

Privacy Notice for Business Partners

Information about the processing of personal data about business contacts

Protecting your personal data is important to us. Iwatani Corporation Europe Office therefore processes your personal data in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and the German Federal Data Privacy Protection Act (FDPA) and further applicable laws on data protection and data security.

This privacy notice details how we process personal data of contact persons at (prospective) customers, service provider, suppliers, vendors and partners ("**Business Partners**" or "**you**").

According to the statutory provisions of the applicable data protection laws, we would like to inform you about the following:

1. The data controller under the GDPR is:
Iwatani Corporation Europe Office ("**Iwatani**" or "**we**"),
Maximilianstraße 2,
80539 Munich,
Germany,
Phone +49 89 237 0808 0
2. We will process (i.e. collect, process and use) your personal data in accordance with the statutory provisions. Iwatani is the primary controller in the sense of data protection law and can be contacted in this function, represented by the head of our office.
3. We will process certain personal data about you as Business Partner for the purposes of communicating with you on planned, current or past business transactions as well as (if you are a (potential) customer) relating to the marketing and sales of our products, including collection and refining service of our products.
4. Iwatani for those purposes processes especially the following personal data of you: your basic personal data such as work address, work telephone number, work mobile phone number, work fax number and work email address, and other contact data, employer, role and position, as well as any emails, letters or notices including our communication with you.
5. Iwatani will transmit personal data to other Iwatani Corporation group entities and third parties to the extent necessary within the framework of the aforesaid designated purposes. This may in particular be necessary if either you act as a contact person for suppliers that cooperate not only with Iwatani but also other Iwatani Corporation Group entities or, in case you represent a customer, if you are also interested in business transactions that relate to other areas that are covered by other Iwatani Corporation Group entities.

To the extent data is transmitted to countries which do not ensure an adequate level of data protection by law, Iwatani will ensure that appropriate safeguards will be provided and enforceable data subject rights and effective legal remedies for data subjects are available, in particular, standard contractual clauses approved by

the EU Commission are used. Upon request, you can receive further details to these adequate measures from the contact person mentioned below.

6. Iwatani is entitled to process your personal data, in each case according to the relevant purpose, especially pursuant to Art. 6 para 1 lit. b EU-GDPR (performance of contract - in case the data is required to fulfil or perform a contract with you, in case you are yourself our Business Partner), Art. 6 para 1 lit. c EU-GDPR (compliance with our legal obligations - to the extent we are subject to legal obligations such as anti-money laundering laws), pursuant to Art. 6 para 1 lit. f) EU-GDPR (legitimate interest of Iwatani such as the administration and communication in the course of a business relationship or the marketing and direct marketing of our products and services or such as enabling use of IT systems) as well as in rare cases the explicit granted consent by you (Art. 6 Para. 1 lit. a) GDPR).
7. Unless indicated otherwise at the time of the collection of the personal data, we erase your personal data if the retention of that personal data is no longer necessary (i) for the purposes for which they were collected or otherwise processed, or (ii) to comply with legal obligations (such as retention obligations under tax or commercial laws)..
8. You may, at any time, object to a data processing on the basis of legitimate interests. Iwatani will then verify whether, in your case, the legitimate interests of Iwatani in the data processing outweigh your interests or whether your interests outweigh Iwatani's interests due to your special personal situation. Only if this outweighing of interests result in the legitimate interests of Iwatani outweighing your legitimate interests and your interests therefore do not hinder a data processing by Iwatani, Iwatani may proceed to process your personal data. The same applies in the case that the processing by Iwatani is aimed at enforcing, defending or executing legal rights. In any other case Iwatani is legally bound to terminate the data processing. In particular, you can always object that we use your personal data for marketing and/or sales purposes.
9. You have the right to:
 - 9.1 request information about the personal data in your matter (Art. 15 GDPR in combination with Sec. 34 FDPA respectively),
 - 9.2 rectification of incorrect data (Art. 16 GDPR respectively),
 - 9.3 possible deletion (Art. 17 GDPR in combination with Sec. 35 FDPA respectively),
 - 9.4 the restriction of processing (Art. 18 GDPR) and;
 - 9.5 the right to data portability of the data provided by you (Art. 20 GDPR).
10. Where we process your personal data based on our legitimate interest (Art. 6 Para. 1 lit. f) GDPR) and there are reasons based on your particular situation, you may have the right to object to the processing of your personal data (Art. 21 GDPR). Especially you may object to the processing for the purposes of direct marketing.

11. Where we process your personal data based on your consent, you have the right to withdraw that consent at any time (Art. 7 GDPR). The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal..
12. If you have any questions about privacy or wish to exercise your rights, please contact our responsible data protection staff at <https://www.iwatani.co.jp/eng/inquiry/company/form.html>
13. We take your requests very seriously and are committed to address any of your concerns. Nonetheless, you have the right to lodge a complaint with the supervisory authority, if you consider that the processing of personal data relating to you infringes applicable data protection law (Art. 77 EU-GDPR). The competent supervisory authority for Iwatani is the *Bavarian Commissioner for Data Protection (Bayerisches Landesamt für Datenschutzaufsicht (BayLDA), Promenade 18, 91522 Ansbach, Germany)*.
14. In the case that your personal data will be processed for any other purpose than the aforesaid designated purposes according to Sec. 2 of this letter, we will inform you about this purpose at the time of the processing of your data.