

**RECRUITING DATA PROTECTION NOTICE**

**Last revised March 16, 2018**

Kao provides this Recruiting Data Protection Notice ("**Notice**") to explain our practices as the responsible data controller regarding the collection, processing, and use of personal data relating to job applicants or other potential employees of the Kao Company in connection with recruiting and hiring activities.

**1. Scope**

This Notice applies to you if you are a job applicant or other potential employee of the Kao Company.

**2. Categories of Personal Data**

The Kao Company collects, processes, and uses the following categories of personal data about you from you or from authorized third parties (e.g., people you have named as your references, previous employers, schools, public authorities, or public resources) in connection with recruiting and hiring activities (collectively, "**Recruiting Data**"):

- **identification data**, such as your name, user ID and password (if you apply via our recruiting website), citizenship, and date of birth;
- **contact details**, such as your home addresses, telephone numbers, and email addresses;
- **recruitment-related information**, such as information regarding previous work experience (including references from previous employers), qualifications and work history, educational background, language skills, professional skills and talents, professional memberships, community involvement, geographic mobility interests, and reports from executive search or employment firms (where applicable);
- **interview notes**; and
- **communication details**, such as email content.

**3. Processing Purposes, Basis, and Consequences**

Recruiting Data is collected, processed, and used for the following purposes (collectively, "**Processing Purposes**"):

Processing Purposes	Categories of Recruiting Data Involved
<p><b>recruiting and hiring activities</b>, including administering your recruitment, making a hiring decision (including assessing qualification and tracking candidates during the application process, and carrying out interviews), and completing the hiring process in case you should be offered and accept a position with the Kao Company (including</p>	<p>identification data, contact details, recruitment-related information, interview notes, and communication details</p>

activities related to on-boarding and the new hire process)	
<b>complying with applicable laws and employment-related requirements</b> along with the administration of those requirements, such as employment and immigration laws	identification data, contact details, recruitment-related information, and interview notes
<b>communicating with you, within the Kao Group, and/or with third parties</b> (such as government officials)	identification data, contact details, recruitment-related information, interview notes, and communication details
<b>responding to and complying with requests and legal demands</b> from regulators or other authorities in or outside of your home country	identification data, contact details, recruitment-related information, interview notes, and communication details

The Kao Company relies on the following legal grounds for the collection, processing, and use of personal data:

- taking steps at your request (i.e., following your application, prior to entering into a potential employment contract with you);
- performance of the contract with you for the usage of our recruiting website;
- legitimate interest of the Kao Company, other Kao Group companies, or other third parties (such as existing or potential business partners, suppliers, customers, end-customers, governmental bodies, or courts) where the legitimate interest could be in particular group-wide information sharing, marketing and Customer Relationship Management (CRM) activities, or potential merger and acquisition activities;
- consent, as permitted by applicable law;
- compliance with legal obligations, in particular in the area of labor and employment law, social security and protection law, data protection law, tax law, and corporate compliance laws.

The provision of Recruiting Data as described in the Notice is partly a statutory requirement, partly a contractual requirement under the terms of our recruiting website, and partly a requirement to carry out the recruitment and hiring process with you. In general, you are obliged to provide the Recruiting Data, except in limited instances when we indicate that certain information is voluntary. Not providing the Recruiting Data may prevent the Kao Company from carrying out recruiting and hiring activities as they relate to you and may require the Kao Company to terminate your application and cease consideration of you for potential employment with the Kao Company.

#### 4. Categories of Recipients and International Transfers

The Kao Company may transfer your Recruiting Data to third parties for the Processing Purposes as follows:

- **Within the Kao Group:** Our parent entity, the Kao Corporation, in Japan and each of its affiliates and subsidiaries (each affiliate or subsidiary including us referred to as "**Kao Company**"; collectively, the "**Kao Group**") within the global Kao Group ([www.kao.com](http://www.kao.com)) may receive your personal data as necessary for the Processing Purposes, in particular to conduct recruiting and hiring activities, and respond to and comply with requests and legal demands.
- **With certain acquiring or acquired entities:** If the Kao Company business for which you are seeking employment is sold or transferred in whole or in part or if the Kao Company is acquiring and integrating another entity into the Kao Company business for which you are seeking employment (or any similar transaction is being contemplated), your personal data may be transferred to the other entity (e.g., the new potential employer, the new acquired entity, or potential new acquired entity) prior to the transaction (e.g., during the diligence phase) or after the transaction, subject to any rights provided by applicable law, including jurisdictions where the other entity is located.
- **With data processors:** Certain third parties, whether affiliated or unaffiliated, may receive your personal data to process such data under appropriate instructions ("**Processors**") as necessary for the Processing Purposes, in particular to conduct recruiting and hiring activities, comply with applicable laws and employment-related requirements, and other activities. The Processors will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the personal data, and to process the personal data only as instructed.

Any access to your personal data is restricted to those individuals that have a need-to-know in order to fulfill their job responsibilities. The Kao Company may also disclose your personal data as required or permitted by applicable law to governmental authorities, courts, external advisors, and similar third parties.

**International transfers.** The personal data that we collect or receive about you may be transferred to and processed by recipients that are located inside or outside the European Economic Area ("**EEA**"). For recipients located outside of the EEA, some are certified under the EU-U.S. Privacy Shield and others are located in countries with adequacy decisions (, and, in each case, the transfer is thereby recognized as providing an adequate level of data protection from a European data protection law perspective. Other recipients might be located in countries which do not adduce an adequate level of protection from a European data protection law perspective. We will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. With respect to transfers to countries not providing an adequate level of data protection, we will base the transfer on appropriate safeguards, such as standard data protection clauses adopted by the European Commission or by a supervisory authority, approved codes of conduct together with binding and enforceable commitments of the recipient, or approved certification mechanisms together with binding and enforceable commitments of the recipient. You can ask for a copy of such appropriate safeguards by contacting us as set out in Section 7 below.

## 5. Retention Period

Your personal data is stored by the Kao Company and/or our service providers, strictly to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws. When the Kao Company no longer needs to use your personal data, we will remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which the Kao Company is subject).

In principle, we will delete your Recruiting Data 5 months after a negative hiring decision by the Kao Company or after you reject an offer from the Kao Company. The Kao Company may retain your Recruiting Data for 2 years if you consented thereto in order to be considered for other positions at the Kao Company or another company of the Kao Group.

If you accept an offer from the Kao Company, your Recruiting Data will be retained for the duration of your employment with the Kao Company.

## 6. Your Rights

**Right to withdraw your consent:** If you have declared your consent regarding certain types of processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. Please contact us as stated in Section 7 below to withdraw your consent.

**Additional data privacy rights:** Pursuant to applicable data protection law you may have the right to: (i) request access to your personal data; (ii) request rectification of your personal data; (iii) request erasure of your personal data; (iv) request restriction of processing of your personal data; (v) request data portability; and/or (vi) object to the processing of your personal data.

Please note that these aforementioned rights might be limited under the applicable local data protection law. Below please find further information on your rights to the extent that the GDPR applies:

- **Right to request access to your personal data:** You may have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to the personal data. The access information includes – inter alia – the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipient to whom the personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access.  
You may have the right to obtain a copy of the personal data undergoing processing free of charge. For further copies requested by you, we may charge a reasonable fee based on administrative costs.
- **Right to request rectification:** You may have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **Right to request erasure (right to be forgotten):** Under certain circumstances, you may have the right to obtain from us the erasure of personal data concerning you and we may be obliged to erase such personal data.

- **Right to request restriction of processing:** Under certain circumstances, you may have the right to obtain from us restriction of processing your personal data. In this case, the respective data will be marked and may only be processed by us for certain purposes. As the Kao Company processes and uses your personal data primarily for purposes of carrying out the contractual recruitment relationship with you, the Kao Company will in principle have a legitimate interest for the processing which will override your restriction request, unless the restriction request relates to marketing activities.
- **Right to request data portability:** Under certain circumstances, you may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another entity without hindrance from us.
- **Right to object:**

**Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by us and we can be required to no longer process your personal data.**

**If you have a right to object and you exercise this right, your personal data will no longer be processed for such purposes by us. You may exercise this right by contacting us as stated in Section 7 below.**

**Such a right to object may, in particular, not exist if the processing of your personal data is necessary to take steps during the hiring process.**

To exercise your rights please contact us as stated in Section 7 below. You also have the right to lodge a complaint with the competent data protection supervisory authority.

## 7. Questions and Contact Information

If you have any questions about this Notice or if you want to exercise your rights as stated above in Section 6, please contact us at: [www.kao.com/global/en/EU-Data-Subject-Request](http://www.kao.com/global/en/EU-Data-Subject-Request).