

PRIVACY POLICY

Last updated: _____, 2021

Privacy Policy

At Chainyard Supplier Management Inc. (the “Company,” “we,” “us,” or “our”), we respect and protect the privacy of our website visitors and registered users of the Network (as defined below) (“you,” “customer,” or “your”). We created this “Privacy Policy” to demonstrate our commitment to your right of privacy and to describe our practices for how we collect and use your personal information. This Privacy Policy applies to information that we may receive, collect, or maintain about you when you visit www.trustyoursupplier.com (the “Site”), and/or use our blockchain-based supplier information management system (the “Network”). By visiting the Site, accepting the Network Agreements (as defined below), and accessing the Network, you expressly consent to the use and disclosure of your information as described below. If you do not agree with the terms set out in this Privacy Policy, please do not visit the Site, check any of the boxes described herein, or use the Network and please delete any cookies placed on your web browser and hard drive by the Network.

Except as specifically set forth herein, this Privacy Policy does not apply to information collected by third party websites or services that you may access through the Network or that you submit to us through email, text message or other electronic message, or offline. We are not responsible for the privacy practices or the content of any third party websites. Users and visitors who link to third party websites from the Network should check the privacy and security policy statements of such third party websites to understand the policies and practices of such third-party websites, as we are not responsible for those policies and practices. If you disclose your information to others on the Network or other websites on the internet, you do so at your own risk as different rules may apply to their use or disclosure of such information.

Please read the following carefully to understand our views and practices regarding your personal data and how we will use it.

Network Agreements and Consent

Data that you consent to provide to us also will be governed by the agreement between you and the Company regarding your use of the Network (the “Network Agreements”).

Information We Receive or Collect From You

You may give us data about you when you:

- (i) set up an account with the Network, for example, user name and password;

- (ii) access or use the Site or the Network, for example, identifying information such as information about the organization you represent, contact information, postal address, email address, IP address, phone number, employer identification number or taxpayer identification number (“Customer Information”);
- (iii) post any information on the Network;
- (iv) contact or correspond with us (for example via phone, email or otherwise); or
- (v) complete a survey about the use of the Site or the Network.

We may collect information about you such as:

- (i) information about transactions between Network users;
- (ii) information about your use of the Network or the Site; or
- (iii) certain technical information if you visit the Network, for example the type of device (and its unique device identifier) you use to access the Network, the Internet protocol (IP) address used to connect your device to the Internet, your login information for the Network, browser type and version, time-zone setting, browser plug-in types and versions, operating system, mobile network information and platform, full Uniform Resource Locator (URL), clickstream to, through and from the Network (including date and time), pages you viewed, page response time, download errors, length of visit to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), and methods used to browse away from the page.

We may be given data about you, the organization you represent, or a third party such as:

- (i) information the organization you represent provides to us when it registers with the Network; or
- (ii) information about you and the organization you represent from third party services that interoperate with the Network, such as Dun & Bradstreet DUNS numbers.

Except with respect to Network visitors invited by a current Network user, we do not record the names or email addresses of visitors who do not register as Network users unless such users subscribe to receive information via electronic mail.

In some cases, provision of your information may be necessary to provide you with the Network. In these cases, if you fail to provide us with certain requested information, you may be unable to use the Network.

To protect children's personal information, we do not knowingly collect any personal information from persons under the age of sixteen (16) that can be used to specifically identify them and the Company does not permit persons under the age of sixteen (16) to use the Network.

If you believe we might have any information from or about underage children, please contact us at info@trustyoursupplier.com.

Purpose and Legal Basis for Processing your Data and the Customer Information

The Company has lawful bases to collect, use and share your Customer Information and any personal data we receive from, collect or maintain about you. Lawful bases include: your consent (as provided for in this Privacy Policy, Cookie Policy and the Network Agreements); contract (where processing is necessary for the performance of a contract with you, such as the Network Agreements); obligation to comply with laws that apply to us; protection of the vital interests of a natural person, such as in the event of an emergency; and other legitimate interests including, but not limited to, where processing is necessary to:

- (i) protect you or the Company from threats (such as security threats or fraud);
- (ii) enable us to administer our business, such as for quality control and customer service;
- (iii) manage corporate transactions; and/or
- (iv) understand and improve our business and customer relationships generally.

Where we have a legal basis to use your personal data without consent, this Privacy Policy fulfils our duty to process personal data fairly and lawfully and in a manner that you would expect given the nature of our relationship with you, by giving you appropriate notice and explanation of the way in which your personal data will be used. Where consent is required for our use of your personal data as described above, you have the right to withdraw or decline your consent and cease your use of the Network. If you decide to withdraw your consent, such withdrawal will not affect the lawfulness of processing based on consent before such withdrawal.

Notwithstanding Customer Information you choose to allow other users of the Network to view and access, your Customer Information will be kept confidential and will be used to support your relationship with us. Except as otherwise set forth in this Privacy Policy or the Network Agreements, we will not sell, rent, or lease to others your Customer Information or any other personal information we receive from, collect or maintain about you.

As set forth above, if you email us, we may keep your message, email address, and contact information to respond to your message. In certain instances, our response may be provided to other Network users or third parties as necessary to address certain problems, comments, and requests.

We employ Stripe™ as a payment intermediary service to receive payment from users of the Network, and do not request or store any of your financial information, such as your bank routing or account numbers, or your debit or credit card account numbers.

Following termination or deactivation of your account with the Network, we may retain information, including profile information and Customer Information, in order to comply with applicable law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, enforce our rights under our agreements with you, for backup, audit or regulatory purposes, and for other actions permitted by law. In addition, you acknowledge the inherent nature of blockchain networks will make any records stored on the blockchain ledger impossible to delete.

Otherwise, we will only retain your personal data for as long as reasonably necessary to fulfil the purposes we originally collected it for. 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, regulatory, tax, accounting or other requirements.

We may share your Customer Information for marketing purposes. Those uses will be subject to such third party's privacy policies. Also, the Company may share your Customer Information with third parties in aggregated and/or anonymized form.

Special Cases in which We Share Personal Information

We may share your information, including Customer Information and personal information, with a third party in connection with a merger, sale, or acquisition, or a bankruptcy. Also, we may disclose your information to subprocessors (as described in the DPA (as defined below)) and businesses with whom we are under common corporate control.

All of our affiliated legal entities and businesses that receive your information from us will comply with the terms of this Privacy Policy with respect to their use and disclosure of such information. Whenever your information is disclosed under this paragraph, we may also disclose such information on a non-aggregated, non-anonymous basis.

Under certain circumstances, Customer Information and personal information may be subject to disclosure pursuant to applicable law, judicial or other government subpoenas, warrants, or orders (such disclosures, "Disclosures Required by Law"). In such circumstances, you acknowledge the Company may disclose such information to the extent necessary to comply with

such legal requirement. Also, we may share your Customer Information or personal information in an emergency if necessary to protect the safety of Company employees, agents, customers or any person. Again, when your information is disclosed under this paragraph, we may also disclose such information on a non-aggregated, non-anonymous basis.

We may also share Customer Information and personal information with our service providers, business partners, suppliers, sub-contractors or agents who perform services for us, as well as our professional advisers (including our lawyers, bankers, auditors and insurers), and analytics and search engine providers that assist us in the improvement and optimization of the Network.

Use of Other Users' Information

If you use the Network, your email address and certain other information you choose to add to your profile may be accessible to other users. By using the Network, you agree that, with respect to other users' information you obtain through your use of Network, you will only use such information for: (i) communications related to the Network that are not unsolicited commercial messages; and (ii) any other purpose that such user expressly agrees to after adequate disclosure of such purpose. Under no circumstances may you disclose information of another user to any third-party without our consent and the consent of such other user.

Third Party Communications

When you are involved in a transaction as a result of your use or access of the Network, each party involved in such transaction may obtain access to the other party's name, email address, phone number and other contact and shipping information. We cannot guarantee the privacy or security of your information when you deal with such third parties.

Control, Email and Opt-Out

You have control over your Customer Information and other personal information related to your use of the Network. Accordingly, you may access, review, add, rectify, modify, correct, delete or update your Customer Information or other personal information at any time.

If you receive one or more emails from us, it means one of two things: (i) you or one of the Network's users provided us (and expressly warranted it had the right to provide us) with your consent to receive marketing communications; or (ii) you provided us your email address so that we could contact you. If you believe you received an email from us in error, please contact us immediately at info@trustyoursupplier.com.

You hereby consent to receive marketing communications from us. If you desire to withdraw such consent, we provide you with the opportunity to opt-out of receiving marketing communications from us at any point in time. If you wish to cease receiving marketing emails and other communications from us, you can opt-out by contacting us at info@trustyoursupplier.com.

In addition to the above rights of access, correction, rectification, amendment or deletion, if you live in the Russian Federation, Mexico, Brazil, the EEA or Switzerland (as defined below), subject to applicable law, you may have some or all of the following rights with respect to your personal information:

- (i) to restrict processing of your personal data if the data is inaccurate, the processing is unlawful or we no longer need it for the purpose for which we hold it;
- (ii) to transmit your data (as provided by you, directly or otherwise collected by us by virtue of your use of the Network) in machine-readable format to you or to a third party when we justify our processing on the basis of your consent or the performance of a contract with you;
- (iii) to withdraw your consent to our processing of your personal data (where that processing is based on your consent);
- (iv) to obtain, or see a copy of the appropriate safeguards under which your personal data is transferred to a third country or international organization;
- (v) to object, at any time, to the processing of your personal information, on legitimate grounds, except if otherwise permitted by applicable law;
- (vi) to erase your personal data (in limited circumstances, such as where it is no longer necessary in relation to the purposes for which it was collected or processed); and
- (vii) to file a complaint with your local supervisory authority for data protection.

You can exercise the above rights by: (i) email sent to info@trustyoursupplier.com; or (ii) mail sent to the Company at Chainyard Supplier Management Inc., One Copley Parkway #216, Morrisville, North Carolina 27560. If you establish a membership account with the Network, you may make changes to the Customer Information related to your account by accessing your account settings.

The personal data processed in connection with your use of the Network is necessary in order for you to maintain an account to use the Network. Accordingly, if you ask us to stop processing your personal data in a certain way or erase your personal data, and this type of processing or data is needed to facilitate your use of the Network you may not be able to use the Network as you did before, or at all. This does not include your right to object to direct marketing, which can be exercised at any time without restriction. Please allow at least ten (10) working days for your request to be addressed.

Please note that the rights mentioned above do not extend to non-personal data. Please also note that it may be necessary to retain your personal data for the purposes of assessing and

verifying data that is submitted to and/or held on the Network, and to manage the Network; your rights under applicable law may be limited accordingly.

Security of the Information Collected

We use technical, organizational, administrative, and physical security measures designed to protect against the loss, misuse and alteration of data used by, or transmitted to or from, our system. No data transmissions over the Internet, however, are guaranteed to be completely secure. While we strive to protect your data from unauthorized use or disclosure, the Company does not warrant or guarantee the security of the data that you provide to us; any transmission is at your own risk.

You are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our digital services. In order to protect you and your data, we may suspend your use of the Network without notice, pending an investigation, if any breach of security is suspected.

Within the Company, only authorized Company personnel have access to personal information. Such personnel have been informed by the Company of their obligation to preserve the confidentiality of such personal information. The Company employees who have access to such personal information may use it only in accordance with the principles set out in the Privacy Policy and applicable legislation and regulation. Depending on the nature of the personal information, it may be stored in the offices of the Company or in various computer systems of the Company or of its service suppliers, or in storage installations of the Company or of its service suppliers.

Information Choices and Changes

You may request to review, correct, rectify, delete or otherwise modify information you have previously provided to us through the Network. Notwithstanding the foregoing, you acknowledge the inherent nature of blockchain networks will make any records stored on the blockchain ledger impossible to delete. You acknowledge that we will make reasonable efforts to delete such information, to the extent technically feasible.

You have the right to ask us not to collect, use, process or disclose your Customer Information in any of the manners described herein. This will affect your user experience. You can notify us of your intention to halt the collection, use, processing, or disclosure of your Customer Information at any time by contacting us at info@trustyoursupplier.com.

Some personal information is automatically collected via the use of data analytics tools. If you object to such collection, your only choice is not to access the Network.

Cookies

Cookies are text files that web browsers place on a computer's hard drive to tell site owners, among other things, whether an individual has interacted with the website previously. The Company uses cookies to recognize repeat visits by visitors or users of the Network and to collect information about our visitors' interactions with the Site and our users' interactions with the Network. Please see the Company's [Cookie Policy here](#), if you would like to learn more about the Company's use of cookies and types of data we collect through cookies.

Further Information

The Company is the sole owner and operator of the Network. If you have any questions about anything in this Privacy Policy or about how we collect your Customer Information, or information generally, please contact info@trustyoursupplier.com.

You may also use the above contact information if you think any information about you is inaccurate, incomplete.

Privacy Policy Changes

We reserve the right to modify, amend or cancel this Privacy Policy at any time, consistent with applicable data privacy laws. Any changes to this Privacy Policy will be posted here, so please check this page regularly and make sure to check the effective date of the policy as set forth above. If you have any questions or concerns about the changes, please contact us at info@trustyoursupplier.com.

How to Contact the Company

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to info@trustyoursupplier.com.

Alternatively, you can contact us by mail at Chainyard Supplier Management Inc., One Copley Parkway #216, Morrisville, North Carolina 27560, USA.

Please also contact us if you would like to know more about our data processing activities, to update or amend any of your personal data which you have sent us, if you believe our records relating to you are inaccurate, or if you would like to withdraw your consent to our processing of your data, receiving marketing communications, or placement of cookies.

Notice to California Residents

Pursuant to California Civil Code Section 1789.3, California users are entitled to the following consumer rights notice: California residents may reach the Compliant Assistance Unit of the Division of Consumer Services for the California Department of Consumer Affairs by mail at 1625 North Market Blvd., Sacramento, CA 95834, or by telephone at (916) 445-1254 or (800) 952-5210.

Notice to Non-U.S. Data Subjects

You understand and acknowledge in connection with our provision of the Network, we are a data processor and not a controller (as such terms are defined under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data). In the event you are a customer of the Network, the data processing addendum referenced in the Network Agreements, by and between you and the Company, applies to the personally identifiable information of non-U.S. data subjects shared by you (the “DPA”).

Please be aware your Customer Information and personal information may be collected, managed, transferred to, processed, and stored or accessed in a country different other than your country of residence. Also, we may allow our service providers or assistance providers, who may be located outside of your country of residence, to access your personal information. In addition, we may make other disclosures of your personal information outside of your country of residence, for example, in the event we receive a legal or regulatory request from a foreign law enforcement body. We will always take steps designed to ensure any transfer of such information to entities based outside your country of residence is carefully managed to protect your rights and interests by implementing appropriate safeguards to protect your personal information. Data protection laws in any such country (including laws governing the terms of the notice issued to you at the time of collection of Customer Information and personal information) may be different from those laws of your country of residence. By visiting the Network, you consent to the transfer of your information, including Customer Information, to such country(ies) as are set forth in this Privacy Policy.

From time to time, personal information we collect from data subjects in the European Economic Area or Switzerland (“EEA or Switzerland”) may be transferred to, stored, processed or accessed by, us and other entities who may be based outside of the EEA or Switzerland, for example, the United States. Also, we may allow our subprocessors, who may be located outside the EEA or Switzerland, to access your personal data. We will always take steps to ensure any transfer of such information to entities based outside the EEA or Switzerland is carefully managed to protect your rights and interests by implementing appropriate safeguards to protect your personal information. Your personal data may be transferred to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or the Swiss government.

Where there is no adequacy decision by the European Commission in respect of a country (to the extent that they are outside the EEA or Switzerland), which means it is not deemed to provide an adequate level of protection to your personal data, we will ensure your personal data receives an adequate level of protection. For example, each such transfer to a third party will be protected by contractual commitments and further assurances (where appropriate) such as the European Commission’s approved Standard Contractual Clauses.

If you would like to find out more about these safeguards in respect of processing your personal data and the means by which you can obtain a copy of them, please contact us at info@trustyoursupplier.com.

Notice to Canadian Data Subjects

Notwithstanding any provisions of the Privacy Policy to the contrary, we will only send you commercial electronic messages in accordance with the requirements of Canada's Anti-Spam Legislation (An Act to promote the efficiency and adaptability of the Canadian economy by regulating certain activities that discourage reliance on electronic means of carrying out commercial activities, and to amend the Canadian Radio-television and Telecommunications Commission Act, the Competition Act, the Personal Information Protection and Electronic Documents Act and the Telecommunications Act, S.C. 2010, c. 23).

In the event a non-English version of the Privacy Policy is created and there is a conflict of terms between such non-English version and the English version of the Privacy Policy, the English version will govern, unless prohibited under applicable legislation. The Privacy Policy and the related documents are drawn up in the English language at the express wish of the parties. *La politique de vie privée et les documents qui s'y rattachent sont rédigés en anglais selon la volonté expresse des parties.*

Notice to Swiss Data Subjects

Notwithstanding any provisions set forth in the Privacy Policy to the contrary, at any time, you can object to data processing, particularly to data processing in connection with marketing communications (e.g., advertising e-mails). In addition to the above rights, you also have the following rights:

- (i) right to information: You have the right to demand insight into your personal data we collect, process and retain at any time and free of charge. You can check as to which of your personal data is being processed by us, and that we are using it in accordance with applicable data protection regulations.
- (ii) right to rectification: You have the right to have incorrect or incomplete personal data rectified (to the extent technologically feasible) and to be informed about the rectification. We will inform you when the corrections have been made to your personal data unless it is impossible or associated with disproportionate effort.
- (iii) right to erasure: You have the right to have your personal data deleted under certain circumstances. In certain cases, the right to erasure may be excluded. In other cases, it may be impossible to delete your personal data, such as personal data uploaded to the Network.

- (iv) right to restriction of processing: Under certain circumstances, you have the right to demand restriction of the processing of your personal data.
- (v) right to data portability: If you are domiciled outside Switzerland with residence in an EU/EEA Member State, under certain circumstances, you have the right to receive any personal data that you provided to us, free of charge and in a readable format (to the extent technologically feasible).
- (vi) right to lodge a complaint with a supervisory authority: You have the right to lodge a complaint with a competent supervisory authority if you consider the processing of your personal data infringes applicable data protection laws.
- (vii) right of revocation: You have the right to revoke an issued consent at any time; however, any processing conducted prior to such revocation remains valid.

Notice to Mexican Data Subjects

The Customer Information and your personal data collected by the Company in accordance with this Privacy Policy shall be treated in a legitimate, controlled, and knowledgeable manner to ensure its privacy, and the right to informational self-determination, and to comply with the protection and confidentiality, legality, consent, information, quality, finality, loyalty, proportionality and responsibility principles of personal data in accordance with the Federal Law on the Protection of Personal Data Held by Private Individuals and its rules (the “Mexican Law”).

This Privacy Policy allows you to exercise your rights of access, rectification, and opposition to the processing of your Customer Information and personal data. In order to exercise your rights of access, rectification, and opposition, you must send a request to the following email address info@trustyoursupplier.com. The Company will provide with a response within a period of ten (10) business days from the date when the request is received. This ten (10)-business day period may be extended for one equal period in certain cases established by Mexican Law, in order to comply with your request, in any event, within fifteen (15) business days after the initial response is communicated.

In the event that a non-Spanish version of this Privacy Policy section is created and there is a conflict between such non-Spanish version and the Spanish version of this Notice to Mexican Data Subjects, the Spanish version will prevail, unless prohibited under applicable legislation.

Notice to Brazilian Data Subjects

In addition to the above rights of access, amendment, or deletion, if you live in Brazil, subject to applicable law, you may also have some or all of the following rights with respect to your personal information:

- (i) to the extent technologically feasible, the right to anonymize, block, or delete your personal data if the data is inaccurate or unnecessary, the processing is unlawful, or we no longer need it for the purpose for which we hold it;
- (ii) the right to confirm the existence of the processing;
- (iii) the right to access your data;
- (iv) to the extent technologically feasible, the right to correct incomplete, inaccurate, or out-of-date data;
- (v) the right to obtain information about public and private entities with which we shared data; and
- (vi) the right to obtain information about the possibility of denying consent and the consequences of such denial.

Notice to Italian Data Subjects

If you wish to cease receiving marketing emails and other communications from us, you can revoke your consent to marketing communications by contacting us at info@trustyoursupplier.com. In such case, the right to object to receiving marketing communications from us through automated means of contact also extends to the processing of data through non-automated means, unless you object to the processing in part.

Notice to Russian Data Subjects

All provisions in this Privacy Policy shall have legal effect as long as they do not contradict mandatory requirements of Russian data protection laws, including Federal Law dated July 27, 2006, No. 152-FZ “On Personal Data” (the “Russian Law”). All terms and definitions used in the Privacy Policy must be interpreted in the sense prescribed by the Russian Law.

You understand and acknowledge that in connection with our provision of the Network, we process your data under instructions (assignment) from you, who shall be considered a data controller with regard to your personal data. In particular, you shall ensure lawful basis for processing personal data and perform initial processing (upon collection) of personal data with the usage of databases located in Russia.

In the event that a Russian version of this Privacy Policy is created and there is a conflict between such Russian version and the English version of this Privacy Policy, the English version will prevail, unless prohibited under applicable legislation.

Notice to Ukrainian Data Subjects

In addition to the above rights of access, amendment, or deletion, if you live in Ukraine, subject to applicable law, you may also have some or all of the following rights with respect to your personal data:

- (i) the right to know the sources of collection of your personal data, location of your personal data, purpose of the processing, location of the owner and processors of personal data or to empower authorized persons to obtain such information, except the cases established by law;
- (ii) the right to receive information concerning third parties' access to your personal data, in particular, information on the third parties' to whom your personal data is being transferred;
- (iii) the right to access your personal data;
- (iv) the right to receive a response within thirty (30) calendar days from the date of request as to the details of processing of your personal data, as well as to receive the content of such personal data;
- (v) the right to reasonably object to the processing of your personal data;
- (vi) the right to request the modification or deletion of your personal data by us, if the data is processed illegally or is inaccurate in any respect;
- (vii) the right to protect your personal data from illegal processing, accidental loss, destruction or damage caused by intentional concealment of your personal data, failure to provide your personal data or the untimely provision of your personal data with such delay, as well as protection from provision of personal data which is inaccurate or disgraceful for the honor, dignity and business reputation of a natural person;
- (viii) the right to lodge complaints regarding the processing of your personal data to governmental agencies and officials responsible for personal data protection or directly to a court of competent jurisdiction;
- (ix) the right to use legal remedies in case of violation of legislation on personal data protection;
- (x) the right to define restrictions and reservations with respect to any element of the processing of your personal data;
- (xi) the right to withdraw your consent to the processing of your personal data;
- (xii) the right to be informed of the procedure for automated processing of personal data;

- (xiii) the right to be protected from automated decisions which may have legal implications for you.

Notice to Taiwanese Data Subjects

In addition to the above rights set forth in this Privacy Policy, if you live within the territory of Taiwan, subject to applicable law, you may also have some or all of the following rights with respect to your personal data:

- (i) the right to review your personal data;
- (ii) the right to make an inquiry regarding your personal data;
- (iii) the right to request a copy of your personal data;
- (iv) the right to supplement or rectify your personal data;
- (v) the right to demand the cessation of the collection, processing, or use of your personal data; and
- (vi) the right to the deletion of your personal data.

Notice to Japanese Data Subjects

Notwithstanding any provisions of this Privacy Policy to the contrary, we will only send you commercial electronic messages in accordance with applicable laws with your opt-in consent.

Notwithstanding any provisions of this Privacy Policy to the contrary, in addition to the other purposes set forth herein, the purposes of use of your Customer Information and any personal data we receive from, collect from, or maintain about you, are as follows:

- (i) to provide the Network to you;
- (ii) to fulfill our obligations to you under the Network Agreements; and
- (iii) to respond to your inquiries to us.

Except to the extent expressly set forth in this Privacy Policy and/or in the Network Agreements, we will not disclose, sell, provide, share or transfer your Customer Information and any personal data we receive from, collect from, or maintain about you, without your prior consent, unless otherwise permitted by the Act on the Protection of Personal Information (Act No. 57 of 2003) of Japan, as amended. For the avoidance of doubt, any “sharing” of your personal data under

this Privacy Policy falls under a category of data processing entrustment to other entities, which is exempted from the consent requirement under such act.