

Privacy Policy

Basic Policy for Protection of Personal Information

Conscious of its important social responsibility of appropriately handling each customer's personal information, TPR EK METALS CO., LTD. (hereinafter referred to as the "Company") will strictly adhere to the following policy:

1. Name of the responsible business entity
 1. TPR EK METALS CO., LTD.

2. Compliance with applicable laws, regulations, guidelines and rules
 1. In handling personal information, the Company will comply with the Act on the Protection of Personal Information and all other applicable laws, regulations, Cabinet orders, ministerial ordinances, guidelines and so forth which relate to personal information and privacy (hereinafter referred to as "Laws").

3. Statement of purpose for obtaining personal information
 1. When obtaining personal information, the Company will clearly state the purpose of its use and obtain relevant information to the extent required for such purpose.

4. Purposes of use
 1. The Company is principally engaged in the manufacture and sales of resistance welding electrode materials, special copper alloy and other metal products for industrial use. The Company will use personal information relating to its customers, employees and other personnel

to the extent necessary for conducting such business in the following manner:

1.

(1) Personal information about customers will be used for the purpose of:

1.

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- Performing business relating to agreements entered into between the Company and its customers;
- Providing customers with relevant guidance and wide-ranging products and services offered by the Company and its group companies;
- Dispatching products and providing necessary communication and after-sales service;
- Performing market surveys and developing new products and services; and
- Conducting other matters ancillary or related to Company business.

2.

1.

(2) Personal information about Company employees and other personnel will be used for the purpose of:

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- Hiring and employing Company employees or other personnel, managing personnel and labor-related matters, providing education, training and welfare, calculating and paying salaries and pensions, and managing healthcare and other employment-related matters; and

- Performing various procedures and matters relating to conducting business of the Company (to the extent necessary) and management of employees and other personnel. Individual Numbers and Specific Personal Information will be appropriately handled pursuant to the “Basic Policy for Appropriate Handling of Individual Numbers and Specific Personal Information.”

3.

The Company will obtain and retain personal information provided for the purposes stated in (1) and (2) above.

The Company will post the above-mentioned purposes of use on its website and clearly state these purposes when it obtains personal information directly from customers in writing.

5. Joint use of personal information

1. The Company and its group companies may jointly use personal information for the purpose of conducting their business of providing goods and products as well as ancillary or related services in the following manner:

1. (1) Personal information about customers:

1. (i) Purpose of joint use

1. To provide customers with guidance on products and related services and address consultations or complaints from customers (for the same purpose as those referred to in 4 (1) above).

2. (ii) Items of personal data to be used jointly

1. Names of individuals, addresses of their companies, departments where they work and

the positions they hold, their telephone numbers, email addresses, items inquired about, etc.

3. (iii) Scope of group companies which jointly use personal information
 1. [The Company and its group companies.](#)
4. (iv) Personal Information Manager
 1. Responsible information manager of a group company which originally obtains relevant personal information.

2.

1.

(2) Personal information about Company employees and other personnel:

1. (i) Purpose of joint use
 1. Management of group companies' business, performance and human resources as well as emergency response and the like.
2. (ii) Items of personal data
 1. Name, date of birth, sex, address, department where the employee belongs, managerial position assigned, telephone number, email address and any other items of information necessary for achieving the purpose of joint use.
3. (iii) Scope of group companies
 1. [The Company and its group companies.](#)
4. (iv) Personal Information Manager
 1. Responsible information manager of a group company which initially obtains relevant personal information.

6. Matters relating to security management measures

1. The Company will set forth its in-house rules and manage internal organization for the purpose of preventing personal information from being leaked or divulged, lost or damaged and otherwise appropriately

managing personal information, and thereby appropriately handle or treat personal information.

2. Upon the lapse of the applicable statutory or regulatory preservation period or when the Company is not required any longer to handle personal information of the relevant customer, the Company will promptly delete such customer information.

7. Entrustment of Personal Information to a third party

1. The Company may entrust handling of personal information to a third party. In such case, the Company will appropriately supervise such third party's handling of entrusted personal information whenever necessary in accordance with Laws.

8. Restriction on provision of personal information to a third party

1. The Company will not provide or disclose to a third party any customer's personal information unless the Company obtains prior approval of such customer or is required to do so by Laws.

9. In-house education

1. The Company will continue to make efforts for improving this Basic Policy and handling of personal information.

10. Continuous improvement

1. The Company will continue to make efforts for improving this Basic Policy and handling of personal information.

11. Disclosure of personal data held by the Company

1. If the Company is requested by a person or his/her agent (hereinafter referred to as the "Requested Person") to disclose such person's personal data contained in the personal information held by the Company which the Company is authorized to disclose or otherwise treat (hereinafter referred to as the "Retained Personal Data"), the Company will promptly comply with such request to a reasonable and necessary extent except in the cases below:

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- The Company's disclosure of Retained Personal Data is likely to damage the life, body, property or other rights or benefits of the Requested Person or a third party;
- The Company's disclosure of Retained Personal Data is likely to significantly obstruct appropriate conduct of its business; or
- The Company's disclosure will be in breach of Laws.

2. The Company's disclosure of Retained Personal Data is likely to damage the life, body, property or other rights or benefits of the Requested Person or a third party;

The Company's disclosure of Retained Personal Data is likely to significantly obstruct appropriate conduct of its business; or

The Company's disclosure will be in breach of Laws.

12. Customer service for questions and complaints

1. If you have any question or complaint about the Company's handling of personal information, please contact the responsible person or the customer service given below. You may also file a complaint with the Personal Information Protection Commission or other supervisory institution.

1.

(1) Chief Privacy Officer

1. General Manager of Administration and Human Resources Department.
2.
 - (2) Customer Service for inquiries about handling of personal information
 1. Customer Service for Inquiries about Personal Information at Administration and Human Resources Dept.
Address: 2147-1, Ohta, Sakura-City, Chiba-Pref, 285-0808, Japan
Telephone: +81-43-486-6611

Established on February 1, 2019

The group companies which would jointly use personal information with the Company are the following:

TPR Co., Ltd., TPR Industry Co., Ltd., TPR Premec Co., Ltd., TPR Engineering Co., Ltd., TPR Thermal Engineering Co., Ltd., TPR Altec Co., Ltd., TPR Sunlight Co., Ltd., TPR Nobukawa Co., Ltd., TPR Nobukawa Trading Co., Ltd., TPR Enpla Co., Ltd., TPR Trading Co., Ltd., TPR Total Service Co., Ltd., and TPR Business Co., Ltd.