

DATA PROTECTION NOTICE

FOR JAPAN JOB APPLICANTS

EFFECTIVE JANUARY 2025

1. INTRODUCTION

The purpose of this Job Applicant Data Protection Notice ("**Notice**") is to inform individuals ("**you**", or "**your**") who apply for a position or an internship at:

- Morgan, Lewis & Bockius LLP and Morgan, Lewis & Bockius Law Offices (Foreign Law Joint Enterprise) (collectively, the "**Firm**", "**we**", or "**us**") with a representative office at Marunouchi Building 16F, 2-4-1, Marunouchi, Chiyoda-ku, Tokyo 100-6316, Japan

on the collection, use, disclosure, transfer, retention, and other processing of your Personal Information and/or Sensitive Personal Information (as defined below) in accordance with the Act on the Protection of Personal Information (No. 57 of 2003, as amended) of Japan ("**APPI**") and/or any other applicable law. Please also review our [Global Privacy Policy](#), which is incorporated by reference into this Notice.

2. DEFINITIONS

Personal Information refers to information about a living individual, such as name, date of birth, or other identifier made by writing, recording, document, drawing, or electronic or magnetic records, which can be used to identify a specific individual. Personal Information also includes any information containing an individual identification code.

Sensitive Personal Information (also known as Special Care-Required Personal Information) refers to

Personal Information involving an individual's race, creed, social status, medical history, criminal record, fact of having suffered damage by a crime, or other descriptions as prescribed by the APPI which require special care so as not to cause unfair discrimination, prejudice, or other disadvantages to the individual.

Data Subject refers to the individual who is the subject of the Personal Information.

Third Parties means third-party service providers, vendors, agents, consultants and/or other third parties.

3. PERSONAL INFORMATION

Throughout the course of your application process with the Firm, we may process certain Personal Information and/or Sensitive Personal Information about you. This may include the following categories:

- **Contact Information:** name (including preferred name), title; home and work address; home and work phone number; personal and work email address; mobile phone number; job title; and any other contact details provided to us.
- **Educational History & Qualifications:** CV/résumé information including education, degrees, grades, and exam certificates.
- **HR Data:** nationality; citizenship; passport number; My Number, validity, and issue information; residency; visa status; date of birth; birth city; country; gender; marital status; photos;

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primary languages; language skills; visa type and information (work permit/business/etc.); emergency contact details.

- **Travel Details:** flight, train, rental car, and hotel bookings and other similar information.
- **Work History Information:** current employer; prior work history; references; criminal record checks (to the extent permitted under applicable Data Privacy Laws); function and work location; memberships and affiliations; work experience; references; compensation history; and any information we found about you from searches of publicly available information, including of social media.
- **Compliance Information:** information required for regulatory or compliance purposes that relate to outside business activities and/or personal account dealing.
- **Security Data:** details for identification card (including name and photograph) for building access and CCTV footage in public areas.
- **Reimbursement Information:** banking information necessary to make payments to you.
- **Sensitive Personal Information (also known as Special Care- Required Personal Information):** health information, race, social status, and criminal records. This type of Personal Information will only be processed with special care as not to cause unfair discrimination, prejudice, or other disadvantages to the individual.

4. SOURCES OF PERSONAL INFORMATION

We may obtain Personal Data about you from the following sources:

- Directly from you, such as through our website or Human Resources, or via other forms or information you provide to us during the application process; and

- From third parties, including recruiters and employment agencies; references from third parties and other background screening checks, subject to the requirements of applicable law; and from former employers.

We will not collect your Sensitive Personal Information unless you expressly consent to us doing so.

5. PURPOSES FOR PROCESSING PERSONAL INFORMATION

The Firm processes your Personal Information to comply with the APPI and other applicable law, to meet its business needs and legal obligations, and to process your job application, such as:

- Managing the job application process and potential employment relationship;
- Conducting surveys and monitoring and reporting equality statistics and similar information on an anonymous basis;
- Tracking and budgeting travel and expenses;
- Performing talent management functions;
- Coordinating and tracking event registration, attendance, and activities;
- Exercising its rights under local laws and compliance with applicable legal and regulatory requests and obligations (including investigations in relation to the same) and audit requirements;
- Establishing or defending legal claims and allegations;
- Maintaining or updating existing services and software; and
- Reviewing, organizing, and indexing data and deploying enterprise tools.
- To comply with the law or respond to compulsory legal processes (such as a search warrant or court order), or in response to a request for information from a regulator or governmental authority, or in the course of actual or anticipated litigation or

otherwise for legal purposes (i.e., to other law firms, courts, or government authorities).

We will not use your Personal Information and/or Sensitive Personal Information for marketing purposes unless you expressly consent to us doing so.

The Firm may process your Personal Data using (i) cloud services, and (ii) artificial intelligence (including portable models) in a closed, proprietary environment. Such cloud and artificial intelligence services may be hosted in the United States (US), United Kingdom (UK), and/or other countries, including those that do not provide the same level of data protection as the jurisdiction in which you reside. The Firm will exercise due diligence in its selection of these services and will ensure that adequate technical and organizational security measures are in place to safeguard your Personal Data through use of these services.

We will not use your Personal Information and/or Sensitive Personal Information for automated decision making, including profiling.

6. DISCLOSURE OF PERSONAL INFORMATION

Your Personal Information will be disclosed within the Firm to management and those individuals who need access to your Personal Information to perform their duties for the purposes listed in Section 5 above or where required or permitted by APPI or as set out in this Notice.

The Firm may also disclose your Personal Information to other Morgan Lewis-affiliated entities and offices (the “**Morgan Lewis Partnership**”) for pursuing the purposes listed above or where required by applicable law. Within the Morgan Lewis Partnership, your Personal Information will be disclosed only to a limited number of relevant individuals such as partners, managers, advisors, or specialists within the Information Technology, Human Resources, Legal, Finance, Operations, Compliance, and Accounting departments, to the extent they need access to your Personal Information for these purposes.

The Firm may also disclose your Personal Information to third parties providing information technology support or technical and organisational services in connection with

human resources-related activities, or legal, audit, or other advisors and other service providers. The Firm will exercise appropriate due diligence in its selection of these providers. Among other things, the Firm will require that such providers maintain adequate technical and organisational security measures to safeguard your Personal Information, and to process your Personal Information only as instructed by the Firm and for no other purposes and comply with the privacy and security standards described in this Notice.

7. DATA RETENTION

We will retain your Personal Information no longer than is necessary to carry out the purposes listed in this Notice or as required by law. The Firm retains your Personal Information for up to 6 to 12 months following the end of your job application process or, if you become employed or engaged by the Firm, from the end of your employment or other business relationship in accordance with applicable law. However, the Firm will retain legal documents in connection with the termination of your job application process for as long as such termination may be in dispute or can be legally challenged by you or your recruiting agency.

8. DATA SUBJECT RIGHTS

You have the right to make the requests listed below regarding your Personal Information unless an exception under applicable data protection is applicable.

- Right to be Informed
- Right to Access
- Right to Rectification
- Right to Erasure and/or Deletion
- Right to Object to Processing/Suspend Use

To exercise any of the above rights, submit your request to MLPrivacyOffice@morganlewis.com. Please note that a reasonable fee may be charged for an access request. If so, the Firm will inform the Data Subject of the fee before processing the request.

Depending on the request made, the Firm may only provide you with (i) access to the Personal Information contained in the documents requested (not to the documents in their

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entirety), and (ii) where appropriate, confirmation of the Personal Information that the Firm has on record, where your Personal Information forms a negligible part of the document(s).

9. DATA SECURITY

The Firm will take reasonable care to protect your Personal Information from unauthorised access, modification, or disclosure. To safeguard your Personal Information, the Firm implements appropriate administrative, physical, and technical measures (such as up-to-date antivirus protection, encryption, and the use of privacy filters and other physical security measures) to secure the storage and transmission of Personal Information by the Firm.

No method of transmission over the Internet (including via our website or email) or method of electronic storage is completely secure. While security cannot be guaranteed, the Firm strives to protect the security of your information and is constantly reviewing and enhancing its information security measures. Transmission of your data to our website is at your own risk.

10. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

You acknowledge and agree that your Personal Information may be transferred and/or shared with the Firm's affiliated offices, entities, and Third Parties (which may be located outside of Japan and whose laws may not be adequate under APPI) for the purposes listed in this Notice. The Firm shall ensure that any Personal Information transferred will be adequately protected as set forth in the APPI.

By participating and providing your Personal Information to the Firm during the application, recruitment, and interviewing process, you consent that your Personal Information may be transferred as described in this Notice. Information about such third parties located outside Japan (except those located in the European Economic Area) is attached hereto as Exhibit A).

Please note that our information technology systems, including email, are hosted and all data is stored on servers located in the US.

CONTACT INFORMATION

If you, (i) have any questions, feedback, or concerns relating to your Personal Information or this Notice; or (ii) would like to make a request as described above; please contact the Privacy Office at the contact information below.

TOKYO OFFICE DATA PROTECTION OFFICER

Email: MLTokyoDPO@morganlewis.com

Telephone: +81.3.4578.2500

Address: Marunouchi Building 16F 2-4-1
Marunouchi, Chiyoda-ku Tokyo 100-6316
Japan

MORGAN LEWIS PRIVACY OFFICE

Email: MLPrivacyOffice@morganlewis.com

Telephone: +1 215-963-5000

Address: 2222 Market Street
Philadelphia, Pennsylvania 19103-3007

11. CHANGES TO NOTICE

The Firm may revise this Notice at any time without any prior notice. Please refer to the effective date of the Notice to determine when it was last updated. Your continued interaction with the Firm constitutes your acknowledgement and acceptance of such changes.

EXHIBIT A

INFORMATION ON THIRD PARTIES OUTSIDE JAPAN THAT MAY RECEIVE PERSONAL INFORMATION

1. COUNTRIES WHERE AFFILIATED OFFICES AND THIRD PARTIES ARE LOCATED:

The countries listed below are subject to change as affiliates and Third Parties may be added or removed.

- the United States of America
- the European Union
- United Kingdom
- China
- Hong Kong
- Singapore
- the United Arab Emirates
- Kazakhstan

2. FOR INFORMATION REGARDING THE PERSONAL INFORMATION PROTECTION LEGISLATION IN THE ABOVE COUNTRIES, EXCEPT FOR THE EU AND UK, WHICH ARE DEEMED ADEQUATE, PLEASE REFER TO THE FOLLOWING ADDITIONAL MATERIALS (THAT MAY BE UPDATED FROM TIME TO TIME) THAT ARE PUBLISHED IN THE JAPANESE LANGUAGE BY JAPAN'S PERSONAL INFORMATION PROTECTION COMMISSION AT THE FOLLOWING WEBSITES AND WHICH SHALL BE DEEMED TO BE PART OF THIS EXHIBIT A:

USA:

- https://www.ppc.go.jp/files/pdf/USA_report.pdf
- https://www.ppc.go.jp/files/pdf/illinois_report.pdf
- https://www.ppc.go.jp/files/pdf/california_report.pdf
- https://www.ppc.go.jp/files/pdf/newyork_report.pdf

China:

https://www.ppc.go.jp/files/pdf/china_report.pdf

Hong Kong:

https://www.ppc.go.jp/files/pdf/hongkong_report.pdf

Singapore:

https://www.ppc.go.jp/files/pdf/singapore_report.pdf

UAE:

https://www.ppc.go.jp/files/pdf/arab_report.pdf

https://www.ppc.go.jp/files/pdf/ADGM_report.pdf

https://www.ppc.go.jp/files/pdf/DHC_report.pdf

https://www.ppc.go.jp/files/pdf/DIFC_report.pdf

* Information for Kazakhstan is not available on the website of Japan's Personal Information Protection Commission

3. INFORMATION REGARDING THE MEASURES TO BE TAKEN BY THE THIRD PARTIES TO PROTECT PERSONAL INFORMATION:

The Firm will thoroughly examine the suitability of each Third Party to which personal information is provided in advance, and confirm that appropriate measures have been taken in terms of security and other factors regarding the handling of personal information in such manner as consistent with the privacy principles set forth in the OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data (i.e., (i) collection limitation principle, (ii) data quality principle, (iii) purpose specification principle, (iv) use limitation principle, (v) security safeguards principle, (vi) openness principle, (vii) individual participation principle, (viii) accountability principle).