

## Privacy Policy

### Basic Policy on Personal Information Protection

NGK BERYLCO FRANCE S.A. (“NGK” or “we”) has established following principles to process Personal Information we collect.

1. We process Personal Information in accordance with laws and regulations regarding protection of Personal Information.
2. We collect Personal Information in a lawful and fair manner.
3. We process Personal Information only to the extent necessary for achieving the purposes specified in advance.
4. We don't disclose Personal Information to a third party unless otherwise permitted by applicable laws or consents from the data subject are obtained.
5. We process personal information by implementing appropriate technical and organizational measures to protect against leaks, outflow or loss of personal information and providing education to our employees.

### Privacy Policy on Processing of Your Personal Information

NGK respects your privacy in accordance with our Privacy Policy and the EU General Data Protection Regulation (“GDPR”). By using our websites or by giving us your personal information, you accept the practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not use our website or give us any personal information.

#### 1. Controller of Personal Information

Any personal information provided to or gathered by NGK is controlled primarily by **NGK BERYLCO FRANCE**.

#### 2. Our Data Protection Officer

We have a data protection officer. You can contact our data protection officer as follows:  
E-mail: [dpo@ngk.co.jp](mailto:dpo@ngk.co.jp)

#### 3. Collection of Information

##### ● Visitor of Our Website

##### (1) Technical Information

When you access to our website, we will collect information through your internet access to our website, including IP address, browser type, operating system, system language used, access times and referring website address (“**Technical Information**”). Such Technical Information is collected in anonymised form. We may use Technical Information only to ensure that the content on our website is presented in the most effective manner for you and your device.

##### (2) Personal Information

Once you contact us through our website form (if any), we will collect following personal information you provided (“**Personal Information**”):

- your name and/or your company name;
- your address and/or your company address;

- your personal and/or business contact information (such as your email address and/or telephone numbers); and
- general information about you (such as your personal or professional interest, your experience of our services and products, and your contact preferences).

(3) Cookies

We use cookies or other similar technologies on our website to enable more convenient browsing when you revisit the site. Cookies are pieces of data that is transmitted from the sites to the user's browser and stored on the user's computer. The user may change the browser settings to refuse to accept cookies.

● Others

- (1) We will collect Personal Information which you provide to us offline, such as when you visit our office, attend one of our exhibitions, or contact us etc.
- (2) If you submit any personal information about other people to us, you represent that you have the authority to do so and to permit us to use their personal information as Personal Information in accordance with our Privacy Policy. If necessary, we will contact such other people to inform our Privacy Policy.

## 4. Use of Personal Information

● We may use your Personal Information for following purposes (“**Authorized Purpose**”):

- (1) for our business and sales activities, and providing services;
  - (2) for providing and collecting information of Our Products and conducting investigations;
  - (3) to perform maintenance and after-sales services;
  - (4) to send you invitation letter for seminar and exhibition, etc. in relation to Our Products;
  - (5) to send you marketing communications such as newsletters in relation to Our Products and our businesses;
- Note: NGK shall not send you unsolicited commercial email in violation of applicable law or regulation.
- (6) to develop and improve Our Products and services(including new product development);
  - (7) to procure materials for Our Products and services;
  - (8) to respond to your inquiries and fulfill your requests;
  - (9) for our internal record keeping;
  - (10) to ensure that the content on our website is presented in the most effective manner for you and your device; and
  - (11) for other related services in the above.

“**Our Products**” means products of our businesses (Power Business, Ceramic Products Business, Electronics Business, Process Technology Business and other businesses).

- At the time of collecting your Personal Information, if we inform specified purpose to you or you give us consent only for specified purpose, we use your Personal Information for such specified purpose.
- Notwithstanding the foregoing, we may use your Personal Information for the purpose permitted by applicable laws.

## 5. Legal Basis on Processing of Personal Information

Generally, we collect and process your Personal Information based on your consent. Provided, however, in following cases, we collect and process your Personal Information on legal basis specified below.

- Legitimate Interests

We collect and/or process your Personal Information for the purpose of following legitimate interests pursued by NGK and/or a third party, provided those interests are not outweighed by your rights and interests.

- (1) legitimate interests pursued by NGK and your company:
  - communication with your company for business-related transaction or possible transaction between NGK and your company
  - performance of a contract with your company

Under such legitimate interests above, we collect and process your Personal Information which you or your company provide to NGK, for the Authorized Purpose (1), (2), (3), (4), (5), (6) and (7) above.
- (2) other legitimate interests pursued by NGK:
  - compliance with applicable laws and regulation (except Union law and Member State law)
  - improvement on our internet website

- Performance of a contract with you

We collect and process your Personal Information for the purpose of performance of a contract with you (not with your company).

- Compliance with a legal obligation (Union law and Member State law)

We process your Personal Information to comply with applicable Union law and Member State law.

## 6. Disclosure of Personal Information

- We shall not disclose your Personal Information without your consent. However, we may share or disclose your Personal Information in the following cases :

- (1) We share and jointly use your Personal Information within NGK group companies under responsibility of NGK Insulators, Ltd.

<b>Joint Users</b>	NGK Group Companies For more details, please refer to here : <a href="https://www.ngk-insulators.com/en/utpolicy/index.html">https://www.ngk-insulators.com/en/utpolicy/index.html</a>
<b>Purpose of Use</b>	Authorized Purpose designated in Clause 4 above.
<b>Personal Information shared</b>	Name, address, telephone numbers, fax numbers, email address and company name (department, title, contact, transaction details, etc.)
<b>Responsible Entity</b>	NGK Insulators. Ltd. (see below for the details)

- (2) We disclose your Personal Information to our outsourcing companies or agencies with whom we have confidentiality agreements in order to fulfill the Authorized Purpose.
- (3) We disclose your Personal Information to a third party (a) in accordance with applicable laws, including laws outside your country of residence; (b) to comply with legal process and/or to respond to requests from competent public and government authorities including public and government authorities outside your country of residence; (c) to protect our operations; and (d) to protect our rights and the rights of you and others.

- We may also disclose your Personal Information to a third party in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

## 7. International Transfer

- As our business processes such as management structures and manufacturing processes, cross borders, we need to share information about you within NGK group companies. So we may transfer your Personal Information to countries in the world where NGK group companies are located in compliance with applicable laws.
- In some cases, we will use outsourcing companies located in various countries to collect, use, store, analyze, and otherwise process your Personal Information on behalf of us for the Authorized Purpose.
- In some cases, your Personal Information may be transferred to countries whose data protection laws are not as comprehensive as those from where you are based. However, in case of international transfer of your Personal Information, we will take adequate measures to ensure that your Personal Information is processed in compliance with applicable laws and this Privacy Policy.

## 8. Retention Period

We will retain your Personal Information for the period necessary to fulfill the Authorized Purpose in this Privacy Policy unless a longer retention period is required or permitted by applicable laws.

## 9. Your Rights

- You have the right to withdraw your consent to the processing of your Personal Information if such processing is based on your consent. However, such withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- You have the following rights:
  - (1) to request to access your Personal Information;
  - (2) to receive your Personal Information provided to us, in a structured, commonly used and machine readable format;
  - (3) to request that we correct any errors, outdated your Personal Information, or omissions in Personal Information that you have supplied to us;
  - (4) to request that your Personal Information not be used;
  - (5) to request that your Personal Information be deleted from our records; and
  - (6) to object to our processing of your Personal Information.
- In order to exercise any of these rights, please contact us at the contact address below.
- You have the right to complain to supervisory authority in accordance with applicable laws.
- If you do not wish to receive marketing communications from us, you can unsubscribe from the link in the email you received or at the contact address below.

## 10. Security

We strive to establish company regulations and a management system so as to prevent theft, leakage, or loss of your Personal Information, and also provide education and training to make sure that our employees handle such information with considerable and proper care.

## 11. Changes to this Privacy Policy

- While abiding by applicable laws concerning protection of personal information and other relevant regulations, we constantly review and revise the contents of Privacy Policy. We may update our Privacy Policy from time to time by posting a new version online. You should check our website occasionally to review any changes. Any changes will become effective when we post the revised Privacy Policy on our website.
- If any change may materially and negatively affect the privacy of your Personal Information, we will use reasonable efforts to notify you in advance and give you a reasonable period of time to object to any changes.

## 12. Others

- We generally will not make any decision based solely on automated decision-making within the meaning of GDPR.
- If we need to collect your Personal Information for the purpose of the legitimate interests pursued by us or by a third party, we will inform you such legitimate interests at the time of collection.
- If provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into contract, we will inform you at the time of collection.

## Contact Us

If you have questions or concerns about our privacy practices, you can contact our Corporate Communications Department:

**NGK BERYLCO FRANCE S.A.**

Address: 103, Quai Jean Pierre Fougerat – CS 20017 – 44220 COUËRON - FRANCE

Phone: +33 (0)2 40 38 67 50

Fax: +33 (0)2 40 38 09 95

E-Mail: [nbf@ngkbf.com](mailto:nbf@ngkbf.com)

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