

1. Introduction - General

Fuji Trading Co., Ltd., Milano Office (hereinafter referred to as: "**Fuji Trading**") is committed to protect your privacy, handling and processing your personal data and use them transparently. "Personal data" for the purposes of our Privacy Policy ("**Policy**") means data which identifies or may identify a natural person. These natural persons involved are hereinafter collectively referred to as data subjects ("you" or "Data Subjects"). "Processing" means the safe collection, maintenance, storing and handling of your personal data.

The below summary of our Policy describes how we collect and process your personal data. If you have any question about our policy you may contact us in writing at the following address:

Via Arzaga 24, 20146 Milan, Italy

Telephone number: Tel: +39-02-4127-3112

Company's details

This "**Policy**" provides information on the personal data processing by the Fuji Trading Co., Ltd., Milano Office, established by its parent company Fuji Trading Co., Ltd of Yokohama, Japan under Italian law, having its registered seat in Milan, Italy, and it is registered with the Italian General Commercial Register of the Milan Chamber of Commerce and Industry under registration number MI-2089326 and under tax code number 97744320157.

Fuji Trading can be reached via the following contact details:

Via Arzaga 24, 20146 Milan, Italy

Telephone number: Tel: +39-02-4127-3112

Fuji Trading is part of the international Fuji Trading Group, with its headquarters in Yokohama, Japan.

Fuji Trading reserves the right to review and/or alter the Policy periodically, in order to comply with (local and/or European) legislation, and for any other purpose deemed reasonably necessary by Fuji Trading.

2. Handling of Personal Data

This Policy sets out the elements necessary for Fuji Trading's compliance with applicable privacy legislation, principles and practice, including but not limited to the General Data Protection Regulation (GDPR) ("**applicable laws**").

The Policy is an external policy, and is directed towards Data Subjects whose Personal Data are being processed by Fuji Trading. This Policy applies to the processing of Personal Data, in which Fuji Trading acts as the data controller, within the meaning of the applicable laws. This is the case when Fuji Trading determines the purpose and the means for the processing of Personal Data of parties.

For business purposes, you may be asked to provide your Personal Data. If this is the case, Fuji Trading and our partners shall be required to keep such information confidential.

3. How we collect your personal data

We obtain your Personal Data mainly through information you provide directly to us (personal data for a contract, e-mails while you negotiate a contract), through third parties (agents, representatives etc.), published information (sites etc).

4. Personal Data

Personal Data mentioned herein and defined by Fuji Trading refers to information of all kinds related to each individual person that is electronically transmitted to Fuji Trading by parties.

The types of Personal Data Fuji Trading collect and process include:

- Name;
- Family name;
- Address;
- E-mail address;
- Telephone number;

- Function/job title;
- ID number;
- Date of birth;
- Place of birth;
- Pension documents;
- Nationality papers;
- Staying permission;
- Working permission;
- Driving licence;
- Passport copy;
- Diplomas.

5. Purpose and Legal Basis of Data Processing

It is not allowed to process Personal Data beyond the legal grounds on which the processing of Personal Data is based.

Personal Data can be processed based on one of the following legal grounds:

Legal ground: necessary for the performance of a contract

Fuji Trading may use your Personal Data for the purpose of the performance of a contract to which the Data Subject is a contractual party. The Personal Data are necessary to enter into a contract. Without providing the Personal Data, the contract cannot be performed.

For these purposes, Fuji Trading retains the Personal Data for a period of 5 years after the contract has ceased.

Legal ground: consent

On the basis of consent, Fuji Trading processes Personal Data for the operation of its business activities.

For these purposes, Fuji Trading retains the Personal Data for a period of 5 years after the contract has ceased.

In case you gave your explicit consent in writing, you have the right to withdraw consent at any time.

Legal ground: legitimate interest

On the basis of legitimate interest, Fuji Trading processes Personal Data for the following purpose(s):

- We process your Personal Data in order to perform the contract we have entered with you or in order to enter in contract with you.
- Corporate management/decision-making;
- Business operation;
- Relationship management.

Fuji Trading is obligated to process the Personal Data in accordance with these purposes and in compliance with the applicable laws.

Retention period

Fuji Trading will not use and store your Personal Data longer than necessary to fulfil the abovementioned purposes and shall remove the collected Personal Data after the necessary period to achieve the purposes described in this Policy has passed, or to comply with contractual obligations or as permitted or required by the applicable laws.

6. Purpose Limitation

The Personal Data may only be processed to the extent necessary for the described purposes. Personal Data may in principle not be processed for other purposes other than that for which the Personal Data were collected. If there is a necessity or need to process Personal Data for other purposes, this should be

presented to Fuji Trading for approval. Fuji Trading shall investigate whether the purposes of the intended data processing is compatible with the original purposes. Fuji Trading shall provide the data subject prior to that further processing with information on that other purpose.

7. Security of your Personal Data

Fuji Trading handles your Personal Data carefully and confidentially, and uses all suitable physical, managerial, and technical safeguards to preserve the integrity and security of your Personal Data.

8. Transfer of your Personal Data

Your information may be accessed or transferred by Fuji Trading entities and other third parties as outlined in this Policy.

Group entities

Personal Data may be shared with Fuji Trading's group entities in compliance with applicable law, for purposes consistent with this policy. Where Fuji Trading Trading's group entities qualify as processors or (joint) controllers, Fuji Trading will enter into a Data Processing Agreement or other contractual arrangement with them.

Vendors and suppliers

Fuji Trading occasionally hires other companies to provide limited services on its behalf, including service providers, (potential) business partners and project companies, such as telephone provider and e-mail provider.

Fuji Trading will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

In all cases, Fuji Trading will expressly state why such information is necessary, so that you may provide the information at your own discretion. Fuji Trading will not disclose Personal Data provided by parties to any party, other than Fuji Trading itself, without prior permission from the parties.

Law enforcement purposes

In certain circumstances, it is possible that Personal Data may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders.

Fuji Trading may disclose Personal Data in case such disclosure is mandatory under applicable laws or is reasonably judged to be essential in order to protect and safeguard the rights, property and safety of other parties, Fuji Trading itself, and/or Fuji Trading's affiliates.

Sale of merger business

Circumstances may arise where, whether for strategic or other business reasons, Fuji Trading decides to sell, buy, merge or otherwise reorganize businesses. Such a transaction may involve the disclosure of Personal Data to prospective or actual purchasers, or receiving it from sellers. It is Fuji Trading's practice to seek appropriate protection for information in these types of transactions.

Transfer of data to third countries

Fuji Trading may transfer Personal Data to a third country or international organisations outside of the EU/EEA, such as to the Headquarters Fuji Trading in Japan, which shall take place only in compliance with the applicable laws, and where appropriate safeguards are in place that ensure the level of protection of parties as required by the applicable laws (e.g. transfers on the basis of an adequacy decision or standard EU Model clauses). These safeguards include entering into EU Model Clauses with the recipient of the Personal Data who is established outside the EU/EEA. The EU Model Clauses are attached to the Data Processing Agreement between Fuji Trading and its data processors.

9. Rights in relation to Personal Data

Parties have the right of information, access, rectification, addition and erasure of Personal Data, and the right to object against or restrict the processing of Personal Data (or withdraw an earlier given consent), as well as the right to data portability. The procedure of Fuji Trading that enable you to exercise these rights, is described below.

Via Arzaga 24, 20146 Milan, Italy
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Parties may file a request for access with Fuji Trading, and Fuji Trading shall respond as soon as possible, and in any event within one (1) month, about:

- a) whether Fuji Trading holds any Personal Data relating to the respective the Data Subject; and,
- b) if so, information is provided on the purposes of the processing, the categories, the recipients (if applicable) the retention periods, the rights of the Data Subject, the right to lodge a complaint with a supervisory authority, the existence of automated decision-making, where the data is transferred to a third country, the appropriate safeguards and the source(s) of the Personal Data.

After a party has accessed the Personal Data, he/she may request Fuji Trading to correct, restrict, amend, add, erase and/or transport the Personal Data. Fuji Trading informs the Data Subject within one (1) month after receiving the request whether the request shall be complied with (in time), and if not, accompanied with the reasons for the delay or rejection.

Information provided shall be free of charge. You can exercise these rights at reasonable intervals.

Fuji Trading will comply with a legitimate request of a Data Subject for erasure or restriction if the Personal Data are factually incorrect, incomplete, or irrelevant for the purpose(s) of the data processing, or otherwise processed in violation with the applicable laws.

With regard to a request to erase Personal Data, it should be taken into account that Fuji Trading shall not comply with such request, if it is incompatible with any legal obligations of Fuji Trading.

If a request is allowed, Fuji Trading shall execute the decision to erase and/or restrict the Personal Data as soon as possible. Fuji Trading shall execute the requests of access, correction and/or data portability as soon as possible, at least within one (1) month.

In the event of concerns about the handling of Personal Data, parties also have the right to lodge a complaint with a local supervisory authority.