

Nikkei ID Privacy Policy

This Privacy Policy sets forth the policy for handling the personal information we collect from each user residing in the European Economic Area (EEA) and the United Kingdom (U.K.) who uses various services connected with “Nikkei ID” provided by Nikkei Inc. (“Nikkei”) such as media, event, career support and/or databases (such services shall be referred to as the “Services”, and such user shall be referred to as “User”). This Privacy Policy commonly applies to the Services. A privacy policy of each Service, if any, shall apply in addition to this Privacy Policy. Words used herein in the singular mean and include the plural and vice versa.

1. Personal information we collect

Nikkei collects User-related personal information mainly in the following cases as necessary for providing Services. Please note that Nikkei also collects personal information when you sign up for a particular Service and uses such personal information in accordance with this Privacy Policy.

(1) When you sign up for the Services

Nikkei collects your name, address, email address, birthday, gender and occupation etc. in the following cases such as:

(i) When you register your information necessary for using the Service and/or purchasing a product

(ii) When you sign up for an event, a seminar and/or a prize, and/or answer to a survey

(iii) When you make an inquiry to Nikkei regarding our Service

(2) When you use the Services

Nikkei collects information regarding your usage of the Services linking to your identifiable information.

(i) Usage of the Services and purchase history of our products

(ii) Status of signing up for the Services, and usage behavior in the Services

(iii) Status of signing up for events, seminars and for prizes, and answering to surveys

(3) When you access our website for providing our Services

When you access our website or app for providing our Services, Nikkei collects your history and status of viewing the content and advertisements, and your access environment etc. through IP address, cookies and web beacons.

(4) When we receive your personal information from our partners

Nikkei may collect User’s personal information from our partners. For example, Nikkei may collect usage and usage behavior etc. for providing better Services, and transaction history and payment information from collection agencies for confirming your payment status for Services.

2. How we use your personal information

Nikkei will use the personal information collected from Users for providing the Services, communicating with Users as necessary, improving the Services and planning new services, as well as for investigating and analyzing Users' usage of the Services for providing content and advertisements relevant to Users' needs. Nikkei may also process your personal information statistically and unidentifiably, and use it for press report for benefiting society. Nikkei will always handle your personal information with consideration for privacy and human rights, complying with the laws, regulations and internal rules. The details are as follows:

(1) To provide Users with the Services

Such as:

- verify identification of the Users when you log in to the Service
- provide Users with the Services as requested
- display your registered personal information automatically on sign up pages for the Services for your convenience
- deliver copies of newspapers, magazines, books and other products purchased
- bill our customers for fee-based Services and confirm the payment
- deliver rewards etc. for surveys you answered to
- investigate failures of the Services and User support thereof
- monitor compliance with our policies and terms and conditions, and to take appropriate action if they are breached

(2) To communicate with Users

Such as:

- respond to your inquiries or other requests
- confirm User's usage of the Services
- deliver important information to Users such as updates of the Services and/or policies and terms and conditions thereof
- recommend Services to you

(3) To improve the Services, and plan and develop new services

Nikkei uses your personal information for improving the Services and for planning and developing new services. Nikkei may use your personal information for use investigations of the Service and conducting surveys.

(4) To investigate and conduct analysis for providing Services relevant to your needs

Nikkei investigates and analyzes your needs using Users' information such as residence areas, occupations, lines of business, the information registered in the Service, usage history of the Services, participation history in events and viewing history of the content and advertisements. Nikkei may also investigate and analyze your needs using Users'

information linking to User's usage information of other websites.

(5) To serve you with content and advertisements that we believe are relevant to your needs

Nikkei serves you with content and advertisements of us, our partners and/or the sponsors that we believe are relevant to your needs based on the analysis described in (4). Nikkei may also share your personal information unidentifiable by itself with our partners such as distributors of content and advertisements so that such partners serve you with content and advertisements. For example, Nikkei may share your personal information unidentifiable by itself with social media platforms so that such social media platforms serve you with advertisements regarding our services.

(6) To benefit society through data analysis

Nikkei does not use your personal information just for providing Services. For example, Nikkei may process your personal information statistically and unidentifiably, and use it for press report. Nikkei may also provide private and public entities with such statistic information for promoting disaster countermeasures and regional development. In such cases, Nikkei will never provide any identifiable information of you.

3. Lawful basis for handling personal information --- your consent etc. --- and your right to withdraw your consent

You are deemed to have agreed to our handling of your personal information when you indicate your consent to this Privacy Policy, and Nikkei handles your personal information based on such consent of you. However, you have the right to withdraw your consent to process your personal information anytime, but this will not affect the lawfulness of any processing carried out before withdrawal of the consent. To exercise this right, please contact us at addresses/number set forth in "9. Your rights and inquiries".

Nikkei handles your personal information described in 1(3) based on legitimate interests necessary for Nikkei. In other cases, Nikkei may also handle your personal information based on legitimate business purposes, contractual necessity or legal obligation if applicable. When you are under the age of sixteen (16), Nikkei shall obtain your parent or guardian's consent regarding your using the Services or you should obtain the permission of your parent or guardian to give consent to your using the Services.

4. Necessity of your personal information

Personal information provided by User is necessary for Nikkei to provide the Services to User, and the Services may not be available to those Users who do not provide their personal information.

5. Provision etc. of personal information to third parties

Nikkei may provide your personal information to third parties in the following cases. When Nikkei provides your personal information to a third-party service provider, Nikkei contractually or otherwise obligates the third-party service provider to comply with the General Data Protection Regulation of the European Union and its equivalent laws and regulations in the U.K. (collectively, "GDPR") and to handle personal information with consideration for User's privacy.

(1) If any of the followings apply:

(i) When disclosure of personal information is required by the laws or regulations, a court judgment, decision or order, or by any public agency;

(ii) When User is in violation of the laws, regulations or related rules and where it is difficult to obtain User's consent --- within the minimum scope necessary for protecting rights, property and/or the Services etc. of Nikkei or a third party;

(iii) When it is urgently necessary since there is an imminent danger to the life, limb or property of a person etc. and where it is difficult to obtain User's consent; or

(iv) Where it is otherwise permitted by the law.

(2) When we provide your personal information to our partner based on and to the extent required to fulfil your instruction given on your signing up for a service, product, prize or transaction, and/or prize, and/or answering to a survey of the partner.

The partner will collect and control such personal information, and use it for fulfilling the transaction and/or conducting the survey, as well as for communication with you by email etc. after such transaction/survey and/or improving the partner's business/services by analyzing your usage etc. of the services.

(3) When we share your personal information with our partners such as content and/or advertisement distributors so that such partners cannot identify you by the shared personal information itself but serve you with content and advertisements.

(4) When Nikkei provides your personal information to third-party service providers.

(5) When we provide the Nikkei group companies listed [here](#) with your personal information within the scope of the purposes described in "2. How we use your personal information";

6. Retention period

Nikkei will retain your personal information for the period necessary to fulfill the purposes outlined in "2. How we use your personal information" or for a longer retention period required or permitted by law, and promptly delete such personal information after the period.

7. Cross border transfers of personal information

Your personal information may be transferred to countries or jurisdictions outside your

residence area including Japan for the purposes outlined in this Privacy Policy. Please note that such countries or jurisdictions may not have the same data protection laws as your residence area and would not afford many of the rights conferred upon you in your residence area. We will put in place sufficient safeguards to protect your personal information that is transferred in this way, for example, by concluding standard contract clauses based on GDPR. For further information, such as requests of a copy of the reference to appropriate or suitable safeguards of your personal information, please contact us at addresses/number set forth in “9. Your rights and inquiries”.

8. Your right to object to processing

You have the right to object at any time to the processing of your personal information which is based on our legitimate interests, including “profiling” (i.e. analyzing or predicting your behavior based on your information). When we process your personal information for direct marketing purposes, you have an absolute right to opt out of direct marketing or the profiling we carry out for direct marketing.

9. Other rights of yours, and inquiries

(1) You have the right to access your personal information, request to update, delete or erase your personal information, request to limit and/or object to the processing of your personal information including provision to our partners and/or other third parties, and request data portability with regards to your personal information. You can contact us at below addresses/number or fill out the form below to exercise the above rights.

Personal Information Protection Center (GDPR Task Force)

Legal and Compliance Office

Nikkei Inc.

1-3-7 Otemachi, Chiyoda-ku, Tokyo 100-8066, Japan

For inquiries, please click [here](#).

(2) You can lodge a complaint with your local data protection authority if you have a complaint regarding Nikkei’s processing of your personal information.

10. EU Representative

PLANIT // LEGAL Rechtsanwaltsgesellschaft mbH

Jungfernstieg 1, 20095 Hamburg, Germany

mail@planit.legal

11. Others

Nikkei may update all or part of this Privacy Policy anytime. Nikkei will publish clearly

noticeable notification of any material update thereof on the website that provides the Services.

(Established on May 25, 2018)

(Revised on Jan 7, 2021)

(Revised on May 31, 2021)

(Revised on Oct 19, 2021)

(Revised on Dec 24, 2021)

(Revised on Apr 1, 2022)