

NIPPON SHOKUBAI EUROPE

Privacy Policy

Introduction

NIPPON SHOKUBAI EUROPE N.V. (the “Company”) is committed to ensuring full compliance with all applicable laws and regulations throughout the Company. Recognizing that protecting personal information through proper processing pursuant to applicable laws and regulations is one of the Company’s important social responsibilities, the Company will process, and strive to ensure protection of, personal information in accordance with the following basic policy.

1. Collection and Use of Personal Information

The Company will collect and use Customer’s personal information to achieve the purposes of use set forth below. When the Company uses personal information for any purpose other than the following purposes, the Company will use such personal information in an appropriate manner in accordance with applicable laws and regulations. In this Privacy Policy,

“Customers” refers to the natural persons, such as contact persons or representatives of our customers, research institutions, and other organizations.

2. Purposes of Use

[Information of Customers]

<Business-related notifications concerning products, services or the like>

- To perform and manage transactions related to products and services of [the Company's group](#) (such as delivery of the products or other items, request for payment, follow-up communication and the like);
- To provide notifications of various events such as exhibitions, briefing sessions, tours and seminars.

<Questionnaires concerning planning, etc. of products and improvement of services>

- To conduct surveys concerning planning, research and development, and sales promotion of products and services of the Company's group; and
- To conduct questionnaires concerning products and services of the Company's group.

<Others>

- To respond to inquiries, requests for materials, and other requests or needs from Customers;
- To exercise the Company's rights and perform the Company's obligations under applicable laws and regulations;

- To conduct any other business that is related or incidental to the purposes of use set forth in Section 2 “Purposes of Use”; and
- To share personal information with a third party to the extent necessary to achieve the purposes of use set forth in Section 2 “Purposes of Use”.

3. Security Measures for Personal Information

The Company will take measures necessary to ensure the security management of personal information in order to prevent leakage, loss, damage or alteration of, or unauthorized access to, personal information, or the like in light of the information security standards then in effect.

4. Provision of Personal Information to Third Parties

The Company will not provide any personal information to any third party without the consent of the subject thereof. However, the Company may provide personal information to a third party only to the extent set forth by applicable laws and regulations, such as the cases of entrustment or joint use stipulated below. In such case, the Company will appropriately process such personal information in accordance with those applicable laws and regulations.

5. Entrustment of the Processing of Personal Information

The Company may entrust the processing of personal information to a third party within the scope of the purposes of use stipulated in Section 2 above. In such case, the Company will strictly select the relevant entrusted party and conduct proper supervision over the same with respect to the processing of personal information.

6. Joint Use of Personal Information

For the achievement of the purposes of use stipulated in Section 2 above, the Company may, from among the personal information that Customers provide to the Company, share certain information such as the Customers' names, addresses, telephone numbers, e-mail addresses, departments/sections and positions, details of inquiries from the Customers, and products or services that the Customers are interested in within the Company's group. In such case, the Company shall be liable for the management of such personal information.

7. Disclosure, Correction, Addition, Erasure, or Cessation of Use, etc. of Personal Information

[Information of Customers]

For any request for disclosure, correction, addition, erasure, or cessation of use, etc. of personal information of Customers collected by the Company, please contact the Contact Information for Inquiries stated below. The Company will promptly respond to such request in accordance with applicable laws and regulations, as well as procedures prescribed by the Company, after confirming that the Customer who made such request is the subject of such personal information.

8. Categories and Collection Method of Personal Information Processed by the Company

The Company will process the following categories of personal information.

The Company will collect the following information from the Customers themselves, companies to which the Customers belong, or SNS or other media to which the Customers have registered to disclose information.

- Names, addresses, telephone numbers, facsimile numbers, email addresses, departments/sections and positions;
- Data entered into an inquiry form or other submissions (such as Customers' business contact details, requests and details of inquiries); and

9. Legal Basis for Processing of Personal Information

- The Company may process the personal information of Customers in order to pursue its legitimate interests in performing agreements with the Customers or the companies or the like to which such Customers belong or in providing products and services of the Company's group in an appropriate and safe manner. Furthermore, the Company may obtain consent from the Customers with respect to such processing of personal information.
- The Company will process the personal information of Customers based on its legitimate interests or the consent from the Customers in cases where there is no such legitimate interest in promoting research and development of products and services of the Company's group and in continuously providing safe and superior products and services to such Customers through the Company's group.
- The Company will respond to requests and inquiries from Customers. In such case, the Company will process the personal information of Customers based on its legitimate interests or the consent from the Customers in cases where there is no such legitimate interest in performing agreements with such Customers and responding to such Customers' requests and inquiries in an appropriate manner.
- The Company may process the personal information of Customers in cases where the Company is performing its legal obligations, or where it holds a legitimate interest in exercising its rights held under applicable laws and regulations.
- In addition to the above, the Company may otherwise process the personal information of Customers based on the consent from the Customers.

If Customers give consent to the Company's processing of personal information, such Customers may at any time withdraw such consent.

10. Disclosure of Personal Information

The Company may disclose personal information of Customers to the following recipients:

- The Company's group: By disclosure of the personal information within the Company's group, the Company's group will provide notification of products and services to Customers.
- Service providers: The Company may entrust the processing of personal information to service providers, such as marketing service providers. In such case, by giving proper instruction and direction concerning the processing of personal information to the service providers, the Company will process personal information of Customers in a safe and appropriate manner.

11. Cross-border Transfer of Personal Information

The Company may process personal information of Customers in Japan. If the Company intends to transfer personal information collected in the European Economic Area or the U.K. to Japan, the Company will implement appropriate security measures for such personal

information, including transfer of such personal information under an adequacy decision made by the competent data protection authority.

12. Storage Period of Personal Information

The Company will immediately erase personal information of Customers after achieving the purposes of use.

13. Rights of Customers

In addition to the rights stipulated in Section 7 above (such as the right to request disclosure of personal information, etc.), any customer may, if certain conditions are met, retain the rights to object to the processing of his/her personal information and request that his/her personal information be directly transferred to a third party or such customer himself/herself.

14. Right to Lodge a Complaint with the Supervisory Authority

Any customer has the right to file a claim to, or lodge a complaint with, any data protection authority having jurisdiction over the place of his/her residence, workplace or alleged place of violation.

[Contact Information for Inquiries]

NIPPON SHOKUBAI EUROPE N.V.

Haven 1053, Nieuwe Weg 1, B-2070, Zwijndrecht, Belgium

yukiya.hida@nseurope.be

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