

GDPR POLICY

Nippon Kayaku Co., Ltd. (personal data manager; hereinafter referred to as “the Company”) and the Company’s associated group companies (please refer [here](#) for the company names; hereinafter collectively referred to as “the Group”) shall comply with the EU General Data Protection Regulation (GDPR) and other relevant laws/ordinances that apply to personal data and shall appropriately handle personal information according to the following policy to appropriately handle the personal data of the Group’s customers and employees (hereinafter collectively referred to as “Customers”) in the European Economic Area (EEA).

1. Purposes and Legal Basis of the Processing of Personal Data

The purposes and the legal basis under the GDPR of the processing of the personal data acquired and handled by the Group are as follows.

Purpose	Legal Basis
To provide or collect useful information relating to products/services and to ensure the Company’s legitimate interests	Legitimate interests (continuation and development of the Company’s business)
To fulfil contracts entered into with Customers	Fulfillment of contracts
To make notifications and reports to public agencies	Legitimate interests (compliance with laws/ordinances)

In addition, the Group shall process sensitive personal data (e.g., health information) only in the following cases.

- 1. When the explicit consent of the Customers themselves has been obtained**
- 2. When necessary to fulfill the duties of Customers or the Group in employment and social security**
- 3. When it is necessary to protect interests relating to the life of Customers in a situation in which it is difficult to obtain the explicit consent of the Customers themselves**

4. **When handling personal data disclosed by the Customers themselves**
5. **When necessary to establish proof, exercise rights or provide a refutation in lawsuits**
6. **When handled within the range stipulated by the relevant laws/regulations to protect important public interests**
7. **When handled within the range stipulated by the relevant laws/regulations for the medical diagnosis and capacity evaluation of Customers**
8. **When handled within the range stipulated by the relevant laws/regulations for public health or the protection of the rights of Customers**
9. **When it is necessary for storage or statistical purposes in the public interest and it is handled within the range stipulated by the relevant laws/regulations**

2. Types of Personal Data

The Group may acquire the following personal data.

- Personal names
- Affiliations (e.g., company name, department and job title)
- Contact information (e.g., telephone number, e-mail address and postal address)
- Online identifiers (e.g., IP addresses and cookie identifiers)
- Employee's employment information (e.g., personnel assessment information, health information, passport number and financial institution account information)
- Recruitment information (e.g., resume content)

3. Personal Data Sharing and Transfer of Personal Data from Inside to Outside the EEA and the UK

The Group may share, provide or transfer outside the EEA and the UK personal data between the Group's companies, lawyers and service providers. At that time, the Group shall take appropriate measures that include entering into the standard contractual clauses required by the GDPR unless the country or region where the data shall be transferred is expressly recognized by the European Commission as having a sufficient level of personal data management for the transfer of personal data outside of the EEA and the UK.

4. Personal Data Storage Period

The Group shall store the personal data of Customers for the period judged necessary for the above purposes in 1 unless otherwise specified by laws/ordinances.

5. Safety Management Measures

The Group shall take appropriate technical and organizational measures to keep the personal data of Customers in an accurate and up-to-date state and to ensure the safety of personal data by preventing illegal or improper handling, destruction or damage.

6. Rights of Customers

Customers shall have the following rights concerning the personal data processed by the Group.

1. Right to access personal data
2. Right to request correction of personal data
3. Right to request the deletion of personal data
4. Right to request restrictions on the processing of personal data
5. Right to request the transfer of personal data to Customers or a third party designated by the Customers
6. Right to revoke consent in the event the personal data of Customers is processed based on that consent
7. Right to appeal to personal data protection regulation authorities in relation to the processing of the personal data by the Group

7. Inquiries

Please contact us by post or e-mail using the following information for inquiries relating to this policy.

[Contact Information]

Post: Corporate Communications Division, Nippon Kayaku Co., Ltd., 1-1, Marunouchi 2-chome, Chiyoda-ku, Tokyo, 100-0005, Japan

[Inquiry Form](#)

8. Revisions

This policy is subject to change according to revisions of the Group's policy or laws/ordinances.

List of the Company's Associated Group Companies

- NIKKA FINE TECHNO CO., LTD.
- Nippon Kayaku Korea Co.,Ltd.
- NIPPON KAYAKU AMERICA, INC.
- Euro Nippon Kayaku GmbH
- KAYAKU CHEMICAL (WUXI) CO.,LTD.
- KAYAKU Advanced Materials, Inc.
- THE GILMORE ROAD PROPERTY, LLC
- WUXI ADVANCED KAYAKU CHEMICAL CO., LTD.
- Shanghai KAYAKU International Trading Co.,Ltd.
- NIPPON KAYAKU (THAILAND) CO.,LTD.
- MOXTEK, INC.
- WUXI POLATECHNO OPTICS CO., LTD.
- Dejima Tech B.V.
- Dejima Optical Films B.V.
- POLATECHNO (HONG KONG) CO. LIMITED
- PictLeap Co.,Ltd.
- NIPPONKAYAKU FOOD TECHNO CO.,LTD.
- Tumor Diagnosis Support Co., Ltd.
- Taiwan Nippon Kayaku Co., Ltd.
- Kayaku Safety Systems (Huzhou) Co., Ltd.
- Kayaku Safety Systems de Mexico, S.A. de C.V.
- Kayaku Safety Systems Malaysia Sdn.Bhd.
- Nishiminato Driving School Co.,Ltd.
- YMK service Co., Ltd.
- Okiura Golf Center Co., Ltd.
- Kayaku (Shanghai) Co.,Ltd.
- JAPAN HUMAN RESOURCES MEDICAL SCIENCE RESEARCH INSTITUTE CO., LTD.
- Wako Toshi Kaihatsu Co., Ltd.
- Kowa Sangyo Co., Ltd.
- Gunnan Sangyo Co., Ltd.

*Please check the website of the respective companies for the policies of Kayaku Safety Systems Europe a.s. and RaySpec Ltd.