

Privacy Policy

Chapter 1

CBC Opto-Technologies Co., Ltd. (hereinafter, “the Company”) fully recognizes the importance of personal information protection in today's highly information-intensive society. Based on the Personal Information Protection Act, the Company has set forth its Privacy Policy on the protection of customers' (including our business partners' persons in charge) personal information as detailed below, and shall make every effort to appropriately protect the personal information in its possession. The meanings of terms used in this Policy shall be as set forth in the Act on the Protection of Personal Information.

1. Purpose of use

For the following purposes of use, the Company will acquire and use personal information to the necessary extent through fair and appropriate means:

- Perform contracts/agreements, and implement after-sale services;
- Receive inquiries, and respond to them;
- Notify business negotiations and meetings;
- Provide information on products, services, seminars, exhibitions, etc.;
- Consider exploring new products and services, and develop and launch them;
- Recruitment screening and decision making;
- Public relations activities, including public relations media and various media;
- Analyze information on customers using products and services and collect statistical data;
- Perform contracted work;
- Give greetings and notices according to socially accepted norms; and
- Achieve the above items and related activities, and other purposes of use clearly stated at the time of acquiring personal information.

In addition, the Company will also acquire and use personal information for the operations of its parent company CBC Co., Ltd. (hereinafter, “CBC”) and operations within CBC Group companies that are related to any of the above items.

2. Provision to Third Parties

Unless any of the following situations applies, the Company shall not disclose to any third party your personal information you have provided:

- When that person gives prior approval;
- When it must be disclosed in accordance with laws and regulations;
- When it is necessary for protecting human life, personal body and property, and obtaining consent from that person is not feasible;
- When it is especially necessary for improving public health or promoting healthy development of children, and obtaining consent from that person is not feasible;
- When it is necessary for assisting a contractor of a government organization in performing work set forth in laws and regulations, and obtaining consent from that person may hinder the execution of such work; or
- When personal information is provided as a result of business succession due to a merger, company split, business transfer or other reasons.

3. Joint Use of Personal Information

Personal information acquired by the Company may be jointly used as set forth below.

When it comes to joint use, reasonable security management measures shall be put in place between the Company and a joint user company to safeguard personal information appropriately.

<Personal information subject for joint use>

Company name, affiliation, job position, name, address, telephone number, e-mail address, information contained in exchanges between you and the Company, etc.

<Joint user companies>

CBC affiliates listed at the link: [CBC Global Network / Company information / CBC Co., Ltd.](#)

<Purpose of joint use>

The scope described in “1. Purposes of use” above

<Name of the person responsible for managing personal information subject to joint use>

Masataro Doi, Representative Director and President

CBC Co., Ltd.

2-15-13 Tsukishima, Chuo-ku, Tokyo

4. Transfer to outside Japan

The Company may transfer your personal information to outside Japan. For the Global Network of CBC, please visit the link: [CBC Global Network / Company Information / CBC Co., Ltd.](#)

When the Company provides your personal information to third parties such as business operators outside Japan (including its contractors and joint users), the Company shall provide it upon your approval, unless either of the following situations applies:

- (1) When the third party is located in a country that is designated by laws and regulations as having a personal information protection system equivalent to that of Japan
- (2) When the third party has established a system necessary for continuously implementing measures equivalent to those that should be taken by companies handling personal information in Japan. In such case, the Company shall take necessary and appropriate measures to ensure the continuous implementation of those equivalent measures by the third party.

5. Security Management Measures

The Company shall establish an appropriate system for managing personal information in accordance with related laws and regulations, and take appropriate security management measures to respond to risks assumed in terms of personal information protection.

(1) Formulation of a basic policy

To ensure that personal information is appropriately handled, the Company complies with related laws and regulations and has formulated a personal information protection policy.

(2) Organizational security management measures

The Company has appointed a personal information protection manager, developed internal rules concerning the safe handling of personal information, and established a system for reporting to and contacting such responsible person if any instances or signs of non-compliance with laws, regulations, etc. are identified.

(3) Personal security management measures

The Company provides training to its employees (including officers, permanent employees, contract employees, dispatched employees and part-time employees; the same applies hereinafter) on the protection and proper management of personal information, and ensures that personal information is handled properly in day-to-day operations.

(4) Physical security management measures

The Company implements measures to prevent unauthorized persons from accessing personal information.

(5) Technical security measures

The Company has introduced a framework for performing access control to limit the scopes of persons in charge and personal information databases handled, etc., and protecting an information system for handling personal information against unauthorized access or malicious

software originating from external sources.

(6) Ascertainment of external environment

The Company implements security management measures after ascertaining personal information protection systems in each country where the Company stores personal information.

For names of countries where the Company and CBC Group companies handle personal information, please see [CBC Global Network / Company Information / CBC Co., Ltd.](#)

For personal information protection systems, etc., in countries (other than Japan) to which personal information may be transferred, please see the website of Personal Information Protection Commission, Japan indicated below.

[Legal Systems of Foreign Countries and Regions / Personal Information Protection Commission \(ppc.go.jp\)](#)

6. Storage Period

The Company stores your personal information for a period necessary to achieve the purposes outlined at the time of acquiring the personal information. In addition, the Company may store personal information for a longer period, taking into consideration the volume, nature, or confidentiality of information; potential risks of harm arising due to unauthorized use or disclosure; possibility of achieving purposes of use or processing or such purposes to be achieved by alternative means; compliance with applicable laws and tax-based obligations; business needs; and other factors.

7. Compliance with Applicable Laws and Regulations

You have rights under personal information protection laws and regulations in each country.

If you live in the EEA (any country included in the European Economic Area) or the UK, the Company processes your personal data in accordance with the General Data Protection Regulation No. 2016/679 (GDPR) or the UK Data Protection Act (DPA). Please see additional provisions described in Chapter 2 APPENDIX (GDPR).

8. Inquiry about Personal Information

If a person makes a request to the Company regarding disclosure, correction, discontinuation of use, erasure, discontinuation of disclosure/provision to a third party, etc. with respect to personal information of that person, the Company shall confirm that such person is identifiable by such personal information and then respond to such request by the method preferred by the person (if no preferred method is specified by the person, the method chosen by the Company), which can be

either electronic data or written documents, unless such request is made in accordance with laws and regulations or due to special reasons. Please make a request to the following inquiry desk.

CBC Opto-Technologies Co., Ltd.

JMF Building Toyochō 01 7F, 4-11-38 Toyo, Koto-ku, Tokyo 135-0016

Management Group Personal Information Inquiry Desk

E-mail: kimura@cbc-optotech.co.jp

9. Cookie Policy

What is a cookie?

Some pages of the Company's website use a cookie. A cookie is used to send data from a webserver to your browser and refer to the contents thereof but does not collect your personal information. In addition, you can use the settings of your browser to disable cookies.

Purpose of use

Cookies are used to gather information that helps us improve our services and provide services that are better tailored to your interests and needs by determining how our services are being used.

Some cookies are considered essential for the operation of our website, but we do not retain information that can identify an individual.

10. Handling of Links on our Website

On websites, etc., of third parties linked from our website that are not under control of the Company, the Company cannot manage your personal information. Websites linked from our website may independently gather your personal information, so we recommend that you pay sufficient attention to handling your personal information and check the privacy policy of each website.

11. Revision to the Privacy Policy

The Company may revise its Privacy Policy from time to time to align with changes in laws and regulations or for other necessary purposes. In such case, the Company shall publish the revised Privacy Policy on its website without delay and clearly state the final revision date of this Policy.

Established on March 13, 2025

<Company handling personal information>

CBC Opto-Technologies Co., Ltd.

JMF Building Toyochō 01 7F, 4-11-38 Toyo, Koto-ku, Tokyo 135-0016

Kanichiro Saito, President and Representative Director

Chapter 2

<APPENDIX (GDPR)>

The following additional provisions shall apply to those who are eligible for protection under the GDPR or the UK Data Protection Act (DPA).

For terms used in these additional provisions, such as “personal data” and “processing”, please see the definitions in Article 4 of the GDPR. If there is any discrepancy between the provisions of Chapter 1 and those of Chapter 2, the provisions of Chapter 2 shall take precedence.

1. Type of Personal Information to Be Processed

Examples of personal data the Company may request you to submit through its services include:

- Name;
- Company name, job title;
- Country/region, postal code, address, telephone number, fax number;
- E-mail address;
- IP address, cookie, access log;
- Other information necessary for providing services.

2. Legal Grounds for Processing Personal Information

The Company shall process your personal data based on the following legal grounds set forth in the GDPR (Articles 6 and 7):

- Such processing is necessary to pursue legitimate gains;
- Such processing is necessary to perform a contract to which you are a party;
- Such processing is necessary to comply with obligations under laws that the Company must adhere to; and
- The Company has obtained your prior approval.

3. Transfer of Personal Information to Third Countries, etc.

The Company may transfer a person's personal information it has acquired in the EU to third countries in order to perform a contract with its customer or take procedures according to the request of such person before the conclusion of a contract. In the case of transfer of personal data to a country for which the European Commission has not adopted an adequacy decision, the Company shall legitimately transfer your personal data by utilizing measures under the standard data

protection clause.

4. Rights of Customers

You have the rights indicated below with regard to your personal data that the Company collects and processes.

These rights may be limited, if they infringe on the rights of a third party including those of the Company, as exemplified by the case where the Company accommodates your request, resulting in disclosure of personal data of another person, or if you request the Company to erase information that must be retained as per legal requirements or for the Company's legitimate legal interests. This includes exceptions related to both the GDPR and the local data protection act.

Acquisition of Information Relating to Data Processing

You have the right to acquire all necessary information from the Company with regard to its data processing operations related to you (Articles 13 and 14 of the GDPR).

Right to Access Personal Data

You have the right to verify with the Company whether personal data pertaining to you is being processed, and if it is being processed, you have the right to access that data and related specific information (Article 15 of the GDPR).

Right to Correct or Erase Personal Data

You have the right to have the Company correct inaccurate personal data pertaining to you without undue delay and the right to have the Company make incomplete personal data complete (Article 16 of the GDPR). In addition, if certain requirements are met, you have the right to have the Company erase personal data pertaining to you without undue delay (Article 17 of the GDPR).

Right to Restrict the Use of Personal Data

If certain requirements are met, you have the right to restrict the use of your personal data (Article 18 of the GDPR).

Right to Make an Objection against the Use of Personal Data

If certain requirements are met, you have the right to make an objection against the use of personal data pertaining to you (Article 21, Paragraph 1 of the GDPR).

Right to Make an Objection against Direct Marketing

You have an absolute right to opt out of the Company's direct marketing or profiling for direct marketing at any time (Article 21, Paragraph 2 of the GDPR).

Personal Data Portability Right

If certain requirements are met, you have the right to receive personal data pertaining to you in a format that is structured, commonly used and machine-readable, and the right to transfer such

data to another administrator without any hindrance from the Company (Article 20 of the GDPR).

Right Not to Be Subjected to Automatic Decisions

If certain requirements are met, you have the right not to be subjected to decisions (including profiling) that are based solely on automated data processing and that have legal or similarly significant effects on you (Article 22 of the GDPR).

With regard to the processing of your personal data by the Company, you have the right to file an objection with the data protection supervisory organization in the member country where your residence or workplace is located or where a violation of the GDPR occurs.