

Kewpie Corporation Privacy Policy for EEA and UK Residents

Last updated on November 30, 2023

[Kewpie Corporation](#) (“**we**” or “**our**”) acknowledges the importance of personal data and other information pertaining to the privacy of our customers, business partners, officers, employees, etc., website visitors and online users located in the European Economic Area (the “**EEA**”) and the UK (collectively, the “**Customers, Etc.**”, “**you**” or “**your**”), and processes your personal data pursuant to this “Privacy Policy for EEA and UK Residents” (this “**Policy**”).

Please note that this Policy only applies to our processing of personal data regarding the Customers, Etc. located in the EEA and the UK.

1. Types of Personal Data We Process

The types of personal data we process shall be as follows:

Customers’ Personal Data

We will process the personal data collected from the customers including: name, gender, contact details (home address, work email address, personal phone number), company name and address, department, title, signature specimens, contact preferences, date of birth, citizenship, kewpie IDs, and other information necessary for customer management.

Business Partners’ Personal Data

We will process the personal data collected from the business partners including: name, gender, contact details (home address, work email address, personal phone number), company name and address, department, title, signature specimens, contact preferences, date of birth, citizenship, and other information necessary for management of the business partners.

Personal Data of Officers, Employees, etc.

We will process the personal data collected from the officers, employees, etc., including: name (including legal and preferred names), date of birth/age, gender, contact details (home address, home telephone number, personal mobile telephone number and personal email address), passport details, background check results (including criminal record checks), interview feedback, position within organization and working arrangement, business network/firm committees membership, employment history, travel and expenses information, and other information necessary for employment management.

Website Visitors and Online Users

We will process the personal data, that we automatically collect when you visit our website(s) or uses our online services including: internet protocol (IP) address, your login data; browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our websites or online services. To learn more about our use of cookies or similar technologies, please reference our cookies policy.

2. How is Your Personal Data Collected?

We will collect your personal data in the following ways:

- (1) **Information that you provide to us:** This includes information about you that is provided by you when filling in forms or when you are communicating with us, whether face-to-face, by phone, e-mail or otherwise;
- (2) **Information we collect or generate about you:** This includes data from and about you through automated technologies or interactions. As

you interact with our website, we will automatically collect technical data about your equipment as well as your browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details; and

- (3) **Information we obtain from other sources:** This includes data provided to us by our affiliates and subsidiaries, third-party service providers, agencies or other publicly available sources where applicable.

Please note that any personal data that is mandatory to provide is indicated in the relevant forms that you complete. In cases where the provision of personal data is mandatory, we are not able to provide our products and/or services to you if the relevant information is not provided.

3. Purposes and Legal Basis for Processing

The purposes of processing that we assume and the legal basis for the processing shall be as follows:

Customers' Personal Data

We will process its customers' personal data for the following purposes and legal bases:

Purposes	Legal bases
To implement campaigns and questionnaires, as well as to send out and provide prizes and remuneration	Necessary for our legitimate interests (to develop and grow our business)
To make announcements concerning products, services or events	Necessary for our legitimate interests (to conduct our marketing activities)

To send products, samples, documents or information	Necessary for our legitimate interests (to conduct our business)
To perform services pertaining to sale, delivery, billing, payment, etc., of products or services	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract
To provide and manage services for customers who have registered for a membership service	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract
To implement and correspond regarding plant visits, taste-testing parties or events	Necessary for our legitimate interests (to conduct our business)
To prepare statistical information through aggregating information such as age, address and application history or use history of the relevant services, to improve products or services, as well as to develop and market new products and services	Necessary for our legitimate interests (to develop and grow our business)
To respond to customers who make inquiries or comments in regard to products, advertisements or others (including sharing information and dealing with inquiries, etc., with the body designated by the customers or found appropriate by ourselves (including, without limitation, the Kewpie Group), depending on the details of various inquiries made by the customers)	Necessary for our legitimate interests (to conduct our business)

We recommend that our customers register themselves for kewpie IDs in order to realize the enhancement of the customers' convenience and the provision of more suitable services, within our various services.

In addition to the customers' personal data provided in connection with their registration and use of the kewpie IDs, we integrate: (i) the customers' personal data generated through registration in the relevant services or via its use; (ii) the activity history within the Kewpie Mayonnaise Fun Club (access history to its website, purchase history of products or services, etc.); and (iii) the outcome of the inquiries that we implemented, in order to use the same for the following purposes and legal bases:

Purposes	Legal bases
To certify customers and manage customers' personal data (including the personal data generated through use of the services) by means of kewpie IDs	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract
To simplify the entry of the registered information for kewpie IDs within the services	Necessary for our legitimate interests (to conduct our business)
To provide personalized products, content, recommendations, advertisements, and marketing communications to the customer using customer trends such as interests and tastes obtained through the integration and analysis of the customers' personal data (the "Integrated Analysis Outcome")	Consent
To use customers' personal data for learning in order to establish AI pertaining to enhancing the accuracy of the Integrated Analysis Outcome, improving the products and services or developing new products and services	Necessary for our legitimate interests (to develop and grow our business)

Business Partners' Personal Data

We will process its business partners' personal data for the following purposes and legal bases:

Purposes	Legal bases
To collect information required for services and under agreements, greetings, correspondence and announcements	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract Necessary for our legitimate interests (to conduct our business)
To fulfill obligations and exercise rights pertaining to transactions	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract
To make announcements regarding products, services or events	Necessary for our legitimate interests (to conduct our marketing activities)
To send products, samples, documents or information	Necessary for our legitimate interests (to conduct our business)
To implement questionnaires	Necessary for our legitimate interests (to develop and grow our business)
To implement and correspond regarding plant visits, taste-testing parties or events	Necessary for our legitimate interests (to conduct our business)
To prepare statistical information through aggregating information such as age, address, and application history or use history of the relevant services, etc., to improve the products and services, as well as to develop and market new products and services	Necessary for our legitimate interests (to develop and grow our business)

<p>To respond to business partners who made inquiries or comments in regard to products, advertisements, etc. (including sharing information of and dealing with inquiries, etc., with the body designated by the business partners or found appropriate by ourselves (including, without limitation, the Kewpie Group), depending on the details of various inquiries made by the business partners)</p>	<p>Necessary for our legitimate interests (to conduct our business)</p>
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Personal Data of Officers, Employees, etc.

We will process the personal data of its officers, employees, etc., for the following purposes and legal bases:

Purposes	Legal bases
<p>To perform screening for recruitment of and administrative procedures for the people who have applied for recruitment or internships</p>	<p>Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract</p> <p>Necessary for our legitimate interests (to conduct our recruiting activities)</p>
<p>To perform labor and employment management of employees and other procedures required by ourselves for its business</p>	<p>Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract</p> <p>Necessary for our legitimate interests (to conduct our recruiting activities)</p>

To provide information and send items for distribution to the family members of employees	Necessary for our legitimate interests (to operate labor and employment management)
To correspond with, provide information to and send items for distribution to retired employees	Necessary for our legitimate interests (to operate labor and employment management)
To respond to the officers, employees, etc., who made inquiries or comments (including sharing information of and dealing with inquiries, etc., with the body designated by the officers, employees, etc., or found appropriate by ourselves (including, without limitation, the Kewpie Group), depending on the details of various inquiries made by the officers, employees, etc.,)	Necessary for our legitimate interests (to conduct our business)
To generate responses equivalent to the item in the previous purpose with respect to applicants for recruitment or internships	Necessary for our legitimate interests (to conduct our business)

For more details regarding our legitimate interests, please contact us via the contact information provided below.

Please note that we do not make decisions that may affect you legally or in a similarly significant manner based solely on automated processing.

Website Visitors and Online Users

We will process the personal data of our websites or use our online services for the following purposes and legal bases:

Purposes	Legal bases
To allow us to deliver our website to you and to provide specific services that you request from us	Necessary for our legitimate interests (to conduct our business)
To collect information about how visitors use our websites which helps us with site analysis and improvements	Necessary for our legitimate interests (to develop and grow our business) nsent
To remember your choices or preferences, such as information on online forms or previous orders	Necessary for our legitimate interests (to conduct our business)
To build a profile of your interests in order to show you relevant adverts on other websites	Consent

4. Processing Security Measures

We take the following measures in compliance with the laws and regulations of the EEA and the UK related to personal data protection, other standards, guidelines, the “Kewpie Group Privacy Policy,” etc., to promote security control of personal data in order to prevent leaks, loss or damage of personal data or any other situation potentially causing damage to the security of personal data:

Institutional Security Control Measures

- Establishing an institutional system for personal data protection, such as appointing a person responsible for the control of personal data; and
- Establishing regulations on the protection of personal data, etc., and operations pursuant to the regulations, etc.

Human Security Control Measures

- Widely disseminating the control system and processing method, including methods for keeping personal data among our officers, employees (including temporary employees and dispatched workers) and other people concerned, causing them to carry out said methods.

Physical Security Control Measures

- Implementing measures to prevent unauthorized persons from accessing any personal data in the personal data processing area; and
- Preparing physical protection such as equipment, devices, etc.

Technological Security Control Measures

- Performing access control to the system for the processing of personal data; and
- Supervising, etc., the system for the processing of personal data

Understanding Outside Circumstances

- Taking security control measures while understanding the personal data protection systems in countries where the personal data is stored.

Other

- Ensuring security control of personal data while fully considering the management capabilities of the contractors of the given service to process personal data, concluding agreements pertaining to personal data and exercising supervision over the contractors.

5. Sharing of Personal Data with Third Parties

We will share your personal data with the following persons and entities in order to achieve the purposes of processing described in “3. Purposes and Legal Basis for Processing” above:

- Kewpie group companies as set forth in the “Kewpie Group Privacy Policy”, including Kewpie Corporation and its affiliates and subsidiaries located in Japan;
- Nakashimato group companies, including Nakashimato Co., Ltd. and its affiliates and subsidiaries (only for personal data of the officers, employees, etc.);
- Service providers, including IT infrastructure service providers, customer relationship management service providers, website hosting and security service providers and payment service providers; and
- Business partners, including ad serving and analytics service companies.

6. International Transfer

We may transfer your personal data to countries/territories outside the EEA/UK, where the third parties listed in the “4. Provision to Third Parties” above are located, including Japan, China, the US, Thailand, Malaysia, Vietnam, Indonesia, the Philippines, Singapore, India, Australia and New Zealand.

When we transfer personal data to countries that are not deemed by the EU and/or the UK to provide an adequate level of data protection, we will protect your personal data through appropriate safeguards based on: the European Commission’s Standard Contractual Clauses ([EU SCC](#)) for the EU, the International Data Transfer Agreement ([IDTA](#)) or the International Data Transfer Addendum to the EU SCC ([Addendum](#)) for the UK, etc.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA and/or the UK.

7. Retention Period

We will retain your personal data until the purpose of processing thereof has been achieved. When the purpose of processing has been achieved, we shall delete the relevant personal data without delay. However, we will retain your personal data beyond such period where we are required to do so by applicable laws and regulations.

8. Your Rights

You have the right to ask us: for a copy of your personal data, to correct or delete your personal data, to restrict (stop any active) processing of your personal data and to send you a copy of the personal data you have provided to us in a structured, machine readable format. Please note that these rights are subject to exceptions under the applicable laws.

You also have the right to object at any time to the processing of your personal data that is based on our legitimate interests, including “profiling” (i.e. analyzing or predicting their behavior based on their information). When we process your personal data for direct marketing purposes, you have an absolute right to opt out of such processing.

Wherever we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. Such withdrawal does not affect the lawfulness of any processing performed pursuant to the consent given prior to the withdrawal.

To exercise any of these rights, please contact us via the contact information provided below.

In addition, you also have the right to lodge a complaint with a supervisory authority in the member state of the EEA or the UK where you have a habitual

residence or a place of work or where the alleged infringement of the applicable data protection laws took place.

9. Cookies and Similar Technologies

We will use “cookies” which are a mechanism to collect, record and manage the information of users when they visit websites, in order to enhance your convenience on the websites operated by us. You are advised to understand in advance that, if your computer is set to block cookies, some of the various services provided may be unable to be used.

Moreover, we will use an information collection module provided by a third party for the purposes of analyzing your visits and other activities on the websites operated by us, including delivering advertisements and measuring their effectiveness. Accordingly, we will transmit your information obtained along with the use of the said information collection module to the third party which provides the same.

To learn more about our use of cookies or similar technologies, please check our cookies policy.

10. Contact

If you have any inquiries, questions, consultations, etc., about the processing of personal data, please make contact as follows:

Inquiry form: <https://www.kewpie.com/en/contact/>