

Personal Data Protection Notice

Nagase & Co., Ltd. ("NAGASE" or "we") appreciates your visit to our website (our "Website") and your interest in NAGASE, the NAGASE Group, our services, and products. The "NAGASE Group" means subsidiaries and affiliates of NAGASE set out in the "NAGASE Group" section on the Website of NAGASE (<https://www.nagase.com/company/global-network>).

This Personal Data Protection Notice (this "Privacy Notice") aims to explain to you ("you", "Business Partners", or "data subject" (including those who may become business partners, and including their officers and employees)) on how NAGASE collects and processes your Personal Data (defined below) collected through our Website and/or offline activities and communications in the course of our business operations.

This Privacy Notice may be updated from time to time. We therefore ask you to check it periodically for updates. The bottom of the page indicates when this Privacy Notice was last updated.

For further information for the respective privacy policies governing each region, please view here:

Nagase America: <https://nagaseamerica.com/privacy-policy/>

Nagase Europe: <https://www.nagase.eu/privacy-policy/>

Scope of This Privacy Notice

This Privacy Notice applies to data obtained by NAGASE.

This Privacy Notice does not apply to data collected by any third party, including through any application or content that may link to or be accessible from or on our Website.

This Privacy Notice is subject to any additional terms of disclaimers or other contractual terms you have entered into with NAGASE such as client privacy statements or notices, and any applicable laws, regulations, and guidelines on the protection of Personal Data. Please be aware that for certain services, NAGASE may provide you with privacy statements in addition to, or in place of, this Privacy Notice, as appropriate.

Definitions

In this Privacy Notice, the following terms have the following meanings:

"Personal Data" means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Process" or "Processing" means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

Data We Collect About You

We may Process different kinds of Personal Data about you which we have grouped together as follows:

- Identity Data includes name, country, company, position, employer number, user account data, date of birth and gender.
- Contact Data includes email address, telephone numbers, office location address, billing address, delivery address.
- Financial Data includes bank account and payment card details.
- Technical Data includes internet protocol (IP) address, date and time of your access, time zone setting and location, browser type and version, your device identifies, your internet or wireless service provider and other technology on the devices you use to access this Website.

We do not collect following data from you:

- Race, creed, social status, medical history, criminal record, record as a criminal victim
- Physical handicap, intellectual handicap, mental disorder
- Results of medical examination and other examination
- Health guidance, medical treatment / dispensing information
- Proceedings concerning criminal cases such as arrest and search, having the data subject as the suspect or the accused
- Proceedings concerning protection cases of juveniles such as protective dispositions, having the data subject as a juvenile delinquent person or a person suspected to be a juvenile delinquent

How We Collect Your Data

We use different methods to collect Personal Data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by exchanging business cards, sending emails or filling in forms or otherwise.
- **Automated technologies or interactions.** As you interact with our Website, we (and service providers acting on our behalf) will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Technical Data by using Cookies, web beacons or other similar tools. Web browsers are usually set by default to accept Cookies (including web beacons) but you may easily change this by modifying the settings of your browser. However, please note that should you choose to disable Cookies, you may be unable to use all or part of the functions of this Website.

Lawful Basis

We will process your Personal Data when the applicable law allows us to. Most commonly, we will process your Personal Data in the following circumstances, to the extent permitted by the applicable law:

- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where we need to perform the contract we are about to enter into or have entered into with you.

Where applicable data protection laws require us to obtain your consent to such Processing of your Personal Data, we will ask for your consent. If you wish to withdraw your consent to Process your Personal Data, please contact us as set forth in the "Legal Rights with Regard to Your Personal Data" section.

Purposes for Which We Will Use Your Personal Data

We use your Personal Data on the lawful basis above for the following purposes:

- Notify and greet based on social customs.
- Provide you with information, products or services.
- Enter into contracts with you and perform our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Fulfill customer inquiries and respond to any problems that may arise, such as difficulties in navigating our Website or accessing certain features.
- Send samples, price quotations, products, and information.
- Develop new products and services.
- Send you newsletters, features, promotional material, surveys, and other updates.
- Analyze your interests based on your browsing history or buying history on our Website or other information.
- Send you emails and/or postal messages with information about the brand and other content of the NAGASE Group we think may be of interest to you.
- Develop and provide advertising tailored to your interests, including interest-based advertising.
- Personalize your experience on our Website by presenting products and information tailored to you.
- Evaluate and administer products and services of the NAGASE Group.
- Gauge our customers' trends to determine what products and services are most popular with our customers.
- Provide information relating to the NAGASE Group's business activities and for exchange of such information.
- Provide services relating to or connected to services other than those described above.
- Share your Personal Data among the NAGASE Group for the purposes listed above or for administrative purposes inside the NAGASE Group.

Disclosures of Your Personal Data

We may disclose certain categories of your Personal Data as may be necessary for the purposes stated above when the applicable law allows us:

- To companies of the NAGASE Group.
- To our service providers with the appropriate management and supervision including those providing us with cloud computing, customer relation management, marketing automation, advertising, messaging or other applications, business travel arrangement, courier, receptionist, conference/event arrangement, hospitality, accommodation.
- To a party that merges or acquires part or all of our business or assets.

NAGASE (for its address and representative, please see (<https://www.nagase.com/company>) is responsible for the management of Personal Data shared among the companies in the NAGASE Group. In order to request disclosure of your Personal Data shared among companies in the NAGASE Group, or to make inquiries or complaints regarding the use of such information, please contact NAGASE as in the sections titled "Legal Rights with Regard to Your Personal Data" or "How to Contact Us" below.

We may also disclose your Personal Data:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To protect life, body, or property, and when it is difficult to obtain consent of the data subject.
- To enhance public hygiene or promote sound upbringing of children, and when it is difficult to obtain a consent of the data subject.

International Transfers

We may transfer your Personal Data to countries whose data protection laws are not as comprehensive as those from where you are based, because of business globalization. When we transfer Personal Data overseas, we have put in place appropriate safeguards, such as contractual commitments (using the format required under applicable data protection law, if any), in accordance with applicable legal requirements to ensure that your Personal Data is adequately protected.

How Long We Keep Your Personal Data

We will retain your Personal Data we collected for the period necessary to fulfill the purposes stated in this Privacy Notice and continue to store it until further notice unless deletion earlier is required by law. Upon receipt of your Personal Data Change Request as described below we will promptly delete your Personal Data.

Legal Rights with Regard to Your Personal Data

We respect your privacy rights and provide you with reasonable access to your Personal Data that you have provided. Based on the applicable law to your Personal Data, you may have the right to request access, correction, erasure, object to Processing, restriction of Processing your Personal Data, stop to transfer, withdraw consent. To exercise your rights, please contact us as set forth in "How to Contact Us" section below.

Data Security

We follow generally accepted industry standards to protect the information submitted to us, both during transmission at our Website and once we receive it. We maintain appropriate administrative, technical, and physical safeguards to protect your Personal Data collected by us against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of Processing of your Personal Data in our possession.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. NAGASE cannot ensure or warrant the security of any information you transmit to us. NAGASE also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us as set forth in the "How to Contact Us" section below.

We have put in place procedures to deal with any suspected Personal Data breach and will notify of a breach where we are legally required to do so.

Changes to this Privacy Notice

From time to time, in order to comply with changes in applicable law or for legitimate business purposes, we may make changes to this Privacy Notice. Any changes we make will be displayed on our Website. Please check back from time to time to ensure that you have read the most recent version of this Privacy Notice.

How to Contact Us

If you have any questions or concerns about this Privacy Notice or our privacy practices, please contact us using the [Personal Data Change Request Form](#).

Alternatively, you can contact us in writing at:

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Tokiwabashi Tower, 2-6-4, Otemachi
Chiyoda-Ku, Tokyo Japan
100-8142

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