

## **Global Version Privacy Policy**

Alconix USA, Inc. (the “**Company**”) has established the following privacy policy (this “**Policy**”) in order to protect personal information (as defined in the applicable data protection laws; hereinafter the same shall apply), and handles personal information with the utmost care.

### **1. Acquisition of Personal Information**

The Company shall specify the purposes of use and only acquire personal information to the extent necessary by using lawful and fair means.

The Company may acquire the following categories of personal data for the purposes specified in “2. Use of Personal Information.”

- A) Personal information concerning business partners (including candidates)  
Name, contact information (including, without limitation, email address, telephone number and fax number; hereinafter, the same shall apply), workplace, position/role, affiliated organization, etc.
- B) Personal information concerning shareholders and investors  
Name, contact information, shareholding status, address, etc.
- C) Personal information concerning job applicants  
Name, contact information, school, address, date of birth, age, nationality, educational background, work experience, qualifications, etc.
- D) Personal information concerning the Company’s directors, officers, employees, former employees and their family members  
Name, contact information, location data, online identifier (IP address, cookie identifier), position, bank account information, performance evaluation records, employment information (e.g., resume, certificates, address, spouse, dependents, date of birth, nationality and references)

### **2. Use of Personal Information**

After obtaining consent from the relevant identifiable person and satisfying other

requirements as required under the applicable data protection laws, the Company will use personal information within the scope of the following purposes of use:

A) 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
- (7) Properly and smoothly performing the Company's business operations in relation to the above items.

B) Personal information concerning shareholders and investors

- (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;
- (2) Providing information to investors concerning an overview of the Company's business, financial results, and various information sessions, etc.; and
- (3) Properly and smoothly performing the Company's business operations in relation to the above items.

C) Personal information concerning job applicants

- (1) Providing information and communications relating to recruitment activities, and screening and making decisions on hiring;
- (2) Providing materials and communications for joining the Company after making informal job offers; and
- (3) Conducting other labor management, and properly and smoothly performing

the Company's business operations in relation to the above items.

- D) Personal information concerning the Company's officers, employees, former employees and their family members
- (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 and regulations, such as human resource policies (including transfers, evaluations, and career development such as education), salary payment, attendance management and welfare benefits;
  - (2) Handling various procedures stipulated in internal regulations;
  - (3) Communicating with, and providing information to, the employee representative association, industrial machinery health insurance association, shareholding association, alumni club and group companies;
  - (4) Notifying and reporting to public offices, auxiliary organizations and other organizations to which the Company belongs;
  - (5) Providing welfare benefit services, referrals concerning various types of group insurance, and other related procedures;
  - (6) Distributing internal publications, etc.;
  - (7) Providing communications during emergencies;
  - (8) Using, maintaining and managing information infrastructure;
  - (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
  - (10) Conducting other labor management, and properly and smoothly performing the Company's business operations in relation to the above items.

In addition to the above, the Company may use the information for the following purposes in connection with the Company's business operations:

- (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.

### **3. Provision of Personal Information to Third Parties**

Unless otherwise set forth in the applicable laws and regulations, the Company will not provide personal information to third parties without obtaining consent from the relevant identifiable person.

The Company may provide personal information to a third party in a country other than the country in which the relevant identifiable person is located. Such country may not have the same level of personal information protection systems as the country in which the relevant identifiable person is located. The Company will not provide personal information unless permitted by the applicable laws and regulations or unless the Company has obtained consent from the relevant identifiable person pursuant to the method set forth in the applicable laws and regulations.

For details of the measures taken by the Company, please communicate with the contact desk specified in “7. Inquiries” below.

### **4. Management of Personal Information**

The Company has taken necessary and appropriate measures to prevent the leakage, loss or damage of personal information provided to the Company, and for other safety management purposes. For details of the measures taken by the Company for managing the security of personal information, please communicate with the contact desk specified in “7. Inquiries” below.

### **5. Personal Information Training**

The Company has established internal regulations for the protection of personal information, implements such internal regulations by thoroughly informing the same to all of the Company’s employees (including general officers and employees, part-timers, dispatched workers, etc.) and other related parties, and will improve and maintain such internal regulations.

### **6. Disclosure, Correction, Suspension of Use, Etc. of Personal Information**

When the Company receives a request from an identifiable person or his/her representative to exercise his/her rights under the applicable laws and regulations (such as notification of purposes of use, disclosure, correction, addition, deletion, suspension of use, erasure, or suspension of provision to a third party) with respect to personal information held by the Company, the Company will appropriately handle

such request pursuant to the applicable laws and regulations. For the detailed procedures regarding these requests, please communicate with the contact desk specified in “7. Inquiries” below.

## **7. Inquiries**

For inquiries regarding personal information held by the Company, please communicate with any of the following contacts:

Shoei Maeno	<a href="mailto:maeno.shoei@alconix.com">maeno.shoei@alconix.com</a>
Shigeru Kiyama	<a href="mailto:kiyama.shigeru@alconix.com">kiyama.shigeru@alconix.com</a>
Koji Kabumoto	<a href="mailto:kabumoto.koji@alconix.com">kabumoto.koji@alconix.com</a>

## **8. Others**

The Company reserves the right to change, modify or add to this Policy without prior notice as necessary at the Company’s discretion or due to the revision or abolition of applicable laws and regulations. The Company shall not be responsible for the protection of personal information on any external websites linked to the Company’s website; thus, please check the privacy policies of each relevant website.