

## ■ Processing Personal Data from the EU/EEA

Inabata & Co., Ltd. (hereinafter referred to as “Inabata”) complies with the GDPR and related laws and regulations concerning personal data on EU/EEA residents, and appropriately manages and processes the provided personal data as set forth below:

### 1. Processing Personal Data

- Inabata and its affiliated companies lawfully collect, use, and maintain personal data from the EU/EEA for the following purposes and takes necessary protective measures.

Data Subject	Purpose	Content of Personal Data	Scope of Users	Legal Basis	Transfer Outside of EU/EEA / Protective Measures	Data Retention Period
(1) Business Partners	<ul style="list-style-type: none"> <li>• Negotiations, communication, consultation, order placement and receipt, settlement, or other forms of processing relating to transactions</li> <li>• Delivery and receipt of goods and services, etc. relating to transactions</li> <li>• Communication between business partners and Inabata; notifications and greetings in accordance with social customs; invitations and communication regarding trade shows, seminars, and other events</li> </ul>	<ul style="list-style-type: none"> <li>• Company name, affiliation, position, name, and contact details (telephone number, fax number, email address, etc.) for the contact at the business partner and other personal data acquired through transactions</li> </ul>	<ul style="list-style-type: none"> <li>• Inabata &amp; Co., Ltd. and its group companies</li> <li>• Partner companies necessary for the delivery of products and services to business partners</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>* To deliver and receive products and services with business partners (the data subject), and to implement other direct marketing activities</li> <li>• The performance of a contract</li> <li>*To fulfil our</li> </ul>	Implement one of the following measures to protect the data subject’s rights as required by the GDPR when transferring	The period necessary for the purpose stated on the left, such as the delivery of products and services, or the retention period necessary under audits, laws and regulations,

	<ul style="list-style-type: none"> <li>• Exchange of information and communication with industry groups and organizations relevant to Inabata's business</li> </ul>	<ul style="list-style-type: none"> <li>• Data equipment identifiers such as those of business partners' PCs used for transactions and communications</li> </ul>		contractual obligations or exercise contractual rights with business partners (the data subject)	the data outside of the EU/EEA 1) Sign an SCC	whichever is the longer
(2) Shareholders	<ul style="list-style-type: none"> <li>• Exercise of rights and performance of obligations pursuant to relevant laws and regulations</li> <li>• Provision of benefits on account of shareholder status and implementation of measures designed to facilitate relationships with shareholders</li> <li>• Management of shareholder information including compilation of shareholder data pursuant to relevant laws and regulations</li> </ul>	<ul style="list-style-type: none"> <li>• Shareholders' name, company (affiliation, position), address, contact details (telephone number, fax number, email address, etc.), as well as other personal data provided by shareholders necessary for the execution of their rights and obligations under related laws and regulations, and for Inabata to provide benefits to shareholders</li> <li>• Data equipment identifiers such as those of PCs used in communications from shareholders</li> </ul>	<ul style="list-style-type: none"> <li>• Inabata</li> <li>• Financial institutions such as securities companies and trust banks that Inabata entrusts with work relating to shares</li> </ul>	<p>Legitimate interests</p> <ul style="list-style-type: none"> <li>* To exercise rights and perform obligations to shareholders (the data subject) and to implement other administrative work pursuant to related laws and regulations</li> <li>• The performance of a contract</li> <li>* To fulfil our contractual obligations or exercise contractual rights to shareholders (the data subject)</li> <li>• Legal obligations</li> <li>* To comply with laws and regulations</li> </ul>	<p>regarding the transfer of personal data between group companies</p> <p>2) Obtain individual consent after having explained the purpose and protective measures when Inabata gathers and transfers the</p>	<ul style="list-style-type: none"> <li>• The period necessary for the purpose stated on the left, such as the execution of shareholders' rights and obligations or the provision of benefits, or the retention period necessary under audits, laws and regulations, whichever is the longer</li> </ul>

<p>(3) Applicants in Recruitment Activities</p>	<ul style="list-style-type: none"> <li>• Provision and communication of information concerning recruitment (including that for internships) by Inabata, and screening and hiring decisions</li> <li>• Provision of materials and communication in order to start work after making informal job offers</li> </ul>	<ul style="list-style-type: none"> <li>• Applicant’s name, address and contact details (telephone number, fax number, email address, etc.)</li> <li>• Information necessary to screen applicants (age, gender, academic background, career history, reasons for applying for the job, etc.)</li> <li>• Data equipment identifiers such as those of PCs used in communications from applicants</li> </ul>	<ul style="list-style-type: none"> <li>• Inabata</li> <li>• Recruiters such as recruitment agencies that Inabata entrusts with its recruitment activities</li> </ul>	<p>Legitimate interests</p> <ul style="list-style-type: none"> <li>* To perform screening work, etc. for applicants (the data subject)</li> </ul>	<p>data directly.</p>	<p>The period necessary to review applications or the period to respond to inquiries after the selection process (6 months)</p>
<p>(4) Inabata’s Officers, Employees, Former Employees, and Their Families</p>	<ul style="list-style-type: none"> <li>• Administrative communication and information exchange</li> <li>• Personnel management (transfers, temporary or permanent employment transfers, training and competence development, personnel evaluations, and promotions or demotions)</li> <li>• Remuneration management (payment of salaries and bonuses, processing</li> </ul>	<ul style="list-style-type: none"> <li>• Officers’, employees’, and former employees’ names, addresses, contact details (telephone number, fax number, email address, etc.), dates of birth, gender, academic background and career</li> </ul>	<ul style="list-style-type: none"> <li>• Inabata</li> <li>• Contractors that Inabata entrusts with its personnel affairs</li> <li>• Inabata’s labor union, health insurance association, medical office, employee shareholding</li> </ul>	<p>• Legitimate interests</p> <ul style="list-style-type: none"> <li>* When necessary for personnel and labor management of human resources who execute Inabata’s operations</li> <li>• Legal obligations</li> <li>* To comply with</li> </ul>		<ul style="list-style-type: none"> <li>• Period of employment in Inabata as officers or employees</li> <li>• Period necessary to respond to inquiries from former officers and employees</li> </ul>

	<p>attendance, severance/retirement allowance and retirement pensions, asset formation, compliance with laws and regulations on taxes and social welfare)</p> <ul style="list-style-type: none"> <li>• Compliance with the Industrial Safety and Health Act (regular medical examinations, comprehensive medical examinations, specific health checkups, etc.) and healthcare management</li> <li>• Responding to procedures stipulated in labor related laws and regulations, and internal rules and regulations</li> <li>• Communication and sharing with Inabata’s labor union, health insurance association, medical office, employee shareholding association, and group companies</li> <li>• Notifications and reports to public agencies and their affiliated organizations or organizations to which Inabata belongs</li> <li>• Provision of welfare services, introduction of various types of group insurance, and performance of related procedures</li> </ul>	<p>history, dependents, and personnel information such as positions, qualifications, remuneration, salary, etc.</p> <ul style="list-style-type: none"> <li>• State of health necessary for officers’ and employees’ labor management, treatment information and results of statutory medical examinations</li> <li>• Data equipment identifiers such as those of PCs used in communications by board members, employees, and former employees</li> </ul>	<p>association, and group companies</p> <ul style="list-style-type: none"> <li>• Companies that accept employees temporarily transferred from the Inabata</li> </ul>	<p>laws and regulations to calculate salaries, handle taxes, social insurance work, and statutory medical examinations, etc.</p>		<ul style="list-style-type: none"> <li>• Period necessary to respond under related laws and regulations such as tax laws on behalf of officers, employees, or former officers and employees</li> </ul>
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	<ul style="list-style-type: none"> <li>• Distribution of in-house newsletters and other materials</li> <li>• Communication in emergencies</li> </ul>					
(5) Personal Information on Former Officers and Employees and Their Families	<ul style="list-style-type: none"> <li>• Procedures, document preparation and storage stipulated in relevant laws and regulations</li> <li>• Communication after resignation/retirement</li> <li>• Response to inquiries made after resignation/retirement</li> </ul>	<ul style="list-style-type: none"> <li>• Former officers' and employees' names, addresses, contact details, gender, dates of birth, academic background and career history, and personnel information such as positions, qualifications, remuneration, salary, etc.</li> <li>• Personnel information on former officers' and employees' families' names, gender, and dates of birth, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Inabata</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>* To respond to various inquiries made after resignation/retirement</li> <li>• Legal obligations</li> <li>* To comply with laws and regulations to handle taxes and for social insurance work, etc.</li> </ul>		<ul style="list-style-type: none"> <li>• Period necessary to respond to inquiries relating to former officers and employees and their families</li> <li>• Period necessary to respond under related laws and regulations such as tax laws on behalf of officers and employees</li> </ul>

\* In principle, Inabata does not process personal data on race, ethnic identity, political opinions, religious or philosophical beliefs, or trade-union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health (excluding data necessary for labor management and legally required data) or sensitive data concerning a natural person's sex life or sexual orientation.

\* Inabata does not engage in automated processing such as profiling when engaging in transactions or hiring employees, etc.

## 2. Rights of Data Subjects

- Inabata respects the rights of data subjects stipulated in the GDPR.

(1) Access

Data subjects can access their personal data retained by Inabata by taking specified procedures.

(2) Portability

Data subjects can transfer their personal data retained by Inabata to another company by taking specified procedures.

(3) Deletion and Correction, etc.

Data subjects can delete and correct their personal data retained by Inabata by taking specified procedures.

(4) Processing Restrictions

Data subjects can restrict the processing of their personal data retained by Inabata by taking specified procedures in cases that fall under certain requirements (i.e. the accuracy of their personal data is contested).

(5) Withdrawal of Consent

Data subjects can withdraw their consent expressed to Inabata at any time without any effect on lawful processing pursuant to consent prior to withdrawing consent by taking specified procedures.

(6) Lodging Other Complaints

Data subjects can lodge complaints with Inabata concerning their personal data by taking specified procedures, or data subjects can lodge complaints with the supervisory authority.

### **3. Security Control Measures for Personal Data**

- Inabata and our affiliated companies take necessary protective measures for the appropriate and secure processing of personal data from the EU/EEA.

(1) Organizational Security Control Measures and Personnel Security Control Measures

We have established an organizational security control system for clerical work that processes personal data, and we will notify the supervisory authority in case of a data leak without delay by the deadline stipulated in the GDPR.

(2) Physical and Technical Security Control Measures

Inabata has established standards including information security rules to prevent personal data leaks and we have implemented physical and technical security control measures.

### **4. Outsourcing of Personal Data**

- Inabata may outsource clerical work relating to the processing of personal data as necessary.

- In such cases, we will execute an agreement that provides for the implementation of security control measures stipulated in the GDPR and ensure that necessary security control measures are properly taken.

## 5. Controller and Data Protection Officer

	Controller	Data Protection Officer (DPO)
Name	Inabata & Co., Ltd.	Corporate Communications Department, General Affairs Office, Inabata & Co., Ltd.
Address	2-8-2 Nihonbashi-honcho, Chuo-ku, Tokyo 103-8448	
Contact Details	Please use the “Contact Us” link below to send an inquiry.	

## 6. Disclosure, Correction, and Discontinuation of Use of Registered Information

- When Inabata receives a request from an individual for disclosure, correction, discontinuation of utilization, deletion, or suspension of disclosure, transfer or provision to third parties, etc., of his/her personal information handled by Inabata, Inabata will confirm the identity of the individual making the request and respond promptly unless otherwise prohibited to do so by laws and regulations or other special circumstances.

Please use the [“Contact Us”](#) form on the Privacy Policy page to send a request.