

# GDPR Privacy Policy

Kanematsu Trading Corporation (“our”, “we” or “us”) is committed to protection of personal data as well as compliance with privacy and data protection laws and regulations, including the European General Data Protection Regulation, and United Kingdom General Data Protection Regulation.

This policy sets out how we collect and process your personal data. This policy only applies to your personal data collected by us.

## Identity of the Data Controller

We are located at WORK VILLA KYOBASHI Bldg. 3F, 1-13-1,

Kyobashi, Chuo-ku, , Tokyo 104-0031, Japan will collect and process your personal data as a data controller.

## Personal Data collected by Kanematsu Trading Corporation

We collect your personal data if you choose to provide it, for example in person, over the telephone, by post or email, via our website or by completing online or hard copy forms. Such personal data collected by us includes your name, telephone number or e-mail address.

When you visit our websites, we automatically collect information about your computer or other electronic device that may include the Internet Protocol (IP) address, date and time of the request and information provided by tracking technologies, such as cookies.

For more details concerning cookies, please refer to our [Cookie Policy](#).

You can also refuse to provide your personal data to us. However, if you do not provide your data, we may not be able to provide you with our products and services. This refusal can also have an effect on the use of our websites.

## Purposes and Legal Basis for Processing

Our purposes and legal basis for processing your personal data are as follows:

Categories of data	Purposes	Legal justification
Identification Data, including full name, e-mail address, birth date and telephone number, [Insert other identification data as specific as possible]	<ul style="list-style-type: none"> <li>• To facilitate communication between you and us</li> <li>• To provide you with notifications and greetings in accordance with social customs</li> <li>• To conduct research, analysis and study in connection with our business</li> </ul>	Pursuit of a legitimate interest; Our legitimate interest is to optimize and improve the usage of our services for you and other users.
	<ul style="list-style-type: none"> <li>• To conclude and execute agreements between you and us and to manage other transactions</li> </ul>	Performance of obligations under the contract
	<ul style="list-style-type: none"> <li>• To provide information on our products and services</li> <li>• To provide invitations to exhibits, seminars and other events</li> <li>• To provide information on results of questionnaires and events to participants</li> <li>• To offer products and services using direct mail, email distribution, fax communications</li> </ul>	Consent

Categories of data	Purposes	Legal justification
	<p>You may, at any time, oppose receiving the above information and communication by using an unsubscribe link.</p>	
	<ul style="list-style-type: none"> <li>• to respond to your inquiry</li> </ul>	<p>Legitimate interest; Our legitimate interest is to address any query you submit as well as to detect and prevent any possible fraud.</p>
	<ul style="list-style-type: none"> <li>• To provide corporate information to people seeking employment with us and prospective employees and to conduct necessary communications</li> </ul>	<p>Legitimate interest; Our legitimate interest is to communicate with the people seeking employment by us to hire resources.</p>
<p>IP-address, host name, user agent, browser identification, referrer, the date/time of your access to the websites</p>	<ul style="list-style-type: none"> <li>• To compile statistics regarding visits to our websites and use of the websites</li> <li>• To improve your user experience</li> <li>• To ensure that our websites are not subject to use that is abusive</li> </ul>	<ul style="list-style-type: none"> <li>• Pursuit of a legitimate interest for us</li> <li>• Consent</li> </ul>

We may also process your personal data to comply with and enforce our rights and perform our obligations under applicable laws.

## Share of Your Personal Data with Third Parties

Your personal data are intended for us but may be shared with third parties in certain circumstances:

**Kanematsu group affiliates:** We may share your personal data among Kanematsu group affiliates (Kanematsu Corporation located at 7-2 MARUNOUCHI 2-CHOME, CHIYODA-KU, TOKYO 100-7017 JAPAN) in order to administer Kanematsu group affiliates' services and products, provide you with customer support, process payments, understand your preferences, send you information about products and services that may be of interest to you and conduct the other activities described in this policy.

**Service providers / Professional advisors:** We engage other companies, agents or contractors to perform services on our behalf or to assist us with the provision of our services and products to you. We may share your personal data with the following categories of service providers and professional advisors:

- infrastructure and IT service providers.
- marketing, advertising and communications agencies.
- credit reference agencies and payment service providers.
- accounting auditors and various advisers.

In the course of providing such services, these service providers and professional advisors may have access to your personal data. However, we will only provide our service providers and professional advisors with your personal data which is necessary for them to perform their services, and we require them not to use your personal data for any other purpose. We will use our best efforts to ensure that all our service providers and professional advisors keep your personal data secure.

**Third parties permitted by law:** In certain circumstances, we may be required to disclose or share your personal data in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal data to the

police, regulators, government agencies or to judicial or administrative authorities).

We may also disclose your personal data to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, matters of national security, law enforcement, to enforce our contracts or protect your rights or those of the public.

**Third parties connected with business transfers:** We may transfer your personal data to third parties in connection with a reorganization, restructuring, merger or acquisition or transfer of assets, provided that the receiving party agrees to treat your personal data in a manner consistent with this policy.

We will not sell your personal data to third parties.

Please note our websites may, from time to time, contain links to and from the websites of our business contacts or affiliates. Please note that these websites have their own privacy policies, and we have no control over how they may use your personal data. You should check the privacy policies of third party websites before you submit any personal data to them.

## **Transfer of Personal Data Outside Your Country**

Your personal data may be transferred to and processed outside of the country you are located, including countries which have different data protection standards from those which apply in the EEA, by Kanematsu group affiliates and our service providers. We will take all steps that are reasonably necessary to ensure that your personal data is treated securely and in accordance with this policy as well as applicable data protection laws, including, where European data protection law is applied, by entering into standard contractual clauses (or equivalent measures) with the party outside the European Economic Area (EEA).

## **Protection of Your Personal data**

We have complied strictly with rules for handling of personal data, according to its sensitivity, as well as to implement technical and organizational security measures to protect personal data in our possession from unauthorized access, disclosure, alteration or destruction. Such measures include administrative, technical and physical

safeguards, for example, limiting access to personal data only to employees and authorized service providers who need to know such information for the purposes described in this policy.

## Your Rights

You have the following rights in accordance with applicable laws and regulations:

- **Access.** You have the right to obtain from us confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, to request access to the personal data. You have the right to obtain a copy of the personal data undergoing processing.
- **Rectification.** You have the right to have incomplete or inaccurate personal data that we process about you rectified.
- **Erasure.** You have the right to request that we delete personal data that we process about you, except we are not obliged to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction.** You have the right to restrict our processing of your personal data where you believe such data to be inaccurate; our processing is unlawful; or that we no longer need to process such data for a particular purpose unless we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.
- **Portability.** You have the right to obtain personal data we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (1) personal data which you have provided to us, and (2) if we are processing that personal data on the basis of your consent or to perform a contract with you.
- **Objection.** Where the legal justification for our processing of your personal data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and

rights, or if we need to continue to process the data for the establishment, exercise or defense of a legal claim.

- **Withdrawing Consent.** If you have consented to our processing of your personal data, you have the right to withdraw your consent at any time, free of charge. This includes where you wish to opt out from marketing messages.

Where you wish to exercise any of these rights, please send us the request via email at [Kgt\\_privacy@kgt.kanematsu.co.jp](mailto:Kgt_privacy@kgt.kanematsu.co.jp). For your own privacy and security, we may require evidence of your identity or to be provided with additional information before we are able to act on your request when the information, we have is insufficient to accommodate your request. We will attempt to provide any requested information or make requested changes in accordance with applicable laws.

You also have the right to lodge a complaint with the local personal data protection regulatory authority in accordance with applicable laws if you believe that we have not complied with applicable personal data protection laws.

If you are based in or the issue you would like to complain about took place elsewhere in the EEA, a list of local data protection authorities in the other EEA countries is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

## Your Personal Data Retention Period

We generally retain your personal data for as long as reasonably needed for the specific business purpose or purposes for which it was collected. The personal data is also archived for the duration necessary to handle any disputes involving you. In some cases, we may be required to retain information for a longer period of time based on laws or regulations that apply to our business. Where possible, we aim to anonymize the information or remove unnecessary identifiers from records that we may need to keep for periods beyond the original retention period. Once your personal data is no longer necessary, we delete or anonymize it as soon as possible.

## Contact Information

Should you have questions or concerns about this policy or our privacy practices, please contact us via email at [Kgt\\_privacy@kgt.kanematsu.co.jp](mailto:Kgt_privacy@kgt.kanematsu.co.jp) .

## **Update of this policy**

We may update this policy from time to time. We reserve the right to modify, add or remove portions of this policy. If we decide to change this policy, we will post an alert on our website.

This policy was last updated on March 1<sup>st</sup> 2025.