

OUR POLICY ON USING YOUR PERSONAL DATA

We, SAPPORO GROUP, take your privacy seriously. As we have business talk or negotiation with you, we collect and use your personal data. When we do so, we undertake to comply with applicable data protection laws including the EU General Data Protection Regulation (the “GDPR”). Below is our policy on how we collect and use your personal data.

We may modify, add to, or delete part of this policy from time to time.

You can obtain the latest version at the following link:

http://www.sapporoholdings.jp/pdf/privacy_notice.pdf

■ PERSON IN CHARGE (who are responsible for protecting your rights)

This privacy policy is issued on behalf of all the entities of SAPPORO GROUP. When one of SAPPORO GROUP companies collects and uses your personal data, such company is the data controller in the meaning of GDPR and is responsible for protecting your rights with personal data. Where such company shares your personal data with other SAPPORO GROUP companies as described below, such other companies are the data controllers, too.

■ PURPOSE AND LAWFUL BASIS (why and on what lawful ground we use your personal data)

You have disclosed to us your personal data such as your name, company, position, business contact details or your statement by handing over your business card to us and/or through our business communication face-to-face, in meetings, over the phone, by email, etc. We assume that by disclosing such personal data you gave us consent to our using such personal data for the following purposes:

- Sharing them among the SAPPORO GROUP companies for our future business communication with you on subject matters reasonably related to those in our prior communications;
- Any other purposes you particularly consented to.

We also use your personal data for keeping records of our business activities in the form of mail logs, meeting logs, etc. on the lawful ground that it is necessary for the purposes of our legitimate interests:

We will not use your personal data without your prior consent for any other purposes than those above.

■ WITHDRAL OF CONSENT

You can, at any time, withdraw or object to your assumed consent to our using your personal data for the purposes described above.

■ HOW LONG WE KEEP YOUR PERSONAL DATA

We will keep your personal data as long as may be necessary for the purposes described above or until you withdraw or object to your assumed consent to our using your personal data. Thereafter we will not use your personal data for any purpose other than keeping records of our business operation, e.g. mail logs, meeting logs, etc.

■ WHO WE SHARE YOUR PERSONAL DATA WITH

We may share your personal data among the SAPPORO GROUP companies for our future business communication with you on subject matters reasonably related to those in our prior communications, We will not disclose your personal data to anybody else without your prior consent, unless we are required to disclose them to competent public authorities by any legal obligations we are subject to.

■ TRANSFERS TO NON-EU COUNTRIES

Where we share your personal data among our group companies as described above, we may transfer your personal data from a SAPPORO GROUP entity located within the European Economic Area (the “EEA”) to others located outside the EEA, where the GDPR is not in force. In such cases we protect your rights with personal data by way of the Data Transfer Agreement (the “DTA”) in accordance with Article 46 of GDPR signed between our European entities and our group entities outside of the EEA. This DTA imposes contractual obligations equivalent to those laid down in GDPR on its signatories to protect your rights. For further information or the complete text of the DTA, please contact us.

■ YOUR LEGAL RIGHTS

Provided that certain conditions are met, you have legal rights to request from us the following:

- Access to your personal data and to certain supplementary information covered by this notice;
- Correction of your personal data if inaccurate or incomplete;
- Erasure of your personal data in certain circumstances;
- Suspension of using your personal data in certain circumstances;
- Stopping processing your personal data in certain circumstances; and
- Obtaining your personal data in a structured, commonly used, and computer-readable format.

If you wish to exercise your right, please contact us.

■ COMPLAINT

You can lodge complaints about our way of processing your personal data with data protection supervisory authorities.

■ INQUIRY

For further information and inquiry, contact:

URL: <http://www.sapporoholdings.jp/english/inquire/index.html>

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