

PRIVACY POLICY

FOR CORPORATE CUSTOMERS, SUPPLIERS and OTHER BUSINESS PARTNERS

This Privacy Policy ("**Policy**") sets out how NHK Cosmomedia Europe Limited (the head office in London and Paris branch) ("**we**", "**us**" and "**our**") will process as a data controller the personal data of individual business partners, the employees of our corporate customers, suppliers and other business partners, and the visitors of this website ("**you**" and "**your**") and the measures and processes we have put in place to ensure its adequate protection. Providing such information is one of the requirements of the General Data Protection Regulation 2016/679 ("**GDPR**").

This Policy does not form any contractual relationship between you and us, and we may amend it from time to time.

2. LAWFUL PROCESSING

We will only process your personal data:

- (a) where you have given your consent (you may withdraw your consent at any time, by making a request using the contact details set out below);
- (b) where the processing is necessary to provide our products or services to you/your employer or to trade with you/your employer;
- (c) where the processing is necessary to respond to a request from you/your employer;
- (d) where the processing is necessary to maintain our relationship with you/your employer; or
- (e) where the processing is necessary for compliance with our legal and regulatory obligations

3. WHAT PERSONAL DATA WE COLLECT ABOUT YOU

3.1 We may process the following types of personal data about you:

- (a) Your name, email address and other contact details;
- (b) Your role, position and/or job title;
- (c) Details of your preferences for types of marketing events or materials;
- (d) Details of your access to our premises, systems and websites; and
- (e) Your messages, feedback or contributions to surveys and questionnaires.

3.2 It may be mandatory for you to provide us with your personal data, to enable us to manage our business and operations, to maintain our relationship with you/your employer, to provide our products or services to you/your employer, to trade with you/your employer or to comply with our legal and regulatory obligations. If you fail to provide your personal data, we might be unable to maintain our relationship with you/your employer, to provide our products or services to you/your employer or trade with you/your employer.

3.3 We make every effort to maintain the accuracy and completeness of your personal data which we store and to ensure all of your personal data is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your personal data or if you become aware that we have inaccurate personal data relating to you. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

4. HOW WE COLLECT PERSONAL DATA.

We usually collect your personal data from the information you/your employer submits during the course of your/your employer's relationship with us. This will typically be through emails and other correspondence from you/your employer, business cards, the forms and documents provided to us when you/your employer signs up to our marketing or market data news lists or when you/your employer starts trading with us.

5. HOW WE USE PERSONAL DATA

We may process your personal data for the following purposes:

- (a) to provide you/your employer with requested products or services;
- (b) to respond to your/your employer's messages or posts to us;
- (c) for payment of invoices issued by you/your employer or the issuance of invoices to you/your employer;
- (d) to provide you/your employer with promotional and marketing materials about our products and services that we think you/your employer may be interested;
- (e) to manage, develop and improve our product range, services, stores, information technology systems and websites;
- (f) for monitoring and assessing compliance with law and our policies and standards;
- (g) to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies;
- (h) for fraud and crime prevention and detection purposes;
- (i) for administrative purposes in relation to the security of and access to our systems, premises, platforms and websites and applications;
- (j) to comply with court orders and exercise and/or defend our legal rights;
- (k) for any other legitimate business purpose; and
- (l) as otherwise permitted or required by any applicable law or regulation.

6. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Your personal data may be transferred to IT service providers located in the US under the Privacy Shield Programs. To learn more about the Privacy Shield Programs, please visit: <https://www.privacyshield.gov/welcome>.

7. WHEN WE MAY DISCLOSE YOUR PERSONAL DATA

We do not and will not sell, rent out or trade your personal data. We will only disclose your personal data to the following recipients:

- (a) to companies approved or designated by you;
- (b) to third parties who process your personal data on our behalf (such as our systems providers including cloud providers);

- (c) to third parties who process your personal data on their own behalf but through providing you or your employer with a service on our behalf (such as our suppliers);
- (d) to any third party to whom we assign or novate any of our rights or obligations;
- (e) to any prospective buyer in the event we sell any part of our business or assets; and
- (f) to any government, regulatory agency, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.

8. HOW WE PROTECT YOUR PERSONAL DATA

We are committed to safeguarding and protecting your personal data and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect your personal data from accidental or unauthorised destruction, loss, alteration, disclosure or access.

9. YOUR RIGHTS IN RELATION TO THE PERSONAL DATA WE COLLECT

9.1 If you wish to:

- (a) update, modify, or delete your personal data, or obtain a copy of your personal data that we hold; or
- (b) restrict or stop us from using any of your personal data which we hold,

you can request this by contacting us using the contact details set out below.

9.2 In any of the situations listed above, we may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of data.

10. HOW LONG WE WILL HOLD YOUR PERSONAL DATA FOR

We will only retain your personal data as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

11. Direct Marketing

If you tell us that you do not wish us to provide you with information about our products and services and other marketing materials, we will not contact you further for the purpose of direct marketing. You can contact us using the contact details set out below.

12. Use of Cookies

We do not use cookies.

13. HOW WE UPDATE OR CHANGE THIS PRIVACY POLICY

We may change or update parts of this Policy in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. You will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Policy so you are fully aware of any changes or updates.

14. HOW YOU CAN CONTACT US

If you have any queries about the contents of this Policy or your personal data, or wish to make a request in relation to your personal data, please contact us using the details set out below:

Email: dpco@nhk-cm.co.uk

Post: The Data Protection Compliance Officer, (address:65 Clifton Street, London EC2A 4JE U.K.)

15. HOW TO LODGE A COMPLAINT TO THE REGULATOR

You are entitled to lodge a complaint with a competent data protection regulator if you consider that we have breached your data protection rights. The data protection regulator in the UK is the Information Commissioner's Office, which can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF and the data protection regulator in France is Commission Nationale de l'Informatique et des Libertés – CNIL, which can be contacted at 8 rue Vivienne, CS 30223.

Date Updated: 23 May 2018