

## **Privacy Policy/Statement (Personal Data Collected on the Websites)**

At the Tsubaki Group, consisting of Tsubakimoto Chain Co. and its domestic subsidiaries and affiliates (collectively “Group”), we take our responsibility to protect your Personal Information and Personal Data seriously. As used in this Privacy Policy, “Personal Information and Personal Data” means any information – either alone or in combination with other information we can access – that relates to you as an identified or identifiable individual. Personal Information and Personal Data are hereinafter collectively referred to as “Personal Data”. We respect your right to privacy and will only process your Personal Data in accordance with applicable data protection laws. This Privacy Policy applies to information we collect when you use the Group Websites, including the EU website, and its functionalities.

### **2-1. Group Websites**

The Group processes your Personal Data as defined in the EU General Data Protection Regulation (“GDPR”) obtained through any of the Group’s Websites ([www.tsubaki.eu](http://www.tsubaki.eu), [www.tsubakimoto.jp](http://www.tsubakimoto.jp), [tsubakimoto.com](http://tsubakimoto.com), [tsubaki.cn](http://tsubaki.cn), [smile.tsubakimoto.co.jp](http://smile.tsubakimoto.co.jp) and [tt-net.tsubakimoto.co.jp](http://tt-net.tsubakimoto.co.jp), [www.tsubaki.de](http://www.tsubaki.de), [www.tsubaki.es](http://www.tsubaki.es), [www.tsubaki.cz](http://www.tsubaki.cz), [www.kabelschlepp.de](http://www.kabelschlepp.de), [www.tsubaki.co.uk](http://www.tsubaki.co.uk) collectively “Websites”).

### **2-2. Personal Data Obtained through Websites and Cookies**

The Group obtains your Personal Data, both directly when you provide it and automatically while you visit the Websites as follows.

i. Personal Data you provide

The Group obtains your Personal Data, such as your name, title, position, the company you work at, physical address, city, state or province, postal code email address, telephone and fax number, through a contact form or any other form on the Websites.

ii. Personal Data collected automatically and Cookies

While you navigate through and interact with the Websites, the Group collects certain information that is automatically recorded from the computer, smartphone, tablet or other electronic device you use to visit the Websites (collectively “Device”). The Group uses cookies, web analytics services and other technologies to analyze the traffic, such as total visitors and pages viewed on the Websites, and to make improvements and personalize your experience based on the data the Group collects. While, as part of the protocol of the Internet, web servers can identify your Device by its IP address, the Group uses the data it collects in such a manner that your IP address usually remains anonymous and that the Group will not be able to identify you. Most browsers are initially set up to accept cookies.

If you do not agree to the use of these cookies please disable them by following the instructions for your browser. However, some of the services in relation to the Websites will not function well if cookies are disabled.

Below, we have provided a list of the categories of cookies used on the Websites, and a description of what these cookies do. Some of these cookies are essential to the operation of the Websites. Others are not essential, but help us to improve our Websites by collecting anonymous user information, or try and improve your experience of the Websites by remembering your choices.

**Necessary cookies:** These cookies are placed on your browser, to ensure that the Websites delivers you information and services securely and optimally. These cookies are essential to the operation of the Websites. Without these cookies, the Websites services that you have asked for cannot be provided as required.

With the use of these cookies the following type of data is processed:

- *anonymous browser session ID;*
- *user ID.*

As far as this data must be considered Personal Data, the processing is based on statutory provisions which justify this on the ground that the processing is necessary to provide the requested Websites services.

**Functional cookies:** Functional cookies remember your preferences. This includes making it possible to retrieve submitted personal data out of the database, or to remain logged in during a browsing session. The aim of these cookies is to provide you with a more personal experience so that you don't have to reset your preferences each time you visit the Websites.

With the use of these cookies the following type of data is processed:

- *device ID;*

As far as this data must be considered personal data, the processing is based on statutory provisions which justify this on the ground that (i) the processing is necessary to provide the requested Websites services; or (ii) the Group has a legitimate interest in ensuring the functionality of the Websites and that it is tailored to the user's needs.

**Performance/analytics cookies:** These cookies collect (pseudonymous) information about the web pages you visit. For example, which pages our visitors go to most often. These performance cookies don't collect information that identifies you as an individual – (all information they collect is aggregated and pseudonymous). We do not associate usage data collected through these cookies with personal data which you may have provided.

As far as this data must be considered personal data, the processing is based on statutory provisions which justify this on the ground that (i) the Group has a legitimate interest that the Websites are tailored to the user's needs; or (ii) the data is used in pseudonymous form for the purpose of marketing and optimization purposes and the user has not objected to this use.

**Third party cookies:** – These cookies collect information for third parties. Third party cookies are placed by Google Analytics for the analysis of the Websites.

## 2-3. Purposes of Processing

- i. The Group processes your Personal Data entered on the contact form or any other form on the Websites for the purpose of: (i) responding to your requests or inquiries; (ii) providing you with services associated with the circumstances under which you provided the Personal Data; or (iii) developing and improving products or services of the Group.
- ii. As mentioned above the Group processes your Personal Data automatically collected through cookies, web analytics services and other technologies for the purpose of facilitating your use of the Websites, analyzing usage by visitors, improving user experience and delivering better services.

## **2-4. Transfer to Overseas Affiliates**

The data you provide to us will be stored in our centralized customer data base in The Netherlands and shared within the Group for the purpose of managing your relationship with the Group.

The sharing and use of the data is based on statutory provisions which justify those operations on the grounds that (i) the processing is necessary for the performance of the Agreement including the Terms of Use regarding the Websites; or (ii) the Group has a legitimate interest in sharing this data within the Group for internal administrative purposes.

Any transfer of your personal data to a third country, which is not a member of the EEA (the European Economic Area: the EU member states and three states, Iceland, Liechtenstein and Norway, as amended), will continue to be in compliance with all applicable data protection laws.

As far as a third country is not recognized by the European Commission or in your local jurisdiction to provide an adequate level of protection, the Group will take appropriate safeguards to ensure adequate protection of your data; for instance by concluding data transfer agreements with third country recipients comprising standard contractual clauses which in accordance with the decisions of the European Commission provide adequate safeguards.

## **2-5. Children's Personal Data**

The Websites are not intended for use by children, and the Group will not knowingly collect Personal Data from a child under the age of 16 without a parent's or guardian's prior consent.

## **2-6. Personal Data of the Data Subject in the EEA**

The Group processes Personal Data of the data subject in the EEA—which is obtained through the Websites ("EEA Personal Data") in accordance with this Article 2-6 in addition to the provisions above.

### **(i) Legal Basis for Processing**

The Group processes the EEA Personal Data on the legal basis of:

- a. the consent you have given freely, specifically, informed and unambiguously. You have the right to withdraw your consent at any time without affecting the lawfulness of processing based on your consent before its withdrawal;
- b. necessity for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract;
- c. necessity for compliance with a legal obligation to which the Group is subject; and
- d. necessity for the purposes of the legitimate interests pursued by the Group, including introduction of new products.

### **(ii) Retention Period**

The Group will retain your EEA Personal Data until you request its deletion or withdraw your consent for its storage or until the purpose for its storage no longer pertains (e.g. after fulfilling your request). Provided, however, that the Group may retain beyond the above period if any applicable laws and regulations require the Group to further retain the EEA Personal Data.

### **(iii) Transfer outside the EEA**

Your EEA Personal Data will be transferred by the Group to the member of the Group or the Overseas Affiliates outside the EEA. If such transfer is made to such companies, outside the EEA, located in the countries which have not been deemed by the European Commission to provide an adequate level of data protection, the Group will take appropriate safeguards to ensure adequate protection of your data; for instance by concluding data transfer agreements with third country recipients comprising standard contractual clauses which in accordance with the decisions of the European Commission provide adequate safeguards.

### **(iv) Your Rights**

You have the following rights:

- a. the right to obtain from the Group confirmation as to whether or not your EEA Personal Data is being processed, and, where that is the case, access to your EEA Personal Data and the information on its processing;
- b. the right to correct inaccuracy of your EEA Personal Data;
- c. the right to erase your EEA Personal Data;
- d. the right to restrict processing of your EEA Personal Data under certain conditions;
- e. the right to receive your EEA Personal Data in a structured, commonly used and machine-readable format and transmit that data under certain conditions;
- f. the right to object, on grounds relating to your particular situation, to processing of your EEA Personal Data which is based on d. of Article 2-6 (i); and
- g. any other rights under the GDPR.

### **2-7. Contact**

In case of any request concerning our use, integrity and/or accuracy of your personal data or in case you want to assert any of your rights mentioned under (v) Your Rights, you may contact us by e-mail at [Privacy@tsubaki.eu](mailto:Privacy@tsubaki.eu).

Please also note that you have the right to lodge a complaint with a supervisory authority.

### **2-8. Changes to this Privacy Policy**

As our collection and processing of your data may change over time, we might also modify this Privacy Policy in order for it to always correctly reflect our data processing practices. We encourage you to review it from time to time.