

GDPR Privacy Notice

This GDPR Privacy Policy Notice (“Notice”) specifically addresses how our organization, Kappa Medical K.K. (Tokyo, Japan), uses the personal data we collect to comply with the EU General Data Protection Regulation (GDPR) or UK GDPR for individuals in the EEA member states and the UK. For other matters regarding our usage and management of personal data, please refer to our Privacy Policy (“Policy”).

1. What personal data do we collect?

We collect the following data in the following methods:

- 1) Personal data provided directly by our customers and business partners (including those who may become our customers or business partners. The same applies hereinafter.)
 - Name and portrait, including still image information
 - Information related to contact information such as e-mail address, telephone number, address, etc.
 - Individual Number (“My Number”) only where necessary for tax procedures required by applicable laws and regulations with respect to business partners who are sole proprietors
 - Information related to professional profile, such as affiliation, department, title, etc.
 - Information related to means of payment such as credit card information, bank account information, electronic money information, etc.
 - Information entered or transmitted through contact forms or other methods determined by us.
- 2) Personal data that is publicly disclosed or published
 - Name and portraits, including still image information
 - Information related to contact information such as e-mail address, telephone number, address, etc.
 - Information about professional profiles such as affiliations,

departments, titles, etc.

3) Personal data of employees and candidates for employment

- Name, date of birth, gender, and portrait, including still image information
- Information related to contact information such as e-mail address, telephone number, address, etc.
- Individual Numbers (“My Numbers”) collected from employees and their dependents only where necessary for social insurance, tax, or other procedures required by applicable laws and regulations
- Information related to professional profiles such as affiliations, departments, titles, and work history, including resumes and CVs, educational background, etc.
- Information related to means of payment, such as bank account information and electronic money information

4) Information regarding visitors to our website

- referrers
- IP addresses
- Server access logs
- Cookies and other identifiers

When obtaining personal data as specified in 1) through 4) above, we will clearly state the purpose of use at the time of acquisition, except in cases where the method of use is obvious and will not acquire personal data through improper means.

2. How do we collect your data directly?

We collect data and process data when you:

- Send emails or meet us directly for business purposes.
- Complete a form to order any of our products or services.
- Voluntarily complete a customer survey or provide feedback via email.
- Make personal data available to the public.

- Use or view our website via your browser's cookies.

3. How will we use your data?

We collect your data so that we can:

Purposes of data use	Lawfulness
For our clients and potential clients	
• Process your order and manage your account	To fulfill the contract
• Email you about the updates on our services we think you might like	To pursue our legitimate interests
• Research and analyze the usage history of our website	To pursue our legitimate interests
• Respond to your opinions and inquiries regarding our service	To fulfill the contract
• Inform you of important notices regarding our services, including Privacy Notice	To comply with a legal obligation
For our business partners and potential business partners	
• Process our orders and manage our business with our subcontractors	To fulfill the contract
• Handle tax, including the preparation and submission of payment records and other tax-related documents required by applicable laws and regulations	To comply with a legal obligation
For our employees and employment candidates	
• Manage our employees and retirees for general administrative and business management purposes as an employer	To pursue our legitimate interests
• Contact and manage employment candidates for recruitment, selection and hiring	To pursue our legitimate interests

4. How do we store and transfer your data?

Our company uses cloud service providers and other service providers to store and process personal data. Depending on operational requirements and the location of authorized users, virtual machines used for Azure Virtual Desktop may be provisioned in Microsoft Azure regions to improve performance and service availability. Personal data is primarily stored in Japan but may also be stored, processed, or accessed in other countries where our service providers or their subprocessors operate.

Where personal data is transferred from the EEA or the UK to another country, we use appropriate safeguards in accordance with applicable data protection laws. Depending on the circumstances, these safeguards may include an applicable adequacy decision or adequacy regulation, the European Commission's Standard Contractual Clauses, or the UK International Data Transfer Addendum or UK Addendum to the European Commission's Standard Contractual Clauses.

We endeavor to keep personal data accurate and up to date and protect it against unauthorized access, alteration, disclosure, loss, or damage. To this end, we have established internal data protection rules and implemented the following security measures.

- 1) Personnel security measures: Our workplace rule protects personal data. We will mandate regular training sessions for our employees, officers, and subcontractors who manage personal data.
- 5) Physical security measures: We set measures to control computers or mobile devices brought in by employees and officers and prevent theft or loss of the computers or mobile devices, electronic media, and documents.
- 6) Technical security measures: We introduced systems to protect information handling personal data from unauthorized external access or software.

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, or for the period required by applicable law. When retention is no longer necessary, we securely delete or dispose of the data.

5. Marketing

We will not share your personal data with third parties for their own direct marketing purposes.

6. What are your data protection rights?

We want to ensure you fully know your data protection rights. You are entitled to the following:

- 1) The right to access: You generally have the right to obtain a copy of your personal data free of charge. We may charge a reasonable fee only where permitted by applicable data protection law, such as where a request is manifestly unfounded or excessive, or where additional copies are requested.
- 2) The right to rectification: You can request that we correct any information you believe is inaccurate. You can also request us to complete information you believe is incomplete.
- 3) The right to erasure: You can request that we erase your data under certain conditions.
- 4) The right to restrict processing: You can request that we restrict the processing of your data under certain conditions.
- 5) The right to object: You can object to our processing of your data under certain conditions.
- 6) The right to data portability: You can request that we transfer the data we have collected to another organization or directly to you under certain conditions.
- 7) The right to lodge a complaint: You can lodge a complaint with a competent data protection supervisory authority, particularly in the country where you live or work or where the alleged infringement occurred.

We will respond to requests relating to your data protection rights without undue delay and, in principle, within one month, which is subject to any extension permitted by applicable law.

7. What are cookies?

Cookies are text files placed on your computer to collect standard Internet

log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

8. How do we use cookies?

Our Company uses cookies to improve the usability of our website and to understand how our website is accessed and used.

9. What types of cookies do we use?

Our website uses cookies to improve user convenience. The files our website sends as cookies do not contain information that directly identifies an individual. We do not use third-party cookies.

10. How to manage cookies

You can turn off cookies by changing your browser settings. However, some of our website features may not function if cookies are turned off.

11. Privacy policies of other websites

Our website contains links to other websites. This Notice and the Policy apply only to our website, so you should read their privacy policy if you click a link to another website.

12. Changes to Notice and Policy

Our Company keeps Notice and Policy under regular review and publishes any updates on this web page.

This Notice was created on 5 August 2024.

The Policy was created on 5 August 2024 and last updated on 1 October 2026 (Version 1.1).

13. How to contact us

We have appointed Prighter Group with its local partners as our privacy representative and your point of contact for the following regions:

- European Union (EU)
- United Kingdom (UK)

Prighter allows you to exercise your privacy-related rights (e.g., requests to access or erase personal data). If you want to contact us via our representative, Prighter, or make use of your data subject rights, please visit the following website: <https://app.prighter.com/portal/17500989957>

14. Precedence of the Notice

For transactions to which GDPR or UK GDPR applies, the Notice takes precedence over the Policy. If the provision of the Notice differs from the provisions of the Policy, provisions of the Notice will apply. However, for details not specified in the Notice, the provisions of the Policy will apply.

15. Our company information

Kappa Medical K.K.
1-12-4 Ginza, N&E BLD. 6F
Chuo-ku, Tokyo 104-0061, Japan
Phone: +81-50-5482-6425
E-mail: privacy@kappa-medical.com