

Privacy Policy

Takebishi Europe B.V. ("Takebishi", "we", "us") endeavors to protect the privacy of the data subjects ("you") whose personal data are being processed by us. Please read this privacy policy carefully and in full before making use of our services, ordering our products, contacting us or otherwise using the website www.takebishi.nl.

ARTICLE 1. DEFINITIONS

1.1 In this privacy policy, the following definitions apply:

Applicable Privacy Legislation: Applicable privacy legislation, including the General Data Protection Regulation ("GDPR") and the relevant national implementation acts.

Contract: The oral or written agreement between a customer and Takebishi concerning the purchase and delivery of Products and Services.

Privacy Policy: This present privacy policy which may be updated from time to time.

Products and Services: Semiconductors, electric and electronic components and integrated devices, and support regarding these products.

Takebishi: Takebishi Europe B.V.
Strawinskylaan 1219 Tower A 12E
1077 XX Amsterdam
The Netherlands
Chamber of Commerce number: 59777559

Website: www.takebishi.nl

1.2 Definitions as used in Article 4 of the GDPR will be applied as such in this Privacy Policy.

ARTICLE 2. SCOPE PRIVACY POLICY

2.1 This Privacy Policy governs the processing of personal data obtained by us in relation to the use of our Products and Services, including our Website. Takebishi is the controller regarding these processing activities.

2.2 The Website includes references of third parties (for example hyperlinks, banners or buttons). We do not control these references and are not responsible for compliance with the Applicable Privacy Legislation by these third parties. We recommend you to carefully read the privacy policies of the third party websites you are visiting.

ARTICLE 3. PERSONAL DATA COLLECTED

3.1 We collect and process the following personal data solely for the purposes specified in this Privacy Policy:

- a. name;
- b. legal and tradename of a company;
- c. address of a company;
- d. e-mail address;

- e. telephone number;
 - f. fax information;
 - g. position;
 - h. IP address;
 - i. other information as provided in the message.
- 3.2 We do not collect sensitive personal data such as passports and health data.
- 3.3 Personal data is collected by us when you:
- a. wish to make use of our Products and Services;
 - b. contact us via e-mail or via the Website; or
 - c. otherwise use the Website.

ARTICLE 4. PURPOSES AND LEGAL GROUND FOR PROCESSING

- 4.1 We will only process the personal data in accordance with Applicable Privacy Legislation as described in this Privacy Policy.
- 4.2 We collect and process your personal data solely for the purposes specified below:
- a. **Performance of a Contract** or in order to take steps at the request of you prior to **entering into a Contract**: if you decide to place an order, your personal data will be processed by us for the performance of a Contract. This includes the track and trace service and handling of the payment for products and/or services. We do not process more personal data than is strictly necessary for the performance of a Contract.
 - b. **Communication**: your personal data are used to communicate with you about our Products and Services and to inform you of matters that are important for your account and/or use of the Website and the handling of any complaints. This processing of personal data is necessary for the performance of a Contract and/or for purposes of a legitimate interest pursued by Takebishi, namely to conduct its normal business.
 - c. **Marketing purposes**: to approach you via e-mail for marketing purposes, we always request your prior consent, unless it concerns offers about similar products that you have ordered or about similar services that you have used. This processing of personal data is necessary for purposes of a legitimate interest pursued by Takebishi, namely to keep in touch with you and to offer you similar Products and Services or is based on prior consent. You always have the right and option to unsubscribe from mailings.
 - d. **Customer service**: if you use customer service, your personal data will be used to provide you with customer service. This processing of your personal data is necessary for the performance of a Contract, or is necessary for purposes of a legitimate interest pursued by Takebishi, namely to conduct its normal business.
- 4.3 If and insofar your personal data is processed on the basis of a legitimate interest pursued by Takebishi, information can be obtained by you as to the so-called *balancing test* that was carried out to allow reliance on a legitimate interest. Please find our contact details in article 10.1 of this Privacy Policy.
- 4.4 If we intend to further process the personal data for a purpose other than those for which the personal data have been collected, we will provide you with information about the(se) other purpose(s) and all relevant further information prior to that further processing.
- 4.5 Prior to entering into a business deal with your company, we may ask you to show us your ID card or passport in person in order to check your identity. We will not process personal data nor will we retain any of those data, unless required by law.

ARTICLE 5. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

- 5.1 We will only disclose personal data to third parties where required by law or to our employees, contractors, designated agents or third-party service providers if necessary for the purposes described in this Privacy Policy, including third-party service providers who provide services to us or on our behalf. Third-party service providers include, but are not limited to hosting, CRM

and cloud providers. Currently the following third-party service providers receive your personal data:

- Zoho Cloud Software (campaign software);
- SRA Europe B.V. (maintains office network, server and e-mail services);
- PerfectView CRM (cloud software);
- Flexwebhosting B.V. (web hosting).

5.2 These third-party service providers may be located outside of your jurisdiction. We may also share personal data of you within the Takebishi Corporation. This will involve transferring your data to countries outside the European Economic Area (EEA), such as Japan.

5.3 Transfers of personal data to Japan take place on the basis of an adequacy decision following from Article 45 GDPR. If and insofar as we transfer personal data with parties in countries outside the EEA that do not have an adequate level of protection, we will agree with these parties data protection provisions set by the European Commission, so called standard contractual clauses as mentioned in Article 46(2)(c) GDPR. A copy of the agreed standard provisions can be requested by you at Takebishi. Please contact us if you would like to obtain additional information on the transfer of personal data out of the EEA. Please find our contact details in article 10.1 of this Privacy Policy.

ARTICLE 6. SECURITY

6.1 We take appropriate organizational and technical security measures to protect your personal data and to prevent misuse, loss or alteration thereof. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a need to have access. Also the aforementioned persons involved are bound by a confidentiality obligation, either in their employment agreements or (data processor) contracts.

6.2 We have internal safety guidelines in place including a data breach policy in which it is described how to deal with a suspected personal data breach. We will notify the relevant supervisory authority and the data subjects involved if required under Applicable Privacy Legislation.

6.3 We store your personal data which we collect via the Website on servers in and outside the EEA, including Japan. The storage will involve transferring your data outside the EEA. Reference is made to article 5.3 of this Privacy Policy.

ARTICLE 7. RETENTION PERIODS

7.1 We do not store your personal data any longer than strictly necessary for the purposes for which we collect the personal data. Regarding our processing activities, we will delete your personal data after:

- Processing when using our services or placing an order: six months after the completion of the Contract;
- Processing when contacting us via e-mail or via the Website: six months after the final contact moment;
- Processing when otherwise using the Website: one month after such use;

7.2 If required by law, Takebishi will store your personal data for a longer period than stated above.

ARTICLE 8. COOKIES

We use cookies to ensure that the Website functions properly.

8.1 Cookies are small pieces of information that are stored by the browser on your computer. Takebishi uses different types of cookies for different purposes.

- a. Functional cookies: cookies that are necessary for the Website to function properly, including cookies that are necessary to create an account;
- b. Analytical cookies: cookies that ensure that insight can be gained into how you use

(parts of) the Website, so that Takebishi can improve the Website and that it fits as well as possible with what you find interesting and important. Takebishi does not use the data obtained with these cookies to study the use of the Website at an individual level.

- 8.2 Most browsers are set to accept cookies by default. You can set the browser to disable cookies or indicate when a cookie is being sent. However, it is possible that some functions and services of both Takebishi and other websites do not function properly if cookies are disabled.

ARTICLE 9. YOUR RIGHTS

- 9.1 In so far as the personal data processing is based on consent (see article 4 of this Privacy Policy), you have the right to withdraw consent at any time.
- 9.2 You have the right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you.
- 9.3 You have the right to request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- 9.4 You have the right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where the personal data are no longer necessary, you have withdrawn your consent, you have objected to the processing activities, the personal data have been unlawfully processed, the personal data have to be erased on the basis of a legal requirement or where the personal data have been collected in relation to the offer of information society services. We do not have to honor your request to the extent that the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation which requires processing, for reasons of public interest in the area of public health, for archiving purposes or for the establishment, exercise or defence of legal claims.
- 9.5 You have the right to object to processing of your personal data where we are relying on a legitimate interest. Insofar as the processing of your personal data takes place for direct marketing purposes, we will always honour your request. For processing for other purposes, we will also cease and desist processing, unless we have compelling legitimate grounds for the processing which override your interests, rights and freedoms or that are related to the institution, exercise or substantiation of a legal claim.
- 9.6 You have the right to request restriction of processing of your personal data in case the accuracy of the personal data is contested by you to enable the controller to verify the accuracy, the processing is unlawful and restriction is requested instead of erasure, the controller no longer needs the personal data but they are required by you for the establishment, exercise or defence of legal claims or in case you have objected to processing.
- 9.7 You have the right to request to transfer of your personal data to you or to a third party (right to dataportability). We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a Contract with you.
- 9.8 If necessary, we request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes.
- 9.9 The exercise of the abovementioned rights is free of charge and can be carried out by contacting us by telephone or e-mail. Please find our contact details in article 10.1 of this Privacy Policy. We will provide you with information about the follow-up to the request immediately and in any case within one month of receipt of the request. Depending on the complexity of the request and on the number of requests, this period can be extended by another two months. We will notify you of such an extension within one month of receipt of the request. Applicable law provides guidance as to whether we should allow or refuse your request. If we cannot allow your request, we will inform you of the reasons why, subject to any

legal or regulatory restrictions.

- 9.10 If your requests are manifestly unfounded or excessive, in particular because of the repetitive character, we will either charge you a reasonable fee or refuse to comply with the request.
- 9.11 When processing your personal data, we do not make use of automated decision-making.

ARTICLE 10. CONTACT DETAILS

- 10.1 For any questions, complaints or in the event that you wish to make use of one of your rights as stated in this Privacy Policy, please contact us at the contact details below:

Name: Takaharu Ieyama
Telephone number: +31(0)20 705 5150
E-mail address: info@takebishi.nl

ARTICLE 11. DATA PROTECTION AUTHORITY

- 11.1 In addition to the above mentioned rights you have the right to lodge a complaint with a supervisory authority in accordance with Article 77 GDPR, in particular in the EU Member State of your habitual residence, place of work or of an alleged infringement of the GDPR at all times. However, we would appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us beforehand.

ARTICLE 12. MISCELLANEOUS

- 12.1 Takebishi reserves the right to change this Privacy Policy on a regular basis. It is your responsibility to regularly review the applicable conditions. This Privacy Policy is last amended and revised in February 2019.
- 12.2 If a provision from this Privacy Policy is in conflict with the law, it will be replaced by a provision of the same purport that reflects the original intention of the provision, all this to the extent legally permissible. In that case, the remaining provisions remain applicable unchanged.