



TSUDAKOMA Europe s.r.l.

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P.I. / C.F. IT11321550961 R.E.A. N. 2594584

Share capital: Euro 300.000 i.v.

Privacy Policy

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Introduction :

This privacy policy (the “Privacy Policy”) describes how personal data will be processed by us, TSUDAKOMA Europe s.r.l. (‘TSUDAKOMA Europe’), when individuals like you visit any TSUDAKOMA Europe’s website (the ‘Website’) or when you otherwise engage with us due to our products and services. Before using the Website, please read this Privacy Policy.

We commit to ensure that your privacy is protected. When we ask you to provide certain personal data, we promise you to use it in accordance with this Privacy Policy.

However, TSUDAKOMA Europe may change this Privacy Policy from time to time by updating this page. Please therefore check this page from time to time to ensure that you have no problem with any changes. The current Privacy Policy is validated and effective as of June 1st, 2022.

Personal data we collect

Personal data is any data that can be used to identify an individual and includes all information about your identity, such as your name, e-mail address or postal address.

We may collect the following personal data:

- Your name
- Your work address including your country location
- Your employer’s name



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- Your contact information including corporate e-mail address and corporate phone number

We retain those personal data as long as we maintain business relationship with you. Once personal data is no longer needed for the purpose of our processing of personal data, we delete it without undue delay.

We obtain such personal data when you provide it to us voluntarily eg. in the context of a completed contact form or a registration form.

When you visit our Website, please be aware that we, TSUDAKOMA Europe, use cookies and active components (eg JavaScript) which are described in our Cookie Policy to track visitors' preferences and behaviour to optimize the website.

How we use the data we collect :

We collect and/or use your personal data to understand your needs and provide you with a better service, and in particular for the following purposes:

- To understand your needs, provide you with a better service and respond to your enquiries
- To provide advice and support to you and prospects
- For the purpose of contract execution between you and us
- To send you marketing related communications
- To fulfil your request to exercise your data protection rights

Lawful basis :

We only use your personal data where we can rely on a lawful basis as required under applicable data privacy laws.

The lawful basis we rely on are:

Legitimate interest – we have a legitimate interest in contacting you when you provide us with your details, to manage our relationship with you and to monitor and improve the use of our Website and to send you marketing communications.

When we process your personal data to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and on your rights under data protection laws. We will not use your personal data for activities where our interests are overridden by the impact on you, for example where use would be



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excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

Contract – we will process your personal data for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract

Consent – when we obtain your personal data upon your consent in order to send you marketing communications

Compliance with a legal obligation – where we are required to collect and disclose your personal data because we are subject to a legal or regulatory obligation

We do not intend to collect any sensitive personal data (or special categories of personal data) which are personal data deemed more sensitive e.g. ethnicity, race, health information.

Where we rely on the legitimate interest lawful basis to use your personal data, you always have the right to object to our use by contacting us.

Where we rely on your consent as the lawful basis to use your personal data, you always have the right to withdraw your consent by contacting us.

How do we share and disclose information to third parties?

Unless set out in this Privacy Policy, your personal data will not be disclosed to any third parties other than any of our affiliates (jointly referred to the “TSUDAKOMA Europe Group”).

Your personal data will be disclosed to and shared within the TSUDAKOMA Europe Group for the purpose of providing our services and supports to you.

Unless set out in this Privacy Policy, we do not sell, distribute or otherwise make your personal data available for third parties for commercial purposes without your consent.

Please understand that TSUDAKOMA Europe uses third party’s IT systems and/or software. This means that these suppliers may process your personal data when they provide services to us. However, these third-party suppliers may only process your personal data according to our instructions.

We may share your personal data with third parties if disclosure is required to comply with applicable laws or regulation; comply with legal process or a court order; to respond



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to requests from public and governmental authorities; necessary to enforce this Privacy Policy; necessary to protect your safety or security; necessary to protect our rights, the safety and security of the Website or property or third parties; to allow us to pursue available remedies or limit the damages we may sustain.

We may share or transfer your personal data to a third party if TSUDAKOMA Europe enters into, or is involved in, a business transaction such as a merger, acquisition, reorganization or sale of some of or all its assets.

Information security

We, TSUDAKOMA Europe, use technical, organizational and administrative security measures to protect any of your personal data we hold in our records from accidental or unlawful destruction, loss, alteration and disclosure. Our security measures are continuously improved in line with technological developments.

However, because no security measure can be perfect, you are always encouraged to take measures to protect yourself against unintended intrusions to your personal privacy (i.e., using anti-virus software).

How we use cookies

Web cookies are small files that are placed on your computer or mobile device by a website when you visit it. They contain details of your browsing history on that website and distinguish you from other users. Cookies send data back to the originating website on each subsequent visit or allow another website to recognize the cookie. Cookies are useful because they allow a website to recognize a user's device and, for instance, remember your preferences and generally improve your online user experience.

For further information, please refer to our Cookie Policy.

Links to other websites

Our Website may contain links to websites of other providers and third parties. Once you click on these links to leave our Website you should note that we have no control over those other websites. We cannot be responsible for the protection and privacy of any personal data you provide whilst visiting those websites and such websites are not



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governed by this Privacy Policy, we recommend you visit each website to see in their privacy policy how they process personal data.

Controlling your personal data

You have variety rights to control your personal data. You can exercise your rights by contacting us through the mail info@tsudakomaeurope.com

You may choose to restrict the collection or use of your personal data in the following ways:

- whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes
- if you have previously agreed to us using your personal data for direct marketing purposes, you may change your mind at any time by writing to or emailing us : info@tsudakomaeurope.com

You may have the following rights concerning your personal data:

Right to withdraw consent

You have the right to withdraw your consent to the processing of your personal data at any time. If you withdraw your consent and we are not otherwise able to lawfully retain your personal data, we will discontinue the processing for which you have given your consent and erase the personal data processed solely based on the consent.

Right to access

You have the right to obtain information on what personal data we have about you and how we process this personal data. You also have the right to receive a copy of this personal data.

Right to rectification and erasure

You have the right to have inaccurate personal data rectified and completed. In some cases, you may also have the right to have your personal data erased, for example if it is no longer necessary for the purpose for which it was collected.

Right to object and right to restriction of processing

You have the right to object to the processing of your personal data for, for example, (i) direct marketing purposes and (ii) where we process your personal data on the legal basis of legitimate interests. You also have the right to restrict the processing of your personal data, e.g. if you contest the accuracy of the personal data we hold on you and we need to restrict our use of the personal data while we verify its accuracy.



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Right to portability

When we process your personal data when you are in the EEA or in the context of the activities of an establishment in the EEA and when you have provided to us either (i) by relying on your consent or (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contact, and in either case we are processing your personal data using automated means (i.e. with no human involvement), you are entitled to ask us to provide your personal data to you in a machine-readable format. We will examine your request and respond to you as quickly as possible.

International data transfer

We may transfer your personal data to countries where our group companies exist. Those countries may include Japan and/or People's Republic of China. Japan has been granted adequacy decision by the EU and we ensure that your personal data is protected with the same level as in the EU. When we transfer your personal data to People's Republic of China, we transfer your personal data only when we implement appropriate safeguards such as concluding the Standard Contractual Clauses approved by the European Commission.

If you have any questions about the international transfer of your personal data, please do not hesitate to contact us.

Complaint to the local data protection authority

If you have any concerns about our processing of your personal data, you have the right to lodge a complaint with your local data protection authority.

Further Information

If you have any concerns regarding how we process your personal data, please contact us:

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