

How personal data is processed in the European Economic Area (EEA)

Except as otherwise indicated, this privacy policy (hereinafter referred to as "this Policy") governs the processing of personal data in European Economic Area (EEA).

This Policy is written in English and translated into other languages. In case of discrepancies or inconsistencies between the English and other languages, the English version shall prevail.

1. Personal Data Management General Administrator or Data Protection Officer (DPO)

The Data Protection Officer (DPO) is as follows:

[Click here for details](#)

Our group's representative in the European Economic Area (EEA) is as follows:

[Click here for details](#)

3. Legal Basis and Purpose of Personal Data Processing

Our group processes your personal data for the following purposes, based on your consent or other legal basis for processing stipulated by laws and regulations as below:

(1) Personal data of customers and business partners

Purpose of processing	Legal basis for processing
Conclusion and performance of contracts with our group and other transaction management	<ul style="list-style-type: none">· Performance of contracts between you and our group· Our group's legitimate interests (to manage transactions)
Communication and information exchange with our group and notifications and greetings based on social and customary practices	<ul style="list-style-type: none">· Performance of contracts between you and our group· Our group's legitimate interests (to provide you with information on our group's products and services)
Providing information and guidance on our group's products and services	<ul style="list-style-type: none">· Our group's legitimate interests (to provide you with information on our group's products and services)

Confirming your eligibility to use our group's products and services and verifying your identity	<ul style="list-style-type: none"> · Performance of contracts between you and our group
Compliance with legal obligations	<ul style="list-style-type: none"> · Compliance with legal obligations necessary for our group's business activities
Research, analysis, research, and auditing for marketing activities related to our group's business	<ul style="list-style-type: none"> · Our group's legitimate interests (to improve the quality of our group's products and services)
Generation of statistical information and processing and analysis of personal data for our group's use	<ul style="list-style-type: none"> · Our group's legitimate interests (to improve the quality of our group's products and services)
Responding to inquiries and opinions	<ul style="list-style-type: none"> · Performance of contracts between you and our group · Our group's legitimate interests (to perform our group's operations necessary to achieve the purpose concerned)
Response and communication in case of emergency	<ul style="list-style-type: none"> · Performance of contracts between you and our group · Our group's legitimate interests (to perform our group's operations necessary to achieve the purpose concerned)
Performing transactions with our group appropriately and smoothly	<ul style="list-style-type: none"> · Performance of contracts between you and our group · Our group's legitimate interests (to perform our group's operations necessary to achieve the purpose concerned)

(2) Personal data of shareholders

Purpose of processing	Legal basis for processing
Management of shareholder information and necessary communication	<ul style="list-style-type: none"> · Compliance with legal obligations necessary for our group's business activities · Our group's legitimate interests (to fulfill our group's obligations and responsibilities to our group shareholders)
Provision of various lawful benefits to shareholders	<ul style="list-style-type: none"> · Compliance with legal obligations necessary for our group's business activities

	<ul style="list-style-type: none"> · Our group's legitimate interests (to fulfill our group's obligations and responsibilities to our group shareholders)
Implementation of various measures and provision of information for shareholders	<ul style="list-style-type: none"> · Our group's legitimate interests (to fulfill our group's obligations and responsibilities to our group shareholders)

(3) Personal data of employees (including prospective employees and workers)

Purpose of processing	Legal basis for processing
Determination of assignment	<ul style="list-style-type: none"> · Performance of contracts between you and our group · Our group's legitimate interest (for proper human resources management of our group employees)
Determination of salary increase, promotion, etc.	<ul style="list-style-type: none"> · Performance of contracts between you and our group · Our group's legitimate interest (for proper human resources management of our group employees)
Determination and payment of wages, bonuses, allowances, etc.	<ul style="list-style-type: none"> · Performance of contracts between you and our group · Compliance with legal obligations necessary for our group's business activities
Personnel transfer (including secondment)	<ul style="list-style-type: none"> · Performance of contracts between you and our group · Our group's legitimate interests (for proper human resources management of our group employees)
Attendance management	<ul style="list-style-type: none"> · Performance of contracts between you and our group · Compliance with legal obligations necessary for our group's business activities
Education and training	<ul style="list-style-type: none"> · Performance of contracts between you and our group · Our group's legitimate interests (for proper human resources management of our group's

	employees)
Health management (including assessment of the capability of the role)	<ul style="list-style-type: none"> · Compliance with legal obligations necessary for our group's business activities · Performance of contracts between you and our group · Our group's legitimate interests (for proper human resource management of our group employees)
Awards and disciplinary sanctions	<ul style="list-style-type: none"> · Performance of contracts between you and our group · Our group's legitimate interests (for proper human resource management of our group employees)
Resignation, retirement and dismissal	<ul style="list-style-type: none"> · Compliance with legal obligations necessary for our group's business activities · Performance of contracts between you and our group
Accident compensation	<ul style="list-style-type: none"> · Compliance with legal obligations necessary for our group's business activities · Performance of contracts between you and our group
Company benefits	<ul style="list-style-type: none"> · Compliance with legal obligations necessary for our group's business activities · Performance of contracts between you and our group
Crisis & business continuity management	<ul style="list-style-type: none"> · Compliance with legal obligations necessary for our group's business activities · Performance of contracts between you and our group
Compliance with legal obligations	<ul style="list-style-type: none"> · Compliance with legal obligations necessary for our group's business activities
Procedures and communication at the time of various ceremonial occasions	<ul style="list-style-type: none"> · Performance of contracts between you and our group
Business communication between our group companies	<ul style="list-style-type: none"> · Performance of contracts between you and our group · Our group's legitimate interests (to carry out

	our group's operations necessary to realize our group's business)
Planning management policies and business strategies	· Our group's legitimate interests (to carry out our group's operations necessary to realize our group's business)
Onboarding procedures for prospective employees	· Performance of contracts between you and our group
Onboarding procedures for new employees	· Performance of contracts between you and our group · Compliance with legal obligations necessary for our group's business activities
Other matters necessary to perform business activities or to enforce our group's rules and regulations	· Performance of contracts between you and our group · Our group's legitimate interests (to carry out our group's operations necessary to realize our group's business)

(4) Personal data of candidates and prospective workers

Purpose of processing	Legal basis for processing
Recruitment activities and selection as well as necessary communication and provision of documents and information	· Conclusion and performance of contracts between you and our group
Necessary communication with recruitment agencies during recruitment activities and selection	· Conclusion and performance of contracts between you and our group
Reimbursement and transfer of transportation expenses incurred during recruitment activities	· Conclusion and performance of contracts between you and our group
Management and review of recruitment procedures, methods, and strategies	· Our group's legitimate interests (to carry out our group's operations necessary to realize our group's business)
Compliance with legal obligations	· Compliance with legal obligations necessary for our group's business activities

5. International Transfer of Personal Data

Our group may transfer personal data collected from you to a different country/region from where you

reside (hereinafter referred to as "international transfer") to process it. When our group conducts international transfer of your personal data, our group will appropriately protect your personal data by taking one or more of the following safeguards:

- Obtaining consent: Our group will obtain explicit consent from you.
- Conclusion of a contract with the recipient based on Standard Contractual Clauses, etc.: Our group will conduct an impact assessment on the risk of data transfer and take necessary measures based on the results of the assessment. Our group will then conclude a contract between our group and the recipient of personal data to ensure that the recipient has the same level of personal data protection as our group.
- Verification of the adequacy decision: Our group will verify that the supervisory authority of the European Economic Area (EEA) has recognized that the personal data protection legislation in the country/region (e.g., Japan, UK, etc.) to which personal data is transferred has an adequate level of protection.

9. Your Rights

With respect to personal data processed by our group, you have the following rights:

- Right to access the relevant personal data
- Right to rectify the relevant personal data
- Right to request the deletion of data (right to be forgotten)
- Right to request that the processing of data is restricted
- Right to data portability
- Right not to be subject to decisions based solely on automated decision-making, including profiling
- Right to object to the processing
- Right to withdraw consent to the processing of the relevant personal data
- Right to lodge a complaint with the supervisory authority