

## Privacy Policy

STARZEN EUROPE ApS (hereinafter the “**Company**” or “**we**”), in connection with the provision of our service (the “**Service**”) to customers (including their contact persons, hereinafter the “**Customers**”), shall comply with the EU General Data Protection Regulation (the “**GDPR**”), the GDPR guidelines, the applicable national laws, guidelines, etc. (“**applicable laws**”), and therefore hereby establishes this Privacy Policy in order to appropriately process the personal data of Customers

The Company is the controller and responsible for your Personal Data.

### 1. PROCESSING PERSONAL DATA

#### (1) Definitions

“**Personal Data**” means any data relating to an identified or identifiable natural person, including, without limitation, Customers’ names, addresses, dates of birth, telephone numbers, e-mail addresses.

“**Processing**” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

#### (2) Types of Personal Data to be acquired

The types of Personal Data that may be acquired by the Company are as follows:

- Customers’ name;
- company address;
- company e-mail address;
- company phone number; and
- cell phone number provided.

The Company does not collect any special categories of Personal Data about the Customers (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor does the Company collect any information about criminal convictions and offences.

The Personal Data that Customers are to provide is necessary in order for the Company to provide the Service to the Customers, and there may be cases in which Customers who have not provided such data will be unable to use the Service.

#### (3) Purposes of use of Personal Data

The Personal Data collected by the Company will be used for business communication with the Customers to manage our relationship with the Customers and to provide the Service to the Customers. In the case of processing the Customers' Personal Data for purposes other than the above, the Company will notify Customers in advance of such new purposes of use and other matters as required by applicable laws.

The Company will use the Customers' Personal Data in the following circumstances where it is necessary:

- to perform the contract we are about to enter into or have entered into with a Customer;
- for our legitimate interests (or those of a third party) and the Customers' interests and fundamental rights do not override those interests. The legitimate interests pursued by the Company is to develop our relationship with the Customers; and
- to comply with a legal obligation

In addition to the above, by manifesting your intention to consent to Privacy Policy, Customers will be deemed to have consented to the processing of their Personal Data by the Company within the scope of the above purposes of use, and the Company will process the Customers' Personal Data based on such Customers' consent; provided, however, that Customers may withdraw such consent at any time. Even in that case, this will not affect any legitimate processing performed pursuant to consent before the Customers' withdrawal thereof.

The Company will not use the Customers' Personal Data for the purpose of automated-decision making.

#### (4) Retention Period

The Company will retain the Customers' Personal Data as long as the Company requires such data for achieving the purposes of use specified in 1(3) above, but will promptly delete the same in the case that such data is no longer necessary.

#### (5) Transfer

The Company may provide the Customers' Personal Data to third parties such as the parent company of the Company, subsidiaries and affiliates of the Company, cloud vendors and outside contractors of the Company, etc., to implement the purposes of use specified above. Countries located outside the European Economic Area (the "EEA", including, without limitation, Japan, the same shall apply hereafter) are among the third parties to whom the Company may disclose the Customers' Personal Data, and the Customers shall be deemed to have consented to the following matters by consenting to this Privacy Policy:

- (a) the Customers' Personal Data will be provided to third parties located outside the EEA; and
- (b) the Customers' Personal Data will be provided and processed for the purposes and on the legal basis specified in 1(3) above by third parties outside the EEA; and

In addition to the above, in the case that the Company provides the Customers' Personal Data to a third party located in a country outside the EEA, , and such country does not have the same data protection laws as the EEA, i.e., many of the rights provided to data subjects in the EEA are not given, the Company will ensure

that adequate measures are taken concerning the protection of the Customers' personal data by executing standard contract clauses based on the GDPR, etc.

#### **(6) Rights of Customers**

The Customers may request the Company access to, rectification or erasure of, and restriction of processing of their Personal Data, may object to the processing of the Customers' Personal Data, and may request data portability. The Company accepts such Customers' requests at the contact point set forth in "3. Contact" below. The Company may refuse the Customers' requests if the Company deems that there is no basis for such Customers' requests or if they are deemed excessive.

The Customers may raise objections with the data protection authorities having jurisdiction over the location of the Customers' domicile with regard to the processing of their personal data.

### **2. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

We keep our privacy policy under regular review. This version was last updated on [1st November, 2023]. Historic versions can be obtained by contacting us. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

### **3. CONTACT**

In the event of Customers having any questions or concerns regarding this Privacy Policy or the processing of Personal Data by the Company, or having any requests concerning the access to, rectification of, erasure of, or restriction of processing of personal data, or regarding data portability, they are requested to please contact the Company.

The contact information for the Company is as follows:

<STARZEN EUROPE ApS>

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