

GDPR Privacy Policy

Hanwa Co., Ltd. and its group companies (hereinafter collectively referred to as “Hanwa Group”) provides information on the processing of personal data in the context of activities of its representative office and subsidiaries in European Economic Area in connection with its relationship with existing and potential customers, existing and potential employees, any third party related to such customers or employee and other persons with whom Hanwa Group maintains or is considering to create a relationship pursuant to the European General Data Protection Regulation (GDPR).

1. Collection of Personal Data

Hanwa Group may collect the following your personal data:

- 1) Name, gender, date of birth, address, email address, phone number, facsimile number, job title, salary, job description, education, family information, work experience, tax information, online identifier such as cookie etc.;
- 2) Further information voluntarily provided by you.

2. Purposes and Legal Ground of Processing

① Hanwa Group processes your personal data for the following purposes:

- 1) Managing and control employment related matters of officers and employees of Hanwa Group;
- 2) Updating commencement and development of relationship between Hanwa Group and you;
- 3) Maintaining information technology communication network;
- 4) Requesting to approve material matters for Hanwa Group;
- 5) Solving disputes, enforcing agreements and/or to establish, exercise or defend legal claims;
- 6) Complying with applicable laws and regulations, including cooperating with relevant authorities and regulators;
- 7) Other purposes adjacent to the aforementioned purposes.

② Hanwa Group processes your personal data based on the following legal ground:

- 1) In case that personal data is voluntarily provided by you, the legal basis for the processing is the consent given by you (Article 6 (1) (a) of the GDPR).
- 2) In case that Hanwa Group processes personal data to take steps prior to entering into agreements at the request of you, the legal basis for such processing is Article 6 (1) (b) of the GDPR.
- 3) In case that Hanwa Group processes personal data to comply with a legal obligation, the legal basis for the processing is Article 6(1) (c) of the GDPR.

- 4) Otherwise, the legal basis for processing of personal data indicated above in Section 1 “Collection of Personal Data” is Article 6 (1) (f) of the GDPR. The legitimate legal interest pursued by Hanwa Group is the exchange of information in order to conduct its business operations, build a relationship with you, and improve and administrate employment matters including, but not limited to benefits package of Hanwa Group.

3. Transfer and Disclosure of Personal Data

Hanwa Group may disclose personal data within the following scope:

- 1) Member of Board of Director, Audit and Supervisory Board and other organization, committee etc. of the Hanwa Group;
- 2) Directors, officers and employees at Personnel Department, General Affairs Department, Legal Department, Credit Department, Corporate Planning Department, Information System Department, Accounting Department, Finance Department, Internal Audit Department, Quality, Safety & Environment Control Department, Secretarial Department, other administrative department related to the data subject’s concern of Hanwa Group, and other business department related to the data subject’s concern of Hanwa Group;
- 3) External advisors such as attorneys, accountants and tax advisors of Hanwa Group;
- 4) Other business partners and their employees whom Hanwa Group needs to share the data with for the purpose of processing;
- 5) Courts and other dispute resolution bodies, law enforcement authorities and regulators.

4. Retention Period

Unless explicitly indicated otherwise at the time of the collection of your personal data, Hanwa Group will endeavor to erase personal data as soon as possible when retention is no longer necessary for the purpose for which they were collected or otherwise processed, and retention is not required by applicable laws or regulations or for the exercise or defense of legal claims.

5. Your Rights

You have the following rights:

- 1) You have the right to access to your personal data that Hanwa Group hold;
- 2) You have the right to require that Hanwa Group correct any incorrect information Hanwa Group hold about you;
- 3) You may also have the right to ask that Hanwa Group delete your personal data;
- 4) You may have the right to ask that Hanwa Group restrict the use of your personal data;
- 5) You may have the right to object to the use of your personal data;

- 6) You may have the right to receive your personal data in a structured and commonly used format;
- 7) You may have the right to complain to a supervisory authority.

6. Points of Contact for Inquiries

For any questions, complaints or in the event that you wish to make use of one of the rights mentioned in Section 5. “Your Rights” of this GDPR Privacy Policy, you may use the “Inquiry form” from the following URL.

<https://www.hanwa.co.jp/en/contact/>

Hanwa Group will not accept request for your direct coming. Thank you in advance for your understanding.

Established: May 25, 2018