

Privacy Statement

Protecting the personal privacy of every customer and vendor is a crucial part of gaining and keeping your trust in OPTEX CO., LTD. (the “Company”, “we”, “us”). As a global organization, we strive to provide a high level of privacy protection across all of our businesses and services and to deploy consistent, rigorous policies and procedures.

This privacy statement (the “Statement”) serves as our commitment to you to protect the security and privacy of your personal data, and covers the following areas of privacy concerns:

1. The types of data we collect from you
2. When we collect your data
3. How we use and process your data
4. Our legal basis for processing your data
5. When and to whom we share your data
6. For how long we retain your data
7. When and to whom we transfer your data across country borders
8. Whether and how we carry out profiling using your data
9. The security measures we take to protect your data
10. Your rights over your data
11. The choices you have over how your data is collected and used by us
12. Who to contact and what to do if you wish to discuss with us about your data and your rights

This Statement does not apply to third-party applications, products, services, websites or social media features that may be accessed through links that we provide on our websites and interfaces. Accessing those links may result in the collection of information about you by a third party. We do not control or endorse those third-party websites or their privacy practices. We encourage you to review the privacy policies of such third parties before interacting with them.

Your privacy is of utmost importance to us in servicing you. Our services are rendered to you on the basis of your understanding of your data privacy rights.

Please read this Statement carefully. When visiting our website and using our services that link to or reference this Statement, you agree to be bound by the terms and conditions of this Statement.

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the data alone or in conjunction with any other data in the data controller's possession or likely to come into such possession. The processing of your personal data is governed by applicable privacy laws.

What roles do we play in processing your data?

We are the data controller with respect to processing your data (contact details below). This means that we decide how your personal data is processed and for what purposes. We know that you care how data about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly.

When are your personal data collected?

Some of your data can, in particular, be collected by us:

- whenever you become our customer;
- whenever you contact us via the various channels we offer you;

Our collection of personal data

The personal data we collect include any and all data you provide to us when you use our services. You can choose not to provide data to us, but we may then not be able to service you where such services require processing such data. We use the data that you provide for fulfilling the purposes of the service, or more specifically, creating your user account for the services, making the notices and claims regarding the services or responding to your questions about the services. We collect and store include the data of your name, e-mail address, telephone number.

How do we process your personal data?

We comply with our obligations under applicable privacy laws by keeping personal data up to date; by storing and destroying it securely; by collecting and retaining only the necessary data that we need to service you; by protecting personal data from loss, misuse, unauthorized access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

The processing operations we perform on your data cover automated and non-automated means of collecting, recording, organizing, structuring, storing, altering, retrieving, using, transmitting, disseminating or otherwise making available, aligning or combining, restricting, and/or erasing your data.

We use your personal data (name, e-mail address and telephone number) for the following purposes:

- To provide services requested by you as described when we collect the information.
- To maintain the integrity and safety of our data technology systems that store and process your personal data.
- To enforce or defend our policies or contract with you.
- To detect and investigate data breaches, illegal activities, and fraud.

What is our lawful basis for processing your personal data?

In general, the lawful basis for us to process your personal data for the various types of processing performed on your data (please refer to “How do we process your personal data?” section of this Statement) is, as applicable, processing based on your consent, as necessary for us to enter into and to perform our contract with you, or as necessary to pursue the legitimate interest of our Company or of third parties.

We will collect, process, and use the personal data supplied by you only for the purposes of providing the services or communicated to you and will not disclose your data to third parties except under the circumstances of data disclosure described in the “Sharing your personal data” section below.

Where we talk about our legitimate interest or that of third parties, such legitimate interest can include:

- Right to freedom of expression or information, including in the media and the arts;
- Prevention of fraud, misuse of company IT systems, or money laundering;
- Operation of a whistleblowing scheme;
- Physical security, IT and network security;
- Internal investigations; and
- Proposed mergers and acquisitions

Necessity to provide us data

You are not under any obligation to provide us any personal data. As noted below, the choice is yours. However, please note that without certain data from you, we may not be able to undertake some or all of our obligations to you under our service contract with you, or adequately provide you with our full range of services. If you would like to obtain more detail about this, please contact us following the instructions in the “Contact Us” section below.

Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with the categories of data recipients listed below. We will only share your data with third parties outside of the Company with your consent, and you will have an opportunity to choose for us not to share your data.

We may disclose your personal data to:

- third party company to provide maintain the system or software for the purpose of providing you with continuous services, to detect and deal with data breaches, illegal activities, and fraud, and to maintain the integrity of our information technology systems.
- governments and/or government-affiliated institutions, courts, or law enforcement agencies, to comply with our obligations under relevant laws and regulations, enforce or defend our policies or contract with you, respond to claims, or in response to a verified request relating to a government or criminal investigation or suspected fraud or illegal activity that may expose us, you, or any other of our customers to legal liability; provided that, if any law enforcement agency requests your data, we will attempt to redirect the law enforcement agency to request that data directly from you, and in such event, we may provide your basic contact information to the law enforcement agency.

- third parties involved in a legal proceeding, if they provide us with a court order or substantially similar legal procedure requiring us to do so.

We may provide you with opportunities to connect with third-party applications or services. If you choose to use any such third-party applications or services, we may facilitate sharing of your information with your consent. However, we do not control the applications or services of those third parties or how they use your information, and your use of such applications and services is not governed by this Statement. Please review the terms and the privacy policies of those third parties before using their applications or services.

How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary for the given purpose for which your data is processed. If you will provide us, or have provided us, consent for us to process your data, we will process your data for no longer than your consent is effective. Notwithstanding the above, we may retain your personal data as required by applicable laws and regulations, as necessary to assist with any government and judicial investigations, to initiate or defend legal claims or for the purpose of civil, criminal, or administrative proceedings. If none of the above grounds for us to keep your data apply, we will delete and dispose of your data in a secure manner according to our data protection policy.

Privacy of data subjects under the age of 16

Our products and services are not targeted to persons under the age of 16. We do not knowingly collect or process personal data from persons under the age of 16.

Your rights and your personal data

Unless subject to an exemption under applicable privacy laws, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request to erase your personal data where it is no longer necessary for us to retain such data, except we are not obliged to do so if we need to retain such

data in order to comply with a legal obligation or to establish, exercise, or defend legal claims.

- The right to withdraw your consent to the processing at any time if we rely on your consent to process your data. This includes cases where you wish to opt out from marketing communications that you receive from us.
- The right to request that we provide you with your data and, where possible, to transmit that data directly to another data controller, where the processing is based on your consent or is necessary for the performance of a contract with you, and in either case, we process the data by automated means.
- The right to restrict our processing of your personal data where you believe such data to be inaccurate, our processing is unlawful; or that we no longer need to process such data for a particular purpose unless we are not able to delete the data due to a legal or other obligation, or because you do not wish for us to delete it.
- The right to object to us using your personal data, where the legal justification for our processing of your personal data is our legitimate interest. We will abide by your request unless we have compelling legitimate grounds for the processing, which override your interests and rights, or if we need to continue to process the data for the establishment, exercise, or defense of legal claims.
- The right to lodge a complaint regarding our processing of your data, with the competent authority where you reside or in which your data is processed.

If you would like to exercise any of the above rights, please do so by providing your request at privacy@geniomapcloud.optex.co.jp (Subject: GENIO Map Cloud)”

After receiving your request, we will evaluate your request and inform you how we intend to proceed on your request. Under certain circumstances in accordance with applicable privacy laws and regulations, we may withhold access to your data, or decline to modify, erase, port, or restrict the processing of your data.

Please be advised that if you exercise the rights to erase data, restrict, or object to our processing, or to withdraw your consent, we may not be able to continue our services to you if the necessary data is missing for processing.

Transfer, Storage, and Processing of Data Abroad

The cloud server for the services provided to you will be located in Singapore. Your personal

data will be transferred to, stored and processed on the cloud server in Singapore. As noted in the “Sharing your personal data” section of this Statement, as a globally operating company, we may share your information with our affiliate companies or third parties. Please refer to the “Sharing your personal data” section of this Statement for the recipients of your data and the reasons for our provision of your data to them. Where such entities are located in other countries and jurisdictions, we will therefore be transferring your personal data outside of your country. In making such data transfers, we make sure to protect your personal data by applying the level of security required by the applicable privacy laws.

We currently do not carry out any form of profiling, which is an automated processing of personal data consisting of using your personal data to build a profile on you and evaluate certain personal aspects concerning you, or to analyze or predict aspects concerning you. If and when we decide to undertake any profiling using your data, we will provide you with a prior explanation about what we intend to do with your data and obtain your explicit written consent for us to do so, and we will prior to such processing implement appropriate measures to safeguard your rights, freedoms and legitimate interests.

Further processing

If we wish to use your personal data for a new purpose not covered by this Statement, then we will provide you with a new notice explaining this new use prior to commencing such further processing for a new purpose, setting out the relevant new purpose and processing conditions. In such case, we will find a lawful basis for further processing, and whenever necessary we will seek your prior written consent to such further processing.

What are your choices?

You have the choice to allow us to collect and process your data. The collection and processing of your personal data is neither a statutory nor a contractual requirement, although as noted above, we will be unable to provide you with certain services without the data necessary for such services purposes.

You can always choose not to provide your data to us, although we may need such data to process your requests, in which case we will inform you of our constraints.

To the extent that you have consented to our processing of your data, you can choose to discontinue our processing at any time.

You can choose to request from us a copy of the personal data we store and process regarding you.

You can choose to add or update data that you have provided to us.

You can choose to erase your data, or you may choose to restrict our processing of your data instead.

You can choose to port your data to a third party under conditions stated above.

You can choose to object to our processing of your data.

Your choice or request on any aspects of data processing listed above can be communicated to us using at privacy@geniomapcloud.optex.co.jp (Subject: GENIO Map Cloud)”

In summary, what we are allowed to do with your data is, with limited exceptions under applicable privacy laws, up to you. However, in the event that you choose for us not to further process your data, such choice may affect the delivery of our obligations or services to you; in this situation, we will inform you of our constraints.

Whom should I contact?

If you have any question about this Statement, or if you would like to exercise any of your rights, or if you have any complaints that you would like to discuss with us, please in the first instance send us your signed and dated request, together with a copy of your identity card. We will properly delete your identity card within a month after complete your request.

Please be as accurate as possible:

by post to

OPTEX CO., LTD.,

General Inquiries Desk for Protection of Personal Information of GENIO Map Cloud, APAC
salse div., OPTEX CO., LTD.

5-8-12, Ogoto Otsu,
Shiga 520-0101, Japan

or

by e-mail to [privacy@geniomapcloud.optex.co.jp] (Subject: GENIO Map Cloud)]