

## Exhibits of EEA (European Economic Area) and the United Kingdom

Effective date: September 9, 2022

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This Exhibit applies to customers who live or reside in the EEA (European Economic Area) and the United Kingdom and relates to the GDPR and the UK GDPR (hereinafter simply referred to as the "GDPR").

### 1. Legal grounds for the Processing

- Security of the Services and Our Website including the prevention of cyber attacks

Purpose of the Processing	Legal grounds for the Processing	Type of personal data	Data recipient	Transfer of personal data outside EEA/UK
<b>Registration in the Services</b>	In the case where the Processing is required in order to meet the requirements of the data subject prior to the conclusion of the contract (Art. 6.1 b GDPR)	Registration information	Please refer to Article 6 of the Global Privacy Policy.)	Please refer to Article 7 of the Global Privacy Policy and Article 2 of this Exhibit.
<b>Provision, operation and improvement of the Services</b>	For the provision and operation of the Services, in the case where the Processing is required for the performance of the contract (Art. 6.1 b	Registration information Service information		

	GDPR). For the improvement of the Services, in the case where the Processing is required for the pursuit of legitimate interests (Art. 6.1 f GDPR)			
<b>Notification to customers on information and questionnaires on products, services, events, seminars, and sales</b>	Consent in the case where it is required for direct marketing (Art. 6.1 a GDPR). Otherwise, in the case where the Processing is required for the performance of the contract (Art. 6.1 b GDPR)	Registration information Service information		
<b>Analysis of the attributes of customers who accessed Our Website to help personalization and improvement of Our Website</b>	Consent for other than strictly essential cookies (Art. 6.1 a GDPR). Otherwise, in the case where the Processing is required for the pursuit of legitimate interests (Art. 6.1 f GDPR)	Online identifiers and terminal information Registration information Service information		

<p><b>Maintenance of Our Website, investigation of server failures, and restoration from failures</b></p>	<p>In the case where the Processing is required for the pursue of legitimate interests (Art. 6.1 f GDPR)</p>	<p>Service information Inquiry information Strictly essential online identifiers and terminal information</p>		
<p><b>Response to customer inquiries</b></p>	<p>In the case where the Processing is required for the performance of the contract (Art. 6.1 b GDPR)</p>	<p>Inquiry Information Registration information Service information</p>		
<p><b>Exercise and defense of legal claims</b></p>	<p>In the case where the Processing is required for the pursuit of legitimate interests (Art. 6.1 f GDPR)</p>	<p>Registration information Service information Inquiry Information</p>		
<p><b>Compliance with Laws and Regulations</b></p>	<p>For the compliance with the legislations of the European Union and the United Kingdom, in the case where treatment is required for the compliance with the legal duty to which the administrator is subject (Art. 6.1. c</p>	<p>Registration information Service information Inquiry Information Strictly essential online identifiers and terminal information</p>		

	GDPR). For the compliance with other legislations, in the case where the Processing is required for the pursuit of legitimate interests (Art. 6.1 f GDPR)			
<b>Other services necessary for the provision of the Services and services incidental thereto.</b>	If required for the performance of the contract, in the case where the Processing is required for the performance of the contract (Art. 6.1 b GDPR) Otherwise, in the case where the Processing is required for the pursuit of legitimate interests (Art. 6.1 f GDPR)	Registration information Inquiry Information Service information Strictly essential online identifiers and terminal information		
<b>Reference for the development of new services and the acquisition of new content</b>	In the case where the Processing is required for the pursue of legitimate interests (Art. 6.1 f GDPR)	Service information Inquiry information Strictly essential online identifiers and terminal information Strictly essential online identifiers		

		and terminal information		
<b>Preparation of statistical information and other non-personal information</b>	In the case where the Processing is required for the pursue of legitimate interests (Art. 6.1 f GDPR)	Registration information Service information Strictly essential online identifiers and terminal information Inquiry information		

<b>Security of the Services and Our Website including the prevention of cyber attacks</b>	In the case where the Processing is required for the pursue of legitimate interests (Art. 6.1 f GDPR)	Service information Strictly essential online identifiers and terminal information Inquiry Information		
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\*Please contact the contact address listed in Article 11 (Contact information) of the Global Privacy Policy for more information about legitimate interest balancing testing.

## 2. **Transfer of personal data overseas**

Where necessary, the Company may transfer personal information obtained in the EEA to Japan and other countries within and outside the EEA . Some of the countries to which information is transferred have received sufficiency certification based on the GDPR such as Japan. The European Commission has determined that Japan has provided adequate levels of protection. More information is available [here](#), the determination of sufficiency certification. In addition, some countries have not received sufficiency certification, but in the case where personal information of users is transferred to countries which have not received the sufficiency certification, the transfer shall be subject to the Standard Contract Clause (Articles 46(2)(c) and 46(5) of GDPR).

### 3. Customers' rights

Customers who are residents in the EEA the Company handles have the following rights under the GDPR with respect to their personal information if they meet the GDPR requirements. [MHM: The contents of the Main Paragraph 4 of the draft policy we received. If you wish to exercise the rights, please contact the contact address in Article 11 of the Global Privacy Policy.

- Acquisition of information relating to the Processing of data: The customer has the right to obtain from the Company all required information relating to the Company's data processing activities relating to the customer (Articles 13 and 14 of GDPR).
- Access to personal data: The customer has the right to obtain confirmation from the Company as to whether personal data relating to the customer has been processed, and if such Processing has been carried out, the customer has the right to access personal data and certain related information (Article 15 of GDPR).
- Correction or deletion of personal data: The customer has the right to have the Company correct inaccurate personal data relating to the customer without undue delay and to have the Company complete the incomplete personal data (Article 16 of GDPR). In addition, if certain conditions are met, the customer has the right to have the Company erase the personal data relating to the customer without undue delay (Article 17 of GDPR). However, this does not apply to the following cases:
  1. In the case where necessary to comply with legal obligations
  2. In the case where there is a legitimate business purpose
  3. In the case where necessary for the proof, exercise or defense relating to a legal claim,
- restrictions on the Processing of personal data: In the case where certain conditions are met, the customer has the right to have the Company restrict the Processing of personal data relating to the customer (Article 18 of GDPR).
- Objection to the processing of personal data: In the case where certain conditions are met, the customer has the right to object to the following regulatory authorities or the Company regarding the Processing of personal data relating to the customer (Article 21 of GDPR).
- Data portability of personal data: In the case where certain conditions are met, the customer has the right to receive personal data relating to the customer in a structured, commonly used and machine-readable form and to transfer such data to another administrator without interference from the Company (Article 20 of GDPR). Provided, however, that such rights shall be limited to those provided pursuant to the consent or contract of the customer and implemented by the means where the handling of personal information has been automated.
- Withdrawal of consent: The customer has the right to withdraw the consent at any time by means separately designated by the Company when the Company obtains the customer's consent. Provided, however, that the withdrawal of the customer's consent will not affect

the legitimacy of any Processing performed with the customer's consent before withdrawal.

In addition, in the case where the customer withdraws the consent, the customer may no longer be able to use the Services in whole or in part.

- Not being subject to automated decision-making: In the case where certain conditions are met, the customer has the right not to be subject to automated (non-human) decision-making that will have a legal or material effect on the customer (Article 22 of GDPR).

The customer may also file a direct complaint with the relevant regulatory authorities listed [here](#) if the customer resides in EEA, or with Information Commissioner's Office if the customer resides in the United Kingdom with respect to the Processing of the customer's personal data by the Company.