

GENERAL CUSTOMER DATA PRIVACY NOTICE
OF IBIDEN EUROPE B.V.

IBIDEN Europe B.V. (“**IBIDEN**” or “**We**”) is processing personal data as part of performing its business activities. Such data processing activities are likely to take place when establishing and maintaining relationships with business partners, maintaining the contact with its current and potential business partners via electronic means, engaging new customers, conducting marketing activities relating to the manufacturing and sale of its products to customers, and ensuring the security of its office facilities and industrial sites.

The subject of such data processing is primarily the employees of the business partners of IBIDEN, but occasionally IBIDEN employees and other third parties can also be affected.

The aim of this general customer privacy notice (the “**Customer Privacy Notice**”) is to provide you, as the subject of the data processing (“**You**”) with information about processing of Your personal data and about Your data privacy rights in connection with such processing activities in accordance with regulation (EU) 2016/679 of the European Parliament and of the Council (the “**GDPR**”) and with the data privacy laws applicable in the relevant jurisdiction (the “**Local Data Privacy Laws**”).

1 The structure of the Customer Privacy Notice

IBIDEN conducts data processing activities for various purposes, each of them having different characteristics. While other parts of this the Customer Privacy Notice contains general information, which are applicable in connection with all the special data processing activities, the specific information (purpose of the data processing activity, legal ground of processing, scope of processed personal data, retention time, etc.) relating to each data processing activity is included in Section 3 of this Customer Privacy Notice.

The scope and the characteristics of the data processing activities can be subject to change from time to time. The affected branch of IBIDEN processing your personal data (as indicated at Section 3 below) will make every effort to notify You about such changes, but for updated information please always refer to the latest version of this Customer Privacy Notice published on the [<https://www.ibiden.com/company/globalization-europe/europe/>] website.

2 Data controller and its branch offices

2.1 This section contains the name, firm data and contact information of the data controller and its branch offices where the data processing activities are taking place.

| Data controller | |
|----------------------------------|---|
| IBIDEN Europe B.V. (“NL”) | Address: Polarisavenue 85f, 2132 JH, Hoofddorp, the Netherlands |

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|---|--|--------------------------------|
| | Telephone: +31 23 554 3180 | E-mail: ieu_privacy@ibiden.com |
| Branch offices of IBIDEN Europe B.V. | | |
| IBIDEN EUROPE Stuttgart Branch (“STR”) | Address: Loeffelstrasse 44, 70597 Stuttgart, Germany | |
| | Telephone: +49-711-469186-0 | E-mail: ieu_privacy@ibiden.com |
| IBIDEN EUROPE Paris Branch (“PAR”) | Address: 55, rue Aristide Briand 92300 Levallois-Perret, France | |
| | Telephone: +33-1-4737-4011 | E-mail: ieu_privacy@ibiden.com |
| IBIDEN EUROPE Turin Branch (“TRN”) | Address: Via San Francesco d'Assisi 22, 10121 Torino, Italy | |
| | Telephone: +39 011 0266 590 | E-mail: ieu_privacy@ibiden.com |
| IBIDEN EUROPE London Branch (“LON”) | Address: 6F, First Central 200, '2 Lakeside Drive, Park Royal, London NW10 7FQ, UK | |
| | Telephone: +44-2039781420 | E-mail: ieu_privacy@ibiden.com |

3 Details of specific data processing activities

| Description of the purpose of the data processing activity | Affected IBIDEN entity | Types of processed personal data | Source of the personal data | Categories of data subjects | Legal basis of the data processing | Retention period |
|---|------------------------|--|-----------------------------|--|---|---|
| Use of sales and accounting software IBIDEN uses such software in order to maintain the company’s operation and to enable prudent invoicing practice. | NL, STR, PAR, TRN, LON | Name, phone number, e-mail address, company address. | Data subjects. | Contact personnel of business partners | <ul style="list-style-type: none"> • GDPR Article 6(1)(c): Processing is necessary for the performance of a legal obligation to which the controller is subject. • GDPR Article 6(1)(f): Processing is necessary for the purposes of legitimate interests pursued by IBIDEN. <i>IBIDEN’s legitimate interest is to maintain clear</i> | Until the business relationship exists. |

| Description of the purpose of the data processing activity | Affected IBIDEN entity | Types of processed personal data | Source of the personal data | Categories of data subjects | Legal basis of the data processing | Retention period |
|--|------------------------|--|---|--|---|---|
| | | | | | <i>and controlled invoicing activity.</i> | |
| <p>Application for business entertainment</p> <p>As a general principle, IBIDEN does not provide business entertainment. In exceptional occasions, the business entertainment is always provided on a strictly legal and transparent manner. Personal data of participant is processed during the prior written approval of the business entertainment.</p> | NL, STR, PAR, TRN, LON | Name, location | Employees of IBIDEN in business contact with the data subjects. | Certain employees of business partners. | <ul style="list-style-type: none"> • GDPR Article 6(1)(c): Processing is necessary for the performance of a legal obligation to which the controller is subject. • GDPR Article 6(1)(f): Processing is necessary for the purposes of legitimate interests pursued by IBIDEN. <p><i>IBIDEN's legitimate interest is to (i) ensure that IBIDEN's monetary assets are used in an appropriate way, (ii) to make sure that the company's anti-corruption and anti-trust rules are properly kept.</i></p> | According to the applicable law the relevant branch: NL: 7 years STR: 10 years PAR: 6 years TRN: 10 years LON: 6 years (from the date of application) |
| <p>Customer data</p> <p>IBIDEN retains contact details of business partner's personnel in order to conduct daily business correspondence.</p> | NL, STR, PAR, TRN, LON | Name, position, department, e-mail address, phone number, company name | Data subjects. | Employees of business partners. | <ul style="list-style-type: none"> • GDPR Article 6(1)(c): Processing is necessary for the performance of a legal obligation to which the controller is subject. • GDPR Article 6(1)(f): Processing is necessary for the purposes of legitimate interests pursued by IBIDEN. <p><i>IBIDEN's legitimate interest is to maintain the operation of the company.</i></p> | Until the business relationship exists. |
| <p>Christmas card list</p> | STR | Name, title, e-mail, company address | Employees of IBIDEN in business | Employees of business partners in business | GDPR Article 6(1)(f): Processing is necessary for the purposes of legitimate | Until the business relationship exists. |

| Description of the purpose of the data processing activity | Affected IBIDEN entity | Types of processed personal data | Source of the personal data | Categories of data subjects | Legal basis of the data processing | Retention period |
|--|------------------------|----------------------------------|---------------------------------|-------------------------------------|---|------------------|
| It is a common custom to send Christmas card to business partners each year. | | | contact with the data subjects. | relationship with IBIDEN employees. | interests pursued by IBIDEN. <i>IBIDEN's legitimate interest is to maintain cordial business relationship by keeping this business tradition.</i> | |

IBIDEN does not transfer personal data for carrying out the above-described data processing activities.

4 Data privacy rights

With any comment, question, complaint and any other request in connection with the processing of Your personal data we encourage You to contact directly IBIDEN or the IBIDEN Group DPO, who shall provide You with a response without undue delay, but no later within one month from the receipt of Your request. This reply deadline may be extended by two further months where necessary, taking into account the complexity and number of requests. If the need for such extension would occur, than IBIDEN shall inform You within the original deadline, together with the reasons for the extension.

For contact information, please see section 2 of this Employee Privacy Notice.

You have certain rights in connection with the processing of Your personal data (data privacy rights), which might differ regarding each data processing activities. Below You will find a short description of Your possible data privacy rights you are entitled to exercise subject to the conditions set in the GDPR and/or Local Data Privacy Laws. Please note, that the GDPR and in some cases the Local Data Privacy Laws might set further conditions and/or limitations in connection with the exercising these rights. Therefore, we advise You to closely study this Employee Privacy Notice and its annexes, the GDPR and the applicable Local Data Privacy Laws before filing a request.

(a) **Withdrawal of consent** (subsection (3) of Article 7 of the GDPR)

You have the right to withdraw your consent granted for a specific data processing activity any time. Please note, that the withdrawal of Your consent does not affect the lawfulness of processing based on consent before its withdrawal.

(b) **Access** (Article 15 of the GDPR) (Article 15 of the GDPR)

You have the right to request confirmation from the data controller as to whether or not personal data concerning You are being processed, and where that is the case, access to the personal data and certain information determined in Article 15 of the GDPR.

(c) **Rectification** (Article 16 of the GDPR)

You have the right to request the controller to rectify any inaccurate personal data concerning You without any undue delay. Taking into account the purposes of the processing, You have the right to have the incomplete personal data completed, including by means of providing a supplementary statement.

(d) **Right to erasure** (“right to be forgotten”) (Article 17 of the GDPR)

You have the right to request the erasure of Your personal data if any of the grounds in of Article 17(1) of the GDPR apply. If the exceptions in Article 17(3) of the GDPR do not apply and/or IBIDEN does not have any legal ground to further process Your personal data, than it shall execute the request for deletion with undue delay.

(e) **Restriction of processing** (Article 18 of the GDPR)

You have the right to request the restriction of processing where the grounds determined in Article 18 of the GDPR apply.

(f) **Data portability** (Article 20 of the GDPR)

You have the right to receive your personal data provided to IBIDEN, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from IBIDEN, if the processing is based on consent [point (a) of Article 6(1) or point (a) of Article 9(2)] or is conducted for the performance of the contract [point (b) of Article 6(1)], and the processing is carried out by automated means. In exercising your right to data portability, You have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

(g) **Objection** (Article 21 of the GDPR)

If the data processing is based on the legitimate interest of IBIDEN: You have the right at any time to object (on grounds relating to your particular situation) against processing of Your personal data based on legitimate interest, including also profiling. IBIDEN shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing, which override Your interests, rights and freedoms or if the data processing is necessary for the establishment, exercise or defence of legal claims.

If the purpose of the data processing is direct marketing: You have the right at any time to object (on grounds relating to your particular situation) against processing of your personal data if the purpose of the data processing is direct marketing, including also profiling if it is related to direct marketing. IBIDEN shall no longer process the personal data in case you submit such objection against processing of your personal data for direct marketing purposes.

5 Legal remedy

If You deem, that Your personal data is processed unlawfully and/or any of Your data privacy rights have been violated You are entitled for the following legal remedies:

- (a) You have the right to contact IBIDEN, as the data controller and/or the IBIDEN Group DPO via the contact details in section 2 of this Employee Privacy Notice.
- (b) (You have the right to turn directly to the national supervisory authority with Your complaint having jurisdiction in the case directly. Please see below the contact information of the national supervisory authorities.

| Country | Authority | Contact |
|-----------------|--|---|
| The Netherlands | Autoriteit Persoonsgegevens | address: Bezuidenhoutseweg 30, 2594 AV Den Haag, postal address: Autoriteit Persoonsgegevens, Postbus 93374, 2509 AJ DEN HAAG https://autoriteitpersoonsgegevens.nl |
| Germany | Landesbeauftragter für Datenschutz und Informationsfreiheit, Baden-Württemberg | address: Königstraße 10a, 70173, Stuttgart, Germany https://www.baden-wuerttemberg.datenschutz.de |
| France | Commission Nationale de l'Informatique et des Libertés (CNIL) | address: 3 place de Fontenoy TSA 80715, Paris cedex 07, France https://www.cnil.fr |
| Italy | Garante per la protezione dei dati personali | address: Piazza Venezia 11, 00187 Roma, Italy https://www.garanteprivacy.it/web/guest/home |
| United Kingdom | Information Commissioner's Office | address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF https://ico.org.uk |

- (c) File a claim against IBIDEN, as data controller at the court

You are entitled to file a claim at your local court having jurisdiction in the case, against IBIDEN, if you deem that Your personal data is processed unlawfully and/or any of Your data privacy rights have been violated.

6 Accountability

IBIDEN, as data controller is responsible for ensuring that all of his data processing activities are lawful and as a part of this must be able to demonstrate the legal compliance with the data protection regulations („accountability”). Accordingly, IBIDEN generally as set out in Annex no. 1 processes the documents, and the personal data therein that are required for the demonstration of the lawfulness of the personal data processing activity.

Documents needed for the demonstration of compliance are particularly the consents of data subjects (name, signature, date); in case of a consent given online the logs storing the consent; the legitimate interest tests (name, title, signature, date); data policies (name, title, signature, date); records of processing activities (name, title, signature, date); data protection impact assessments (name, title, signature, date); in-house policies (name, title, signature, date); contracts (name, title, signature, date); company documentations (content of the resolution, name, title, date); all correspondence and documents regarding compliance of the data processing activities (and the personal data therein). The personal data mentioned here might be processed for 5 (five) years from the termination of the certain data processing activity.

7 Local Data Privacy Laws

The rules of data processing are primarily determined by the GDPR, however Local Data Privacy Law maintains an important role, as it can supplement, or in some cases determine additional rules to the GDPR.

8 Version information

This Customer Privacy Notice was published on September 30th, 2019. The current text of the Customer Privacy Notice is the 1st edition.

ANNEX NO 1.

***SPECIAL PRIVACY NOTICE REGARDING PERSONAL DATA PROCESSED
IN CONNECTION WITH ACCOUNTABILITY***

| GENERAL CHARACTERISTICS OF THE PROCESSING ACTIVITY | |
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| Title of data processing: | Personal data processed in connection with accountability |
| Description of the purpose of processing: | <p>IBIDEN_HQ_LEGAL_005_Managing_Data_Privacy_Governance_(accountability)</p> <p>In accordance with paragraph (2) of Article 5 of the GDPR, the controller shall be responsible for ensuring that all his data controlling activities are lawful and as a part of this shall be able to demonstrate legal compliance („accountability”). Accordingly, the controller generally processes the documents and the personal data therein that are needed for the demonstration of the legal compliance.</p> |
| Categories of personal data processed: | <p>Documents needed for the demonstration of compliance are particularly the consents of data subjects (name, signature, date); in case of a consent given online the logs storing the consent; the legitimate interest tests (name, title, signature, date); data policies (name, title, signature, date); records of processing activities (name, title, signature, date); data protection impact assessments (name, title, signature, date); in-house policies (name, title, signature, date); contracts (name, title, signature, date); company documentations (content of the resolution, name, title, date); all correspondence and documents regarding compliance of the data processing activities (and the personal data therein). The personal data mentioned here might be processed for 5 (five) years from the termination of the certain data processing activity.</p> |
| Legal basis for the processing: | <p align="center">subparagraph f) of paragraph (1) of Article 6 of the GDPR – the legitimate interest pursued by the controller</p> <div style="border: 1px solid black; padding: 10px; margin: 10px auto; width: fit-content;"> <p align="center">Right to object <i>(against data processing based on legitimate interest)</i></p> <p>When the data processing is based on a legitimate interest, in accordance with paragraph (1) of Article 21 of the GDPR, the data subject shall have the right to object against the data processing, including profiling based on those provisions. The controller shall no longer process the personal data unless the controller</p> </div> |

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| | demonstrates compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. |
| Description of the legitimate interests: | In accordance with paragraph (2) of Article 5 of the GDPR, the controller shall be responsible for ensuring that all his data controlling activities are lawful and as a part of this shall be able to demonstrate legal compliance. In a given case, the controller might only be able to comply with the mentioned provision by retaining the documents made in connection with the compliance of the data processing activities for the limitation period of 5 (five) years as set out in 3:307 of the Dutch Civil Code. Accordingly, the controller has a legitimate interest in keeping the documents and the personal data therein. The controller prepares documents needed for the demonstration of compliance with data protection laws by only using the essential personal data, and it shall be possible to separate them from the personal data collected over the data processing activities (databases) |
| Retention time: | The documents are retained for 5 (five) years from the termination of the relevant data processing activity (purpose) |
| Data subject: | Employees, clients, representatives and contact persons of the clients, business partners, representatives and contact persons of the business partners |
| Source of personal data: | The personal data is directly provided by the data subjects to the controller, however if the personal data is available in the records of the controller, or in public registries, than the controller shall have the right to acquire the personal data from these sources. |
| Is the provision of personal data a statutory or a contractual requirement? (Statutory/ Contractual/ Not Applicable) | In case of employees, it is a statutory obligation (instruction of the employer). In case of third parties, it is a contractual obligation. |
| Is the provision of personal data a preliminary requirement for concluding the contract? (Yes/ No) | When it is a contractual obligation, than yes. |
| Is it mandatory for the data subject to provide the personal data? (Yes/ No) | Yes |

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| Possible consequences of failure to provide such data: | The instruction of the employer cannot be carried out. |
| Is profiling used in the course of the processing activities? (Yes/No) | No |
| DATA SECURITY MEASURES | |
| Description of data security measures: | Electronic data is stored on a file server with strictly limited access. Automatic daily backup protects against data loss, and data alteration. Physical documents – if any – are located in a locked cabinet with sole access of the compliance officer. |
| Persons (by positions) having access to the personal data: | Compliance officer, managing director |
| TRANSFER OF PERSONAL DATA | |
| n.a. | |
| DATA PRIVACY RIGHTS | |
| <i>(The description of certain rights and the way they might be exercised is described in the General Employee Data Privacy Notice of IBIDEN EURPE B.V. Abbreviations: “Y”=yes / “N”=no / “Cond.” =according to the conditions of the GDPR)</i> | |
| Withdrawal of consent: | N |
| Access: | Y |
| Rectification: | Y |
| Erasure: | Cond. |
| Restriction of processing: | Cond. |
| Data portability: | N |
| Objection: | Y |

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| Exemption from being a subject to a decision based solely on automated processing: | Y |
| Complaint (with the controller): | Y |
| Complaint (with the supervisory authority): | Y |
| Filing a claim (before court): | N |
| Other characteristics | |
| Other relevant information on the processing activity | - |