

Kikkoman Group Privacy Policy

Kikkoman Corporation and its Group companies (hereinafter referred to as the “Kikkoman Group”) believe that the protection of your personal information is both fundamental to our business operations and is also our social responsibility. As such we have established this privacy policy which will be communicated to all directors and employees and by which we will strive to protect your personal information.

※Here the definition of Group companies is related companies within Japan as well as directly-owned unconsolidated companies within Japan. However, the Kikkoman General Hospital has established separate privacy policies.

1. Internal Management

Within the Kikkoman Group, personal information of customers, clients, shareholders, and applicants for employment (hereinafter collectively referred to as the “Customer”) is protected and managed appropriately under the direction of a manager who is appointed for each department.

2. Purpose of Use of Personal Information

Personal information received from the Customer will be used for the following purposes. Furthermore, for personal information acquired directly in writing (including via web sites and e-mail) from the Customer, except where statutory exceptions apply, in each instance the Customer will be clearly informed beforehand regarding the purpose of use.

The Kikkoman Group uses personal information provided by the Customer for the following purposes of use or within the scope of purpose of use informed at the time of provision. If usage beyond the scope of the informed purpose of use becomes necessary, we will only use personal information after contacting the Customer regarding this usage and obtaining consent to use.

(1) Personal information acquired through inquiries, campaigns, events or use of Kikkoman Group facilities

- to handle inquiries
- to inform of lottery for campaigns, sweepstakes, etc., and to send prizes to winners
- to provide information on contests, events, exhibitions, etc., and for the carrying out of related operations
- to respond during facility usage and provide information regarding usage

(2) Personal information acquired through the online shopping website

- for required confirmation and contact to ship purchased products and/or services as well and provide products and/or services
- for payment procedures related to sold products, provided services or both
- to send out or mail advertisements including the email magazine, and information on products, services and events
- to propose and provide recommended product and event information and ad serving based on the analysis of and relevant analytical results of purchase history, activity history, browsing history, location information, device advertising ID, survey responses, as well as for use in the development and provision of services and for marketing purposes
- for the customization and optimization of our online shopping website in accordance to the provided information, registered content and usage status

(3) Personal information acquired through user registration, following and email subscription on our official website, apps and official SNS accounts

- for the registration, confirmation and other relevant services for members and followers of Kikkoman Group official websites, apps, official SNS accounts as well as registered users of the email subscription service
- to send out or mail advertisements including the email magazine, and information on products, services and events
- to propose and provide recommended product and event information and ad serving based on the analysis of and relevant analytical results of activity history, browsing history, location information, device advertising ID, survey responses, as well as for use in the development and provision of services and for marketing purposes
- for the customization and optimization of our Kikkoman Group official websites, apps, official SNS accounts in accordance to the provided information, registered content and usage status

(4) Personal information of business partners (including potential business partners; hereinafter the same) in business operations

- for contacting, responding, managing and following-up in relation to business operations

(5) Personal information related to shareholders

- to manage and inform shareholders as stipulated in the Companies Act
- to inform of services provided for shareholders and events

(6) Personal information of job applicants

- to provide information about recruitment to applicants for employment, for employment selection and survey questionnaires about our recruiting activities

(7) Other

- for statistical data in the form of non-personally identifiable information to improve on product development and marketing activities carried out by the Kikkoman Group

※ During the course of business operations, we may acquire and handle some Specific Personal Information (i.e. “My Number” and personal information containing “My Number”) related to business partners and stakeholders. Regardless of whether or not consent of the Customer is obtained, Specific Personal Information will be limited to the usage purposes outlined below as permitted by the “Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures” (hereinafter referred to as the “Numbers Use Act”) and managed in accordance to the “Numbers Use Act”.

- for preparation and submission of withholding tax slips, as well as any other matters related to tax withholding slips
- for matters related to the preparation and/or submission of payment records for remuneration, fees, contract money or prize money
- for matters related to the preparation and/or submission of payment records concerning shares
- for matters related to the preparation and/or submission of payment records of real estate usage fees, considerations for acquisition of real estate, etc.
- for matters related to each of the aforementioned

3. Shared Use

The Kikkoman Group may share use of personal information provided by the Customer as outlined below. However, the shared use of Customer personal information shall not exceed the required scope to achieve the purpose of shared use, is to be limited to the required scope of group companies, and the shared use of Customer personal information will not necessarily include every group company.

Scope of Shared Use

Within the Kikkoman Group

Items of Personal Information for Shared Use

information attributed to the Customer, including address, name, telephone number, age, gender, email address, as well as the content of opinions, requests, registrations, inquiries, browsing history, activity history, purchase history and device advertising ID

Purpose of Use of Shared Use

- ① for smooth response to Customer opinions, requests and inquiries
- ② for the provision of product, event and other information as well as ad serving in line with information, registration content and usage status provided by the Customer
- ③ for the purpose of customization and optimization of our online shopping sites and official websites,

apps, official SNS accounts in line with information, registration content and usage status provided by the Customer

④ for the purpose of business contact, after sales follow-up and service offers from business partners

Responsible Party for Management

Kikkoman Corporation

250 Noda, Noda-shi, Chiba 278-8601, Japan

Shozaburo Nakano (President and COO)

4. Management & Protection of Personal Information

For the handling of personal information, appropriate management will be carried out to prevent risk of unauthorized access, loss, destruction, damage, tampering or leaking by a third party, and an appropriate and reasonable level of security measures will be put in place. In the case of such an incident, prompt action will be taken to correct for the occurrence. Safe Management Measures are outlined in detail below:

(Formulate a basic policy)

- ensure appropriate handling of personal information, formulate a basic policy for handling any questions, etc.

(Maintain discipline for the handling of personal information)

- for every step of handling, including acquirement, usage, provision, deletion and destruction, formulate rules for the protection of personal information which establish the personnel in charge and these duties

(Organizational safe management measures)

- appoint a person to be in charge of personal information handling (a Personal Information Protection Manager (PIM))
- clarify which employees handle personal information and the scope of personal information handled by relevant employees
- maintain a system for reporting to the Personal Information Protection Manager for cases where it becomes known as fact, or there are signs of, violation of the law or the rules of personal information protection

(Personal safe management measures)

- carry out periodical training for employees regarding issues to consider when handling personal information
- include a clause on confidentiality in regards to personal information in the Rules of Employment

(Physical safe management measures)

- in addition to putting in place measures to prevent the theft or loss of equipment for handling personal information, including electronic media and documents, implement measures to prevent personal information from being easily identified when relevant equipment and electronic media, are carried, including movement within the office

(Technical safe management measures)

- implement access control, limit the scope of employees and databases that will handle personal information
- implement a security plan to protect systems handling personal information from external unauthorized access and unauthorized software

(Understanding of the external environment)

- for cases where personal information is stored outside of Japan, implement safe management measures after gaining understanding of systems for the protection of personal information in each relevant country

5. Provision of Personal Information to a Third Party

Without consent of the Customer, the Kikkoman Group will not disclose or provide personal information of the Customer to third parties other than service providers. However, this does not apply in cases where there is a legitimate reason, such as when disclosure is required by law.

※ Regardless of whether or not consent of the Customer is obtained, Specific Personal Information will not be provided to third parties with the exception of service providers, and cases based on Article 19 of the Numbers Use Act, and other laws and regulations, where disclosure may be necessary or appropriate.

6. Management of Service Providers

As mentioned in the above clause, upon disclosure of the Customer personal information to service providers, the Kikkoman Group will enter into a confidentiality agreement, as well as provide guidance and supervision to ensure appropriate handling and protection of the said personal information.

7. Disclosure, Revision and Suspension of Use of Personal Information

In the case where the Customer wishes to disclose, revise (including adding to or deleting), suspend use (including deletion and suspension of provision to a third party) of one's own personal information in the possession of the Kikkoman Group, please contact us through **【CONTACT US】** referred to in the "9. Inquiries". After confirming the Customer identity, your request will be met with prompt compliance to a reasonable extent.

8. Continuous Improvement of the Personal Information Protection System

In order to adequately maintain the protection of personal information, the Kikkoman Group will carry out continuous improvements by formulating and applying rules outlined in this privacy policy and regularly monitoring its content.

Revised as of April 1, 2022