

Privacy Policy

[Privacy Policy \(Japanese\)](#)
[Privacy Policy \(Chinese\)](#)

ETRIA MANUFACTURING JAPAN Co., Ltd. (hereafter referred to as "ETRIA MANUFACTURING JAPAN" or "we") recognizes the importance of the personal information. ETRIA MANUFACTURING JAPAN promises to respect your privacy and process your personal information in a careful and confidential manner in accordance with this Privacy Policy and applicable laws.

1. Purpose of this Privacy Policy

This is our Privacy Policy that explains why and how we process personal information and, if you are the subject of any of the personal information concerned, what rights you have and how to get in touch with us if you need to. Additional information on our personal information practices may be provided in other notices provided prior to or at the time of data collection. Certain ETRIA MANUFACTURING JAPAN services, systems and websites may have their own documentation describing how we handle personal information for those services, systems or websites specifically. To the extent a specific notice for a service, system or website differs from this Privacy Policy, the specific notice will take precedent. If you are a customer of one of our ETRIA MANUFACTURING JAPAN group companies, please refer to their privacy policy as this Privacy Policy will not apply to their use of your personal information.

2. Collection and processing of personal information

(1) How we collect your personal information:

ETRIA MANUFACTURING JAPAN may collect your personal information when you provide such personal information to us, through our services, systems, websites, market research and development activities, or through third parties such as our distributors.

(2) What do we do with your personal information:

ETRIA MANUFACTURING JAPAN may process your personal information only for fair, lawful and legitimate reasons. The table below lists data subject categories, types of personal information and the purposes for processing such personal information.

Whose personal information do we process?	ETRIA MANUFACTURING JAPAN may process personal information relating to a range of individuals. This includes when: <ul style="list-style-type: none">• You are a customer, a supplier or a partner of ours.• You use or wish to use our products or services.• You work for a customer, a supplier or a partner of ours, or for someone who uses our products or services.• You wish to apply for a job with us.• You are someone (or you work for someone) to whom we want to advertise or market our products or services. In this case, we may have obtained your details directly from you (for example, via our website or at a trade show or exhibition) or from another source.• You are a shareholder of our shares.• You are a target person of our study, research or development.• We will also process personal information provided by our consignors.
What personal information do we process?	ETRIA MANUFACTURING JAPAN may process your personal details, including: <ul style="list-style-type: none">• Your name or ID information.• Who you work for, and your job function or department.• When personal information is included in your payment information. We may also collect and process technical or usage information such as details regarding your access to and use of our services, systems and websites. Please also refer to Section 5 of this Privacy Policy for more information.
Why we process your personal information?	ETRIA MANUFACTURING JAPAN may process your personal information for the purposes including: <ul style="list-style-type: none">• To enter into, and to perform contracts with you or the person that you work for (including billing and collection).• To:<ol style="list-style-type: none">1. provide products, services and support to customers or other users of those products and services (including conducting related office work and accounting work);2. obtain products and services from suppliers or partners (including communications that take place for purchasing materials and conducting related office work and accounting work);3. provide information and proposals of our products and services;4. send invitations to seminars and business fairs;5. manage and administer our relationships with customers, suppliers, partners or other users of our products and services;6. contact for business negotiations and meetings;7. request for questionnaires and surveys regarding the planning and use of products and services;8. create statistical data;9. entrance and exit management to our facility; and/or10. respond to inquiries;• where you or the person that you work for may be the relevant customer, user, supplier or partner of products or services for these purposes.• To:<ol style="list-style-type: none">1. exercise shareholder's rights;2. perform business to fulfill our obligations;3. to provide services to our shareholders; and/or4. manage shares and shareholders, including creating data based on laws and regulations;• To advertise and market, and provide information about, our products and services.• To reply to your comments or questions on a feedback form.• To handle your request and for statistical purposes to see about your request.• To provide information to job applicants and to perform recruitment activities.• To perform business entrusted by consignors.• To administer our services, systems and websites under our terms and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.• To authenticate individual user accounts of our services, systems and websites.• To allow functions of our services, systems and websites.• To improve and tailor our services, systems and websites to ensure that content is presented in the most effective manner for you and for your device.• To keep our services, systems and websites safe and secure.• To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising.• To improve our products related to our services, system, website and to provide new products and services.
What are the legal grounds for our processing of your personal information?	The legal basis on which we process your personal information is as follows: <ul style="list-style-type: none">• Where it is necessary to obtain your prior consent to the processing concerned in order for us to be allowed to do it, we will obtain and rely on your consent in relation to the processing concerned (see below for how to withdraw your consent at any time).• We will process your personal information where the processing is necessary:<ol style="list-style-type: none">1. for the performance of a contract to which you are a party to or in order to take steps at your request prior to entering into such a contract;2. for compliance with a legal obligation to which we are a subject; or3. for the purposes of the legitimate interests pursued by us or another person, provided that this will only be in circumstances in which those legitimate interests are not overridden by your interests or fundamental rights and freedoms which require protection of personal information. For further details regarding legitimate interests, please contact us.• In addition, we will process your personal information when such processing is permitted under the laws and regulations of each country.

(3) Data Retention:

ETRIA MANUFACTURING JAPAN processes personal information only for so long as it is necessary for the purpose(s) for which it was originally collected, after which it will be deleted or archived except to the extent that it is necessary for us to continue to process it for the purpose of compliance with legal obligations to which we are subject to or for another legitimate and lawful purpose.

(4) As for the personal information ETRIA MANUFACTURING JAPAN had collected, compiled, and retained in its database before the Personal Information Protection Act came into force in Japan (April 1, 2005), ETRIA MANUFACTURING JAPAN may continue to use such personal information for the above purposes of use.

(5) When a certain business is transferred to ETRIA MANUFACTURING JAPAN through merger, split-up, business transfer, etc. so that personal information is provided to ETRIA MANUFACTURING JAPAN, ETRIA MANUFACTURING JAPAN will use the personal information within the scope to which the individual has given consent, or within the scope necessary for accomplishing the purposes of use having been notified or announced before the transfer.

3. Provision of personal information to a third party

ETRIA MANUFACTURING JAPAN may share your personal information with:

Any member of our affiliated companies, stockholders and stockholder group companies. The information we may share with such members are listed in Section 2(2) "What personal information do we process?", and the purpose of use by such members are listed in Section 2(2) "Why we process your personal information?". The information is managed responsibly by our representative in Company Data.

Appropriate third parties including our business partners, suppliers and sub-contractors, to the extent necessary for the full or partial performance and fulfillment of any contract we enter into or other dealings we have in the normal course of business with you or the person that you work for. We will conduct necessary and appropriate supervision to such third parties we share your information with.

[Company Data](#)

Other than the above, ETRIA MANUFACTURING JAPAN will not provide personal information to third parties except in the following cases:

- (1) When you have given a prior consent.
- (2) When the personal information has been acquired for the purpose of providing said information to a third party, and when its purposes, data items to be provided, provision means, contact persons for requesting cessation of use are notified or put in an easily accessible state. In this case, ETRIA MANUFACTURING JAPAN will, via internet or other appropriate means, disclose the content of the notification to the Personal Information Protection Commission.
- (3) When the personal information is required to protect human life, limb, or property, and it is difficult to obtain the consent of the principal.
- (4) When it is particularly necessary to improve public health or promote the sound development of children, and it is difficult to obtain the consent from you.
- (5) When it is necessary to cooperate with a national agency, local public entity, or a person entrusted thereto with carrying out the affairs prescribed by laws and regulations, and there is risk that obtaining the consent from you will interfere with the execution of said affairs.
- (6) When a judicial or administrative organization demands provision of personal information according to laws and regulations.
- (7) When the recipient of third party information is a research institution, etc. for which it is necessary to obtain the personal information for research purposes (including situations where there is a risk of unfairly infringing on your rights and interests).
- (8) When ETRIA MANUFACTURING JAPAN provides the personal information to other parties because of merger, split-up, business transfer, etc.

4. Inquiries and procedures for disclosure, etc. of personal information

(1) You have the following rights in relation to your personal information that we process:¹

If you or your agent wishes to exercise any of your following rights, please contact us through "Inquiries about Personal Information".

[Inquiries about Personal Information](#)

You may request access to the personal information concerned (in addition to the right to third party transfer records, where legally applicable).

In certain circumstances incorrect personal information that we are processing may be rectified.

process it, you may be entitled to request that we erase the personal information concerned.

Where legally applicable, you may request the restriction of the processing of the personal information.

Where legally applicable, you may request to have the personal information you have provided to us returned to you, or, where technically feasible, transferred to a third party.

Where we are processing your personal information relating to the basis of your prior consent, after which, where legally applicable, you may withdraw your consent at any time, after which we shall stop the processing concerned. Please note that such withdrawal will not affect the processing of your personal information before such withdrawal.

If you have a complaint about any processing of your personal information being conducted by us, you can contact us or lodge a formal complaint with a supervisory authority.

In addition, you may object to the processing of the personal information, at any time if we are processing personal information relating to you on the basis of legitimate interests.

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