

Effective Date: March 16, 2023

Amway Employee Recruitment Privacy Notice

This Privacy Notice describes how Amway Japan G.K., 7-1, Udagawa-cho, Shibuya-ku, Tokyo 150-0042, (hereinafter “**Amway**” or “**we**” or “**us**”) uses personal information collected or received from Job Applicants (“**Applicant**” or “**you**”). It describes how we collect or receive your personal information, the types of personal information we process, how we use, share and protect these information, how long we retain these information, your rights with respect to the processing of your personal information, and how you can contact us about our privacy practices. Please acknowledge that documentation (resume, career history, academic record, etc.) you have presented will not be returned.

1. How We Collect or Receive Personal Information from You

Amway collects your personal information during your application process in preparation for a potential employment relationship with Amway.

Amway collects and receives personal information from applicants in the following ways:

- directly from you;
- through recommendation from a third party (e.g. recruitment agencies, schools, current Amway employees) with your consent.

2. The Types of Personal Information We Process

We process the following types of personal information relating to you:

- Contact information (e.g., name, postal and e-mail address and phone number);
- Portrait photograph
- Professional information (e.g., profession, title, resume, schools, results, reference check);
- Demographics information such as, nationality, date and place of birth;
- Work permit information, visa availability and type (if applicable);
- Name of Amway Employee Referrer (if applicable, with the consent).

In some countries, the law requires or permits the collection of information on gender, ethnicity, and military status. In everything we are doing, we are committed to equality, diversity and inclusion.

We may process other personal information in exceptional circumstances only. If we need to process other types of personal information about you, we will make sure that you are informed about the processing of such personal information and there is a valid legal basis for doing so.

3. How We Use the Personal Information We Collect

We only process your personal information to the extent it is necessary (i) for evaluation and preparation of a possible employment relationship; (ii) to comply with our legal obligations; or (iii) for the purpose of our legitimate interests, including preventing and protecting you, us and others against fraud,

unauthorized transactions, claims and other liabilities; and ensuring compliance with company policies and industry standards.

4. Sensitive Personal Data

Certain categories of job applicant's personal information are considered particularly sensitive and are subject to higher legal standards of data protection and security (e.g., "Special care-required personal information" under the Act on the Protection of Personal Information, Japan). Amway collects your sensitive personal information in exceptional circumstances only. If we do need to process sensitive personal information about you, we will make sure that there is a valid legal basis for doing so.

5. How We Share Personal Data

Amway does not sell, rent or trade your personal information. Amway does share your personal information specified in Section 2 for the purpose described in Section 3 with:

- Alticor Inc. (7575 Fulton Street East, Ada, Michigan 49355, USA);
- Amway International Inc. (7575 Fulton Street East, Ada, Michigan 49355, USA);
- other related entities, to whom it is reasonably necessary or desirable for Amway to disclose personal information in the context of your application (e.g., Access Business Group International LLC (USA), Amway (China) Co., Ltd. (China), Amway Korea Ltd. (Korea), Amway Business Services Asia Pacific Sdn. Bhd. (Malaysia), Amway Global Services India Private Limited (India), Amway (Singapore) Pte. Ltd. (Singapore), Amway of Australia (Australia))

Amway is responsible for controlling shared personal data.

6. Providing Personal Information to Third Parties

We may provide your personal information without your consent under the following circumstances:

- (a) When required by applicable laws and regulations;
- (b) When there is a need to protect a human life, body or fortune, and when it is difficult to obtain your consent;
- (c) When there is a special need to enhance public hygiene or promote fostering healthy children, and when it is difficult to obtain your consent; and
- (d) When there is a need to cooperate in regard to a central government organization or a local government, or a person entrusted by them performing affairs prescribed by applicable laws and regulations, and when there is a possibility that obtaining your consent would interfere with the performance of the said affairs.

7. International Data Transfers

We transfer the personal information we collect about you to Alticor Inc., Amway International Inc. and its related entities as set forth in Section 5. Some of these companies are located in countries other than the country in which the personal information was originally collected. The laws of those countries may not have the same level of data protection as the country in which you initially provided the personal information. When we transfer your personal data to other countries, we will protect that personal data as described in this Privacy Notice and in accordance with applicable law. For the systems in regard to the protection of personal information of the foreign country where these companies are located, please

check the information provided by the Personal Information Protection Commission at its website (<https://www.ppc.go.jp/personalinfo/legal/kaiseihogohou/#gaikoku>).

For personal data originating from European Economic Area (EEA) that are transferred to countries that have not been recognized by the European Commission as providing an adequate level of data protection, we have put in place **EU Standard Data Protection Clauses** to protect your personal data.

8. How We Protect Personal Data

We maintain appropriate organizational, human, physical, and technical security safeguards designed to protect the personal data we process and securely manage against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure, or use. The outline of our security control actions is as stated in the Appendix 1. For further details of our security control actions, please make an inquiry to us using our [Contact Information] at the end of this document.

9. How Long We Retain Personal Data

We store personal data as long as necessary to fulfil the purposes for which we collect the information (see above under Section 3), except if required or allowed otherwise by law. Please contact us using our [Contact Information] provided below, if you have any questions with respect to our data retention practices.

10. Updates to this Privacy Notice

Amway may update this Privacy Notice from time to time. We will notify you of any material changes to this Privacy Notice on our website (<https://www.amway.co.jp/privacy/recruit/index.html>) or through other appropriate communication channels. All changes shall be effective from the date of publication, unless otherwise provided in the notification.

11. Your Rights

Subject to the relevant legislative provisions, you have the following data protection rights:

(a) The right to access

You have the right to obtain confirmation as to whether or not your personal data are being processed and, where this is the case, access to the personal data. You also have the right to ask us for a copy of your personal data.

(b) The right to rectification

You have the right to ask us to rectify personal data about you that you think are inaccurate. You also have the right to ask us to complete data you think are incomplete.

(c) The right to erasure

This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your data where there’s no compelling reason for us to keep using the data. This is not a general right to erasure; there are exceptions, e.g. if we have a legal obligation to keep your data.

(d) The right to restriction of processing

You have the right to ask us to restrict the processing of your personal information in certain circumstances.

(e) The right to data portability

This right only applies to personal information you have given us. You have the right to ask that we transfer the information you gave us to another organization or give the data to you.

(f) The right not to be subject to a decision based solely on automated processing

You have the right not to be subject to a decision based solely on automated processing of your information - this means without any human intervention - which produces legal effects for you or similarly affects you. However, we may base our decision on automated processing of your information if you explicitly consented to it. In that case, you have the right to obtain human intervention, to express your point of view and to contest the decision.

(g) The right to withdraw consent

Where you have provided us with consent to process your personal information, you have the right to withdraw your consent at any time. This will not affect the lawfulness of the processing that has been carried out based on your consent prior to the withdrawal.

(h) The right to object

When we process your personal data for purposes of pursuing our legitimate interests, you have the right to object to such processing at any time. If you object, we will stop the processing unless we have strong and legitimate reasons to continue using your data.

(i) The right to lodge a complaint

If you have concerns about the way we handle or process your personal data, please contact us using our [Contact Information] listed below.

12. How to Contact Us

If you have any inquiries about this Privacy Notice, if you would like to update information we have about you, or if you wish to exercise your data protection rights as described above, please use our [Contact Information] listed below.

Revised on March 16, 2023

Irina Menshikova
Representative
Amway Japan G.K.

[Contact Information]

Ms. Yamakiri, Human Resources Division
Amway Japan G.K.
7-1 Udagawa-cho, Shibuya, Tokyo, 150-0042
Email : Mie_Yamakiri@Amway.com

Appendix 1

Outline of Security Control Actions

(Formulation of Fundamental Principles)

- To ensure the appropriate handling of personal data, we have formulated fundamental principles such as the compliance with the relevant laws/regulations and guidelines, etc. and the contact for inquiries and claims management and posted them on our websites.

(Maintenance of Rules for the Handling of Personal Data)

- We have formulated internal rules such as regulations on personal information protection and stipulated the manner of handling and the responsible person/person in charge as well as their responsibilities, etc. according to each phase as to the collection, use, preservation, provision, deletion and disposal, etc. of personal information.

(Organizational Security Control Measures)

- We have deployed a person with ultimate responsibility in managing information who controls our overall management system of personal information and a responsible person for each department that handles personal data.

- We have clarified the employees, etc. who handle personal data and the scope of personal data to be handled and maintained the reporting and communication system in case of recognizing the fact or symptom of breach of laws and internal rules.

(Human Security Control Measures)

- We have educated and made efforts in raising awareness amongst management and employees (including temporary workers) about protecting personal information, and we have made the utmost effort to control personal information.

(Physical Security Control Measures)

- We have managed the entry and exit of employees, etc. and restricted the takeout of electronic devices, etc. as well as implemented measures to prevent browsing personal data without authority.

- We have implemented measures to prevent theft or loss of devices, electronic media and documents, etc. that deal with personal data.

(Technical Security Control Measures)

- We have implemented access control and restricted the person in charge and the scope of personal information database, etc. to be handled.

- We have adopted a mechanism to protect information system that deals with personal data from unauthorized access or malware.