

## Processing of Personal Data on JAL Group Employees in CCPA

The JAL Group (hereinafter referred to as the “Company”) processes and protects personal data (hereinafter referred to as “Personal Data on Employees, etc.”). This personal data covers persons engaged in work at the Company (including officers, employees, and temporary staff, etc., hereinafter referred to as “Employees”) and persons wishing or who wished to become Company Employees (hereinafter referred to as “Job Applicants”), (Employees, Job Applicants are hereinafter referred to as “Employees, etc.”). In the State of California, the Company’s data protection is based on the California Consumer Privacy Act (hereinafter referred to as “CCPA”) and the JAL Group’s Basic Policies for Information Security and Personal Data Protection.

### 1. Purpose of Processing Personal Data

The Company properly processes Personal Data on Employees, etc. within the scope of the following purposes:

Category	Processed Personal Data	Purpose of Processing
Employees	Refer to Appendix 1-1	Refer to Appendix 1-2
Job Applicants	Refer to Appendix 2-1	Refer to Appendix 2-2

### 2. Disclosure and Provision of Personal Data to other Companies

- (1) The Company discloses and provides personal data on Employees to the Company’s group companies for the purposes indicated in Appendix 1-1 or Appendix 2-2. Refer to the following website for details on group companies.  
JAL Group Information  
[http://www.jal.com/ja/outline/group\\_category/](http://www.jal.com/ja/outline/group_category/)
- (2) The Company discloses personal data relating to Employees’ names, bank accounts, other salary payments, and pension work to companies outsourced to perform salary calculation work and pension related work, in accordance with the outsourcing of work relating to salary payments and work relating to pensions.
- (3) Personal data on Job Applicants is not disclosed or provided to other companies, including group companies. Explanations shall be made individually beforehand if personal data is disclosed or provided due to exceptional circumstances.
- (4) The Company may disclose or provide Personal Data on Employees, etc. to authorities or in accordance with the laws and regulations as necessary to comply with the laws and regulations of members of the state of California.

### 3. Management of Personal Data

The Company stores Personal Data on Employees, etc. as follows:

Category	Storage Period
Employees / Former Employees	<ul style="list-style-type: none"><li>• Stored for the necessary period in light of the purpose of processing stated in Appendix 1-2.</li><li>• Notwithstanding the above, when the laws and regulations that apply to the Company require the storage of personal data, personal data is stored in accordance such laws and regulations.</li></ul>
Job Applicants	Personal data to the extent that a Job Applicant applied to work for the Company is stored on an ongoing basis and when it is clear that the Company will not hire a Job Applicant or the Job Applicant declines a job offer from the Company, resumes, etc. are destroyed.

### 4. Inquiries Concerning Personal Data

Administration, The Americas

org.amrbgu.jal@jal.com

Appendix 1-1 Personal Data on Employees Collected and Processed by the Company

Category	Details
Basic Personnel Data	Name, employee number, face photograph, date of birth, gender, academic background, affiliation, job title, job grade, qualifications, occupation, career history, home address, telephone number, family structure, data on income tax withholding, Social Security number, etc.
Personnel and Labour Management Data	Data related to personnel transfers and assignment, data related to personnel evaluations and assessments, data concerning awards and disciplinary action, details stated in personnel system related forms, records of training and education received, qualifications held and license information, data concerning intellectual property, data concerning occupational disasters, etc.
Work Management Data	Work records and history, attendance data, data on administrative leave and reinstatement, data on leave and absence, data on commuting routes, etc.
Data Relating to Wages	Records of wages, graded salaries, and bonuses, etc., data on allowances and salary deductions, data on dependents family members, salary bank transfer accounts, retirement benefit data, data on tax payments, etc.
Data Relating to Social Insurance and Benefits	Data concerning social insurance etc., data concerning pensions, data concerning built-up savings and shareholding systems, etc. and financing, data concerning mutual benefit associations, data concerning enrolment in insurance, etc., data on use of dormitories and company housing, data on use of the staff travel system, etc., data on use of welfare facilities, etc.
Security Control Data	Records of access to offices, data relating to data security, etc.
Business Administration Data	Audio records of conferences, video records of teleconferences, communications records, records of use of information systems, etc.

Appendix 1-2 Purpose for Processing Employees' Personal Data

Category	Details
Personnel Management	Payment management such as salary increases, promotions, work performance, etc. assessments, retirement allowances, etc.
	Matters concerning personnel prescribed in the rules of employment (including recruitment, temporary transfers, transfers, etc.), planning organisational management systems and personnel plans, planning and analysing personnel systems and measures, planning and implementing HR development and training systems, self-development support, and management of intellectual property rights, etc.
Work Management	Implementation of management matters concerning working hours prescribed in laws and regulations and the rules of employment, management of working situation, etc.
Wage Related Duties	Procedures and administrative work concerning wages and bonuses, etc.
	Planning and analysing salary-related systems and measures, etc.
Duties Relating to Social Insurance and Benefits	Planning and implementation of benefits systems, procedures and administrative work relating to social insurance, etc., provision of, procedures for and administrative work relating to employee services, etc.
Health Management	Statutory medical examinations, etc.
	Performance of security consideration obligations that should be taken as an operator and decisions on occupational measures, etc.
Security Management	Matters concerning security such as access to offices and the authority to access systems, etc.
Business Administration	Publishing and sharing on intranet and in yellow pages, etc. (employee number, name, affiliation, position, duties, workplace telephone number, email address, etc.), preparing minutes, reports, and work contact, etc., storing records, etc.
External Interactions	Business talks, negotiations, consultations and contract performance with relevant external parties, responding to external inquiries and consultations, implementation of procedures and adjustments prescribed in laws and regulations and rules, etc. such as notifications, applications, registration, obtaining approval, and reporting, responding to complaints, etc.

Appendix 2-1 Personal Data on Job Applicants Collected and Processed by the Company

Category	Details
Basic Personnel Data	Name, academic background, career history, home address, telephone number, etc.
Data Relating to Wages	Method of determining salaries such as annual salary, monthly salary, and bonuses, etc.

Appendix 2-2 Purpose for Processing Job Applicants' Personal Data

Category	Details
Recruitment Activities	Assessment of Job Applicants and decisions on whether to hire Job Applicants, investigation and decisions on employment terms, responding to inquiries, contacting Job Applicants, management of Job Applicants' record of submitting applications, etc.