

SOJITZ EUROPE PLC PRIVACY NOTICE

TABLE OF CONTENTS

1. **PERSONAL INFORMATION WE USE**
 - 1.1 Information we collect directly from you
 - 1.2 Information we collect when you visit our Site
 - 1.2 Information we collect from other sources
 - 1.3 Special categories of personal information
2. **PURPOSES AND LEGAL BASIS OF OUR USE OF YOUR PERSONAL INFORMATION**
3. **YOUR RIGHTS OVER YOUR PERSONAL INFORMATION**
4. **INFORMATION SHARING**
5. **INFORMATION SECURITY AND STORAGE**
6. **THIRD-PARTY LINKS ON OUR SITE**
7. **INTERNATIONAL DATA TRANSFER**
8. **CONTACT US**
9. **CHANGES TO THIS PRIVACY NOTICE**

This privacy notice describes how Sojitz Europe plc and its branches and offices collect and process personal information about you and how we and our affiliates use and protect your personal information as well as your rights in relation to your personal information. When referring to '**Sojitz**', '**we**' or '**us**', we mean Sojitz Europe plc or its branches and offices set out in section 8 (Contact Us) which is doing business with you and thus acting as controller with respect to your personal information collected or processed in this connection and/or Sojitz Europe plc with respect to the Site.

This privacy notice applies to all personal information we collect or process about you when doing business with us or providing contact information to us, including the personal information that we obtain about you when visiting our website <http://www.europe.sojitz.com/> (the "**Site**") and using the services available through our Site. Personal information is information, or a combination of pieces of information that could reasonably allow you to be directly or indirectly identified.

1. **PERSONAL INFORMATION WE USE**

We will collect personal information about you from a variety of sources. We may collect your personal information from you directly (e.g. when you contact us) or from other sources such as public registrars, credit research agencies, recruiting agencies, employment screening agencies.

1.1 **Information we collect directly from you**

The categories of information that we collect directly from you are:

- (a) personal details (e.g. name, date of birth)
- (b) contact details (e.g. company name, phone or mobile number, email address, postal address)
- (c) educational details (e.g. educational history, qualifications, certifications, skills)

- (d) citizenship or immigration information
- (e) professional experience
- (f) your marketing preferences, including any consents you have given us
- (g) any other information you may choose to provide us in your dealings with us.

We may be required by law or as a consequence of any contractual relationship we have with you to collect certain personal information from you. In such case, your failure to provide the information may prevent or delay the fulfilment of our obligations under the law or the contract.

1.2 Information we collect when you visit our Site

In general, you can visit our Site without identifying yourself or revealing any of your personal information. There are times, however, that you may choose to give us personal information. This is for example the case when you decide to contact us. In this case, we may collect the information set out in section 1.1 (Information we collect directly from you) above.

1.3 Information we collect from other sources

The categories of information that we collect about you from other sources are:

- (a) personal details (e.g. name, date of birth)
- (b) contact details (e.g. phone number, email address, postal address or mobile number)
- (c) background check information
- (d) publicly available professional profiles on websites or social media (e.g. LinkedIn)
- (e) information about your creditability or reputation

1.4 Special categories of Personal Information

Some of the categories of information that we collect are special categories of personal information (also known as sensitive personal information). In particular, we may process personal information that may reveal your racial or ethnic origin, religion or that may relate to your health, such as your medical history and reports on medical diagnoses, injuries and treatment.

We collect such kind of personal information only when you give us an explicit consent or as permitted or required by law.

2. PURPOSES AND LEGAL BASIS OF OUR USE OF YOUR PERSONAL INFORMATION

2.1 We use your personal information to:

- (a) perform and enforce any contractual obligation under a contract with us if applicable
- (b) provide and, if applicable, personalise our services you have requested
- (c) deal with your enquiries and requests

- (d) comply with legal or regulatory obligations to which we are subject, including, but not limited to, use in connection with legal claims, compliance and investigative purposes and cooperate with regulators and law enforcement bodies
- (e) protect our rights and interests as well as the rights and interests of our users and any other person
- (f) contact you with marketing and offers relating to products and services offered by us and/or other members of Sojitz Group Companies (defined in section 4) based on statutory provisions or your consent as required by applicable law
- (g) personalise the marketing messages we send you to make them more relevant and interesting if applicable

2.2 We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- (a) to fulfil our contractual obligations to you, for example to provide the services, to ensure that invoices are paid correctly, and to ensure you are able to access our premises when required
- (b) to fulfil our contractual obligations to you, for example your contact details and bank account details
- (c) to comply with our legal obligations, for example obtaining proof of your identity to enable us to meet our anti-money laundering obligations
- (d) to comply with our legal obligations to you, for example health and safety obligations while you are on our premises or to a third party (e.g. the taxation authorities)
- (e) to meet our legitimate interests to enable our business, for example screening your background for anti-corruption purpose or to understand how you use our services or products and to enable us to derive knowledge from that enable us to develop new services or products. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms
- (f) to protect your or another person's vital interests, for example by providing your health information to a doctor in case of a medical emergency situation.
- (g) when you gave us consent to the processing of your personal information for the specific purposes (When the legal basis to process your personal information is based on your consent, you may withdraw your consent ("opt out") at any time by contacting us using the details at the end of this privacy notice. In case of electronic direct marketing, you can opt out by following the instructions in the communication.)

3. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You have certain rights regarding your personal information, subject to local law. These include the following rights to:

- access your personal information

- rectify your personal information
- erase your personal information
- restrict our use of your personal information
- object to our use of your personal information
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability)
- withdraw your consent where our processing is based on your consent
- lodge a complaint with your local data protection authority.

These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data. In some instances, this may mean that we are able to retain data even if you withdraw your consent.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honour your requests.

If you would like to discuss or exercise such rights, please contact us at the details below.

4. INFORMATION SHARING

We may share your personal information for the abovementioned purposes with the following third parties under the following circumstances, in each case always only in accordance with applicable data protection laws:

- Service providers and business partners. We may share your personal information with our service providers and business partners that perform marketing services and other business operations for us. For example, we may partner with other companies to process secure payments, fulfil orders, optimize our services, send newsletters and marketing emails, support email and messaging services and analyse information as well as for website hosting, support and maintenance.
- Our group companies. Sojitz Europe plc is owned by Sojitz Corporation (1-1, Uchisaiwaicho 2-chome, Chiyoda-ku, Tokyo 100-8691, Japan) and we work closely with other businesses and companies that fall under Sojitz Corporation (**‘Sojitz Group Companies’**). We may share your personal information with Sojitz Group Companies for marketing purposes, legal compliance purposes, and any other abovementioned purposes. A list of our current Sojitz Group Companies with whom personal information may be shared and their locations is available in the following hyperlinks:

<https://www.sojitz.com/en/corporate/network/> (with respect to our entities constituting our operating bases)

<https://www.sojitz.com/en/corporate/group/> (with respect to our entities constituting our major group companies)

- Law enforcement agency, court, regulator, government authority or other third party. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- Asset purchasers and advisors. We may share your personal information (subject to the applicable laws) with our advisers and any prospective purchaser's adviser and will pass this information to the new owner that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice.

Because we operate business globally, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See section 6 (International Data Transfer) for more information.

5. **INFORMATION SECURITY AND STORAGE**

We implement reasonable technical and organisational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing. Please note that any transmission of information through the internet is not completely secure. So, while we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted via the internet. Any transmission is at your own risk. Once we have received your personal information, we will protect your data.

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for an appropriate period of time that will enable us to:

- Maintain business records for analysis and/or audit purposes
- Comply with record retention requirements under the applicable law or under applicable record retention policies
- Defend or bring any existing or potential legal claims
- Deal with any complaints regarding the services, to the extent it is reasonably possible for us

We will delete your personal information when it is no longer required for these purposes. We will further delete your personal information when you withdraw your consent, if there is no other legal ground for further processing (e.g., a statutory obligation to retain your personal information), or when you object to the processing in accordance with "Your Rights over your Personal Information" (see above) or when we are obligated to delete it in accordance with an obligation under applicable law. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

6. **THIRD-PARTY LINKS ON OUR SITE**

Our Site and services may contain links to third-party websites and applications. Any access to and use of such linked websites and applications is not governed by this privacy notice but instead is governed by the privacy notices of those third parties. We are not responsible for the information practices of such third-party websites or applications.

7. **INTERNATIONAL DATA TRANSFER**

Your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information by the European Commission.

We have and shall put in place appropriate safeguards (such as EU standard contractual clauses) in accordance with applicable legal requirements to ensure that your personal information is adequately protected. For more information on the appropriate safeguards in place or to request a copy of the aforementioned safeguards, please contact us at the details below.

8. **CONTACT US**

If you have questions or concerns regarding this privacy notice or the way in which your personal information has been used, please contact us:

- Via regular post at Sojitz Europe plc, 7th Floor, 8 Finsbury Circus London EC2M 7EA, UK, to the attention of General Manager, Legal Department;

- Via email at privacy.europe@sojitz.com.

Please find below the list of our operated branches and offices outside the UK:

Czech: Prague Office: Krakovska 7, 110 00 Prague 1, Czech

France: Paris Branch 23 rue de la Paix, 75002 Paris, France

Germany: Düsseldorf Branch: Schirmerstraße 76, 40211 Düsseldorf, Germany

Hamburg Office: Kurze Mühren 1, 20095 Hamburg, Germany

Hungary: Budapest Office: Lehel ut 61, 1135 Budapest, Hungary

Italy: Milan Branch: Piazza della Repubblica, 32 20124 Milano, Italy

Poland: Warsaw Office: ul. Ogrodowa 58, 00-876 Warszawa, Poland

Spain: Madrid Branch: Claudio Coello, n°.124, 3.ª planta, 28006 Madrid, Spain

Turkey: Istanbul Branch: Esentepe Mahallesi, Kore Şehitleri Caddesi, Propa Plaza, No:4 Kat:6 Zincirlikuyu, Şişli, 34394 İstanbul, Turkey

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority in your country.

9. **CHANGES TO THIS PRIVACY NOTICE**

We may modify or update this privacy notice from time to time.

If we change this privacy notice, we will notify you of the changes by posting them on the Site. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice by adding a prominent notice on our Site or by sending you an email notification as required by applicable law so that you have the opportunity to exercise your rights.

25 JUNE 2019