

# Privacy Policy

GIYU KAIUN CO., LTD.'s handling of personal data of all customers

## 1. Handling of Personal data

- I. GIYU KAIUN CO., LTD. (hereinafter, "we"/"us"/"our") is committed to safeguarding the privacy of our customers and users (hereinafter, "you"/"your"). This privacy policy for the handling of personal data (hereinafter, "this notice") is intended to inform you of the ways in which we collect, use and share any personal data that you choose to provide to us.
- II. If you are an existing customer of ours, further details about how we use your personal data are set out in your customer contract with us. When we collect your personal data, further notices highlighting certain intended uses of your personal data, together with the ability to opt in or out of such uses, may also be provided.
- III. The following will be explained to you on a case-by-case basis when we obtain personal data from you.
  - (a) Whether the provision of personal data is a statutory requirement, a contractual requirement, or a requirement necessary to enter into a contract
  - (b) Whether you are obliged to provide the personal data
  - (c) Possible consequences of failure to provide the personal data
  - (d) Whether automated decision-making is used
- IV. Our websites may contain links to other third-party websites. If you follow a link to any of those third-party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal data. Please check these policies before you submit any personal data to such third-party websites.
- V. This notice is intended to explain our privacy practices and covers the following areas:
  - (a) Information we collect about you

- (b) How we use your personal data
- (c) How we protect your personal data
- (d) Your rights and how to contact us
- (e) Changes to our privacy policy for the handling of personal data

## **2. Information we collect about you**

- I. We may collect and process all or some of the following personal data about you.
  - (a) Information you provide to us

During interactions with us, we may ask you to provide personal data.

    - (i) When you purchase, send for repair or return one of our products, we may ask you to provide information such as your name, address, contact details, phone number, email address, and payment information.
    - (ii) If you contact us via a contact form on one of our websites, we may record information such as your name, address, business contact details, telephone number, email address, and other information. We may also keep a record of your inquiry and our correspondence.
    - (iii) We may ask you to complete surveys that we use for research purposes. In such circumstances, we may collect information such as your name, address, business contact details, telephone number, email address, date of birth, contact details, and interests.
    - (iv) When you create an account to use our online services, we may ask you to provide information such as your name, address, business contact details, telephone number, email address, date of birth, contact details, interests, and newsletter preferences.
  - (b) Information provided by other sources

We may collect your personal data from publicly available sources and third parties.
  - (c) Website and communication usage

We may collect details of your visits to our websites and information gathered through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and resources that you access.

### 3. How we use your personal data

- I. We shall set out the purposes for which we use any personal data that we collect and, in compliance with legal obligations, identify the legal grounds on which we process such information.
- II. We shall comply with Japan's Act on the Protection of Personal Information and its rules and guidelines issued by the Personal Information Protection Commission in Japan. We shall also comply with international personal data protection laws such as the European General Data Protection Regulation (GDPR). Our processing of personal data is based on specific legal grounds as outlined in the GDPR and other applicable laws and regulations (a full description of each of these bases can be found [here](#)). Please note that in addition to the disclosures identified below, we may disclose personal data to service providers, contractors, agents, advisors (e.g. legal, financial, business or other) and affiliates of our company that perform activities on our behalf, for purposes explained in this notice.

(a) Effective communication and business purposes

We may use your personal data to conduct our business, including responding to your queries or otherwise communicating with you, or to fulfil our obligations arising from any agreements between you and us;

Use justification:

contract performance, legitimate interest (to enable us to perform our obligations and provide our services to you)

(b) Providing you with marketing materials

We may use your personal data to provide you with updates and offers, if you have chosen to receive these. We may also use your information for marketing our own and our business partners' products and services to you by post, email, SMS, phone or fax and, where required by law, we will ask for your consent at the time we collect your data to conduct any such types of marketing. We will provide an option to unsubscribe or opt out of further communication on any electronic marketing communication sent to you. Alternatively, you may opt out by contacting us as set out in the ["Contact us"](#) form below.

Use justification:

consent, legitimate interest (to keep you updated with news in relation to

our products and services)

(c) Research and development purposes

We may analyse your personal data to better understand your needs about our service and marketing activities, and to develop products and services;

Use justification:

legitimate interest (to allow us to improve our services)

(d) Monitoring certain activities

We may use your personal data to monitor queries and transactions in order to ensure service quality and compliance with procedures, and to combat fraud.

Use justification:

legal obligation, legal claims, legitimate interest (to ensure the quality and legality of our services)

(e) Informing you of changes

We may use your personal data to notify you about changes to our services and products.

Use justification:

legitimate interest (to notify you about changes to our service)

(f) Ensuring website content is relevant

We may use your personal data to ensure that content from our websites is presented in the most effective manner for you and for your device, which may include passing your data to business partners, suppliers and/or service providers.

Use justification:

legitimate interest (to allow us to provide you with the content and services on the websites)

(g) Reorganising or making changes to our business

In the event that we: (i) are subject to negotiations for the sale of our business or part thereof to a third party; (ii) are sold to a third party; or (iii) undergo a reorganisation, we may need to transfer some or all of your personal data to the relevant third party (or its advisors) as part of any due diligence processes for the purpose of analysing a proposed sale or reorganisation. We may also need to transfer your personal data to the relevant reorganised entity or third party after the sale or reorganisation, in order for them to use it for the same purposes set out in this notice.

Use justification:

legitimate interest (to allow us to change our business)

(h) In connection with legal or regulatory obligations

We may process your personal data to comply with regulatory requirements or dialogue with regulators as applicable, which may include disclosing your personal data to third parties, court services and/or regulators, or law enforcement agencies in connection with an enquiry, proceedings or investigations by such parties anywhere in the world or where it is compulsory to do so. Where permitted, we will direct a request to you or notify you before responding unless doing so would prejudice the prevention or detection of a crime.

Use justification:

legal obligations, legal claims, legitimate interest (to cooperate with law enforcement and regulatory authorities)

#### **4. How we protect your personal data**

I. Security over the internet

No data transmission over the Internet or a website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal data in accordance with data protection legislative requirements.

- II. All information you provide to us is stored on our servers or other secure servers set up by trusted third-party service providers who have been verified to meet our company's management standards, and is accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures about which we notify you. We ask you not to share your passwords with anyone.

III. Export overseas

Your personal data may be accessed by staff or suppliers in, transferred to, and/or stored at destinations outside the country in which you are located, where data protection laws may be of a lower standard than

those of your own country. We will, in all circumstances, safeguard personal data as set out in this notice.

- IV. Please contact us as set out in the "[Contact us](#)" form below if you would like to see a copy of the specific safeguards applied to the export of your personal data overseas.

V. Storage limits

Our retention periods for personal data are based on business needs and legal requirements. We retain personal data for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purposes. For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When personal data is no longer needed, we either irreversibly anonymise the data (and may further retain and use the anonymised information) or securely destroy the data.

## **5. Your rights and how to contact us**

I. Marketing

To tailor the online marketing on our websites to your needs or interests, we use technologies that automatically track information such as browsing history on our websites, links clicked in our emails, or mobile applications that you use.

- II. You have the right to ask us not to process your personal data for marketing purposes including the above. From time to time, we will inform you if we intend to use your information for certain types of marketing activities, or if we intend to disclose your information to certain categories of third parties for such purposes. You can exercise your right to prevent such processing by not checking certain boxes on the forms we use to collect your personal data. You can also exercise the right at any time by contacting us as set out in the "[Contact us](#)" form below.

III. Updating information

We will make reasonable efforts to ensure that your personal data is accurate. As this requires your assistance, please contact us as set out in the "[Contact us](#)" form below to notify us of any changes to the personal data that you have provided to us.

#### IV. Your rights

If you have any questions in relation to our use of your personal data, please first contact as set out in the "[Contact us](#)" form below. Under certain conditions, you may have the right to demand that we:

- (a) provide you with further details on our use of your information;
- (b) provide you with a copy of the information that you have provided to us;
- (c) update any inaccuracies in the personal data that we hold (please see paragraph 5.3);
- (d) delete any personal data that we no longer have any legal grounds to use;
- (e) where processing is based on consent, to withdraw your consent so that we stop the processing in question (see paragraph 5.2 for marketing);
- (f) object to any processing justified by legitimate interest unless our reasons for said processing outweigh any prejudice to your data protection rights and
- (g) restrict how we use your information whilst a complaint is being investigated.

- V. Your exercise of these rights is subject to certain exemptions to safeguard public interest (e.g. prevention or detection of crime) and our interests (e.g. maintenance of legal privilege). If you exercise any of these rights, we will verify your entitlement to do so and will respond within a month in most cases.

- VI. If you are not satisfied with our use of your personal data or our response when you exercise any of these rights, you have the right to complain to the data protection authority in the country that you reside in.

#### VII. Contacting us

Depending on your location, the "data controller" responsible for processing your personal data under this Privacy Policy may vary. If you have any inquiries regarding the detailed information of the data controllers in each country, please contact us as set out in the "[Contact us](#)" form below.

- VIII. In some countries or regions, data protection laws may require the appointment of a Data Protection Officer (DPO). Where necessary, we shall appoint a DPO in accordance with applicable regulations. If you

have any inquiries regarding our Data Protection Officers (DPOs), please contact us as set out in the "[Contact us](#)" form below.

- IX. If you have any questions in relation to this notice, please contact us as set out in the "[Contact us](#)" form below.

## **6. Changes to our privacy policy for the handling of personal data**

- I. We may change the details of our handling of personal data and this notice may change from time to time in the future. If so, we will update the date on which it was last changed below. If these changes are material, we will indicate this clearly on our websites.
- II. This notice was last updated on 01.04.2024.

## **Annex**

The use of personal data under the data protection laws of various countries must be justified under one of a number of legal grounds, and we are required to set out the grounds for each use of personal data in this notice. The grounds used to justify each use of your information are listed alongside a description of each use in the "How we use your personal data" section of this notice.

These are the principal legal grounds that justify our use of your information:

- **Consent:**  
Where you have consented to our use of your information (you will have been presented with a consent form in relation to any such use and may withdraw your consent by contacting us as set out in the "[Contact us](#)" form below).
- **Contract performance:**  
Where your information is necessary to enter into or fulfil a contract between you and us.
- **Legal obligation:**  
where we need to use your information to comply with our legal obligations.



- Legitimate interest:

Where we use your information to fulfil a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.

- Legal claims: Where your information is necessary for a defence, lawsuit or claim against you, us or a third party.

Date of Enactment: April 1, 2010

Revision Date: June 17, 2022

GIYU KAIUN CO.,LTD.

Akira Hashimoto, President