

FICT USA, INC.

CALIFORNIA EMPLOYEE PRIVACY NOTICE AND POLICY

Effective: November 1, 2026

1. Purpose and Scope.

This California Employee Privacy Notice and Policy (this “Notice”) is provided by FICT USA, Inc. (“FICT USA,” “we,” or “us”) to all current and former employees, job applicants, and contractors of FICT USA who are California residents. It satisfies both the “notice at collection” requirement and the online privacy policy requirement under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, “CCPA”).

This Notice applies to personal information we collect in connection with the employment relationship, including information collected through the FICT Group Whistleblowing and Compliance Question Policy (the “Policy”) and its associated Compliance Hotline. It does not apply to personal information we collect about customers or other third parties in the course of business.

2. Categories of Personal Information We Collect.

We collect the following categories of personal information from or about you, depending on your relationship with FICT USA:

2.1 *Identification and Contact Information.* Name, home address, telephone number, email address, and emergency contact information.

2.2 *Employment Records.* Job title, department, employment start and end dates, employment classification, offer letter terms, compensation and remuneration, performance evaluations, disciplinary records, and training records.

2.3 *Payroll and Compensation Data.* Salary and wage information, tax withholding elections, direct deposit account information, expense reimbursement records, and related payroll documentation.

2.4 *Benefits Information.* Enrollment records for medical, dental, vision, workers’ compensation, paid family leave, state disability, and retirement plan benefits, including information about plan selections and beneficiary designations.

2.5 *Leave and Attendance Records.* Vacation and paid time off records, sick leave usage, leave of absence documentation, and attendance records.

2.6 *Immigration and Work Authorization Records.* Form I-9 documentation and right-to-work records.

2.7 *IT and Technology Use Records.* Records of your use of FICT USA’s technology resources, including email, internet usage, and system access logs, as disclosed in the FICT USA Data Protection & IT Security Policy and the Technology Use and Privacy policy in the FICT USA Employee Handbook. You have no expectation of privacy with respect to your use of company-owned technology resources.

2.8 *Whistleblower and Compliance Records.* Personal information collected in connection with reports submitted through the FICT Group Compliance Hotline (DQ Helpline, operated by D-Quest, Inc.) or directly to a Supervisor, including the identity of reporters (where disclosed), the identity of reported persons, and the substance of and findings from investigations. See Section 6 below for important information about how we handle this information.

2.9 *Sensitive Personal Information.* Within the categories above, we collect the following sensitive personal information as defined by CCPA:

- Social Security numbers and government-issued identification numbers (for payroll, tax, and I-9 purposes);
- Financial account information (for payroll direct deposit and expense reimbursement purposes); and
- Health and medical information (collected in connection with medical, dental, and vision benefits enrollment through Blue Shield of California and related carriers, workers' compensation administration through Hartford, and sick leave and disability administration as required by law).

We limit our use of sensitive personal information to purposes authorized by CCPA and do not use it for inferring characteristics about you.

3. How We Collect Personal Information.

We collect personal information:

- Directly from you, through employment applications, onboarding forms, benefits enrollment, time and expense records, and other HR documentation;
- From FICT Holdings, Inc. ("FICT Holdings"), our Japanese parent company, with respect to seconded employees and director-level personnel whose employment records are maintained at the group level;
- From third-party service providers involved in payroll, benefits, and HR administration (see Section 5 below);
- Through your use of FICT USA's technology resources, as described in Section 2.7 above; and
- Through the FICT Group Hotline (DQ Helpline) and, where a Covered Person elects to report directly to their Supervisor, through such reports.

4. Purposes for Which We Use Personal Information.

We collect and use personal information for the following business purposes:

- Recruiting, hiring, onboarding, and managing the employment relationship;
- Administering payroll, compensation, benefits, and leave programs;
- Complying with federal, California state, and local employment laws and regulations;
- Administering the FICT Group Whistleblowing and Compliance Question Policy and investigating compliance reports received through the Compliance Hotline or directly from employees;
- Maintaining workplace safety, security, and the integrity of FICT USA's technology resources;
- Communicating with employees and administering personnel files;
- Defending against legal claims and complying with legal obligations; and
- Supporting corporate governance, group-level oversight, and reporting obligations of FICT Holdings as ultimate parent company.

We do not sell or share your personal information for cross-context behavioral advertising purposes.

5. With Whom We Share Personal Information.

We may share your personal information with the following categories of recipients, for the business purposes described in Section 4 above:

5.1 *FICT Holdings Inc. (Japan)*. As our ultimate parent company, FICT Holdings receives certain employee personal information for group-level corporate governance, HR administration, and compliance oversight purposes. This sharing is governed by a Data Processing Agreement between FICT Holdings and FICT USA. FICT Holdings does not have direct access to FICT USA's technology systems; data is transmitted by email where applicable.

5.2 *Payroll and HR Service Providers*. We use ADP for payroll administration. ADP receives payroll records, tax information, and financial account details for direct deposit and payroll processing purposes.

5.3 *Benefits Providers*. We share benefits enrollment information and related personal information with: Blue Shield of California (medical insurance); Hartford (workers' compensation insurance); and retirement plan administrators. Each provider receives only the information necessary for the specific benefit.

5.4 *Expense Management*. We use Expensify for expense reimbursement. Expensify receives expense records and financial account information for reimbursement processing.

5.5 *IT Service Provider*. We engage SeekNet as our external IT administrator. SeekNet has access to company systems and infrastructure in the course of providing IT support and security services.

5.6 *Compliance Hotline and Audit and Supervisory Committee Hotline Operators*. Reports submitted through the FICT Group Hotlines are processed by DQ Helpline, operated by D-Quest, Inc. (Japan). D-Quest processes Hotline reports on behalf of FICT Holdings in connection with the Policy. A CCPA-compliant service provider agreement with D-Quest is in place.

5.7 *Legal and Professional Advisors*. We may share personal information with legal counsel, accountants, and other professional advisors to the extent necessary for the provision of professional services.

5.8 *Government and Law Enforcement*. We may disclose personal information to government agencies, regulators, or law enforcement where required by law or in response to a valid legal process.

We do not sell your personal information to third parties. We do not share your personal information for cross-context behavioral advertising.

6. Whistleblower Investigation Records - Special Notice.

The collection and use of personal information in connection with whistleblower reports and investigations is subject to the following additional disclosures:

6.1 *Confidentiality*. Reporter-identifying information is protected to the maximum extent permitted by applicable law and will not be disclosed to the reported person or other unauthorized parties without the reporter's consent, except as required by law.

6.2 *Retention.* Personal information collected in connection with a whistleblower investigation is retained for a minimum of four years from the date the investigation is closed, notwithstanding any deletion request, on the basis of FICT USA's legal obligations and the exercise of its legal rights. This retention period is sufficient to cover the three-year statute of limitations for retaliation claims under California Labor Code § 1102.5. For reports submitted directly to a Supervisor, FICT USA maintains its own contemporaneous written record retained for the same minimum period. For reports submitted through DQ Helpline, FICT Holdings downloads and retains the case correspondence for a minimum of four years from case closure.

6.3 *Data Subject Rights and Investigations.* CCPA data subject rights requests relating to whistleblower investigation records (including access, deletion, and correction requests) are subject to a separate internal DSAR protocol. Reporter-identifying information will be protected in responding to any such request, including a request submitted by the reported person. FICT USA may decline to delete investigation records during the applicable retention period on the basis of its legal obligations and legal rights.

7. How Long We Retain Personal Information.

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected, to comply with our legal obligations, and to defend against potential legal claims. The following retention periods apply:

- Payroll records: minimum four years from the date of creation;
- Workers' compensation records: minimum five years from the date of injury or illness;
- Whistleblower investigation records: minimum four years from the date of case closure;
- General employment records: for the duration of employment and a minimum of three years following separation; and
- Other records: in accordance with applicable law and FICT USA's record retention practices.

8. Your California Privacy Rights.

As a California resident, you have, subject to Section 6, the following rights with respect to your personal information under CCPA:

8.1 *Right to Know.* You have the right to request that we disclose to you the categories and specific pieces of personal information we have collected about you, the categories of sources from which it was collected, the business purposes for collecting it, and the categories of third parties with whom we have shared it.

8.2 *Right to Access.* You have the right to receive a copy of the specific pieces of personal information we hold about you, subject to certain exceptions.

8.3 *Right to Delete.* You have the right to request that we delete personal information we have collected from you, subject to certain exceptions including our legal obligation to retain records as described in Section 7 above.

8.4 *Right to Correct.* You have the right to request that we correct inaccurate personal information we hold about you.

8.5 *Right to Limit Use of Sensitive Personal Information.* You have the right to limit our use of sensitive personal information to purposes authorized by CCPA.

8.6 *Right to Non-Discrimination.* We will not discriminate against you for exercising any of your CCPA rights.

9. How to Submit a Privacy Rights Request.

To submit a request to exercise any of your CCPA rights, please contact us using one of the following methods:

- Email: michelle.ma@us.fict-g.com
- Mail: FICT USA, Inc., 100 Century Center Ct, Suite 302, San Jose, CA 95112, Attn: Privacy/Compliance

We will respond to verified requests within 45 days of receipt. We may extend this period by an additional 45 days where reasonably necessary, in which case we will notify you. We will verify your identity before processing any request. We cannot respond to requests that we cannot verify.

Where a data subject rights request relates to a whistleblower report or compliance investigation that involves the President of FICT USA as Reporter or Reported Person, such request should be directed to FICT Holdings' Legal and IP Department (currently Katsuya Ono, Esq., Secretary of FICT USA) rather than to the contact above.

10. Contact Information.

If you have questions about this Notice or about how FICT USA handles your personal information, please contact:

Michelle Ma, Legal / Compliance Contact, Email: michelle.ma@us.fict-g.com

For questions relating to the Compliance Hotline and whistleblower program, please contact FICT Holdings' General Counsel of Legal and IP Department (currently Katsuya Ono as of the effective date of this Notice).

11. Updates to This Notice.

We may update this Notice from time to time to reflect changes in our practices or applicable law. We will notify you of any material changes by delivering an updated Notice to your work email address. The most current version of this Notice will be maintained on FICT USA's website at <https://www.fict-g.com/en/us/index.html#employee-privacy>

This Notice was last updated on November 1, 2026.