details, social security number or other taxpayer ID number, national insurance number, information about your loans, and similar information	Our affiliates; service providers; public and governmental authorities
<b>HR administration information</b> , such as length of service, job title or code, grade or level, job function, department and legal employer, office location, willingness to relocate, absence and attendance records, health and safety records, dietary requirements, travel and accommodation details, sickness records, accident reports, performance information (including any appraisals, performance reviews, or other internal	Our affiliates; service providers; public and governmental authorities

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
communication regarding performance), disciplinary records, grievance information, skills and experience records, training records, records of projects you have worked on, information used to populate biographies, emergency contacts, and similar information	
<b>Audio/Video Data.</b> Audio, electronic, visual, and similar information, such as your headshot photo and other photos, call and video recordings, including voicemail and security camera footage, key card usage	Our affiliates; service providers; public and governmental authorities
<b>Monitoring Information,</b> such as CCTV footage, swipe card records, device and systems use logs, email scanning reports, content review of emails where necessary for a business need, status indicators on apps, your use of our corporate resources including communications, remote access, office access, emails, voice recordings and similar information	Our affiliates; service providers; public and governmental authorities
<b>Public Information,</b> such as your use of social media, information in the public record, and similar information	Our affiliates; service providers; public and governmental authorities
<b>Recruitment Information,</b> such as your CV, school level or grade, educational trajectory, degrees, certificates, recognitions, occupation, position and place of work, work history, notes of interviews, application forms, decisions to offer employment or engage in contracts to receive services, test results, and similar information	Our affiliates; service providers; public and governmental authorities
<b>Internet or network activity information,</b> such as access and usage information regarding websites, applications and systems, information about online communications, including browsing and search history, timestamp information, IP address and access and activity logs	Our affiliates; service providers; public and governmental authorities
<b>Geolocation Data,</b> such as approximate location of devices used to access our network, website or	Our affiliates; service providers; public and governmental authorities

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
online application portal derived from IP address, or GPS, Wi-Fi or BLE tracking	
<p><b>Sensitive Personal Information.</b></p> <ul style="list-style-type: none"> <li>• Personal Information that reveals an individual’s Social Security, driver’s license, state identification card, or passport number; account log-in, financial account, racial or ethnic origin, religious or philosophical beliefs or other demographic information, citizenship, immigration status, or union membership; the contents of email and text messages unless the Company is the intended recipient of the communication</li> <li>• The processing of biometric information for the purpose of uniquely identifying an individual, such as fingerprints</li> <li>• Personal Information collected and analyzed concerning an individual’s health</li> </ul>	Our affiliates; service providers; public and governmental authorities

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).

**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 (“CCPA”). 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.

#### Further Details Regarding How We Disclose Personal Data

Due to the global nature of ORIX operations, we disclose Personal Information to staff and departments throughout ORIX to fulfill the purposes set out in this Policy. This may include transferring Personal Information to other countries. The primary company responsible for your Personal Information will be the ORIX company by which you are engaged. However, other ORIX entities will process your Personal Information for certain purposes.

We provide access to Personal Information within ORIX to those who have a need to know the information for the purposes described above, and will include individuals in HR, IT, Compliance, Legal, Finance and Accounting, and Internal Audit. All staff within ORIX will generally have access to your business contact information available on our intranet, such as name, position, telephone number, postal address, email address and upcoming time off.

As identified in the table above, from time to time, ORIX will need to make Personal Information available to other unaffiliated third parties, service providers, and advisors that have a “need to know” such information, or other third parties if we are compelled by law. Generally, we will only disclose your Personal Information in the following circumstances:

- To provide a third party such as a potential **supplier, customer or client** with a means of contacting you in the normal course of business, for example, by providing your contact details, such as your business phone number and email address;
- When we have legal obligations or it is in our legitimate interest to pass on to **public authorities**, such as when complying with applicable health and safety or whistleblowing requirements, or when we deem it important to share Personal Information with public authorities;
- When we need to share Personal Information with **service providers**, such as background check providers, payroll service providers, pension providers, benefit providers, learning and development service providers, event venues, occupational health assessment providers, and similar third parties;
- When we are **audited or checked by third parties** (e.g., annual financial audit), which may enable such third parties to see some Personal Information about you;
- Where it is reasonable in the circumstances to disclose your Personal Information in complying with a Personal Information **individual rights request** made by an individual;
- In response to a legitimate request for assistance by **law enforcement**;
- To seek advice from our **external lawyers or other providers of professional services such as insurers, recruitment agencies and bankers**, for example, in connection with litigation with a third party, to conduct internal investigations or to comply with applicable laws such as financial and tax laws;
- To our **investors and shareholders or other business partners**, for example in connection with the **sale, purchase or merger** of our business; or
- As otherwise **required by law** or under a binding disclosure request.

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, 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/contact/> and <https://hilcoglobal.com/contact/>. Where we transfer Personal Information to another jurisdiction, we do so in compliance with the applicable laws and implement appropriate safeguards such as contractual protections.

**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 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 by contacting us using the details set out below in the “[YOUR RIGHTS, QUESTIONS AND COMPLAINTS](#)” section of this Policy.

**Information for Japan:** ORIX Corporation USA and our parent company, ORIX Corporation, are responsible for the management of Personal Information shared with ORIX affiliates for the purposes set out in this Policy. ORIX Corporation USA and will remain jointly responsible for Personal Information about you that is transferred and jointly used.

## 5. FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL INFORMATION?

The table below explains the purposes for which we use Personal Information, including what Personal Information is necessary for each purpose. We keep our processes and information collection under review and will update this Policy should any Personal Information no longer be necessary for the given purpose or activity.

Processing Purpose and Examples of Related Activities	Personal Information Used
<p><b>Background Checks and recruitment:</b> Conducting background checks upon hiring and on an ongoing basis, including criminal records checks, credit checks, general background checks, and references.</p>	<ul style="list-style-type: none"> <li>• General details</li> <li>• Background information</li> <li>• Contact details</li> <li>• Recruitment information</li> <li>• Audio/video data</li> <li>• Public information</li> </ul>
<p><b>HR Management and Administration:</b> Managing career development, performance management, compensation, payroll, and benefits (e.g., medical insurance and life insurance); handling absences (e.g., sickness, parental leave, and flexible working policies); liaising with third parties such as pension providers or tax offices; preparing headcount reports; and supporting disaster recovery and emergency response planning.</p>	<ul style="list-style-type: none"> <li>• General details</li> <li>• Business operations information</li> <li>• Contact details</li> <li>• Corporate expenses information</li> <li>• Employment benefits information</li> <li>• Financial Information</li> <li>• HR administration information</li> <li>• Audio/video data</li> <li>• Information about third parties</li> <li>• Internet or network activity information</li> <li>• Geolocation data</li> <li>• Monitoring information</li> <li>• Sensitive information</li> </ul>
<p><b>Expense Processing:</b> Managing expenses you incur if you are in a role authorized to incur business expenses in accordance with applicable policies.</p>	<ul style="list-style-type: none"> <li>• General details</li> <li>• Contact details</li> <li>• HR administration information</li> <li>• Corporate expenses information</li> <li>• Financial information</li> </ul>
<p><b>Equal Opportunities Monitoring:</b> Monitoring and ensuring compliance with equal opportunity standards.</p>	<ul style="list-style-type: none"> <li>• Anonymized sensitive Personal Information</li> </ul>

Processing Purpose and Examples of Related Activities	Personal Information Used
<p><b>Investigations and Dispute Resolution:</b> Conducting investigations, grievance and disciplinary processes, and resolving disputes.</p>	<ul style="list-style-type: none"> <li>• Personal Information necessary for the relevant investigation or dispute</li> </ul>
<p><b>Business Operations:</b> Carrying on day-to-day business activities, collaborating internally, displaying your details within the organization, providing services to customers, ensuring business continuity, and sharing details with affiliates, partners, service providers, customers, and others as necessary.</p>	<ul style="list-style-type: none"> <li>• General details</li> <li>• Business operations information</li> <li>• Contact details</li> <li>• HR administration information</li> <li>• Public information</li> <li>• Audio/video data</li> <li>• Internet or network activity information</li> <li>• Geolocation data</li> </ul>
<p><b>Call and Communication Recording:</b> Recording calls and communications with clients, prospects, and enquirers to maintain transaction records, document instructions or complaints, ensure compliance with obligations, support quality control and training, prevent and detect crime, and ensure the effective operation of communication systems.</p>	<ul style="list-style-type: none"> <li>• General details</li> <li>• Contact details</li> <li>• Business operations information</li> <li>• Monitoring information</li> <li>• HR administration information</li> </ul>
<p><b>Workforce Planning:</b> Conducting business forecasting, employee assignment planning, budgeting, and similar workforce management activities.</p>	<ul style="list-style-type: none"> <li>• General details</li> <li>• Background information</li> <li>• Contact details</li> <li>• Business operations information</li> <li>• HR administration information</li> <li>• Employment benefits information</li> <li>• Monitoring information</li> </ul>
<p><b>Process and Standards Development:</b> Analyzing user actions across corporate systems or reviewing historic customer calls to identify opportunities for improvement.</p>	<ul style="list-style-type: none"> <li>• General details</li> <li>• Business operations information</li> <li>• HR administration information</li> <li>• Monitoring information</li> </ul>
<p><b>Health and Safety:</b> Ensuring workplace health and safety by conducting desk assessments, assessing fitness to work, making reasonable adjustments or accommodations, and monitoring and managing sickness absence.</p>	<ul style="list-style-type: none"> <li>• General details</li> <li>• Contact details</li> <li>• Information about third parties</li> <li>• Sensitive information</li> </ul>
<p><b>Marketing and Public Relations:</b> Displaying your details and photograph on the company's public website or other media channels, where appropriate.</p>	<ul style="list-style-type: none"> <li>• General details</li> <li>• Contact details (professional)</li> <li>• HR administration information</li> <li>• Audio/video data</li> </ul>
<p><b>Corporate Social Responsibility (CSR) and Team Activities:</b> Supporting CSR initiatives, celebrations, team-building, or similar activities, such as by publishing images of participation in sporting events or charity fundraising on our website or social media platforms such as LinkedIn.</p>	<ul style="list-style-type: none"> <li>• General details</li> <li>• Business operations information</li> <li>• CSR and team information</li> <li>• Audio/video data</li> <li>• Information about third parties</li> </ul>

Processing Purpose and Examples of Related Activities	Personal Information Used
	<ul style="list-style-type: none"> <li>Public information</li> </ul>
<p><b>Corporate Asset Management and Information Security:</b> Ensuring the secure operation of corporate devices, protecting premises and corporate assets, and enforcing compliance with company policies and procedures.</p>	<ul style="list-style-type: none"> <li>General details</li> <li>Contact details</li> <li>Business operations information</li> <li>HR administration information</li> <li>Monitoring information</li> <li>Internet or network activity information</li> <li>Geolocation data</li> </ul>
<p><b>Monitoring of Corporate Devices and Systems:</b> Monitoring corporate devices, systems, communications, and personal devices used for work, whether in the office or elsewhere, using CCTV or other lawful monitoring. Activities are carried out to ensure legal compliance, protect assets, safeguard rights and freedoms, prevent crime, investigate wrongdoing, and comply with laws.</p>	<ul style="list-style-type: none"> <li>Monitoring information and any other Personal Information as is necessary and proportionate for our lawful and legitimate purposes</li> </ul>
<p><b>Access to Corporate Devices and Systems:</b> Accessing corporate devices, systems, accounts, and communications (or personal devices used for work) during absences or upon departure, for business continuity and collaboration purposes. This may include monitoring, remote wiping, or other device management functionalities.</p>	<ul style="list-style-type: none"> <li>General details</li> <li>Contact details</li> <li>Business operations information</li> <li>Monitoring information</li> <li>Internet or network activity information</li> <li>Geolocation data</li> </ul>
<p><b>Crime Prevention:</b> Detecting or preventing crime.</p>	<ul style="list-style-type: none"> <li>Personal Information necessary for the relevant investigation, including monitoring information</li> </ul>
<p><b>Legal and Regulatory Compliance:</b> Ensuring compliance with health and safety requirements, tax or fiscal obligations, financial industry regulations, immigration rules, anti-money laundering, anti-bribery, or similar obligations.</p>	<ul style="list-style-type: none"> <li>Personal Information necessary for compliance with the legal or regulatory requirement</li> </ul>
<p><b>Legal Claims and Regulatory Requests:</b> Processing and disclosing Personal Information in connection with legal claims, law enforcement or regulatory requests, or to demonstrate fulfillment of duty of care to you or third parties.</p>	<ul style="list-style-type: none"> <li>Personal Information necessary for the relevant claim, law enforcement or regulatory request or legal process or the relevant investigation</li> </ul>

You will not be subject to decisions based exclusively on an automated processing of your Personal Information without prior further notice, unless permitted by applicable law.

**Individuals in the EEA/UK:** If you're in the EEA or UK, please view the "EEA/UK SUPPLEMENT" at the end of this Privacy Policy for more information regarding our legal basis for processing Personal Information.

## 6. HOW AND FOR HOW LONG IS YOUR PERSONAL INFORMATION KEPT?

ORIX will take reasonable steps to ensure that the Personal Information processed is reliable for its intended use and is accurate and complete for carrying out the purposes described in this Policy.

The Personal Information, including sensitive Personal Information, that we collect will be retained for as long as reasonably necessary or permitted for the purposes set out in this Policy and consistent with our retention policies, in accordance with applicable laws. When determining these retention policies, we take into account: the duration of your relationship with ORIX; the period we have an ongoing relationship with you or your dependents; the length of time we need to retain Personal Information to comply with a legal or compliance obligations to which we are subject or for audit purposes; and when it is advisable for us to retain Personal Information to defend or bring potential legal claims.

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## 7. HOW DO WE KEEP PERSONAL INFORMATION SAFE?

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. Please contact Compliance for additional information on the procedures and policies that ORIX has in place or if you are an employee, please see the Compliance Manual, privacy policies and/or the Employee Handbook, if applicable, in your jurisdiction.

## 8. YOUR RIGHTS, QUESTIONS AND COMPLAINTS

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

1. You may request that we disclose to you the following information:
  - a. The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
  - b. The specific pieces of your Personal Information, including receiving a copy of your Personal Information for purposes of transmitting it to another company;
  - c. The business or commercial purpose for collecting Personal Information about you; and
  - d. The categories of Personal Information about you that we disclosed, and the categories of third parties to whom we disclosed such Personal Information.
2. You may request to update or correct inaccuracies in your Personal Information.
3. You may request that we suppress, restrict, or delete your Personal Information that we have collected from you.

4. You may request to opt out of the processing of Personal Information or withdraw your consent (which will not affect the lawfulness of processing prior to the withdrawal).
5. You may issue a complaint about how we process your Personal Information.

You have the right not to be unlawfully retaliated against for making a privacy request. To make a privacy request, if you have any other questions about how ORIX uses Personal Information, or if you believe that we have not complied with applicable privacy laws, please fill out the [privacy policy form](#) or contact us at [dataprivacy@orix.com](mailto:dataprivacy@orix.com). California residents may also issue a request by calling toll free at 1-833-358-2395.

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. We will take any concern that you raise seriously and aim to resolve such concerns in an efficient manner. Please note, however, that certain Personal Information may be exempt from requests pursuant to applicable data protection laws or other laws and regulations.

Depending on your jurisdiction, you may lodge a complaint with a data protection authority for your country or region. 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>.

We may need to request further information from you in order to verify your identity and protect against fraudulent requests. 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.

#### Authorized Agents for California Residents

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

## **9. YOUR OBLIGATIONS**

Please keep Personal Information up to date and inform us of any significant changes to Personal Information.

For current employees, you may access, review and change Personal Information that ORIX holds about you by updating your Workday profile, or by contacting the ORIX USA team or function responsible for maintaining such information, as applicable. You agree to inform the other individuals, such as your dependents, whose Personal Information you provide to ORIX about the content of this Policy, and ensure you have the right to provide that information to ORIX. You further agree to follow applicable law and ORIX's policies, standards and procedures that are brought to your attention when handling any Personal Information to which you have access during your relationship with ORIX. In particular, you will not access

or use any Personal Information for any purpose other than in connection with and to the extent necessary for your work with ORIX. You understand that these obligations continue to exist after termination of your relationship with ORIX.

## 10. EEA/UK SUPPLEMENT

We process Personal Information based on the following legal bases:

Purpose	Legal Basis for Processing
Background Checks and recruitment	Necessary to take steps prior to entering into a contract with you, and necessary for compliance with a legal obligation to which we are subject including in the field of employment.
HR Management and Administration	Necessary for the performance of our contract with you, or necessary for our legitimate interest in managing our workforce, HR administration and complying with best practice, or where processing or sharing your information is necessary for compliance with a legal obligation to which we are subject including in the field of employment.
Expense Processing	Necessary for the performance of our contract with you.
Equal Opportunities Monitoring	Where necessary to satisfy our legitimate interest in promoting equal opportunities, complying with best practice or applicable laws, and as necessary for compliance with a legal obligation to which we are subject or necessary for substantial public interest.
Investigations and Dispute Resolution	Where necessary and proportionate, in order to satisfy our legitimate interest in investigating complaints, resolving disputes, ensuring compliance with our policies, procedures and contractual obligations, and protecting life, health, and property, or necessary for the performance of our contract with you or necessary for exercising rights or complying with obligations in the field of employment or establishing, exercising or defending legal claims or fulfilling a duty of care owed to you or others
Business Operations	Necessary for the performance of our contract with you, necessary for our legitimate interest in running our business, complying with our contractual obligations, monitoring performance of third parties, ensuring efficiency and productivity, or as necessary for compliance with a legal obligation to which we are subject.
Call and Communication Recording	Necessary for the performance of our contract with you, research purposes, defending claims, or as is necessary for compliance with a legal obligation to which we are subject.
Workforce Planning	Necessary for our legitimate interest in managing our human resources, benchmarking, business forecasting and contingency planning. Necessary for compliance with a legal obligation to which we are subject.
Process and Standards Development	Necessary for our legitimate interest in developing our business processes and managing our business resources in a sustainable manner.
Health and Safety	Where necessary in order to satisfy our legitimate interest in ensuring good working conditions for our staff, managing absences, complying with best practice or applicable laws, where necessary to protect your vital interests or that of another third party or where necessary for compliance with a

Purpose	Legal Basis for Processing
	legal obligation to which we are subject and to exercise rights or comply with obligations in the field of employment.
Marketing and Public Relations	Necessary for our legitimate interest in promoting our business and encouraging client engagement.
Corporate Social Responsibility (CSR) and Team Activities	Necessary for our legitimate interest in promoting our core values based on your voluntary participation.
Corporate Asset Management and Information Security	Necessary for the performance of our contract with you, necessary for our legitimate interest in ensuring the security of people, our business and corporate assets, compliance with our contractual obligations, and as necessary for compliance with a legal obligation to which we are subject.
Monitoring of Corporate Devices and Systems	Necessary for the performance of our contract with you, necessary for our legitimate interest in ensuring the security of people, our business and corporate assets, compliance with our contractual obligations, and as necessary for compliance with a legal obligation to which we are subject.
Access to Corporate Devices and Systems	Necessary and proportionate for our legitimate interest in running our business, complying with our contractual obligations, monitoring performance of third parties, ensuring efficiency and productivity.
Crime Prevention	As necessary and proportionate for our legitimate interest in protecting people, our business and corporate assets and detecting and preventing crime, and as necessary for compliance with a legal obligation to which we are subject.
Legal and Regulatory Compliance	Where processing or sharing your information is necessary for compliance with a legal obligation to which we are subject, or, where appropriate and proportionate, to satisfy our legitimate interest in complying with best practice or applicable laws.
Legal Claims and Regulatory Requests	Where processing or sharing your information is necessary for compliance with a legal obligation to which we are subject, to establish, exercise or defend legal claims or, where appropriate and proportionate, to satisfy our legitimate interest in complying with best practice or applicable laws.

## 11. POLICY UPDATES

We may change or update this Policy in the future. When we do, we will post the revised Policy on our intranet sites. This Policy was last updated and became effective on the date posted at the top of this page.

**APPENDIX**

**ORIX Entities and Region**

Entity	Region
Administradora de Activos Terracota SA de CV	Mexico
Boston Financial Investment Management, LP	US
Clipper Marine Limited	UK
Hilco Acetec Servicios de Valuacion Y Monetizacion S. DE R.L. DE C.V.	Mexico
Hilco Appraisal Limited	UK
Hilco Appraisal Singapore Ptd. Ltd.	Singapore
Hilco Canada Holdings ULC	Canada
Hilco Capital (Australia) Pty Limited	Australia
Hilco Capital (Canada) ULC	Canada
Hilco Capital Limited	UK
Hilco Global (Australasia) Pty Limited	Australia
Hilco Global Asia Pacific Pte. Ltd.	Singapore
Hilco Global Capital Solutions, LLC	US
Hilco Global Mexico S De RL de CV	Mexico
Hilco Global Professional Services, LLC	US
Hilco Industrial Acquisitions B.V.	Netherlands
Hilco Industrial SDN BHD	Malaysia
Hilco IP Merchant Capital (Canada) ULC	Canada
Hilco Merchant Australia Pty Ltd.	Australia
Hilco Profit Recovery Limited	UK
Hilco Real Estate Finance UK Ltd.	UK
Lument Real Estate Capital Holdings, LLC	US
NXT Capital Finance Company, LLC	US
ORIX USA, LP	US