

JERA Global Markets Pte. Ltd.
Job Applicant Privacy Policy & Consent

Effective Date: 21 July 2026

1. ABOUT THIS POLICY

- 1.1. This Privacy Policy sets out the basis upon which JERA Global Markets Pte. Ltd., its subsidiaries, affiliates, related and co-operating companies (collectively, the “**JERAGM Group**”) may collect, use, disclose or process personal data of individuals seeking employment with us (hereinafter, referred to as “**you**” or “**your**”). The terms “**JERAGM**”, “**us**”, “**we**” or “**our**”) refers to any organisation within the JERAGM Group, as appropriate, including:

1.2.

Entity Name	Details
JERA Global Markets Pte. Ltd. (including its London branch office at 80 Victoria Street, London, SW1E 5JL, United Kingdom)	a company incorporated in Singapore and operating at 88 Market Street, #22-01, Singapore 048948
JERA Global Markets UK Ltd.	80 Victoria Street, London, SW1E 5JL, United Kingdom
JERA Global Markets Services Co. Ltd.	Nihonbashi Takashimaya Mitsui Building 25th Floor 2-5-1 Nihonbashi, Chuo-ku, Tokyo 103-6125 Japan
JERA Global Markets Holdings Ltd.	80 Victoria Street, London, SW1E 5JL, United Kingdom
JERA Global Markets Co. Ltd.	Nihonbashi 1-chome Mitsui Building, 14 th Floor, 1-4-1 Nihonbashi, Chuo-ku, Tokyo 103-0027, Japan
JERA Global Markets North America LLC	1000 Main Street, Suite 3100, Houston, TX 77002, United States
JERA Americas Holdings Inc.	1000 Main Street, Suite 3100, Houston, TX 77002, United States
JERA Americas Inc.	1000 Main Street, Suite 3100, Houston, TX 77002, United States
JERA Americas Energy Services LLC	1000 Main Street, Suite 3100, Houston, TX 77002, United States

Although this Privacy Policy is in common use by the JERAGM Group, except where applicable laws provide otherwise and as expressly stated otherwise, each organisation is only responsible to you in relation to its own collection and use of your personal data, and its own actions.

- 1.3. We will only collect, use, disclose or process your personal data where you have given us your consent or where we have another lawful basis for doing so, and in the manner set out in this Privacy Policy. By providing us with your personal data, you acknowledge that our collection, use, disclosure and processing of your personal data will be in accordance with this Privacy Policy.
- 1.4. This Privacy Policy supplements but does not supersede or replace any consents you may have provided to us, or any other agreements or arrangements that you may have with us, in respect of your personal data

- 1.5. If you have any feedback or issues in relation to your personal data or about this Privacy Policy or wish to make a complaint to us, you may contact our Data Protection Officer at:

E-mail Address: DataProtection@jeragm.com

This does not affect your statutory rights. For example, if the General Data Protection Regulation of the European Union (“EU”) applies to you, you also have a right to lodge a complaint with a European supervisory authority, in particular in the Member State in the EU where you are habitually resident, where you work or where an alleged infringement of data protection law has taken place.

When you contact us, we may require that you submit certain forms or provide certain information, including verification of your identity, before we are able to respond to you.

2. AMENDMENTS TO THIS PRIVACY POLICY

- 2.1. We may amend this Privacy Policy from time to time without notice to you, in compliance with applicable laws or as we update our data usage and handling processes. The updated Privacy Policy will supersede earlier versions and will apply to personal data provided to us previously. The updated Privacy Policy will take effect when made available at <https://www.jeragm.com/job-applicant-privacy-policy-consent>.

3. WHAT PERSONAL DATA WE COLLECT

- 3.1. **What is personal data.** “Personal data” is data that can be used to identify a natural person. Examples of personal data that we collect and process include your name, address, contact details, education background, compensation details, employment history, references, results of employment checks and any other information of a personal nature in the context of your job application with us.
- 3.2. **Voluntary provision of personal data.** We collect personal data that you voluntarily provide to us or from third party sources (including recruitment agencies, background check service providers, your former employers and your referees). Please see paragraph 0 on “*How We Collect Personal Data*” for further details.

When our collection is based on consent, you can choose not to provide us with your personal data. You also have the right to withdraw your consent for us to continue collecting, using, disclosing and processing your personal data, by contacting us in accordance with paragraph 1.5. However, if you do so, it may not be possible for us to fulfil the purposes for which we require the personal data, including contacting you, processing your job application or considering you for employment with us.

- 3.3. **Providing personal data belonging to others.** If you provide us with personal data of persons other than yourself, you represent and warrant that you have brought this Privacy Policy to his / her attention, informed him / her of the purposes for which we are collecting his / her personal data and that he / she has consented to your disclosure of his / her personal data to us for those purposes. You agree to indemnify and hold us harmless from and against any and all claims by such individuals relating to our collection, lawful use, disclosure and other processing of such personal data in accordance with the terms of this Privacy Policy.

- 3.4. **Accuracy and completeness of personal data.** You are responsible for ensuring that all personal data that you provide to us is true, accurate and complete. You are responsible for informing us of any changes to your personal data.
- 3.5. **Special category personal data.** In certain jurisdictions such as the EU, special category personal data refers to particularly sensitive personal data including your racial or ethnic origin, health data, sexual orientation, trade union membership or information concerning past criminal convictions. In such jurisdictions, and if we require such special category personal data from you, we will process the data where:
- 3.5.1 we have obtained your explicit consent for the processing of such special category personal data;
 - 3.5.2 it is necessary for the purposes of carrying out our obligations and exercising our or your specific rights in the field of employment, social security and social protection law;
 - 3.5.3 it is necessary to protect your vital interests or those of another person;
 - 3.5.4 it is necessary to deal with legal claims or proceedings;
 - 3.5.5 it is necessary for substantial public interest; or
 - 3.5.6 as otherwise permitted by applicable laws.

4. HOW WE COLLECT PERSONAL DATA

- 4.1. **Personal data collected from you.** We collect personal data from you in the course of or in connection with your job application with us. We may collect personal data from you through various channels, such as when you submit a job application to us via our online job application portal or via e-mail or during an interview.
- 4.2. **Personal data collected from third parties.** We may also collect your personal data from third party sources, such as from:
- 4.2.1. employment and recruitment companies, recruiters, human resource management service providers, and employee assessment service providers engaged, contracted and/or otherwise authorised by us;
 - 4.2.2. your referees, educational institutions, or previous / current employers; and
 - 4.2.3. public agencies or other public sources.

5. WHAT WE DO WITH YOUR PERSONAL DATA

- 5.1. **General purposes.** We collect, use, disclose and process your personal data for purposes connected or relevant to your job application with us. Such purposes include:
- 5.2.1 administering, processing and managing your job application;
 - 5.2.2 contacting you in relation to your job application;
 - 5.2.3 responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - 5.2.4 assessing and evaluating your job application and suitability for employment in any prospective positions within JERAGM;
 - 5.2.5 validating your references and conducting background screening, employment checks, criminal history checks and other due diligence activities which may be required under law or our risk management procedures / requirements;
 - 5.2.6 developing, monitoring, reviewing and improving our recruitment policies and processes;
 - 5.2.7 carrying out research, planning, policy development and statistical / data analysis relating to recruitment; and

5.2.8 such other purposes that may be informed to you when your personal data is collected.

5.2. **Use permitted under applicable laws.** We may also collect, use, disclose and process your personal data for other purposes where this is required or permitted by law.

6. DISCLOSURE OF PERSONAL DATA

6.1. **Disclosure to related parties.** We may disclose or share your personal data with our related parties (as set out in paragraph 1.1) for the purposes described in paragraph 5.

6.2. **Disclosure to third parties.** We may also disclose your personal data to third parties for the purposes described in paragraph 5. In general, your personal data is shared with or disclosed to the following categories of third parties for the purposes described below:

S/N	Type of Third Parties / Category of Service Providers	Purpose(s) / Activity(ies)
(a)	JERAGM's affiliates, subsidiaries and related companies, including any entity that may be incorporated or established and which may need to hire personnel as they come into being	(i) recruitment and/or onboarding purposes (ii) processing of employment applications, documents and information (iii) assessment of job applicants (iv) screening and referencing of job applicants
(b)	Recruitment / employment services providers including background screening providers	(i) recruitment and/or onboarding purposes (ii) processing of employment applications, documents and information (iii) assessment of job applicants (iv) screening and referencing of job applicants
(c)	IT service providers	(i) IT procurement and issuance of IT equipment and/or services
(d)	Security service providers	(i) monitoring and managing the use and security of our information and communication resources and systems
(e)	Government authorities or agencies, law enforcement agencies and/or any other public agency or authority	(i) to comply with any applicable law, regulation, code of practice, guideline, rules, investigation, law enforcement action, court order and/or request
(f)	Your referees, educational institutions, or previous / current employers	(i) validating references, education background or employment history of job applicants (ii) assessment of job applicants

For the avoidance of doubt, the types of third parties / services providers described above are non-exhaustive and we may disclose or share your personal data with other third parties or services providers for the purposes described in paragraph 5.

- 6.3. When disclosing personal data to third parties, we will enter into contracts with these third parties to protect your personal data in a manner that is consistent with all applicable laws and/or ensure that they only process your personal data in accordance with our instructions.

7. TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES

- 7.1. **Transfer of personal data overseas.** We may transfer your personal data to different jurisdictions (including but not limited to United Kingdom, Singapore, Australia and the United States of America) in connection with the purposes described in paragraph 5 and 6:

- 7.1.1. from the jurisdiction where it is collected (which is usually where you are located) to any other jurisdictions that we operate in; and
 - 7.1.2. to third parties in other jurisdictions.

- 7.2. **Safeguards.** Where we transfer your personal data across jurisdictions, we will ensure that your personal data is protected in accordance with this Privacy Policy and applicable laws regardless of the jurisdictions they are transferred to, but in any event to a level that is no less stringent than the jurisdiction from which the personal data is transferred and the data protection law that applies to you. When we transfer your personal data and where required by applicable law, such as under the GDPR, we will put in place appropriate safeguards including EU Standard Contractual Clauses or rely on the EU Commission's adequacy decisions. You may obtain details of these safeguards by contacting us in accordance with paragraph 1.5.

8. SECURITY AND RETENTION OF PERSONAL DATA

- 8.1. **Unauthorised access.** While we take reasonable precautions to safeguard your personal data in our possession or under our control, to the maximum extent permitted by applicable laws, you agree not to hold us liable or responsible for any loss or damage resulting from unauthorised or unintended access that is beyond our control, such as hacking or cybercrimes.
- 8.2. **Period of retention:** We retain your personal data only for as long as is necessary to fulfil the purposes we collected it for, and to satisfy our business and/or legal purposes, including data analytics, audit, accounting or reporting purposes. We do not usually retain personal data of unsuccessful job applicants for more than one (1) year from the date of collection.

9. YOUR RIGHTS

- 9.1. **Rights you may enjoy.** Depending on the jurisdiction that you are in or where we operate, you may enjoy certain rights under applicable law in relation to our collection, use, disclosure and processing of your personal data. Such rights include:
 - 9.1.1. **Access:** you may request access to a copy of and information on the personal data that we hold about you.
 - 9.1.2. **Correction:** you may request that any incomplete or inaccurate personal data that we hold about you is completed or corrected.

- 9.1.3. **Erasure:** you may ask us to delete or remove personal data that we hold about you in certain circumstances.
- 9.1.4. **Restriction:** you may ask us to restrict or suspend the processing of your personal data if statutory prerequisites apply.
- 9.1.5. **Portability:** you may request to receive the data provided by you in a structured, commonly used and machine-readable format and to have such data transferred to another party, to the extent that this is technically feasible, under certain conditions.
- 9.1.6. **Withdrawal of consent:** you may withdraw your consent to our collection, use, disclosure or processing of your personal data at any time, without giving reasons and with effect from the date of withdrawal. The withdrawal of your consent will not affect the lawfulness of the processing of your personal data based on your consent before your consent was withdrawn.
- 9.1.7. **Objection:** where we are processing your personal data based on our legitimate interests or those of a third party, you may object to the processing on this ground.

If you wish to exercise any of your rights, you may contact us in accordance with paragraph 1.5. We may require that you submit certain forms or provide certain information to process your request. Where permitted by law, we may also charge you a fee to process your request.

- 9.2. **Limitations.** We may be prevented by law from complying with your request. We may also decline your request if the law permits us to do so or if we no longer have records of your personal data.