

## MKI (U.K.) Limited (the 'Company') Privacy Notice

This notice explains how information about you is used. The Company will be the data controller and can be contacted as follows:

By post: Data Protection Manager, MKI (U.K.) Limited, 8<sup>th</sup> floor, 1 St Martin's-Le-Grand, London, EC1A 4AS

By e-mail: [gdpr-contact-mkiuk-dg@mki.co.jp](mailto:gdpr-contact-mkiuk-dg@mki.co.jp)

By phone: +44-20-7822-0382

### The information we gather

The Company gathers certain information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom), and the Data Protection Act 2018, and we are responsible for that personal information for the purposes of those laws.

In this notice, references to 'we' or 'us' means the Company and our group companies.

Information that we gather about you may include without limitation your name, your title, and contact details.

The provision of information by you is entirely voluntary. If you do not provide your information it may not be possible for us to provide any goods or services.

We may also obtain information about you from third parties, such as our service providers and agents.

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### The legal basis and reasons for processing

This privacy notice sets out how we will process your data.

Processing can take place when it is necessary to perform a contract between us, or where we are both taking steps to enter into a contract. It can also take place based on our legitimate interests or those of a third party. A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. Our legitimate interests may be that we are carrying on or may carry on business with your employer. There is a limited privacy impact on you, and we think that you will expect that we will process your data in this way. Sometimes processing will take place based on your consent, such as when you give us your clear and express permission to do something with your personal data. Whenever you have given consent you can withdraw it at any time.

We process information about you for the following reasons:

What we use your information for	Our reasons
To provide our services	For the performance of our contract with you or to take steps at your request before entering into a contract, or for our legitimate interests if we are entering into a contract with your employer
Providing customer services, analysing preferences and improving services	For the performance of our contract with you, for our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service

	for you at the best price, and to comply with our legal and regulatory obligations
To improve user experience	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Operational reasons, such as recording transactions, training and quality control, and ensuring business policies are adhered to	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Conducting checks to identify our customers and verify their identity, screening for financial and other sanctions or embargoes, and other processing necessary to comply with professional, legal and regulatory obligations, corporate governance obligations and good practice that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you, and to comply with our legal obligations
Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests	To comply with our legal and regulatory obligations
Security vetting, preventing fraud, investigating claims, complaints and allegations of criminal offences	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you, and to comply with our legal obligations
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information, and to comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you, and to comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract, to comply with our legal and regulatory obligations, and for our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations, and for our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver

	the best service to you
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standard, and to comply with our legal and regulatory obligations
Marketing our business and those of our group	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers

### **Promotional communications**

We may use your personal information to send you updates (by email, text message, telephone or post) about our products and services, including promotions or new products or services. We have a legitimate interest in processing your personal information for promotional purposes (see above). Where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never share it with other organisations outside our group for marketing purposes. You have the right to opt out of receiving promotional communications at any time by contacting our Data Protection Manager.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

### **Information about third parties**

Information we process as described in this notice may also include information about third parties such as whose details you supply to us.

### **Systems used to process data**

We gather information directly from you and also via other technical systems. These may include, for example, our: computer networks and connections, communications systems, trading platforms, email systems, intranet and Internet facilities, telephones, and other hardware and software owned, used or provided by or on behalf of us and our group companies.

### **Cookies**

When you use our website we may gather information about you through Internet access logs, cookies and other technical means. 'Cookies' are text files placed on your computer to collect Internet log information and user behaviour information. These are used to track website usage and monitor website activity and for other data processing reasons set out below.

Some of the cookies we use are essential for parts of the site to operate and have already been set. You may delete and block all cookies from this site, but parts of the site will not work. To find out more about the cookies we use and how to delete them, please contact [gdpr-contact-mkiuk-dg@mki.co.jp](mailto:gdpr-contact-mkiuk-dg@mki.co.jp) by email.

### **Disclosures and exchange of information and transfers outside the EEA**

We may disclose and exchange information with our group companies, service providers, representatives and agents, as well as with law enforcement agencies and regulatory bodies for the above reasons. We only share information with such service providers if we are happy that they take appropriate measures to protect your personal information.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

Information may be held at our offices and those of our group companies, and third-party service providers, representatives and agents as described above. Information may be transferred internationally to other countries around the world, including those without data protection laws equivalent to those in the UK, for the reasons described above. We have security measures in place to seek to ensure that there is appropriate security for information we hold including those measures detailed in our information security and data protection policies, which are available on request.

Japan has received a finding of adequacy from the European Commission, so you can be satisfied that you continue to enjoy equivalent data rights whenever your data has been transferred to Japan. For other international data transfers outside the European Economic Area are protected by Standard Contractual Clauses, as per GDPR Article 46(2).

If you would like further information please contact our Data Protection Manager (see above). We will not otherwise transfer your personal data outside of the EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

### **Retention periods**

Your data will be held for as long as it is genuinely useful to us, in accordance with the Company's retention policy, which is available on request. In general, your data may be stored for the duration of your contractual relationship with us, plus 6 years.

### **Further enquiries**

Please contact the Data Protection Manager if you would like to correct or request (in accordance with applicable law) information that we hold relating to you or if you have any questions in relation to the above.

### **Your rights**

You have a number of important rights, which can be exercised free of charge. You have the right to request:

- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances.

We will not do anything with your data not outlined in this notice.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

- If you would like to exercise any of these rights, or if you have any complaints, please contact our Data Protection Manager, providing enough information to identify you and let us know which information to which your request relates.

If you are not satisfied with any complaint you have with us, you also have the right to make a complaint to the Information Commissioners Office, which is the supervising authority in the UK in relation to data processing. You can contact the Information Commissioner at [ico.org.uk/concerns/](https://ico.org.uk/concerns/) or by telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

We may change this privacy notice from time to time, when we do we will inform you via updates on our website.