

# Privacy Policy

## Basic Policy

Japan Transport Engineering Company ("the Company") shall comply with all laws and internal regulations pertaining to the protection of personal information (defined as information pertaining to living people wherein any name, date of birth or other datum may be used to identify any individual). The Company shall protect personal privacy by obtaining and using personal information appropriately, maintaining such information safe and up-to-date, and disposing of it by appropriate methods.

## Company-wide Privacy Protection Activities

- (1) The Company shall comply with privacy protection laws.
- (2) The Company shall establish and comply with privacy protection regulations.
- (3) The Company shall periodically ascertain whether or not personal information is being handled appropriately, and act to remedy any problems should they be discovered.
- (4) The Company shall request cooperation from all companies in the JR East Group, and business partners-corporate and otherwise- in achieving the objectives of the internal regulations.
- (5) The Company's privacy policy shall be made available to the public at all times, such as by posting it on the Company's website.

## Handling Personal Information

The Company shall handle personal information as outlined below except where law permits otherwise.

### (1) Internal Systems

The Company shall assign administrators for each item of personal information, and shall manage all such information appropriately.

### (2) Obtaining Personal Information

The Company shall specify the purpose of use for and obtain personal information by appropriate means.

**(3) Use of Personal Information**

In using personal information, the Company fully acknowledges the importance of privacy protection, and shall only use personal information for the stated purposes.

**(4) Management**

The Company shall implement all necessary safety measures in managing personal information.

**(5) Personal Rights**

The Company shall acknowledge and respect the rights of those whose personal information the Company possesses. If any such person requests that their personal information be disclosed or revised, or that the Company cease use of such information, the Company shall do so within a reasonable period and within the scope of law.

**(6) Improvements**

The Company shall continually endeavour to improve its protection of personal privacy.

March 2021

Japan Transport Engineering Company

# Details of How We Process Your Personal Data

## 1. Personal data we collect

If you are located outside Japan, we collect the following personal data for the purposes of business operations and service provision.

### (1) Collection of business contact information

(A) Personal data related to exchanged business cards

- We collect your name, telephone number, e-mail address, company name, and address as the business contact information.

### (2) Recruitment

(A) Personal data of potential employees

- We collect your name, contact details, employment history, skills such as languages, etc. and any necessary information for recruitment as recruitment information.

### (3) Personal data we automatically collect when you use our online (website) services

(A) Personal data related to the use of our web site

- We collect IP address as the access information.

If you do not provide personal data that are necessary for each operation and service, the business and service may not be able to be provided.

## 2. The purpose of processing of the collected personal data

We process the collected personal data for the following purposes.

### (1) Collection of business contact information

(A) For providing information on rolling stock car and other information related to our business activities

(B) For the conclusion and performance of a contract with business partners, and the management of a contract

## **(2) Recruitment**

- (A) For recruitment activities and providing information related recruitment
- (B) For the employee management (including loan and transfer)
- (C) For the procedures and contact, etc. necessary for legal requirements
- (D) For the procedures and contact, etc. necessary for business operations

## **(3) Personal data we automatically collect when you use our online (website) services**

- (A) For ensuring security of our customers and employees
- (B) For the consideration and development of software, systems, equipment, devices etc. for ensure security

## **3. The lawful basis for processing of personal data**

We process personal data only when we obtain your consent or the processing is permitted by the Japanese law.

If you are located in European Union member states, Iceland, Liechtenstein, and Norway (Hereinafter defined as "EU"), we process your personal data only if we obtain your consent or at least one of the following conditions applies.

- (A) When the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract
- (B) When the processing is necessary for compliance with a legal obligation to which we are subject (e.g. when following the information disclosure orders from government/court based upon laws and regulation announced by government agencies/courts)
- (C) When the processing is necessary in order to protect the vital interests of yours or of another individual
- (D) When it is considered appropriate to investigate, prevent, or take measures against illegal or suspicious acts
- (E) When the processing is necessary for the purpose of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your privacy related rights, interests, and freedom. The legitimate interests pursued by us or a third party are as follows:
  - Customer satisfaction improvement;
  - Service improvement;
  - Direct marketing;
  - Illegal act prevention;

- Regular communication with business partners and others; and
- Protection of assets (security) of our customers and our company

#### **4. Places where we store personal data**

We store the data on a server located in Japan. Although Japan has not received the adequacy decision from the European Commission regarding personal data protection, we will protect your personal data by taking appropriate measures in accordance with the relevant regulations.

#### **5. Retention period, deletion and disposal of personal data**

After the purpose of processing is accomplished, personal data collected from you will be properly deleted, disposed, or anonymized in the ways that the individuals can not be identified, in accordance with the rules of personal data processing we specified.

#### **6. Your rights**

If you are located in the EU, you have the following rights regarding the processing of personal data.

- (A) Right to access to your personal data and related information
- (B) Right to rectification of your inaccurate personal data without undue delay
- (C) Right to erasure of your inaccurate personal data without undue delay
- (D) Right to restriction of processing your personal data
- (E) Right to data portability
- (F) Right to object
- (G) Right to withdraw your consent at any time regarding the processing of personal data based on your consent (The withdrawal does not affect the lawfulness of processing of personal data based on consent before its withdrawal)

#### **7. When you wish to exercise your rights**

If you are located in the EU and wish to exercise your rights described above, you can contact us via the following e-mail address. The personal data provided us during your request will be used only for the purposes of contact with you and taking actions upon your request.

If you are located in the EU and dissatisfied with the processing of personal data by our company, you can lodge a complaint to a supervisory authority, in particular in the EU of your habitual residence, place of work, or place where infringement occurs.

## **8. Inquiry desk**

### **Inquiry desk for Personal Data, Japan Transport Engineering Company**

3-1 Okawa,Kanazawa-ku, Yokohama, Kanagawa,236-0043, Japan

E-mail address: [i-desk@j-trec.co.jp](mailto:i-desk@j-trec.co.jp)

## **9. Revision**

We may revise all or part of this "Details of How We Process Your Personal Data" without prior notice. In making revisions which we consider important, we will notify you in advance through our web site.