

## **Global Privacy Policy for Customers – GDPR Annex**

Last Updated: 5 October, 2022

Effective Date: 5 October, 2022

This GDPR Annex will be applied if the following Glico group companies process your personal data.

- Glico companies located in the European Union (EU)
- [Glico companies located outside the EU](#) which (i) offer goods or services to or (ii) monitor the customers who are in the EU

The provisions of each Section described below are supplementary to the provisions of the respective Sections with the same numbers and same titles of the Global Privacy Policy unless otherwise specifically stipulated in such Section below.

### **2. Purposes of the Group's Use of Your Personal Data**

We use your personal data for the purposes described below, based on the legal bases set out for each purpose.

Personal data collected by us will be used for:

- (a) fulfilling our contractual obligations in relation to transactions between you and us, including processing your orders and payments; this processing is necessary for Glico to perform the contract to which you are party.
- (b) communicating with you about the products, services, campaigns and events offered by Glico, including responding to your enquiries and complaints and providing news and information which we think will be of interest to you; this processing is based on your consent when it is required by law. If this is not the case, then this processing will be based on the legitimate interest of Glico to inform you about its products and services.
- (c) permitting you to participate in surveys, campaigns, and customer prizes; this processing is based on your consent when it is required by law. If this is not the case, then this processing will be based on the legitimate interest of Glico to improve the quality of its products and services provided online.
- (d) monitoring and analyzing trends, usage, and activities in connection with our products and services, with an aim to improve or develop our products and services; if such data is collected using cookies, then this processing of personal data is based on your consent. When this is not the case, this processing of personal data will be based on the legitimate interest of Glico to facilitate the use of services provided online and to improve the functioning of these services.

- (e) detecting, investigating, and preventing fraudulent transactions and other illegal activities; this processing is necessary for Glico to comply with its legal obligations and can also be based on the legitimate interest of Glico to prevent fraud and ensure the compliance with Glico Terms of use.
- (f) protecting the rights and property of Glico, you and others; this processing is based on the legitimate interest of Glico to protect its rights and property.
- (g) distributing targeting advertisement to you; this processing is based on your consent when it is required by law. If this is not the case, this processing of personal data is based on the legitimate interest of Glico to communicate with you about our products and services and to improve our communication.
- (h) reporting internally within Glico and conducting internal group company audits by Ezaki Glico Co., Ltd.; this processing is based on the legitimate interest of Glico to monitor its business activities.
- (i) carrying out any other purpose described to you at the time the information was collected; and
- (j) responding to legitimate requests for disclosure of information made by law enforcement or governmental authorities or by court order; such processing is necessary for Glico to comply with its legal obligations to the extent that it is required to respond to such requests in accordance with applicable law.
- (k) responding to any request from the data subject; this processing is based on the legitimate interest of Glico to answer to the data subjects' requests.

#### **4. Data Transfer Outside of the Country**

Notwithstanding the provisions of **Section 4 "Data Transfer Outside of the Country"** of the Global Privacy Policy to the contrary, the following provisions will be applied.

Your personal data may be transferred to, stored or processed in [Glico companies located in Japan, including headquarter](#). The European Commission adopted an adequacy decision, based on article 45 of the GDPR, regarding Japan. We therefore rely on the Commission Implementing Decision (EU) 2019/419 of 23 January 2019 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data by Japan under the Act on the Protection of Personal Information ("EU Japan Adequacy Decision") when we transfer your personal data to Japan.

#### **6. Retaining and Deleting Personal Data**

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your

personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **7. Customers' Rights**

In the case where consent is the legal basis to process your personal data, you have the right to withdraw your consent for the processing of your personal data at any time. To withdraw your consent, please contact us by using the contact details set forth in **Section 11 “Contact Details”** of the Global Privacy Policy.

You have a right of access, a right to rectification and to erasure of your personal data and a right to data portability. You also have a right to object, on grounds relating to your particular situation, to the processing of your personal data and a right to restriction of processing.

To assert your rights, please contact us by using the contact details set forth in **Section 11 “Contact Details”** of the Global Privacy Policy.

We will deal with your requests above in accordance with articles 15 to 22 of the GDPR. Any request must include sufficient details to identify you. Upon receipt of your request, we may ask for additional information from you (including proof of identity) in order to deal with your request.

You also have the right to lodge a complaint before the supervisory authority, in the Member State of your habitual residence, place of work or of alleged infringement of the GDPR.