

# Privacy policy

## Fujitsu and data privacy

Fujitsu Limited, Japan, and its subsidiaries worldwide ("**Fujitsu**") are committed to protecting and respecting your privacy.

This privacy policy establishes the basis on which we will process any personal information that may be collected about you as a visitor to our website or premises or a contact at one of our customers or potential customers, suppliers or potential suppliers or other business partners or in any other cases where we specifically state that this policy applies.

This privacy policy also establishes how we protect your privacy and your rights in the context of our use of your personal information.

Fujitsu may have a privacy policy or statement specific to local regulations, products or services in which case such policy or statement shall supersede or supplement this privacy policy.

## What personal data do we collect?

We may collect and process the following personal information about you:

- **Personal information that you give us:** Information about you that you provide us with by filling in forms on our website (or other forms that we may ask you to fill in), presenting us with your business card (or similar) or contacting us by telephone, post, email or otherwise. For example, it may include your name, address, email address and telephone number; information about your business relationship with Fujitsu, and information about your professional role, background and interests.
- **Personal information that our website and other systems collect about you:**
  - If you visit our website it will automatically collect some information about you and the visit, including the Internet protocol address (IP) used to connect your device to the Internet and other information such as specific pages on our site that you visit. This is used to monitor our website's performance and improve our website visitors' experience. Our website may also download "cookies" to your device – that is described in our separate

"cookie" policy. As described further in the "cookie" policy, you may change the way we use "cookies" by changing your preferences.

- If you interact with us through social media, we may be able to access specific information about such interactions, for example if you interacted with us through a number of social networks. We make reasonable efforts to make sure that social media providers received permission from you to allow us to access certain information about you. Please note that we cannot be held responsible for the manner in which social media service providers deal with your personal information that they may collect from you (as this is their responsibility). For instance, our website may use plugins of social media networks such as Twitter, Facebook, LinkedIn and Google+. If you use one of these plugins, they are able to set up a direct connection between your browser and websites of the specific social media networks. This transfer takes place directly between your browser and the mentioned network, Fujitsu does not have any access, knowledge or control over data sent or the use of this data within the respective social media networks. If you use social media network and make your content available to these networks, it is not covered by this privacy policy. Instead, the terms of use and privacy policies of respective operators of those social media networks shall apply to such content. We encourage you to read privacy policies and terms and conditions of your social media service providers in order to understand how they handle your personal information.
- Our website may contain links to websites of third parties who are not affiliated to Fujitsu. If you access such third party websites by clicking on such links, we are not responsible for the way in which mentioned third parties process your collected personal information.
- We may make web-based platforms available to our partners and suppliers. If you use them, such platforms may collect your personal information. This privacy policy applies to such personal information collected during the registration process and/or the use of such platforms.
- If you interact through emails, telephone conversations or other electronic communications with our employees and other members of our staff, our information technology systems can record details of those conversations, sometimes including their content.
- Some of our premises have closed circuit TV systems as well as other security and access management systems which, for security and safety purposes, may record you and certain information about your visit if you visit our locations.
- **Other information:** We may also collect specific information from other sources. For example:
  - If we have an established business relationship with the organisation represented by you, your colleagues or other business contacts may give us information about you such as your contact details or details of your role in the relationship.
  - We sometimes collect information from third party data providers or publicly available sources for anti-money-laundering, export control, credit rating background checking and

similar purposes, and to protect our business and comply with our legal and regulatory obligations.

## How will we use your personal information?

We may collect, store and use your personal information for the purposes as follows:

- to operate, manage, develop and promote our business (including our products and services) and, in particular, our relationship with the organisation that you represent (if any) and other transactions that may relate, such as:
  - marketing purposes (when we have either gathered prior opt-in consent and/or have a legitimate interest to send you communications which we believe are relevant and of use to you);
  - warranty processes;
  - product compliance processes;
  - accounting and billing/payment purposes (including offering financing solutions to our customers together with our finance partners);
  - to operate, administer and improve our website, premises and other aspects in which we run our operations;
  - to offer services of our online shops based on the terms and conditions of the dedicated online shop;
  - to provide you with services or information that you may have requested;
  - to keep you informed and updated regarding relevant products or services you may be interested in;
  - to enable you to take part in our online assessments and surveys;
  - to manage and maintain the relationship with investors; and
  - to perform recruitment processes;
- to protect our business from fraud, money-laundering, breach of confidence, theft of proprietary materials and other financial or business crimes;
- to comply with our legal and regulatory obligations and bring and defend legal claims and assert legal rights; and
- if the purpose is directly connected with an assigned purpose that you have been previously informed about.

From time to time, we may review your information held in our systems – including the contents and other information related to your email and other communications with us – for compliance and business-protection purposes as it is described above. This may include reviews for the purposes of disclosure of

information relevant to litigation and/or reviews of records relevant to internal or external regulatory or criminal investigations. To the extent permitted by applicable law these reviews will be conducted in a reasonable and proportionate way and approved at an appropriate level of management. They may involve disclosure of your information to governmental agencies and litigation counterparties as described below. Your emails and other communications may also occasionally be accessed by persons other than members of staff with whom they are exchanged for ordinary business management purposes (for example, if necessary, when a staff member is out of the office or when s/he has left Fujitsu).

We will only process your personal information if it is necessary so that we can pursue the purposes described above and when we have a legal basis. Where our lawful basis for processing if such processing is necessary to pursue our legitimate interests, we will only process your personal information where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest. In exceptional circumstances we may also be required by law to disclose or process your personal information in other way.

## **Disclosure and international transfer of your personal information**

We may disclose your personal information when it is reasonably necessary for various purposes listed above:

- to other members of the Fujitsu group of companies;
- to your colleagues within the organisation that is represented by you;
- to service providers who host our web services or other IT systems or store / process your information on our behalf, under conditions of confidentiality and security required by law;
- business partners, channel partners, service partner, agents, suppliers and sub-contractors for the purpose of executing any contact between us on them/you;
- to a person who takes over our business and assets, or relevant parts of them; or
- in exceptional circumstances:
  - to competent regulatory, prosecuting and other governmental agencies, or litigation counterparties, in any country or territory; or
  - when we are required by the law to disclose.

These disclosures may involve transferring your personal information overseas. If you are dealing with us within the European Economic Area, you should be aware that this may include transfers to countries outside the European Economic Area, which have not been determined by the European Commission to have an adequate level of data protection. In those cases, when we transfer your personal information to other

members of the Fujitsu group or our service providers, we will ensure that our arrangements with them are governed by relevant legal mechanisms and safeguards including data transfer agreements, designed in order to ensure that your personal information is protected on terms approved for this purpose by the European Commission.

## How long do we keep your personal information?

We will delete your personal information when we no longer need it, for instance when:

- i. it is no longer necessary for us to maintain your personal information to fulfil the purposes for which we had collected it;
- ii. we believe that your personal information held by us is inaccurate; or
- iii. in certain cases when you have informed us that you no longer give consent to our processing of your personal information.

Sometimes, however:

- a. there are legal or regulatory requirements which may require us to retain your personal information for a specified period. In such cases we will store your personal information for such specified period; and
- b. we may need to retain your personal information for certain longer periods for product liability purposes or in relation to legal disputes. In such cases we will retain it for such longer periods to the extent required.

Note that we may retain some limited information about you even when we know that you have left the organisation that you represent, so that we can maintain a continuous relationship with you if and when we are in contact with you again, representing a different organisation.

## What are your rights?

You have the following rights (subject to applicable local laws) in relation to the personal information that we hold about you:

- to access your personal information, and some related information, under relevant data protection law;
- to require any inaccurate personal information to be corrected or deleted;

- to object to our use of your personal information for direct marketing purposes at any time; you may have the right to object to our processing of some or all of your personal information (and require them to be deleted) in some other circumstances;
- to require us to delete your personal information in certain circumstances;
- to require us to restrict or block the processing of your personal information in certain circumstances (however, when processing is restricted, we can still store your personal information, but may not use it);
- to obtain from us your personal information, in a structured, commonly used and machine-readable format in certain circumstances. Further, you may have the right to require us to transmit your personal information directly to another person (for instance a new provider) where it is technically feasible to do so; and
- where we are processing your personal information based on your consent to such processing, to withdraw your consent at any time.

Further information and advice regarding your rights can be obtained from the data protection regulator in your country.

If you wish to exercise any of these rights (subject to applicable local laws), or if you have complaints about our processing of your personal information, please contact us using details provided below. You can also file a complaint about our processing of your personal information with authorities regulating data protection in your country.

## **Sensitive information**

We request you not send to or share with us any sensitive personal information (e.g. information related to racial or ethnic origin, political opinions, religion or other beliefs, health, genetic, or biometric data, criminal background or trade union membership).

## **Personal information of children**

Fujitsu respects the privacy of children and does not knowingly collect, use or disclose personal information concerning children under 16 years of age without verifiable consent from a parent or their guardian.

If Fujitsu becomes aware that the information submitted to or collected by Fujitsu is personal information of children without first receiving verifiable consent from a parent or guardian, Fujitsu will take prompt steps to delete such personal information.

If a parent or guardian wishes to raise a concern regarding personal information pertaining to a child, please contact us using the details provided in the section titled "Contact us" below.

## Automated decision making

We may use technology which tracks your use of our website and your interactions with us and which helps us build a profile of your preferred products and information requests. If we do this, you are more likely to receive offers and information that are tailored to your specific preferences, based on your previous profile activity.

If we use automated decision making in respect of any specific service or product and such automated decision making produces legal effects concerning data subjects or similarly significantly affects them, we will provide information required by applicable laws in respect of such automated decision making.

We may use automated decision making in the context of comparing delivery and personal data with export control sanction lists of the European Union, the United States of America, Japan and any other country from which an export takes place. Depending on the result of these controls Fujitsu is obliged to take appropriate measures within the context of export control regulations, which are stipulated by the European Union, the United States of America, Japan and any other country from which the export takes place.

## Contact us

If you have any questions, comments and requests regarding this privacy statement or our processing of personal information, please [contact us](#).

If you would like to contact our Data Protection Office, please [contact us](#).

## Changes to the policy

This privacy policy is valid from the time of its publication on the Fujitsu websites, and all previous versions of this privacy policy become invalid as of such time. Any changes we make to this privacy statement in the future will be posted to our website. They will be also available for sending, if you [contact us](#). Please check back frequently to see any changes.

We will also keep available previous versions of this privacy policy on our website indicating their date and version number.

**Last updated: May 21<sup>st</sup>, 2018**