

MARUBENI CITIZEN-CINCOM, INC. PRIVACY POLICY

This privacy policy (“**Policy**”) describes how Marubeni Citizen-Cincom, Inc. (“**MCC**”, “**we**”, “**our**” or “**us**”) collects, uses, and discloses personal information about you when you visit our website (the “**Site**”) or when we conduct our businesses and services; how we protect this information; and your rights in relation to this information under applicable law. If you are a California resident, please refer to the section 4, “Your California Privacy Rights” below for additional information regarding our collection, use, and disclosure of your personal information.

1. PERSONAL INFORMATION WE MAY COLLECT

We may collect personal information about you from a variety of sources. We collect information from you directly (e.g., when you contact us), automatically when you visit our Site (e.g., data collected from cookies), and from other sources, including commercially available sources, such as public databases (where permitted by law).

Information we may collect from you

The categories of information that we may collect directly from you include the following:

- **Identifiers**, such as your name, postal address, telephone number, email address, account name, social security number, passport number, national ID number, and other similar identifiers;
- **Demographics**, such as your gender, age, veteran status, ethnic background and disability status;
- **Commercial information**, such as products or services purchased, or other purchasing or consumption histories or tendencies;
- **Financial, medical, or health insurance information**, such as bank or credit card numbers, or insurance policy number;
- **Pictures, audio, and video**, such as photographs for identification, voice recordings of business calls, or information collected via video cameras at our facilities;
- **Professional information**, such as employer, salary, job title, experience, skill, or expertise;
- **Education information**;
- **Inferences regarding preferences or other characteristics**; and
- **Sensitive personal information**, such as religious or philosophical beliefs.

Information we may automatically collect about you

We and our service providers and business partners may collect information about you automatically through the use of cookies and similar technologies including information about your online activities over time and across different websites or online services. These categories of information include:

- **Identifiers**, such as unique device identifiers, IP addresses, and other persistent identifiers;
- **Geolocation data**, such as precise location;
- **Commercial information**, such as products or services purchased, content downloaded from our sites, or other purchasing or consumption histories or tendencies;
- **Internet or other electronic network activity information**, such as information regarding your interaction with any websites, applications, or devices associated with our business; and
- **Sensitive personal information**, such as precise location.

Information we may collect from other sources

We may collect information from other sources. For example:

- **Identifiers-** We may collect contact information such as email addresses from marketing vendors;
- **Commercial information-** We may collect information on your purchasing history and potential interests from data supplementation services;
- **Public and Government Record Information-** We may collect information about you from public sources, including court records and government agencies;
- **Biometric Information-** We may collect biometric information from authentication services;
- **Demographics**, such as your gender, age, or veteran status provided by data supplementation services or government sources;
- **Professional information**, such as employer, salary, or job title from references, recruiters, or employment-related services;
- **Education information** from background check providers;
- **Internet or other electronic network activity information;** and
- **Sensitive personal information**, as described above and defined under applicable law.

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes;
- Perform internal research to assess and improve our business;
- Comply with record retention requirements under the law or other relevant legal or regulatory requirements or internal document retention policy;
- Defend or bring any existing or potential legal claims; and

- Deal with any complaints regarding the services.

2. HOW AND WHY WE MAY USE YOUR PERSONAL INFORMATION

We may use your personal information for the following business purposes:

- **Identification and authentication:** We may use your identifiers to verify your identity and to protect the security of your personal information;
- **Operating our business:** We may process your personal information to provide you with our products or services, to assess your ability to provide us with your products or services, or to conduct due diligence including Know Your Customer/Know Your Shareholder diligence for assessment of business relationships;
- **Communicating with you:** We may use your personal information to communicate with you about your use of our services;
- **Marketing:** We may use your personal information to understand your preferences better and to appropriately personalize our marketing;
- **Exercising our rights:** We may use your personal information to exercise our legal rights where it is necessary to do so, for example to detect, prevent and respond to fraud claims, intellectual property infringement claims or violations of law or our terms and conditions;
- **Complying with our obligations:** We may process your personal information to comply with legal or regulatory requirements, where this is required by law or regulation, such as in response to court orders, to comply with privacy or financial regulations, or to cooperate with law enforcement, other government entities, or lawful investigations; and
- **Protecting against harm:** We may use personal information as we deem necessary to protect the rights and safety of us, you, or others.

We may aggregate or de-identify any information collected about you and we may use that aggregated or de-identified information for any purpose.

3. PERSONAL INFORMATION WE DISCLOSE TO OTHER PARTIES

We may disclose certain categories of your personal information to our service providers, business partners, or affiliates.

Information we disclose

In order to achieve our business purposes, we may disclose your personal information in the following circumstances:

- **Service providers and business partners:** We engage service providers and business partners to assist us with operating our businesses and providing you with our services. These service providers or business partners may perform various services, help us process business, support email and messaging services, analyze information, and conduct compliance related activities. Some of our service providers or business partners may engage their own service providers or business partners to further assist us. Unless

otherwise specified, these companies will only use your personal information in the ways described in this Policy.

- **Marubeni group companies:** MCC has affiliates around the world. Our affiliates work closely with each other to provide you access to our services. We may disclose your personal information to Marubeni group companies for marketing purposes, security, compliance, optimization of products and services, and internal reporting. Unless otherwise specified, Marubeni group companies will only use your information in the ways described in this Policy.
- **To comply with law or cooperate with reasonable requests:** We may disclose your personal information to law enforcement agencies, courts, other government authorities or other third parties where we believe necessary to comply with a legal or regulatory obligation. We may disclose personal information as we deem reasonably necessary to support lawful investigations or otherwise to protect our rights or the rights of you or any other party.
- **In the context of a transaction:** We may disclose your personal information to potential transaction partners, service providers, advisors, and other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell or transfer all or a portion of our assets or business.

We may disclose the following categories of your personal information to these parties for our business purposes:

- **Identifiers;**
- **Demographics;**
- **Commercial information;**
- **Public and Government Record information;**
- **Biometric information;**
- **Geolocation data;**
- **Internet or other electronic network activity information;**
- **Financial, medical, or health information;**
- **Pictures, audio, and video;**
- **Professional information;**
- **Education information;**
- **Inferences drawn from any of the above information categories; and**
- **Sensitive personal information.**

4. YOUR CALIFORNIA PRIVACY RIGHTS

This section provides California residents with additional information regarding our collection, use, and disclosure of their personal information.

We do not “sell” or “share” your personal information as those terms are defined under California law.

We do not use or disclose your sensitive personal information for purposes other than those described under California law.

You may have rights in relation to your personal information under California law, as described below. In the event you would like to exercise one of your rights or if you are an authorized agent submitting a request on behalf of a California consumer, please contact us at <https://www.marucit.com/contact.html> or at 1-201-818-0100. We will ask you to provide name and contact information. Please note that we may require additional information from you in order to honor your request, and we may decline your request as permitted under applicable law.

- **Right to know:** Users exercising this right may request information about the personal information that we collect, use, disclose, share and sell;
- **Right to deletion:** Users exercising this right can ask us to delete their personal information we have collected;
- **Right to correct:** Users exercising this right can ask us to correct inaccurate personal information that we maintain about them; and
- **Right to be free from discrimination:** Users may freely exercise these rights without fear of being denied goods or services. We may, however, provide a different level of service or charge a different rate reasonably relating to the value of your personal information.

5. DO NOT TRACK SIGNALS

We do not currently respond to web browser “do not track” signals or other mechanisms that provide a method to opt out of the collection of information across websites or other online services. If we do so in the future, we will describe how we do so in this Policy.

6. CONTACT US

If you have questions about this Policy or our use of your personal information, please contact us at <https://www.marucit.com/contact.html> or at 1-201-818-0100.

7. CHANGES TO THE POLICY

We may modify or update this Policy from time to time. We encourage you to visit this Policy at least once per year to learn about any changes to the way we collect, use, or disclose your personal information. If we make a material change to this Policy, we will take reasonable steps to notify you, as required by applicable law.

Effective Date: 12/01/2024