

## **PRIVACY POLICY REGARDING PERSONAL INFORMATION OBTAINED THROUGH SURVEY AND SALES CAMPAIGN**

Effective Date: July 12, 2024

KOKUYO Co., Ltd. ("**KOKUYO**") is committed to protecting your privacy. This Privacy Policy (the "**Policy**") describes how we collect, share, and secure your personal information that is provided by you through KOKUYO's Products Survey (the "**Survey**") and KOKUYO's Sales Campaign (the "**Campaign**").

The Policy explains our practices in handling your personal information, including how we collect, use, and share your personal information, and your rights regarding the personal information we collect.

We may update the Policy from time to time, so please check it occasionally.

### **The Policy describes:**

- Personal Information We Collect;
- How We Collect Your Personal Information;
- How We Use Your Personal Information;
- How We Disclose Your Personal Information to Third Parties;
- How We Protect Your Personal Information;
- Ability to Access, Update and Correct Your Personal Information;
- Your Privacy Rights
- Changes to the Policy;
- Questions About the Policy.

### **PERSONAL INFORMATION WE COLLECT**

KOKUYO may collect, or have collected in the preceding 12 months, personal information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual person or a household ("**Personal Information**"). KOKUYO may also collect non-Personal Information that cannot be linked or associated with an individual person or household. When non-Personal Information is combined with other information so that it identifies an individual person, we treat that combination as Personal Information. We may collect, use, store and transfer different kinds of Personal Information about you, which we have grouped together, as follows:

- **Basic Information** such as name, age, sex, school name, school year, email address, address and social media (SNS) account(s).
- **Answers to the Survey** such as responses.
- **Information Obtained through Subsequent Video Interview(s) and/or Face-to-face Interview(s)** such as recording of your remarks and facial image.

KOKUYO has obtained the categories of personal information listed above directly from you in the preceding 12 months.

**Your ‘Do Not Track’ Browser Setting.** Some web browsers incorporate a Do Not Track (“DNT”) feature that signals to the websites that you visit that you do not want to have your online activity tracked. At this time, our website does not respond to DNT signals. Other third party websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.

**Children’s Privacy.** The Survey and the Campaign are not directed towards children. If you are under the age of 13, you are not authorized to provide us with any Personal Information. If the parent or guardian of a child under 13 believes that the child has provided us with any Personal Information, the parent or guardian of that child should contact us using the contact form below to have this Personal Information deleted from our files.

<https://kokuyo.jp/inquiry/en/privacy>

## **HOW WE COLLECT YOUR PERSONAL INFORMATION**

**Information You Provide To Us:** KOKUYO may collect Personal Information from you that you voluntarily provide to us as below:

- Through answering the Survey and their subsequent video interview(s) and/or face-to-face interview(s).
- Through webform on the Campaign site.

## **HOW WE USE YOUR PERSONAL INFORMATION**

### **How We Use Your Personal Information**

We will use your personal information for the following purposes:

- To provide notifications relating to products/services handled by KOKUYO or guidance regarding related services, and to make requests such as product monitoring and the Survey.
- To provide guidance regarding fairs/events, etc., held by (organized/jointly sponsored/supported by) KOKUYO.

- To analyze your responses to the Survey, the video interview(s) and/or the face-to-face interview(s) for the purpose of developing and advertising new products, services.
- To provide KOKUYO's products for the Campaign.
- To contact for the recruitment of sales ambassadors (e.g., social media influencers).
- For other purposes previously agreed to

### **Purposes For Which We May Use and We Have Used in the Preceding 12 Months Your Personal Information**

We may use or have used in the preceding 12 months your collected information for the above purposes.

### **HOW WE DISCLOSE YOUR PERSONAL INFORMATION TO THIRD PARTIES**

We may share or have disclosed in the preceding 12 months your Personal Information to third parties only in the ways that are described in the Policy.

**Service Providers.** We may use third party service providers to perform certain business services and may disclose Personal Information to such service providers as needed for them to perform these business services. Service providers are only allowed to use, disclose, or retain the Personal Information to provide these services and are prohibited from selling the Personal Information. Business services provided include but are not limited to our survey platform service provider, email service provider web conferencing service provider and delivery service provider.

**Business Transactions.** We may do business with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Information in the same way as set out in this Policy.

**Legal Process.** Subject to applicable law, we may disclose information about you (i) if we are required to do so by law, regulation, or legal process, such as a subpoena; (ii) in response to requests by governmental entities, such as law enforcement authorities; (iii) when we believe disclosure is necessary or appropriate to prevent physical, financial, or other harm, injury, or loss; or (iv) in connection with an investigation of suspected or actual unlawful activity.

**No Sales or Sharing of Personal Information.** We do not sell or share your personal information for advertising.

### **Personal Information We Have Disclosed And To Whom In The Preceding 12 Months**

We have not disclosed your Personal Information in the preceding 12 months.

### **HOW WE PROTECT YOUR PERSONAL INFORMATION**

We have implemented and maintain generally accepted industry standards to protect against the unauthorized access, use, modification, destruction, or disclosure of your Personal Information both during transmission and once we receive it. We endeavor to keep your Personal Information confidential and protected against unauthorized access, misuse or alteration with commercially reasonable physical, technical, and administrative measures. However, as effective as these measures are, no security system is impenetrable. We cannot guarantee the security of electronic data nor can we guarantee that the information you supply will not be intercepted.

## **ABILITY TO ACCESS, UPDATE AND CORRECT YOUR PERSONAL INFORMATION**

KOKUYO wants your Personal Information to be complete and accurate. You represent and warrant that all information you provide will be complete and accurate, and that you will update that information as necessary to maintain its completeness and accuracy. To confirm the completeness and accuracy of, or make changes to, your Personal Information, please use [the contact form](#).

KOKUYO will not retain your Personal Information for longer than is reasonably necessary for the purposes for which it is used or as required by law.

## **YOUR PRIVACY RIGHTS**

You have all or a part of the specific rights regarding your Personal Information described below according to the applicable law. This section describes your privacy rights and explains how to exercise those rights.

**Right to Access:** You have a right to access the Personal Information that we collect.

**Right to Know:** You have a right to know what Personal Information we have collected about you in the immediately preceding 12-month period, including the categories of personal information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we have disclosed Personal Information, and the specific pieces of Personal Information we have collected. You may exercise this right no more than twice in any 12-month period.

**Right to Delete:** You have the right to request that we delete Personal Information that we collected from you and retained, subject to certain exceptions.

**Right to Correct:** You have the right to correct inaccurate personal information that we maintain about you.

**Right to Opt-Out of the Sale/Sharing:** You have the right to opt-out of the sale or sharing of your personal information, or processing for targeted advertisement or profiling by the business. We do not sell your Personal Information.

**Right to Limit the Use or Disclosure of Sensitive Personal Information:** You have the right to request that we limit the use and disclosure of sensitive personal information to specific business purposes approved by the applicable law. We do not collect your Sensitive Personal Information.

**Right to Obtain a Copy:** You have the right to obtain a copy of your personal data previously provided by the consumer to the controller in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the personal data to another controller without hindrance when the processing is carried out by automated means.

**Right to Non-Discrimination:** Unless permitted by applicable law, we will not discriminate against you for exercising any of your privacy rights under the applicable law, including by, but not limited to:

1. Denying you goods or services;
2. Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
3. Providing you a different level of quality of goods or services; or
4. Suggesting that you will receive a different price or rate for goods or services or a different level of quality of goods or services.

### **Exceptions.**

These rights are not absolute and are subject to certain exceptions under applicable law. For example, we cannot disclose or permit access to specific pieces of Personal Information if granting your request would present a certain level of risk to the security of the Personal Information at issue, your account with us or the security of the website. We may deny your deletion request if retaining the information is necessary for us or our service providers and/or contractors to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).

- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

**Other California Privacy Rights.** California Civil Code Section 1798.83 permits California residents who have provided personally identifiable information to us or third-party advertisers and marketing partners, if any, to request certain information regarding our disclosure of personally identifiable information to third parties for direct marketing purposes. Requests should be submitted by using [the contact form](#) and should include CALIFORNIA PRIVACY RIGHTS in the subject line. We will need your first and last name, mailing address, and email address in order to process your request. Please be aware that not all information sharing is covered by the requirements of Section 1798.83 and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

## **EXERCISING YOUR RIGHTS**

Requests can be submitted by using [the contact form](#).

Only you, or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

### **Authorizing an Agent to Act on Your Behalf**

When using an authorized agent you must: (i) provide the agent with signed written permission clearly describing their authority to make a request on your behalf; (ii) verify your own identity; and (iii) directly confirm that you have provided the authorized agent permission to submit the request. We may deny a request from an authorized agent if the agent does not provide us with the signed written permission demonstrating that they have been authorized to act on your behalf.

### **Verifying Your Request**

The verifiable consumer request must:

- Include your full legal name and phone number, which we will need to contact you in order to verify that you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. In order to verify your identity, one of our representatives will call you at the phone number provided.

### **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **CHANGES TO THE POLICY**

KOKUYO may modify or update the Policy from time to time. We encourage you to revisit this page often to remain fully informed of the Policy or you can contact us at any time to obtain the latest copy of the Policy.

### **QUESTIONS ABOUT THE POLICY**

For questions or comments regarding the Policy, please use [the contact form](#).