

Privacy Policy

The Company declares that, concerning the personal data of our customers, business partners, employees, etc., we observe the laws, regulations, and other rules regarding the protection of personal data. We also establish rules and systems of our own, and provide, implement, and maintain our privacy policy as mentioned below.

1. Basic policy for handling personal data

In order to implement the above declaration, we set rules for protecting personal data, make sure that our workers (not only our employees but also directors, audit & supervisory board members, consultants, temporary workers, and partner companies' staff working in our company, etc.) and other related parties are familiarized with and faithfully follow the rules, and ensure that they are maintained and continuously improved.

2. Collection of personal data

We use fair and legal means to collect personal data, and notify or publish details about the purposes of using it.

3. Purpose of using personal data

The information collected in compliance with the rules above is handled only by authorized personnel for specific tasks with the following purposes.

(1) Personal data of customers and business partners

- Promotion of our products and services including provision of related information (such as catalog delivery)
- Sales/supply of our products and services, and customer support
- Development of our products and services
- Delivery of direct marketing to prospective and current customers and business partners regarding products, offers, promotions, rewards, events, and services offered by our company and other business entities
- Verification of eligibility and delivery of prizes, in connection with conducting promotions for customers or business partners
- Analysis of the browsing history of customers and business partners that they have provided to us through our website and social media, and other information of such customers and business partners, thereby providing them with information on products that meet their preferences and tastes

- Analysis of the number of accesses made to the landing page as set up through our advertisements, thereby striving to improve the content of the advertisements and advertisement placements
- Fulfillment of any other business or commercial purposes at the direction of customers or business partners or with notification and/or consent thereof
- Performance of contracts with customers and business partners
- Engagement in business negotiations, meetings, or other forms of communication with customers and business partners (including audio recording and videotaping of the content of such meetings, etc.)
- Response to comments, questions, and requests from customers and business partners, provision of after support service, and otherwise performance of services requested by customers and business partners
- Conduct of questionnaire surveys of customers and business partners and analysis of the results thereof

(2) Personal data of shareholders

- Exercise of rights and performance of obligations under the Companies Act and other relevant laws and regulations
- Provision of services
- Implementation of various measures for shareholders
- Management of shareholder information based on laws and regulations, including creation of databases

(3) Personal data of employment applicants

- Provision of employment information to applicants and communication with them about selection procedures, either directly or through their universities or employment agencies
- Consideration of whether or not to hire the applicants
- Management of applicants who have been offered employment, and to perform other procedures related to applicants for employment

(4) Common purposes of use for all personal data

- Prevention of and response to fraud, violation of relevant policies and rules, threats, and damage
- Operation, management, and improvement of our website, social media accounts, applications, marketing activities, products, and services
- Analysis of data on access to our website and its contents and the access speed thereto, thereby striving to improve our website and its contents

and to enhance our systems and servers

- Any other purposes individually notified or publicly announced to the extent that it is required by applicable laws and regulations

○

4. Sharing of personal data

We may use the personal data specified under Section 2 of [Global Privacy Policy](#), jointly with our joint controllers listed below. The usage of the information is restricted to the extent appropriate to accomplish the purposes mentioned in the previous article.

The scope of joint controllers is the affiliated companies of Sumitomo Electric Industries, Ltd. listed in, but not limited to, the following link.

https://sumitomoelectric.com/company/office_group_companies

*Joint controllers include those listed as its affiliates on the website of each company named at the above URL.

Company in charge of personal data management:

Sumitomo Electric Industries, Ltd.

4-5-33 Kitahama, Chuo-ku, Osaka 541-0041, Japan

The name of the Chief Personal Data Manager is provided [here](#).

5. Management of personal data

In order to secure the accuracy and safety of personal data, we take measures to prevent unlawful access to or loss, destruction, falsification, leakage, etc. of personal data.

6. Provision of personal data

(1) We do not provide personal data to third parties without the consent of the person or unless otherwise provided by laws or regulations with regard to personal data protection.

(2) When we entrust the handling of personal data to a third party to the extent appropriate to achieve the purposes of using the information, we take measures required by laws or regulations to prevent the personal data from leaking from the third party.

7. Specific personal data

Separate measures required by laws or regulations shall be taken to handle specific

personal data.

8. Disclosure, correction, no further use of retained personal data

Upon request from individuals to disclose, correct, or otherwise handle, or stop using their retained personal data, or upon request from individuals to disclose records on the provision of such personal data as would lead to the identification of those individuals to a third party, we will respond to such request properly in a manner specified by the company. Details of the specific procedures are provided on our website: <https://sumitomelectric.com/jp/privacy/index2>.

Effective on April 1, 2005

Revised on February 1, 2016

Revised on May 30, 2017

Revised on April 1, 2022

Revised on May 30, 2023