

# **EEA and UK PRIVACY POLICY**

## **1. About This Policy**

This policy applies to you (a) if you interact with Sumitomo Electric Industries, Ltd. (“SEI”) and you are based in the European Economic Area (“EEA”) or the UK or (b) if you interact with SEI’s affiliates and related entities (listed in, but not limited to, the following [link](#), “Group Companies”) based in the EEA or the UK or (c) if EEA or UK data protection law otherwise applies.

This policy, which should be read together with our [Global Privacy Policy](#), describes how we will make use of your data when you interact with us and our websites, and when you receive communications from us or otherwise communicate with us, when your organisation is our business partner, and when you apply to us. The list of relevant data controllers and their contact details can be found in the [“Contact Us”](#) section. A reference to “we,” or “us” is a reference to SEI and Group Companies involved in the processing of personal data.

In some cases, we may provide additional privacy policies specific to certain products, services and areas. Those specific privacy policies shall supersede this policy to the extent that the clauses set forth in those policies contradict the clauses set forth in this policy.

This policy also describes your data protection rights, including the right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the [“Your Rights”](#) section.

## **2. Summary of How We Use Your Data**

- We use your personal data for the purposes described in this policy, such as the promotion, sale and supply of our products and services, the management of our relationship with you, and recruitment.
- Data is shared with our Group Companies for administrative purposes and for uses described in this policy. We may also share your personal data with our service providers, such as internet service providers, web analytics service providers, cloud service providers, software vendors, sales statistic analytics service providers, recruitment or employment agencies, professional advisors, or consultants. We may share your personal data with potential partners in the event of merger and acquisition, legal or regulatory authorities.
- Due to the global nature of our business, your personal data will be disclosed to Group Companies outside of the EEA and the UK including, in particular, to Japan as a Japanese headquartered company. The European Commission and UK government have determined that Japan offers an adequate level of protection – you can find out more in the adequacy decision(s) [here](#) and [here](#). We rely on these decisions for EEA-Japan and UK-Japan transfers.
- Where we rely on your consent, you can withdraw this consent at any time.

### 3. Personal Data Obtained by Us

We collect and process personal data about you when you interact with us and our websites, and when you receive communications from us or otherwise communicate with us, when your organisation is our business partner and we deal with you in that capacity, and if you apply to us. This includes:

- **Identity and Contact Data-**

Name, age, date of birth, gender, occupation, address, country of residence, and other information related to contact details, such as phone number, email address, and social media accounts;

- **Products and Services Data**

Information related to products and services your organisation has purchased;

- **Communications Data**

Details regarding your opinions, requests, inquiries, survey responses and the other information you provided;

- **Technical Data**

Technical data including access data, 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 this website;

- **Usage Data**

Information about how you use our website, products and services;

- **Marketing Data**

Your preferences in receiving marketing from us and the third parties engaged by us and your communication preferences; and

- **Application-related Information**

Information relating to experience, education and right to work checks if you apply to work for us.

We will not obtain or use sensitive information that reveals your data concerning health, genetic data, data concerning sexual orientation, or the like, unless provided for in laws and ordinances or you consent to us doing so.

You may be required to provide us with certain data because the provision of personal data is required by statute or contract, or is a necessary to enter into a contract with us. In this case, if you do not provide your personal data, we may not be able to provide you with our service.

## 4. How We Collect Your Personal Data

We may obtain the personal data described above both directly from you and through third parties, such as contractors, business partners, and social media providers (including Facebook and Google). More specifically, we collect and process the following personal data about you from each of these sources:

### 1. **Information you give us.**

This includes information about you that you give us through inquiry forms on our website, or by communicating with us, whether by email, letter or otherwise. The information you give us is likely to include your contact information such as your name, address, email address, phone number.

### 2. **Information third parties give us.**

This includes information about you that third parties give us through inquiry forms on our website, or by communicating with us, whether by email, letter or otherwise. If you apply to us, we may collect application-related information from third parties including referees and people we interview with. If your organisation is our business partner, we may also collect your personal information from your organisation. The information third parties give us is likely to include your contact information such as your name, address, email address, phone number.

### 3. **Information we collect automatically from you.**

When you visit our website, the website automatically collects certain types of data related to you. These types of data include access logs, web beacons (also known as pixels), cookies, etc. These types of data may remain in your computer and continue to collect data.

We also may collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this policy.

## 5. Purpose of Processing Personal Data and Legal Basis

We may only use your personal data for the purposes and legal bases set out below:

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To register business contact information	(a) Identity and Contact	Necessary for our legitimate interests (to manage our relationship with you or your organisation and keep our records updated)
To operate, develop or improve our products, services and websites.	(a) Identity and Contact (b) Products and Services (c) Communications (d) Technical (e) Usage (f) Marketing	Necessary for our legitimate interests (to fulfil our contract with a business partner; to operate, develop or improve our products, services and websites to meet the needs of our business partners)
To process and deliver your organisation's order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity and Contact (b) Products and Services (c) Communications (d) Marketing	Necessary for our legitimate interests (to fulfil our contract with a business partner; to develop our relationship with the business partner; and to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity and Contact (b) Products and Services (c) Communications (d) Marketing	(a) Necessary to comply with a legal obligation (such as data protection laws, tax laws and similar obligations) (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity and Contact (b) Products and Services (c) Usage (d) Communications (e) Marketing	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity and Contact (b) Technical (d) Usage	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation (such as data protection and similar obligations)
To deliver relevant website content and advertisements to you and measure or understand the	(a) Identity and Contact (b) Products and Services (c) Communications (d) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to

effectiveness of the advertising we serve to you	(e) Usage (f) Marketing	grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity and Contact (b) Products and Services (c) Communications (d) Technical (e) Usage (f) Marketing	Necessary for our legitimate interests (to develop our products/services and grow our business)
To provide employment information to applicants and communication with them about selection procedures, either directly or through their universities or employment agencies	(a) Identity and Contact (b) Communications (c) Application-related Information	Necessary for our legitimate interests (to ensure we recruit possible candidates.)
To consider whether or not to hire the applicants and to manage applicants who have been offered employment, and to perform other procedures related to applicants for employment	(a) Identity and Contact (b) Communications (c) Application-related Information	Necessary for our legitimate interests (to ensure we recruit possible candidates.)
To prevent and respond to fraud, violation of relevant policies and rules, threats, and damage	(a) Identity and Contact, (b) Products and Services, (c) Technical (d) Usage	Necessary for our legitimate interests (to prevent fraud and protect our business interests and rights, or that of individuals and the public.)

## 6. Disclosure of Personal Data to Recipient

Personal data will primarily be processed by employees in our website team, business departments, IT and finance departments and our HR team if you apply to us.

We may disclose your personal data to the recipients described as follows.

1. **Group Companies** (affiliates and related entities of SEI listed in, but not limited to, the following [link](#)). We share your personal data with our Group Companies globally for internal administrative purposes and for uses that are consistent with this policy. Particularly, we share your contact information such as addresses, names, your company names, phone numbers, email addresses, or comments on the inquiry form with our Group Companies. Those Group Companies will use the personal data to (i) provide products or services that you requested the company to deliver to you, (ii) improve our products or service, (iii) promote our products or services, marketing

events and campaigns, or conduct marketing surveys and analysis, and (iv) develop new products or services. SEI is responsible for management of the personal data shared with the Group Companies.

2. **Service Providers.** We may share your personal data with service providers, such as internet service providers, web analytics service providers, cloud service providers, software vendors, sales statistic analytics service providers, recruitment or employment agencies, professional advisors, or consultants.
3. **Others.** We may share your personal data with potential partners of merger and acquisition, or legal or regulatory authorities.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Please see the relevant personal data categories below:

<b>Recipient</b>	<b>Category</b>
Group Companies	(a) Identity and Contact (b) Products and Services (c) Communications (d) Technical (e) Usage (f) Marketing (g) Application-related Information
Service Providers	(a) Identity and Contact (b) Communications (c) Technical (d) Usage (e) Marketing
Others (potential partners of merger and acquisition, or legal or regulatory authorities)	(a) Identity and Contact (b) Products and Services (c) Communications (d) Technical (e) Usage (f) Marketing (g) Application-related Information

## **7. Cross-Border Transfers**

Due to the global nature of our business, your personal data will be disclosed to Group Companies outside of the EEA and the UK including, in particular, to Japan as a Japanese headquartered company. The European Commission and UK government have determined that Japan offers an adequate level of protection – you can find out more in the adequacy decision(s) [here](#) and [here](#). We rely on these decisions for EEA-Japan and UK-Japan transfers.

We also transfer your personal data to some third parties which host or access personal data outside of the EEA and UK. Where these locations do not provide an adequate level of data protection, we ensure appropriate safeguards are in place to protect the transfer of your personal

data to these countries. Some of these countries are subject to a European Commission adequacy decision. For other countries, we have put in place European Commission-approved standard contractual clauses within group companies or with the relevant third party to protect this personal data. We also rely on other permitted data transfer mechanisms such as relying on the relevant third-party corporate rules (approved by EU data protection authorities and put in place to protect your personal data).

A copy of the relevant mechanism can be obtained for your review on request by using the contact details below.

## 8. Storage Limit for Personal Data

Unless indicated otherwise, we will retain the personal data that we collect about you for the period necessary to process such personal data. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve these purposes through other means, and the applicable legal requirement.

Generally, we will keep data for a period of [6] years from the point at which it is no longer required, unless there are relevant legal proceedings for which the data is reasonably required. After this period, we will take steps to delete your personal data or hold it in a form that no longer identifies you.

## 9. Your Rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

1. the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
2. the right to request that we rectify your personal data if it is inaccurate or incomplete;
3. the right to request that we delete your personal data;
4. the right to obtain the personal data you provide in a structured, machine-readable format
5. the right to object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement);
6. the right to object to us about our processing of your personal data;
7. the right to withdraw your consent to our processing of your personal data. (This right only exists where we are relying on consent to process your personal data. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.)

You can exercise your rights by contacting us at the contact details set out in the [“Contact us”](#) section. Also, please note that you may need to submit additional information to us to verify your identity before we process your request.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.

In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

If you have unresolved concerns, you have the right to complain to a data protection authority in the country where you live, work, or where you believe a breach has occurred.

## **10. Changes to this Privacy Policy**

We may modify this policy from time to time and will post the updated policy with a “Last Updated” effective date for the revisions. We recommend that you review this policy periodically. We will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

## **11. Contact us**

Your information is controlled by SEI and Group Companies. The list of relevant data controllers and their contact details can be found in a table below.

If you have questions about this privacy notice or wish to contact us for any reason in relation to our personal data processing, please contact us at the contact details below.



Data Controller	Contact Details
<p>If you (a) apply to, (b) provide your services to, or purchase products and services from, (c) visit the web site of, the following companies or their subsidiaries/branches, that company will be the data controller of your personal data.</p>	
<p><b>Automotive Products</b></p>	
<p><a href="#">SEI Automotive Europe GmbH</a></p>	<p>Gustav-Stresemann-Ring 1, 65189 Wiesbaden, Germany            Phone: +49 (0) 611-1677-1800            Data Protection Officer:            Hans Schloemer            Email: <a href="mailto:dataprotection@sei-ae.com">dataprotection@sei-ae.com</a></p>
<p><a href="#">SEWS-Cabind SpA</a></p>	<p>Corso Pastrengo 40, 10093 Collegno (TO), Italy            Phone: +(39)-011-4010611</p>
<p><a href="#">Sumitomo Electric Bordnetze SE</a></p>	<p>Brandgehaege 11 38444 Wolfsburg-Hattorf, Germany            Phone: +(49)-5308-400-400            Data Protection Officer:            Felix Barth            Email: <a href="mailto:datenschutzbeauftragter@sebn.com">datenschutzbeauftragter@sebn.com</a></p>
<p><a href="#">Sumitomo Electric Wiring Systems (Europe) Ltd.</a></p>	<p>Prospect House, Cemetery Road, Silverdale Newcastle-under-Lyme Staffordshire ST5 6PA, U.K.            Phone: +(44)-1782-664700</p>
<p><b>Industrial Material</b></p>	
<p><a href="#">Sumitomo Electric Hardmetal Ltd.</a></p>	<p>3 Paper Mill Drive, Redditch, Worcestershire, B98 8QJ, U.K.            Phone +(44)-18-4434-2081</p>
<p><a href="#">Sumitomo Electric Hartmetall GmbH</a></p>	<p>Konrad-Zuse-Str. 9, 47877 Willich, Germany            Phone: +(49)-2154-4992-0            Data Protection Officer:            Hans Schloemer            Email: <a href="mailto:dataprotection@sei-ae.com">dataprotection@sei-ae.com</a></p>

<a href="#">Sumitomo Electric Hartmetallfabrik GmbH</a>	<p>Industriestrasse 2, 73466 Lauchheim, Germany</p> <p>Phone: +49 (7363) 87-86</p> <p>Data Protection Officer: GS Management Systeme</p> <p>Email: <a href="mailto:gerald.saur@gsmanagement.de">gerald.saur@gsmanagement.de</a></p>
<a href="#">Sinterwerke Herne GmbH</a>	<p>Forellstraße 100, 44629 Herne, Germany</p> <p>Phone: +49 (0) 2323 201-0</p> <p>Data Protection Officer: Brands Consulting</p> <p>Email: <a href="mailto:info@sinterwerke.com">info@sinterwerke.com</a></p>
<a href="#">Sinterwerke Grenchen AG</a>	<p>Neckarsulmstrasse 20, 2540 Grenchen, Switzerland</p> <p>Phone: +41 (0) 32 655 6868</p> <p>Data Protection Officer: Brands Consulting</p> <p>Email: <a href="mailto:info@sinterwerke.com">info@sinterwerke.com</a></p>
<a href="#">Sumitomo Electric Sintered Components (Germany) GmbH</a>	<p>Dischinger Str. 1, 02763 Mittelherwigsdorf, Germany</p> <p>Phone: +(49)-3583-51840</p>
<b>Electronic Products</b>	
<a href="#">Sumitomo Electric Europe Ltd.</a>	<p>Unit 220, Centennial Park, Elstree, Hertfordshire, WD6 3SL, U.K.</p> <p>Phone: +(44)-208-953-8118</p>
<a href="#">Sumitomo Electric Schrumpf-Produkte GmbH</a>	<p>Oststrasse 89, 22844 Norderstedt, Germany</p> <p>Phone: +(49)-40-5265010</p> <p>Data Protection Officer: Hans Schloemer</p> <p>Email: <a href="mailto:dataprotection@sei-ae.com">dataprotection@sei-ae.com</a></p>
<a href="#">SEI Identification Solutions Ltd.</a>	<p>Pysons Road Industrial Estate, Broadstairs, Kent CT10 2LQ, U.K.</p> <p>Phone: +(44)-1792-487-290</p>

<a href="#">SEI Interconnect Products (Europe) Ltd.</a>	Axis 10 Axis Court, Mallard Way Swansea SA7 0AJ, U.K. Phone: +(44)-1792-487-290
<a href="#">SEI Interconnect Products (Hungary) Kft.</a>	5142, Alattyán, Jászapáti út 1, Hungary Phone: +(36)-57-561-200
<a href="#">Heinrich Thulesius GmbH &amp; Co. KG</a>	Zum Panrepel 15, 28307 Bremen, Germany Phone: +49 (0) 421 / 4895-0
<b>Finance and Legal Services</b>	
<a href="#">Sumitomo Electric Finance U.K. Ltd.</a>	Octagon Point, St Paul's, 5 Cheapside, London, EC2V 6AA Phone: +(44)-20-7073-7800
<b>For all other processing in the context of SEI's products and services:</b>	
Sumitomo Electric Industries, Ltd.	4-5-33, Kitahama, Chuo-ku, Osaka, Japan Inquiry Form: please click <a href="#">here</a> .

Effective date: 14 April 2023

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