



## Processing of Personal Data in the European Union

"1-Oct.-24"

Kintetsu World Express, Inc. ("KWE" or the "Company") shall ensure a Process is in place to rigorously protect Customer information obtained.

1. KWE shall protect Customer Personal Data in the European Union
  - (1) KWE manages customers' personal data in the European Union (the "Union") in an appropriate manner.
  - (2) The data KWE obtains from the customer consist mainly of his/her Union personal data required when providing our service such as the customer's name, e-mail address, telephone number and address. Although KWE may potentially ask a question on other matters for the purpose of providing service desired by the customer, the information is intended to be given by him/her voluntarily with the exception of minimally required matters.
  - (3) Newly-inquiring customers:

KWE may potentially provide the customer's Union personal data to a third party after obtaining his/her prior consent, depending on what is inquired about or consulted on (collectively "Consultation"). This applies in cases where, for example, what is inquired about by the customer is not processed by the Company and KWE check with a KWE Group company processing it.
  - (4) Existing customers:

KWE may potentially provide the customer's Union personal data to a third party, depending on the service type. This applies in cases where, for example, KWE inform a Transport Contractor providing Freight Services of the Customers name.
  - (5) To rigorously store customers' Union personal data, KWE develop internal regulations and periodically implement employee training on the protection of their Union personal data as well as relevant audits.
  - (6) If the customer wants to inquire about or revise his/her Union personal data, KWE will respond to a reasonable extent after verifying the identity of the customer.
  - (7) The Company's website, although occasionally using cookies in order to provide better services, does not obtain any data that allows a person to be identified through the process.

The term “Cookie” as used herein refers to a function to store the Company’s website in the computer of the person who has viewed the site and to memorize it. Although being allowed to refuse the receiving of cookies by altering the setting of the browser used, the person doing so could potentially fail to use certain services.

- (8) KWE may be requested to provide customers Union Personal data by Local Jurisdiction Authorities in the event of a Police investigation relative to an incident occurring, or as requested by the relevant Competent, Certification and or Regulation Authorities in which case, all such Personal Data requests shall be informed to the DPO in advance.
- (9) KWE comply with laws and regulations and standards that apply to customers’ Union personal data while revising and improving the above-mentioned endeavors as KWE see fit.

2. Processing purpose of Union personal data obtained from customers

Newly-inquiring customers:

As for Union personal data submitted by the customer at the time of the Consultation, KWE occasionally use, to the extent required, the data in order to get in touch with the customer and communicate and check with authorities relevant to the contents of the Consultation by the customer.

Existing customers:

As for Union personal data submitted by the customer at service launch, KWE use the data in order to get in touch with the customer and use them for service arrangement purposes to the extent required.

To provide Union personal data is essential for fulfilling the contract on service provision. If refraining from providing the customer’s Union personal data on his/her own decision, inconvenience may cause effect on the Resulting provision of Service by KWE to the customer.

3. Terms and conditions of the processing of Union personal data

KWE process the customer’s Union personal data only if obtaining his/her consent to the processing or if any of the following applies:

- (1) Processing of the data is required for the fulfillment of a contract to which the customer is a party (or processing of the data is required for performing a procedure at the request of the customer prior to entering into a contract);
- (2) Processing of the data is required in order for the Company to comply with a legal obligation it must observe (such as when obeying a data disclosure order from a government agency under laws);
- (3) Processing of the data is required in order to protect the significant interests of the customer or other individual person;

- (4) It is considered appropriate to investigate, prevent or deal with an unlawful act or an act suspected of being an unlawful act;
- (5) Processing of the customer's personal data is required in order for the Company to achieve a fair profit and the processing does not seriously affect the customer's privacy.
4. Union personal data of special categories  
In providing our service, KWE do not use the customer's Union personal data of special categories (on health conditions and physical characteristics).
5. International transfers of Union personal data  
KWE occasionally transfer Union personal data to a KWE Group company and/or a business partner company in Japan for the purpose of checking what is being inquired. KWE appropriately manage customers' Union personal data pursuant to the RULES OF THE KWE GROUP on the processing of personal data in the European Union.
6. Security countermeasures  
KWE implement technical, physical, organizational and human security countermeasures in order to manage customers' Union personal data appropriately, prevent a leakage, loss or damage from being caused to their Union personal data and control the security of the Union personal data.
7. Joint use  
KWE will jointly use Union personal data from the customer solely for the following purpose.  
Personal data to be used jointly:  
Of Union personal data submitted by the customer at the time of the Consultation, the Company and a KWE Group company will jointly use data minimally required for getting in touch with or servicing the customer such as his/her name, telephone number and address. When the Company and a KWE Group company jointly use Union personal data, the companies shall clearly specify the scope of their obligation to process the customer's Union personal data as well as the inquiry service desk.

Union personal data to be used jointly by KWE Group companies:

Name, company name, address, telephone number and e-mail address

KWE Group companies:

Kintetsu World Express, Inc.	Shanghai Fengxian Kintetsu Logistics Co., Ltd.
Kintetsu World Express (U.S.A.), Inc.	Dalian BLP Kintetsu Logistics Co., Ltd.
Kintetsu World Express (Canada) Inc.	Kintetsu World Express (Guangzhou) Ltd.
World Wide Customs Brokers Ltd.	Zhongshan Kintetsu Logistics Co., Ltd.
Kintetsu World Express Mexico, S.A. de C.V.	Xi'an Kintetsu Logistics Co., Ltd.
KWE do Brasil Servicos Logisticos Ltda.	Chongqing KG International Logistics Co., Ltd.
Kintetsu World Express South Africa (Pty) Ltd.	Chengdu Jinda Logistics Co., Ltd.
Kintetsu World Express (Switzerland) Ltd.	Xi'an JD Logistics Solutions Co., Ltd.
Kintetsu World Express (RUS), Inc. LLC	Info Trade Ltd.
Kintetsu World Express (Middle East) FZE	KWE-Kintetsu World Express (S) Pte Ltd.
Kintetsu World Express Middle East Logistics L.L.C	Kintetsu World Express (Malaysia) Sdn. Bhd.
Kintetsu World Express (Saudi Arabia) Ltd.	Kintetsu Logistics (M) Sdn. Bhd.
Kintetsu World Express (HK) Ltd.	KWE-Kintetsu World Express (Thailand) Co., Ltd
Kintetsu World Express (Taiwan), Inc.	KWE Development (Thailand) Co., Ltd.
Kintetsu World Express (Australia) Pty Ltd.	Kintetsu Logistics (Thailand) Co., Ltd.
Kintetsu South China Co., Ltd.	Kintetsu World Express (India) Pvt. Ltd.
Kintetsu Logistics (Shenzhen) Co., Ltd.	PT.Kintetsu World Express Indonesia
Kintetsu Far East Development Co., Ltd.	PT.Kintetsu Logistics Indonesia
Kintetsu World Express (Korea), Inc.	Kintetsu World Express (Vietnam), Inc.
Beijing Kintetsu World Express Co., Ltd.	Kintetsu Logistics (Vietnam), Inc.
Shanghai Kintetsu Logistics Co., Ltd.	Kintetsu World Express (Philippines) Inc.
Kintetsu World Express (Xiamen) Co., Ltd.	Kintetsu World Express (Subic) Inc.
Dalian Kintetsu Logistics Co., Ltd.	Kintetsu World Express (Clark) Inc.
Suzhou Kintetsu Logistics Co., Ltd.	Kintetsu Logistics (Philippines) Inc.
Kintetsu Logistics (Xiamen) Co., Ltd.	Kintetsu World Express (Cambodia) Co., Ltd.
Yantai Kintetsu Logistics Co., Ltd.	
Kintetsu World Express (China) Co., Ltd.	Other KWE Group Companies

8. Union personal data provided by the customer are transferred by the Company solely for the following purposes.

Newly-inquiring customers:

KWE occasionally transfer the Customers Union Personal Data to a Transport Forwarding Company to the extent required for addressing the Consultation from the customer.

Existing customers:

KWE transfer the Customers Union Personal Data to a Transport Forwarding Company to the extent required for arranging services.

9. KWE shall store the customer's Union personal data for a period equal to a Contract in place or that of 2 years prior to erasing or discarding all such Personal Data appropriately.

10. The customer holds the following rights to his/her Union personal data:

(1) The right to know his/her own Union personal data as well as relevant data;

- (2) The right to obtain, without undue delay, the rectification of any inaccurate Union personal data on the customer;
- (3) The right to obtain the erasure of the Union personal data on the customer without undue delay and pursuant to certain legal requirements;
- (4) The right to obtain the restriction of the processing of the Union personal data on the customer pursuant to certain legal requirements;
- (5) The right to receive customer-provided Union personal data in an ordinary and computer-readable format pursuant to certain legal requirements and to transmit those data to another organization's control without hindrance;
- (6) The right to object to the processing of the Union personal data on the customer for reasons of public interest or the interest of the Company or a third party, or for direct marketing purposes;
- (7) The right not to be subjected to such assessment or decision based on automated processing such as profiling as has significant effects on him or her including legal effects;  
\* The Company does not engage in any profiling.
- (8) If verifying an infringement on the customer's rights pursuant to the General Data Protection Regulation (GDPR), he/she holds the right to lodge a complaint with a relevant supervisory authority in his/her country of residence.

#### 11. Disclaimer

This website is intended to be used at the responsibility of the customer.

Neither KWE nor the KWE Group shall be held liable for any and all damages incurred due to the use of various information obtained from this website or other website page to which a link is shown on this website.

#### 12. Governing laws

This website is under the control of KWE. Although the website is able to be accessed from countries with different laws around the world, the customer accessing the website and KWE shall consent to being bound by the laws of Japan concerning the use of the website in spite of the differences in legal principles.

KWE does not provide, on the website, any statement or display on whether the contents of the website are appropriate for the customer's environment. Any access to this website is intended to be done at the customer's volition, and the customer shall be held responsible for the use of the website.

#### 13. Group Data Protection Manger

The KWE Group establishes the position of Group Data Protection Manager, with overall responsibility for the handling of personal information in the KWE group in compliance with these regulations and law. The manager's contact details are as shown below:

24th Floor, Shinagawa Intercity Tower A, 2-15-1 Konan, Minato-ku, Tokyo 108-6024, Japan

Telephone: +81-3-6863-6440

E-mail: [g000@kwe.com](mailto:g000@kwe.com)