Privacy Policy

This Privacy Policy sets out the rules under which we protect personal information collected and processed by us.

Compliance with Laws

We comply with the applicable laws and regulations for the protection of personal information. All personal information collected by us will be used for the purposes set forth herein only.

The Kind and Purpose of Use of Personal Information

(1) Customers and potential customers

(a) Personal information which we collect from customers and potential customers are as follows:

- Contact information (e.g., name, company name, address, phone number and email address) of relevant personnel of customers and potential customers

(b) We process personal information collected from customers and potential customers for the purposes set forth below:

- Contact with customers and potential customers for reasonable business purposes including business negotiations and discussions, performance of legal obligations and any other legitimate purposes;
- Promotion and sales activities;
- Process of order, delivery, claim, payment and any other transactional matters including performance of contracts; and
- Analysis of market, customers and likes for our products and services.

(2) Suppliers, vendors, contractors, distributors, and other business partners and potential business partners

(a) Personal information which we collect from trade partners and potential trade partners are as follows:

- Contact information (e.g., name, company name, address, phone number and email address) of relevant personnel of trade partner and potential trade

partners

(b) We process personal information collected from trade partners and potential trade partners for the purposes set forth below:

- Contact with customers and potential customers for reasonable business purposes including business negotiations and discussions, performance of legal obligations and any other legitimate purposes; and
- Process of order, delivery, claim, payment and any other transactional matters including performance of contracts.

(3) Employees

(a) Personal information which we collect from employees are as follows:

- Personal details, including any information that identifies the data subject and their personal characteristics, including: name, address, contact details, age, date of birth, sex, and physical description including images and voice recordings;
- Personal identifiers issued by a public authority, including individual numbers, passport details, national insurance numbers, identity card numbers, driving licence details;
- Nationality, VISA status, working permits and any other information with respect to the right to work;
- Family & dependents and related information including those concerning congratulations and condolence events;
- Education and training details & qualifications including references and other information from educational institutions;
- Carrier records including references from former employers;
- Employment details, including employment terms, recruitment and termination details, and attendance records;
- Records of jobs and services performed under employment in Santec Group Companies (as defined below) including performance appraisals, records of disciplinary actions and any noteworthy events in the course of employment;
- Information related to salary payments including those concerning various withholding items such as tax and social insurance; and
- Health information including sick leaves information, pre-recruitment medical examination, periodic medical check ups for employees, and any

other information necessary or useful for safety and health of employees.

(b) We process personal information of employees for the purposes set forth below:

- Human resources managements;
- Performance of legal obligations as the employer; and
- Contact with the employees in connection with their jobs and duties.

Notwithstanding the foregoing, health data of employees are processed only in cases where the data subjects give express consent to processing or processing is necessary for the purposes of carrying out the obligations and exercising specific rights of Santec Group Companies (defined below) such as obligation of occupational safety and health, and management of sick leaves.

(4) Job Applicants

(a) Personal information which we collect from job applicants are as follows:

- Personal details, including any information that identifies the data subject and their personal characteristics, including: name, address, contact details, age, date of birth, sex, and physical description including images and voice recordings;
- Personal identifiers issued by a public authority, including individual numbers, passport details, national insurance numbers, identity card numbers, driving licence details;
- Nationality, VISA status, working permits and any other information with respect to the right to work;
- Family & dependents and related information;
- Education and training details & qualifications including references and other information from educational institutions;
- Carrier records including references from former employers;
- Any other information stated in CV (curriculum vitae), resume or other documents for job application submitted by applicants; and
- Health data including pre-recruitment medical examination.

(b) We process personal information of job applicants for the purposes of management of recruit process, assessment of applicants, and selection of applicants for employment. Health data of applicants shall be used solely for

the purpose of checking whether the health conditions of applicants fit for the positions they would be assigned.

(5) Cookies

(a) Our website uses cookies. Insofar as those cookies are not strictly necessary for the provision of [our website and services], we will ask you to consent to our use of cookies when you first visit our website. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

(b) We use cookies for the following purposes:

- authentication and status - we use cookies to identify you when you visit our website.
- personalization - we use cookies to store information about your preferences and to personalize our website for you.
- advertising - we use cookies to help us to display advertisements that will be relevant to you.
- analysis - we use cookies to help us to analyze the use and performance of our website and services.
- cookie consent - we use cookies to store your preferences in relation to the use of cookies.
- Other purposes shown in our cookie policy

(c) Third party cookies for targeting. Our service providers including advertisement agents use targeting cookies to gather information about your use of our website, if you consent to use of targeting cookies. Such information will be used by our service providers for personalization of advertisements reflecting your interests. Our service providers that use targeting cookies are listed in our cookie policy.

Sharing and Joint Use of Personal Information within Santec Group Companies

(1) We may share and jointly use your personal information with other Santec Group Companies (defined below) for the purposes of use set forth in this Privacy Policy. In such cases we and such other Santec Group Companies comply with the applicable laws and regulations with respect to protection of personal information.

(2) We may receive personal information from other Santec Group Companies (defined

below) as a controller of such personal information. Such personal information shall be subject to this privacy policy and processed for the purposes set forth in this privacy policy.

Santec Group Companies

"Santec Group Companies" mean Santec Holdings Corporation and companies majority of whose voting securities or voting rights are held directly or indirectly by Santec Holdings Corporation. Santec Group Companies currently consist of the following companies:

- Santec Holdings Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Santec AOC Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Santec LIS Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Santec OIS Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Santec Japan Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- movu Japan Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Aqumen Capital Corporation
  Address: 5823 Ohkusa-Nenjozaka, Komaki, Aichi, 485-0802, Japan

- Santec Global Corporation
  Address: 400 Kelby Street Suite 1501 Fort Lee, NJ 07024, USA

- movu-inc. (d.b.a. Santec Photonics Laboratories, Silicon Valley)
  Address: 2350 Mission College Blvd, Suites 1165 & 1170 Santa Clara, CA 95054,

USA

- Santec USA Corporation
  Address: 400 Kelby Street Suite 1501 Fort Lee, NJ 07024, USA

- Santec California Corporation
  Address: 4750 Calle Quetzal Camarillo, CA 93012, USA

- Santec Canada Corporation
  Address: 160 Michael Cowpland Dr Kanata, ON K2M 1P6, Canada

- Santec (Shanghai) Corporation, Ltd.
  Address: 307B,Yuexiu Building, 388 Fushan Road, Pudong New District, Shanghai 200122 China

- MOG Laboratories Pty Ltd
  Address: 49 University St, Carlton VIC 3053 Australia

- Santec Europe Ltd. UK Head Office
  Address: 99 Park Drive, Milton Park, Abingdon Oxfordshire, OX14 4RY

- Santec Europe Ltd. Czech Office
  Address: Impact Hub Zlín, tr. Tomase Bati 829, Zlin, 760 01, Czech Republic

- Santec Vienna GmbH
  Address: Spittelberggasse 3, Top 13, 1070 Wien, Austria

Contact with our Company

If you have any questions or complaints with respect to this Privacy Policy or our handling of your personal information, please feel free to contact us at the following URL:

- Santec Holdings Corporation
  https://www.santec.com/en/inquiry/inquiry_policy/index.html

Use of Processor

We may outsource processing of personal information to third party processors. In such cases, we will have processors implement appropriate information security measures in

such a manner that processing meet the requirements of the applicable laws and regulations.

Cross Border Transfers

We may transfer personal information collected and processed by us (including those received from other Santec Group Companies) to other Santec Group Companies outside of Japan or to third party processors outside of Japan in accordance with the applicable laws and regulations on the condition that personal information so transferred is properly protected and used only for the limited purposes provided herein.

Data Security

We implement adequate technical and organizational security measures to protect your personal information from misuse, unauthorized access, leakage, loss, falsification and any other information security risks.

Rights of Data Subjects

Under the Act on the Protection of Personal Information (*Kojin Joho no Hogo ni kansuru Houritsu*, Law No. 57, 2003), you (data subjects of personal information processed by us) have the following rights.

- The right to access your personal information processed by us.
- The right to request correction of your personal information to be corrected if it is inaccurate or incomplete.
- The right to request to cease to use or delete personal information if such personal information has been processed in violation of Article 18 or 19 of the Act on the Protection of Personal Information, or has been collected in violation of the provisions of Article 20 of the said Act.
- The right to request to cease to transfer personal information to third parties if such personal information is provided to third parties in violation of Article 27 Paragraph (1) or Article 28 of the Act on the Protection of Personal Information.

If you would like to exercise the above-mentioned rights or you have inquiries about the above-mentioned rights, please contact us at the following URL:

- Santec Holdings Corporation
  https://www.santec.com/en/inquiry/inquiry_policy/index.html