

## GDPR Privacy Policy

This GDPR Privacy Policy (this “**Policy**”) is stipulated by ALCONIX EUROPE GMBH (the “**Company**”) in accordance with the EU General Data Protection Regulation (the “**GDPR**”) for the handling of personal data to which the GDPR applies, and the Company shall take all possible measures for the handling of personal data by ensuring that all of its officers and employees will comply with this Policy.

In this Policy, the term “Alconix Group” refers to the following companies:

(Domestic Group Companies and Overseas Group Companies)

### Personal Data To Be Acquired

The Company may acquire the following categories of personal data for the purposes specified in this Policy.

Data Subject Categories	Personal Data Type
Business partners	Name, contact information (including, without limitation, email address, telephone number and fax number; hereinafter, the same shall apply), workplace, position/role, affiliated organization, etc.
Job applicants	Name, contact information, school, address, date of birth, age, nationality, educational background, work experience, qualifications, etc.
Shareholders and investors	Name, contact information, shareholding status, address, etc.
Company’s directors, officers, employees, former employees and their family members	Name, contact information, position, bank account information, performance evaluation records, employment information (e.g., resume, certificates, address, spouse, dependents, date of birth, nationality and references)

Aside from collecting personal data from data subjects, the Company may also acquire personal data from the following sources:

- Alconix Group
- Business partners
- Recruitment agencies
- Social media (public information)

In addition, the Company may automatically collect website users' location data and online identifier (IP address, cookie identifier).

### **Purposes and Legal Basis for Handling of Personal Data**

1. The purposes for the Company's handling of personal data and the legal basis therefor are as follows:

Personal Data Categories	Purposes of Handling	Legal Basis
Personal information regarding business partners (including potential business partners)	(1) Conducting negotiations, referrals, contacts, agreements, order placements, order acceptances and settlements in relation to transactions, and other processing and management relating to transactions with business partners; (2) Delivering and receiving the Company's products, services, etc. in transactions; (3) Providing various information on guidance for events, exhibitions, etc. and other information relating to the Company's products and services; (4) Improving the quality of the Company's products and services, and planning and development of new products and services; (5) Conducting research and analysis of information relating to the Company's products and services; (6) Handling customer inquiries, requests for information brochures, etc.; and	Consent (Article 6(1)(a) of the GDPR); the Company's legitimate interests (Article 6(1)(f) of the GDPR)

	(7) Properly and smoothly performing the Company's business operations in relation to the above items.	
Personal information concerning shareholders and investors	<p>(1) Performing functions concerning the rights and obligations of shareholders in accordance with the Companies Act and other applicable laws and regulations, and implementing various measures to facilitate a smooth relationship with shareholders;</p> <p>(2) Providing information to investors concerning an overview of the Company's business, financial results, and various information sessions, etc.; and</p> <p>(3) Properly and smoothly performing the Company's business operations in relation to the above items.</p>	Consent (Article 6(1)(a) of the GDPR); the Company's legitimate interests (Article 6(1)(f) of the GDPR)
Personal information concerning job applicants	<p>(1) Providing information and communications relating to recruitment activities, and screening and making decisions on hiring;</p> <p>(2) Providing materials and communications for joining the Company after making informal job offers; and</p> <p>(3) Conducting other labor management, and properly and smoothly performing the Company's business operations in relation to the above items.</p>	Consent (Article 6(1)(a) of the GDPR); Performance of a contract or taking steps prior to entering into a contract (Article 6(1)(b) of the GDPR); the Company's legitimate interests (Article 6(1)(f) of the GDPR)
Personal information concerning the Company's	(1) Conducting work-related communications, exchanges of information, and handling rights and duties relating to labor laws and regulations, tax laws and regulations and social welfare laws	Consent (Article 6(1)(a) of the GDPR); Performance of

officers, employees, former employees and their family members	<p>and regulations, such as human resource policies (including transfers, evaluations, and career development such as education), salary payment, attendance management and welfare benefits;</p> <p>(2) Handling various procedures stipulated in internal regulations;</p> <p>(3) Communicating with and providing information to the employee representative association, industrial machinery health insurance association, shareholding association, alumni club and group companies;</p> <p>(4) Notifying and reporting to public offices, auxiliary organizations and other organizations to which the Company belongs;</p> <p>(5) Providing welfare benefit services, referrals concerning various types of group insurance, and other related procedures;</p> <p>(6) Distributing internal publications, etc.;</p> <p>(7) Providing communications during emergencies;</p> <p>(8) Using, maintaining and managing information infrastructure;</p> <p>(9) Conducting various analysis based on information infrastructure usage logs for the purpose of ascertaining the actual state of business operations and improving such business operations; and</p> <p>(10) Conducting other labor management, and properly and smoothly performing the Company's business operations in relation to the above items.</p>	<p>a contract or taking steps prior to entering into a contract (Article 6(1)(b) of the GDPR); the Company's legitimate interests (Article 6(1)(f) of the GDPR)</p>
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Regardless of the categories of personal data specified above, the Company may use the personal data for the following purposes of use in connection with the Company's business operations. The Company shall process the personal data for these purposes of use based on the legal basis of consent given by the data subject

(Article 6(1)(a) of the GDPR) or the Company's legitimate interests (Article 6(1)(f) of the GDPR):

- (1) Accepting visitors, inviting external guests, and other personal exchanges;
  - (2) Implementing and reporting internal audits;
  - (3) Handling of whistle-blowing, etc., and implementing internal investigations and reporting based on whistle-blowing, etc.; and/or
  - (4) Purposes of use presented by the Company upon the provision of personal information.
2. The Company handles personal data based on the following legal basis: consent given by the data subject; legitimate interests pursued by the Company or by a third party; performance of an agreement between the data subject and the Company, or preparation for entering into such agreement; or compliance with legal obligations borne by the Company. For more details about the legitimate interests, please contact the Company through the contact information specified below.
  3. In the case where the Company's handling of personal data is based on the consent given by the data subject, the data subject may withdraw his/her consent at any time; provided, however, that the withdrawal of consent shall not affect the legality of the handling of personal data based on the consent given prior to the withdrawal.
  4. When the Company intends to handle the personal data that it has acquired for any purposes other than those specified above, the Company shall revise this Policy and notify the data subjects to such effect.
  5. The Company will not make decisions that may have legal effects or similar significant effects on the data subject based solely on automated processing.

### **Provision of Personal Data**

The Company may provide personal data to the following third parties in addition to each of the Alconix Group companies:

- Shipping/courier companies and customs brokers;
- Trustees for tax, accounting and legal services;
- Trustees for payroll services;
- Other service providers (including those for IT systems);
- Counterparties to important commercial transactions, such as the sale or transfer of

the Company's assets, mergers and consolidations; and

- Third parties to whom the Company is required to disclose personal data under the applicable laws and regulations.

The Company may transfer personal data outside the European Economic Area, such as to Japan, the United States, China, Hong Kong, South Korea, Thailand, Vietnam, Malaysia, Taiwan, Mexico and Singapore. The European Commission may not have granted an adequacy decision for the destination country. In such case, the Company will protect the data subject's personal data by executing the Standard Contractual Clauses (Article 46(2) of the GDPR) with respect to such transfer. To confirm the Standard Contractual Clauses, please click [here](#).

### **Security of Personal Data**

When handling personal data, the Company shall exercise appropriate management, endeavor to prevent unauthorized external access, loss, destruction, alteration and leakage, and take an appropriate and reasonable level of security measures. In the event of an incident occurring, the Company shall promptly take corrective measures.

### **Storage of Personal Data**

The Company shall store personal data through a method for which appropriate security has been established. The Company shall store personal data only for the period necessary to achieve the purposes of use specified in this Policy, and shall promptly delete the same when it becomes unnecessary. The specific storage period shall be determined by taking into consideration the purposes for which the personal data is acquired and handled, the nature of the personal data, and the legal or business necessity for storing the personal data.

### **Data Subjects' Rights**

1. The data subjects have the following rights with respect to the personal data handled by the Company:
  - The right to request access (disclosure of purpose, type, recipient, storage period, source from which personal data is obtained, etc.);
  - The right to request correction or erasure;
  - The right to request restriction of handling;
  - The right to object to handling;
  - The right to request transfer or copying (portability) to make the personal data

- available to be used for services other than those provided by the Company;
- The right to withdraw consent at any time.
2. When exercising any of the above rights, please refer to the “Contact” section.
  3. If the data subject has a complaint about the Company’s handling of personal data, he/she may file a complaint at any time with the competent data protection authority.

### **Contact**

For any questions regarding personal data, please contact the Company specified in the following. the following details.

[Contact]

Managing Director

Tel: +49(0)211-500-808-12

### **Others**

1. Please acknowledge that this Policy is subject to revision or change from time to time without prior notice.
2. Please be aware that if the data subject does not agree to provide personal information, the Company may not be able to provide its services to the data subject, the data subject may not be able to access and/or use certain features of the website, and customer satisfaction may be affected.