

PRIVACY POLICY

Effective Date: July 1, 2021.

1. Introduction and Overview.

This Privacy Policy provides a comprehensive description of how Mitsubishi HC Capital (U.S.A.) Inc. (“**we**,” “**our**,” or “**us**”) collects, uses, and shares information about you as well as your rights and choices regarding such information. It applies to any online location that links to this Privacy Policy (the “**Service**”) or offline location that makes this Privacy Policy available to you.

By using the Service or interacting with us offline, you consent to our collection, use, sharing, and other activities as described in this Privacy Policy. If you have any questions or wish to exercise your rights and choices, please contact us as set out in the “Contact Us” section below.

2. Information Collection.

A. **Information You Provide.**

We may collect information when you use the Service or interact with us offline, including information when you access our content, request products or services, apply for a job, or otherwise interact with us. The categories of information we collect and have collected in the last 12 months include:

- **Contact Data**, including your (and your company’s) name, email address, postal address, and phone number.
- **Content**, including content within any messages you send to us.
- **Job Applicant Data**, including your employment history, transcript, writing samples, and references as necessary to consider you for a job opening if you submit an application to us.

You may choose to voluntarily submit other information to us that we do not request, and, in such instances, you are solely responsible for such information.

B. **Information Collected Automatically.**

In addition, we may automatically collect information when you use the Service. The categories of information we may automatically collect and have collected in the last 12 months include:

- **Service Use Data**, including data about the features you use, the pages you visit, the emails you view, the time of day you browse, and your referring and exiting pages.
- **Device Connectivity and Configuration Data**, including data about the type of device or browser you use, your device’s operating software, your internet service provider, your device’s regional and language settings, and device identifiers such as IP address.

We use various current – and later – developed tracking technologies to automatically collect information, including the following:

- **Log Files**, which are files that record events that occur in connection with your use of the Service.
- **Pixels** (also known as web beacons), which is code embedded in a website, video, or email that sends information about your use to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a website, video, or email that contains a pixel, the pixel may permit us or a third party to drop on your browser.

For further information on tracking technologies and your rights and choices regarding them, see the “Third Parties” and “Your Rights and Choices” sections below.

C. Information from Other Sources.

We also may collect information from other sources. The categories of sources from which we collect and have collected information in the last 12 months include our partners and publicly available sources.

4. Use of Information.

We collect and use information for business and commercial purposes in accordance with the practices described in this Privacy Policy. Our purposes for collecting and using information, including the last 12 months, include to:

- Manage and improve our Service.
- Perform services requested by you or at your direction.
- Respond to your comments and questions.
- Send you technical notices, updates, security alerts, and information regarding changes to our policies, and support and administrative messages.
- Prevent and address fraud, breach of policies or terms, and threats or harm.
- Develop and send you direct marketing, including advertisements and communications about our and other party products, offers, promotions, rewards, events, and services.
- Fulfill any other purpose disclosed to you and with your consent.

Notwithstanding the above, we may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law. For information on your rights and choices regarding how we use information about you, please see the “Your Rights and Choices” section below.

5. Sharing of Information.

We share information we collect in accordance with the practices described in this Privacy Policy. The types of entities with whom we share and have shared information in the last 12 months include the following:

- **Service Providers.** We share information with entities that process information on our behalf for our business purposes. Service providers assist us with services such as data analytics, marketing, website hosting, and technical support. We contractually prohibit our service providers from retaining, using, or disclosing information about you for any purpose other than performing the services for us, although we may permit them to use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law.
- **Affiliates.** We share information with our related entities including our parent and sister companies.
- **Merger, Acquisition or Asset Sale.** We share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.
- **Security and Compelled Disclosure.** We share information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We also share information to protect the rights, property, life, health, security and safety of us, the Service or any third party.
- **Facilitating Requests.** We share information for purposes of facilitating your requests.
- **Consent.** We share information with notice to you and your consent.

Notwithstanding the above, we may share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. For information on your rights and choices regarding how we share information about you, please see the “Your Rights and Choices” section below.

7. Third Parties.

Our Service contains content from and hyperlinks to websites and services operated and owned by third parties. Third parties may use tracking technologies to independently collect information about you and may solicit information from you. The information collected and stored by third parties remains subject to their own policies and practices, including what information they share with us and your rights and choices on their services. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

8. Your Rights and Choices.

A. Tracking Technology Choices.

Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need

to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to “Do Not Track” signals. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

Please be aware that if you disable or remove tracking technologies some parts of the Service may not function correctly.

B. Analytics.

We may incorporate tracking technologies into our Service (including our website and emails) as well as into other websites and services. For example, we use analytics services, such as Google Analytics, to help us understand how users access and use the Service. You can opt-out of your data being used by Google Analytics through cookies by visiting <https://tools.google.com/dlpage/gaoptout> and downloading the Google Analytics Opt-out Browser Add-on.

C. Communications.

You can opt-out of receiving promotional emails from us at any time by following the instructions as provided in emails to click on the unsubscribe link or emailing us at legal@mhccusa.com with the word UNSUBSCRIBE in the subject field of the email. Please note that you cannot opt-out of non-promotional emails, such as those about your transactions, servicing, or our ongoing business relations.

6. Children.

The Service is intended for a general audience, and is not directed at children under 13. We do not knowingly collect personal information (as defined by the U.S. Children’s Privacy Protection Act, or “**COPPA**”) from children. If you are a parent or guardian and believe we have collected personal information from your child, please contact us at legal@mhccusa.com. We will remove the personal information to the extent required by applicable laws.

7. Data Security.

We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

8. International Transfer.

We are based in the U.S. and the information we collect is governed by U.S. law. If you are accessing the Service from outside of the U.S., please be aware that information collected through the Service may be transferred to, processed, stored, and used in the U.S. and other jurisdictions. Data protection laws in the U.S. and other jurisdictions may be different from those

of your country of residence. Your use of the Service or provision of any information constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of information about you in the U.S. and other jurisdictions as set out in this Privacy Policy.

9. Changes to this Privacy Policy.

We reserve the right to revise and reissue this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy. Your continued use of our Service indicates your consent to the Privacy Policy then posted. If the changes are material, we may provide you additional notice to your email address.

10. Contact Us.

If you have any questions or comments about this Privacy Policy, our data practices, or our compliance with applicable law, please contact us:

By email: legal@mhccusa.com

By postal mail:

Mitsubishi UFJ Lease & Finance (U.S.A.) Inc.
Attn: Legal Department
30555 Southfield Road, Suite 260
Southfield, Michigan 48310

11. Additional Disclosures for California Residents.

A. Business Relationship.

Our processing of information is within the context of a business relationship. By using the Service or interacting with us offline, you agree (i) you are acting as a job applicant and we will collect and use your information solely within the context of your role as a job applicant; or (ii) you are acting as an employee, owner, director, officer, or contractor of another business and we will collect and use your information solely within the context of us conducting due diligence regarding, or providing or receiving a product or service from such business.

B. Right to Know and Delete.

In certain circumstances, the California Consumer Privacy Act of 2018 (“**CCPA**”) provides additional rights for California residents. These rights include the right to delete the personal information we have collected from you and the right to know certain information about our data practices in the last 12 months. In particular, you may have the right to know:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information was collected;
- The categories of personal information about you we disclosed for a business purpose or sold;
- The categories of third parties to whom the personal information was disclosed for a business purpose or sold;

- The business or commercial purpose for collecting or selling the personal information; and
- The specific pieces of personal information we have collected about you.

To exercise any of these rights, please submit a request to legal@mhccusa.com or call our toll free number at 833-772-0305. In the request, please specify which right you are seeking to exercise and the scope of the request. We will confirm receipt of your request within 10 days. We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity, we may deny your requests to know or delete. Please note that we may retain and use information in accordance with applicable law.

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent's permission to do so and verify your identity directly. You have the right not to receive discriminatory treatment by us for the exercise of any your rights.

We do not sell personal information as the term "sell" is defined under the CCPA.

C. Shine the Light.

Customers who are residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties' own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write us at the email or postal address set out in "Contact Us" above and specify that you are making a "California Shine the Light Request." We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.