

**FURUKAWA CO., LTD.**  
**PRIVACY POLICY**

Furukawa Co., Ltd. (“Furukawa”) is committed to protecting and respecting your privacy. This privacy policy sets out how Furukawa handles personal data of their website visitors, (employees of) customers and suppliers and other third parties (“**user**” or “**you**”). Should we ask you to provide certain information by which you can be identified when using this website or any other services provided by us, then you can be assured that it will only be used in accordance with this privacy policy.

**1. Scope**

- 1.1. The scope of this privacy policy is limited to processing activities to which the General Data Protection Regulation and its national implementation acts apply.

**2. Responsibility**

- 2.1. We will only process personal data in accordance with the applicable privacy legislation and as described in this privacy policy.
- 2.2. The website includes links to website of third parties. We are not responsible for the content of these websites, services provided by these third parties, or their compliance with the applicable privacy legislation. Once you have used these links to leave our website, you should note that we do not have any control over that other website.

**3. How we obtain your personal data**

- 3.1. We obtain your personal data in various ways:
  - a. We obtain information actively provided by you. For example, if you contact us or if you provide information to us in the course of our services.
  - b. We obtain some information automatically when you visit our website. For example, we automatically obtain information about you via cookies when you visit our website. For more information on this, please see Article 5.
  - c. We also obtain information from third parties. For example, we may request information about your company from the Trade Register of the Chamber of Commerce.
  - d. We may perform analysis on personal data about you. The resulting data can also qualify as personal data about you. For example, we may analyze which webpages are visited most frequently.
- 3.2. It may be that providing certain personal data to us is a statutory or contractual requirement, a requirement necessary to enter into a contract, or that you are otherwise obliged to provide the data to us. If that is the case, we will inform you thereof separately, and will also explain the possible consequences if you fail to provide such personal data to us.

**4. Details of processing**

- 4.1. It depends on the processing activity, which personal data we process about you, for which purposes and based on which legal ground. Please find an overview below.
  - 4.1.1. Categories of personal data:
    - a. If you visit our website, we may process the following personal data about you:
      - IP address
      - Cookie preferences
      - Movements on our websites or websites of third parties (in case of tracking cookies)
    - b. If you contact us or otherwise make use of our customer service, we may process the following personal data about you:
      - Contact information
      - Name (and name of business)
      - Position
      - Content of your enquiry
    - c. If you make use of our services as a(n employee of a) customer, we may process the following personal data about you:
      - Contact information
      - Address information (of the business)
      - Name (and name of business)
      - Position
      - Information as to correspondence, services, contracts and billing

- d. If you apply for a position within Furukawa through our website or other online channels, we may process the following personal data about you:
  - Contact information
  - Name
  - Address information
  - Information with regard to current and previous job and educational experiences
- 4.1.2. Sensitive personal data: via our website we do not collect sensitive personal data such as copies of your ID or information about your health.
- 4.1.3. Your personal data is collected by us when you:
  - i. Use our website;
  - ii. Contact us through the website for questions or customer services purposes;
  - iii. Use our services;
  - iv. Apply for jobs through our website or other online channels.
- 4.1.4. Purposes and legal grounds: If you visit our website, we may process your personal data for the following purposes:
  - a. Performance of a contract that you have concluded with us or another party or in order to take steps at your request prior to entering into such a contract. In those cases, we process your personal data on the basis of a contract or the in preparation of entering into a contract or our legitimate interests, namely carrying out our regular business activities in acquiring customers 4.1.3 (ii-iii).
  - b. Communication: we use your personal data to communicate with you about our products and services and to inform you of matters that are important for your account and/or use of the website. This processing of personal data is necessary for the performance of a contract and/or for purposes of our legitimate interests, namely to conduct our normal business 4.1.3 (i-iii).
  - c. Customer service: if you contact our customer service, your personal data are used to provide you with our customer service. This processing of your personal data is necessary for the performance of a contract, or is necessary for purposes of our legitimate interests, namely to conduct our normal business 4.1.3 (ii).
  - d. Optimization of our website: if you use our website, we may process your personal data in order to gain insights regarding the use of our website. This processing of your personal data takes place on the basis of our legitimate interests, namely to optimize and improve our online channels 4.1.3 (i).
  - e. Vacancies: if you apply for a position with Furukawa, we may process your personal data in order to assess whether your profile matches with us and whether your experiences are in line with what we are looking for. These processing activities take place on the basis of our legitimate interests and on the basis of possibly entering into a contract with you 4.1.3 (iv).
- 4.2. If and insofar your personal data is processed on the basis of legitimate interests, we have weighed your rights and interests against ours. Only in case we can guarantee that our rights and interests outweigh yours without adversely affecting you, we are able to invoke this legal basis. In case you want more information about (y)our rights and interests, please contact us through our contact details below.
- 4.3. It may be that we intend to further process your personal data for a purpose other than those for which the personal data have been collected. In such case, we will provide you with information about the(se) other purpose(s) and all relevant further information prior to that further processing.

## 5. Cookies

- 5.1. What is cookie: A cookie is a small text file stored on the hard drive of your computer to track your browsing history, etc. We or the service providers retained by us can receive cookies from your computer while you browse this website if your browser is configured to send and receive cookies.
- 5.2. The processing of personal data using analysis and advertising cookies is based on Article 6. 1 (a) of GDPR (consent). The processing of personal data using technical cookies is based on Article 6. 1 (f) of GDPR (legitimate interests). Purpose and our legitimate interest in using technical cookies is to ensure proper functionality of our website.
- 5.3. Management of cookies: we do not place cookies listed above on our website until you accept the use of such cookies. Please note that in case you decline the use of such cookies, only the technical cookies saving your decision of declining the use of cookies will be temporarily stored on your browser so that our website can recognize such status. You can disable (or enable) the sending and receiving of cookies used by third party distributors. The section below shows how to change the Cookies settings on the webpages of Google and Yahoo! JAPAN, two typical content distributors.
  - Google: Opt-out page access <https://adssettings.google.com/> to disable (or enable) the use of cookies by Google.

- Yahoo!JAPAN: Opt-out page access <https://btoptout.yahoo.co.jp/optout/preferences.html> to disable (or enable) the use of cookies by Yahoo! JAPAN.
  - You can also disable (or enable) cookies and delete recorded cookies by changing the settings of your browser. Search the "Help" menu of your browser for instructions on changing the settings (the method varies from browser to browser).
- 5.4. Google Analytics: This website uses tools such as Google Analytics for collection and analysis of our access logs. These tools use cookies in their collection of logs in a manner that ensures that the information collected does not include information that can be used to identify any individuals. On behalf of us, Google will process this data in order to analyze your use of our websites, to generate reports on website activity and to render further services regarding the use of our websites. The IP address transmitted by your browser will not be associated with other data in possession of Google. You can prevent the storage of cookies by modifying your browser setting to decline cookies. Furthermore, you can prevent the collection and following procession of data by Google through this cookie by downloading a browser-plugin through the following link: <https://tools.google.com/dlpage/gaoptout/>. You can find further information about terms and conditions as well as data protection on <https://marketingplatform.google.com/about/analytics/terms/us>, <https://policies.google.com/privacy> and <https://support.google.com/analytics/answer/6004245?hl=en>. The processing of personal data through Google Analytics is based on Article 6. 1 (a) of GDPR (consent). Purpose of the processing is the analysis of the use of our websites as well as improved functionality.

## 6. Sharing with third parties

- 6.1. For the provision of our services we share your personal data on a strictly need-to-know-basis with:
- a. affiliate companies of Furukawa;
  - b. subcontractors and service providers involved, such as: shipping lines, trucking companies, insurance companies, other authorities and hosting and payment providers;
  - c. competent authorities, such as the authorities of the country of transit or destination for customs clearance in as far as required by the laws of the respective country; and
  - d. incidentally: other third parties such as marketing service providers, on a need-to-know basis.

## 7. Transfer to countries outside the EEA

- 7.1. Furukawa generally does not involve parties that are located outside the European Economic Area ("EEA") for the processing of your personal data. It however may share your personal data with its affiliate companies located outside the EEA.
- 7.2. If and insofar as we transfer personal data with parties in countries outside the EEA, we will agree with these parties to data protection provisions set by the European Commission, so called standard contractual clauses. A copy of the agreed standard contractual clauses can be requested by you. Please also contact us if you would like to obtain additional information on the transfer of your personal data out of the EEA. Our contact details are stated below.

## 8. Security

- 8.1. We take appropriate organizational and technical security measures to protect your personal data and to prevent misuse, loss or alteration thereof. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who need to have access in view of their work/services. Also, the aforementioned persons involved are bound by a confidentiality obligation, either in their employment agreements or (data processing) agreements.
- 8.2. Examples of technical security measures taken by us are:
- a. logical and physical security (e.g. safe, doorman, firewall, network segmentation);
  - b. technical control of the authorizations (as limited as possible) and keeping log files;
  - c. management of the technical vulnerabilities (patch management);
  - d. keeping software up-to-date (e.g. browsers, virus scanners and operating systems);
  - e. making back-ups to safeguard availability and accessibility of the personal data;
  - f. automatic erasure of outdated personal data;
  - g. encryption of personal data;
  - h. applying hashing or (other) pseudonymization methods to personal data; and
  - i. provide secure storage facilities for end-users (e.g. file server storage).
- 8.3. Examples of organizational security measures taken by us are:
- a. assign responsibilities for information security;
  - b. promote privacy and security awareness among new and existing employees;
  - c. establish procedures to test, assess and evaluate security measures periodically;

- d. check logfiles regularly;
- e. using a protocol for handling data breaches and other security incidents;
- f. conclude confidentiality, data processing and data protection agreements;
- g. assess whether the same objectives can be achieved with less personal data;
- h. provide access to personal data to as few people within the organization as possible; and
- i. define the decision-making and underlying considerations per processing.

## 9. Retention periods

- 9.1. We will only retain your personal data for as long as necessary to fulfil the purpose we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 9.2. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 9.3. Please contact us via our contact details displayed below, should you wish to be further informed on how long we process your personal data.

## 10. Your rights (incl. the right to object)

- 10.1. In relation to our processing of your personal data, you have the below privacy rights. For more information on your privacy rights, please be referred to [this webpage](#) of the European Commission.
  - a. **Right to withdraw consent:** In so far as our processing of your personal data is based on your consent (see above), you have the right to withdraw consent at any time.
  - b. **Right of access:** You have the right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you (but not necessarily the documents themselves). We will then also provide you with further specifics of our processing of your personal data.
  - c. **Right to rectification:** You have the right to request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
  - d. **Right to erasure:** You have the right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where: (i) the personal data are no longer necessary, (ii) you have withdrawn your consent, (iii) you have objected to the processing activities, (iv) the personal data have been unlawfully processed, (v) the personal data have to be erased on the basis of a legal requirement, or (vi) where the personal data have been collected in relation to the offer of information society services. We do not have to honor your request to the extent that the processing is necessary: (i) for exercising the right of freedom of expression and information, (ii) for compliance with a legal obligation which requires processing, (iii) for reasons of public interest in the area of public health, (iv) for archiving purposes, or (v) for the establishment, exercise or defence of legal claims.
  - e. **Right to object:** You have the right to object to processing of your personal data where we are relying on legitimate interests as processing ground (see above). Insofar as the processing of your personal data takes place for direct marketing purposes, we will always honour your request. For processing for other purposes, we will also cease and desist processing, unless we have compelling legitimate grounds for the processing which override your interests, rights and freedoms or that are related to the institution, exercise or substantiation of a legal claim.
  - f. **Right to restriction:** You have the right to request restriction of processing of your personal data in case: (i) the accuracy of the personal data is contested by you, during the period we verify your request, (ii) the processing is unlawful and restriction is requested by you instead of erasure, (iii) we no longer need the personal data but they are required by you for the establishment, exercise or defence of legal claims, or (iv) in case you have objected to processing, during the period we verify your request. If we have restricted the processing of your personal data, this means that we will only store them and no longer process them in any other way, unless: (i) with your consent, (ii) for the establishment, exercise or defence of legal claims, (iii) for the protection of the rights of another natural or legal person, (iv) or for reasons of important public interest.
  - g. **Right to data portability:** You have the right to request to transfer of your personal data to you or to a third party of your choice (right to data portability). We will provide to you, or such third party, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies if it concerns processing that is carried out by us by automated means, and only if our processing ground for such processing is your consent or the performance of a contract to which you are a party (see above).
  - h. **Automated decision-making:** You have the right not to be subject to a decision based solely on automated processing, which significantly impacts you ("which produces legal effects concerning you or similarly significantly affects you"). In this respect, please be informed that when processing your personal data, we do not make use of automated decision-making.

- i. **Right to complaint:** In addition to the above mentioned rights you have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your habitual residence, place of work or of an alleged infringement of the GDPR at all times. However, we would appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us beforehand.
- 10.2. The exercise of the abovementioned rights is free of charge and can be carried out by e-mail via the contact details displayed below. If requests are manifestly unfounded or excessive, in particular because of the repetitive character, we will either charge you a reasonable fee or refuse to comply with the request.
- 10.3. We may request specific information from you to help us confirm your identity before we comply with a request from you concerning one of your rights.
- 10.4. We will provide you with information about the follow-up to the request without undue delay and in principle within one month of receipt of the request. Depending on the complexity of the request and on the number of requests, this period can be extended by another two months. We will notify you of such an extension within one month of receipt of the request. The applicable privacy legislation may allow or require us to refuse your request. If we cannot comply with your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

**11. Contact details**

For any questions, comments or requests, you may contact us at the contact details below:  
 Furukawa Co., Ltd.  
 6-4, Otemachi 2-chome, Chiyoda-ku, Tokyo 100-8370, Japan  
 privacy@furukawakk.co.jp

**12. Miscellaneous**

- 12.1. Furukawa is entitled at all times to delete your personal data without notice. In such a case, Furukawa owes no compensation to you as a result of the termination of the account.
- 12.2. If provisions from this privacy policy are in conflict with the law, they will be replaced by provisions of the same purport that reflects the original intention of the provision, all this to the extent legally permissible. In that case, the remaining provisions remain applicable unchanged.
- 12.3. Furukawa reserves the right to change this privacy policy on a regular basis. Where required, Furukawa will inform you of updates made to this privacy policy. The current version is always available on our website <https://www.furukawakk.co.jp>. This privacy policy was last amended and revised in April 2021.

**13. Definitions**

13.1. In these privacy policy, the following definitions apply:

Applicable privacy legislation	All applicable privacy legislation, including the General Data Protection Regulation (“GDPR”) and the relevant national implementation acts.
Privacy policy	This present privacy policy.
Furukawa Co., Ltd.	6-4, Otemachi 2-chome, Chiyoda-ku, Tokyo 100-8370, Japan
Website	<a href="https://www.furukawakk.co.jp">https://www.furukawakk.co.jp</a>

13.2. Other terms that are defined in the applicable privacy legislation, such as ‘personal data’, (joint) controller, processor, data subject and processing will have the meaning as described in the applicable privacy legislation.

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