

## How personal data is processed in Japan

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

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

### 4. Transfer of Personal Data

Our group may disclose or provide your personal data to a third party in cases that fall under Chapter 4, "Transfer of Personal Data," of the MOL Group Global Privacy Policy. Our group will not disclose or provide your personal data to a third party without obtaining your consent, except in the following cases or in cases pursuant to the provisions of the Act on the Protection of Personal Information or other laws and regulations.

#### (1) Outsourcing of personal data processing

As described in "② Transfer to outsourcees that provide information system services, data processing services, and other services" of Chapter 4, "Transfer of Personal Data," of the MOL Group Global Privacy Policy, our group may outsource the processing of your personal data to an external party. In such cases, our group will select an outsourcee that meets an adequate level of protection of personal data and is deemed to process the personal data appropriately, and our group will conclude a contract for the outsourcing and conduct appropriate management and supervision.

#### (2) Joint use

In order to provide comprehensive services and support related to the business operated by our group throughout our entire group, our group will jointly use personal data acquired by our group within our group as follows, only when necessary for business activities and permitted by laws and regulations.

##### ① Items of personal data to be jointly used

Those necessary for the following "③ Purpose of joint use," out of the items set forth in Chapter 2, "Types of personal data to be handled," of the MOL Group Global Privacy Policy

##### ② Scope of those who will jointly use

Our company and our group companies

③ Purpose of joint use

Within the scope of purposes described in Chapter 3, "Legal Basis and Purpose of Personal Data Processing," of the MOL Group Global Privacy Policy

④ Person responsible for the management of personal data

Mitsui O.S.K. Lines, Ltd.

Contact:

〒105-8688

1-1 Toranomon 2-chome, Minato-ku, Tokyo

E-mail: [privacy-mol@molgroup.com](mailto:privacy-mol@molgroup.com)

## 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.
- Development of a system that conforms to standards at the recipient\*: By taking one of the following measures at the recipient of personal data, our group will develop a system that conforms to standards to ensure an adequate level of personal data protection.
  - Conclusion of a data transfer agreement with the recipient
  - Verification that the recipient complies with the Basic Regulation for the Protection of Personal Data (our group policies for complying with laws and regulations of countries/regions relevant to our group)
  - Verification that the recipient has obtained the Cross-Border Privacy Rules (CBPR) System certification of the Asia-Pacific Economic Cooperation (APEC)
- Verification that the recipient country/region is recognized as having adequate personal data protection legislation\*: Our group will verify that the Japanese supervisory authority has recognized that the personal data protection legislation in the country/region (e.g., European Economic Area (EEA) and UK) to which personal data is transferred has an adequate level of protection.

\*Safeguards to be taken when personal data other than information related to personal information\*\* is transferred internationally

\*\*Information relating to a living individual which doesn't fall under personal information, pseudonymized

personal information and anonymized personal information (e.g., browsing history, purchase history of products, use history of services, etc., collected through online identifiers such as cookies)

For information on the personal data protection legislation in the country/region to which personal data is transferred, please refer to the following website on "Legal System of Other Countries and Regions (Personal Information Protection Commission)" (Japanese only).

<https://www.ppc.go.jp/enforcement/infoprovision/laws/>

The recipient takes the following measures to appropriately protect your personal data.

- Compliance with the Basic Regulation for the Protection of Personal Data (our group policies for complying with laws and regulations of countries/regions relevant to our group)
- Ensuring the level of personal data protection equivalent to that of our group through the conclusion of outsourcing agreements and data transfer agreements with our group

## **9. Your Rights**

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

- Right to request for notification of the purpose of use
- Right to request for disclosure of personal data our group holds
- Right to request for correction, addition, or deletion of personal data our group holds
- Right to request for cessation of use, erasure, or cessation of provision to a third party of personal data our group holds
- Right to request for disclosure of records related to disclosure or transfer to a third party of personal data our group holds

## **10. Procedures and Contact Points for Exercising Rights**

In accordance with Chapter 10, "Procedures and Contact Points for Exercising Rights," of the MOL Group Global Privacy Policy, if you have questions about this Policy or the processing of personal data, or if you wish to exercise your rights, etc., and if you send an inquiry by mail, our group may charge a fee of 1,000 yen (price before tax) depending on the details of the procedure.