



March 18, 2022  
**MISUMI Group Inc.**

## Notification regarding Revision of Misumi Group Privacy Policy

We hereby notify you of the revision of the Privacy Policy of Misumi Group.

This revision is in response to the revision of Personal Information Act of Japan enacted in April 1, 2022.

### ■ Effective Date

April 1, 2022

### ■ Summary of Revision

In this revision, MISUMI confirms that we will handle the personal information of our stakeholders appropriately and set forth the matters to be observed in the Misumi Group Fundamental Privacy Policy. We have revised the Privacy Policy for Customers and Privacy Policy for Job Applicants, and established Privacy Policy for Business Partners and Privacy Policy for Shareholders to ensure that we handle the personal information of business partners and shareholders appropriately as well.

### Main revisions of revised privacy policies

#### 1. Misumi Group Fundamental Privacy Policy

- Change the title as “Fundamental” and clarification that it is the privacy policy to be applied to the entire group
- Clarification of the exception for providing personal information to third parties as well as the matters to be observed when it is provided to entrusted parties or jointly used
- Addition of procedures for principals requesting disclosure, correction, or suspension
- Clarification that it will be notified on the website when it is revised
- Deletion of the matters targeting only customers, such as purpose of use or contact information (which have been updated in the Privacy Policy for customers)
- Adding the URL links of privacy policy for each target

#### 2. Privacy Policy for Customers

- Clarification of observing Misumi Group Fundamental Privacy Policy
- Addition of “development of products and services” to the purposes of use and exceptions for providing information to third parties
- Addition of the address and representative of the company which is responsible for the management of personal data when shared
- Addition of information of the Personal Information Handling Business Operator
- Addition of procedure for principals requesting disclosure, correction, or suspension
- Addition of security control actions

3. Privacy Policy for Job Applicants
  - Clarification of observing Misumi Group Fundamental Privacy Policy
  - Clarification and additions to types of information collected and purposes of use
  - Addition of address and representative of the company which is responsible for the management of personal data when shared
  - Addition of information of the Personal Information Handling Business Operator
  - Addition of procedure for principals requesting disclosure, correction, or suspension
  - Addition of security control actions

#### Contents of newly established privacy policy

1. Privacy Policy for Business Partners
  - Article 1 Definition
  - Article 2 Personal information Misumi acquires
  - Article 3 Purpose of use
  - Article 4 Provision to third party and joint use
  - Article 5 Disclosure, correction, and suspension etc.
  - Article 6 Matters regarding the retained personal data
2. Privacy Policy for Shareholders
  - Article 1 Definition
  - Article 2 Personal information Misumi acquires
  - Article 3 Purpose of use
  - Article 4 Provision to third party
  - Article 5 Disclosure, correction, and suspension etc.
  - Article 6 Matters regarding the retained personal data

#### ■ Privacy Policy after Revision

Please see the following pages for the “MISUMI Group Fundamental Privacy Policy,” and “Privacy Policy for Shareholders.”

The Privacy Policies below are only available in Japanese.

- MISUMI Group Inc. and Misumi Corporation:
  - Privacy Policy for Customer
  - Privacy Policy for Business Partners
  - Privacy Policy for Job Applicants
- Suruga Production Platform Co. Ltd and Suruga Seiki Co. Ltd
  - Privacy Policy for Customer
  - Privacy Policy for Business Partners
  - Privacy Policy for Job Applicants
- Daiseki Co., Ltd.
  - Privacy Policy for Customer
  - Privacy Policy for Business Partners
  - Privacy Policy for Job Applicants

**【For further inquiries, please contact】**

Misumi Group Personal Information Officer, MISUMI Group Inc.  
e-mail: [privacy@misumi.co.jp](mailto:privacy@misumi.co.jp)

## **Misumi Group Fundamental Privacy Policy**

Companies within Misumi Group (the "Misumi Group") will observe laws and regulations to protect personal information, for all personal information used by the Misumi Group for business purposes. The Misumi Group will protect personal information in accordance with the Privacy Policy as stated below.

The Misumi Group employs appropriate measures in accordance with the law to protect personal information and ensure that the individuals to whom the information belongs are not disadvantaged by Misumi Group's use of the information. In this regard, the Misumi Group declares the following:

1. The Misumi Group will establish this Fundamental Privacy Policy (this "Policy"), as well as additional individual Privacy Policies (the "Individual Policies"), and other Rules to set appropriate procedures to protect personal information. The Misumi Group will protect the rights and interests of principals of when handling personal information.
2. The Misumi Group will employ appropriate security controls when handling the personal information, train employees on these security controls, and direct employees to observe them. The Misumi Group will designate a manager for protecting personal information and will determine their accountability for Misumi Group's security.
3. The Misumi Group will acquire personal information only by legal and appropriate means and not by deceit or other improper means.
4. The Misumi Group will not provide personal information to a third party without obtaining a principal's consent in advance, except in the following cases:
  - i. when required by laws and regulations;
  - ii. when necessary to protect a human life, body, or property when it is difficult to promptly obtain a principal's consent;
  - iii. when there is a special need to improve public hygiene or promote fostering healthy children, and it is difficult to obtain a principal's consent;
  - iv. when there is a need to cooperate with a government organization, or a person entrusted by them to perform affairs prescribed by laws and regulations, when there is a possibility that obtaining a principal's consent would interfere with the performance of the legal or regulatory affairs;
  - v. when necessary to provide to university and other organization or group where required for use in academic studies, unless such provision or use is likely to infringe the personal rights or interest of the principal;
  - vi. when personal information is provided to MISUMI Group companies or other named third parties;
  - vii. when personal information is provided in accordance with a business succession caused by a merger or other reason;
  - viii. when personal information is provided with the agreement that Misumi Group entrustment of the handling of the personal information will be handled in accordance with the Individual Policies.
5. The Misumi Group will, in case of entrusting the handling of personal information, select the parties who will handle personal information appropriately, enter agreements to ensure the third parties' appropriate handling, and exercise necessary and appropriate supervision over the entrusted parties.
6. The Misumi Group will, when providing personal information to Misumi Group affiliated companies or by a specified third parties, give notice on its website of the categories of the

jointly utilized personal information, the scope of a jointly utilizing person's use, the utilization purpose, and the name of a person responsible for controlling the such personal information. The Misumi Group will exercise necessary and appropriate supervision over third parties who jointly utilize the personal information.

7. The Misumi Group will respond promptly and in good faith when requested by a principal to disclose, revise, delete, suspend use, suspend provision to third parties, or disclose the record on provision to third parties.
8. The Misumi Group will continue to review and improve this Policy and Individual Policies. When this Policy or Individual Policy needs to be revised, the Misumi Group will post a notice of the updated policy on the Website.
9. The Misumi Group will take necessary and appropriate action in the case of a data incident such as leakage, loss, or damage or any other incident covered under applicable laws and regulations.

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#### Individual Privacy Policies

##### MISUMI Group Inc. and Misumi Corporation

- Privacy Policy for Customer (Japanese only)
- Privacy Policy for Business Partners (Japanese only)
- Privacy Policy for Job Applicants (Japanese only)
- Privacy Policy for Shareholders

##### Suruga Production Platform Co. Ltd. and Suruga Seiki Co. Ltd.

- Privacy Policy for Customer (Japanese only)
- Privacy Policy for Business Partners (Japanese only)
- Privacy Policy for Job Applicants (Japanese only)

##### Daiseki Co., Ltd.

- Privacy Policy for Customer (Japanese only)
- Privacy Policy for Business Partners (Japanese only)
- Privacy Policy for Job Applicants (Japanese only)

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If you have any questions or comments about this Policy, Individual Policies, the ways in which MISUMI collects and uses your personal information, please contact us at the contact information below.

#### Contact Information

Misumi Group Personal Information Officer, MISUMI Group Inc.

E-mail: [privacy@misumi.co.jp](mailto:privacy@misumi.co.jp)

## **Privacy Policy for Shareholders**

This Privacy Policy ("Policy") sets out how MISUMI Group, Inc. ("MISUMI") handles the personal information of shareholders used for its business.

MISUMI will appropriately handle the personal information of shareholders by observing MISUMI Group Fundamental Privacy Policy, this Policy, laws, and regulations related to the protection of personal information, and any other applicable standards.

### Article 1 Definition

Terms in this Privacy policy shall be defined as follows. The terms not defined in this Policy shall be defined in accordance with applicable the laws and regulations related to protection of personal information.

- (1) Shareholder shall mean a person, a company or any organization who owns shares of MISUMI.
- (2) Personal Information shall mean information relating to a living individual and that either contains a name, date of birth, or other personal descriptions which identify a specific individual (including those which can be readily collated with other information and thereby identify a specific individual), or contains an individual identification code
- (3) Principal means the person who is identified by such personal information.

### Article 2 Shareholders' Personal Information that MISUMI Acquires

MISUMI may acquire the following personal information of Shareholders

- (1) Names, the names of company or organization representatives if the shareholder is a company or organization, address, number of shares, the date of acquisition of shares, phone numbers, email address, and similar types of information.
- (2) Contents of communications between shareholder and MISUMI such as conversations, written communications, telephone calls, emails, interviews, etc.

### Article 3 Purpose of Use

1. Personal information that MISUMI acquires shall be used for the following purposes. MISUMI will not use the personal information for any purpose other than the following without the principal's consent.
  - (1) To exercise shareholders' rights or pursue the obligations based on the Company Act.
  - (2) To provide information to shareholders regarding business operations of MISUMI and its affiliates and subsidiaries.
  - (3) To take actions to improve the relationship between shareholders and MISUMI
  - (4) To provide payments such as dividends or information about the status of the same to shareholders.
  - (5) To manage shareholders, such as by aggregating or reviewing shareholders data based applicable laws and regulations, statistics, or in any other way.
  - (6) To respond to the inquiry from shareholders
2. MISUMI will not, in case of altering a utilization purpose, do so beyond the scope recognized to be reasonably relevant to the pre-altered utilization purpose. Any alterations will be publicized on MISUMI's website.

### Article 4 Disclosure to Third Party

MISUMI will not provide personal data to a third party without first obtaining the principal's consent, except in the following cases;

- (1) where personal information is provided for the purposes set in Article 3, provided that

MISUMI will enter non-disclosure agreements imposing the entrusted parties not to use the personal information for any purpose other than the entrusted matter

- (2) where permitted as an exception under applicable laws and regulations
- (3) where consented by the shareholder
- (4) where necessary under applicable laws and regulations

#### Article 5 Disclosure, Correction, and Suspension etc.

MISUMI will respond quickly and in good faith, when requested by a shareholder, to notify the shareholder of the purpose of use, disclose, revise, delete, or suspend use of the retained personal data, suspend the provision to third parties, or disclose the record on provision to third parties. Please contact the following contact. We may ask for a fee to notify the shareholder of the purpose of use and to disclose retained personal data (including to disclose the record of provision to third parties.)

#### <Contact>

Corporate Relations Department, IR/SR Team, MISUMI Group Inc.  
Email : cc@misumi.co.jp

#### Article 6 Matters relating to the Retained Personal Data

##### 1. Information "Personal Information Handling Business Operator"

MISUMI Group Inc.

112-8583 2-5-1 Koraku, Bunkyo-ku, Tokyo

Representative Director and Chairman Kosuke Nishimoto

##### 2. Security Control Action

MISUMI takes necessary and appropriate security control actions, in order to manage personal information to protect from leakage, loss, damaging etc. The security control actions MISUMI takes are as below.

###### (1) Organizational Security Control

MISUMI sets internal rules, such as Information Security Basic Policy, Information Security Guidelines, and Rules for Handling Personal Information, and handles personal information according to these internal rules. MISUMI also appoints a person in charge on handling of personal information, conducts periodical investigation on what personal information is being collected, and establishes systems to respond to a leakage accident if it happens.

###### (2) Human Security Control

MISUMI has its employees periodically to take information security training including how to handle personal information so the personal information is handled appropriately. When personal information is provided to entrusted parties or joint users as set forth in Article 4, MISUMI manage and supervises such entrusted parties or joint users so as the personal information is handled appropriately.

###### (3) Physical Security Control

MISUMI uses security cards for entry to its offices where personal information is stored, and implements other security control actions to protect the information from being stolen or lost such as locking devices and encrypting electronic mediums. In the case a device or electronic media is stolen or lost, MISUMI sets some measures such as encryption or password protection to prevent personal information from being easily accessible. Additionally, when personal data is to be deleted, or devices or electronic medium including personal data are to be discarded, MISUMI uses measures to ensure that personal information is not recoverable from the deleted or discarded medium.

(4) Technical Security Control

For databases which include personal information, MISUMI sets access control by limiting access rights so the employees who can access such information is limited. Also, MISUMI identifies and tracks those who access such systems. Additionally, MISUMI uses its security controls to protect the systems that handle personal information to prevent unauthorized access, illegal software, or information leakage.

(5) Understanding of Surrounding of Other Countries

When MISUMI handles personal information in other countries, MISUMI understands the personal protection system of such country and takes security control measures to comply with legal requirements.

April 1, 2022