



PRIVACY POLICY

Ritzwell & Co. believes that it is our responsibility to protect all personal information in our possession. We have established the following privacy policy to carry out such social responsibility and hereby declare our compliance with the following.

Privacy Policy

1. Use of Personal Information

Ritzwell & Co. uses personal information for the following purposes. Except where permitted under the Personal Information Protection Law or any other relevant law or regulation, we will obtain an individual's prior consent when we use an individual's personal information for any purpose other than as listed below.

- (1) Personal information of customers who purchase our products
 - (i) For the purpose of shipping products purchased from our company.
 - (ii) For the purpose of providing after-sale services related to (i).
 - (iii) For the purpose of providing information related to our new products and services.
 - (iv) For the purpose of ensuring proper and smooth transactions with customers.
- (2) Personal information of customers visiting our facilities and events
 - (i) For the purpose of offering explanation and support related to our facilities and events.
 - (ii) For the purpose of responding to inquiries received at a later date.
 - (iii) For the purpose of providing information related to our new products and services.
- (3) Personal information of customers who sent inquiries to our company
 - (i) For the purpose of responding to inquiries.

2. Provision to Third Parties

Except where permitted under the Personal Information Protection Law or any other relevant law or regulation, we will not provide an individual's personal information to third parties without that individual's prior consent.

3. Business Outsourcing

We may outsource the handling of personal information in whole or part to third parties who signed contracts, including a nondisclosure agreement with us, and disclose personal information to our subcontractors for the purposes described above. We set standards either equal or higher personal information protection standards under Article 20 of Personal Information Protection Law in terms of selecting subcontractors to conduct screening of these subcontractors. We will strictly supervise and manage the subcontractors.

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4. Legal Compliance

We comply with the Personal Information Protection Law and other related laws and regulations.

5. Safety Control Measures

We take necessary and appropriate precautions for security control for the prevention of leaks, loss, and damage of the personal information we handle by setting up internal rules and systems for the protection of personal information.

6. Request for Disclosure, etc.

We will respond appropriately and promptly to a request for disclosure, correction, and discontinuation of the use of personal data in our possession according to the procedures set by us.

7. Inquiries and our complaint reception desk

For requests the disclosure, correction, and discontinuation of use of personal information in our possession, inquiries in regard to the handling of personal information, and complaints, please contact our reception desk below:

Reception desk: General Affairs Department, Ritzwell & Co.

Telephone: +81-92-584-2240

E-mail: somu@ritzwell.com

8. Continuous Improvement

We pay attention to social conditions and industry trends related to personal information, our customers' requests, and the latest network technology trend to review internal rules and systems for the protection of personal information, as well as to review the appropriate operation of the system and on a timely basis to make continuous improvements.

As of September 1, 2015.

Shinsaku Miyamoto, President

Ritzwell & Co.



PRIVACY POLICY

EU Compliant

1. Scope

This privacy policy, compliant with the EU data protection rules, specifies how Ritzwell handles personal data obtained from individuals who reside in the European Economic Area (EEA): Iceland, Liechtenstein and Norway in addition to 28 EU member countries.

2. Purposes of and Lawful Basis for Processing of Personal Data

The purposes of and lawful basis for our processing personal data are as follows:

(1) Personal data concerning purchasers of our products

(i) To deliver purchased products to the purchaser

(Lawful basis: The processing is necessary to fulfill our contracts with the purchaser.)

(ii) To provide after-sale services for the purchased products

(Lawful basis: The processing is necessary to fulfill our contracts with the purchaser.)

(iii) To provide information on our new products and services

(Lawful basis: Personal data is processed to provide information as part of legitimate business interests we pursue, or based on the purchaser's consent.)

(iv) To carry out other transactions with the purchaser in an appropriate and smooth manner

(Lawful basis: The processing is necessary to fulfill our contracts with the purchaser.)

(2) Personal data concerning users of our facilities and participants in our events

(i) To give explanation about our facilities and events, and meet the needs of the facility users and event participants

(Lawful basis: The processing is necessary to perform our normal duties as part of legitimate business interests we pursue.)

(ii) To respond to inquiries from individuals who used our facilities or participated in our events

(Lawful basis: The processing is necessary to perform our normal duties as part of legitimate business interests we pursue.)

(iii) To provide information on our new products and services

(Lawful basis: Personal data is processed to perform our normal duties as part of legitimate business interests we pursue, or based on the purchaser's consent.)

(3) Personal data concerning inquirers

(i) To respond to inquiries

(Lawful basis: The processing is necessary to perform our normal duties as part of legitimate business interests we pursue.)

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3. Transfer of Personal Data outside the EEA

Ritzwell may transfer personal data we possess to a country outside the EEA to process it, where the rights of data subjects may not be protected at the same level as they are under the General Data Protection Regulation (GDPR). When personal data is transferred to such a country, Ritzwell shall take necessary and appropriate measures to protect the personal data by abiding by the Standard Contractual Clauses based on the GDPR.

4. Data Retention Period

Ritzwell shall retain any personal data no longer than a reasonable period necessary for the purposes of personal data processing.

5. Rights of Data Subjects

In regard of personal data we possess, data subjects shall hold the right to withdraw their consent, the right to have access to their personal data, the right to rectify the data, the right to delete the data, the right to limit its processing, the right to transfer the data, and the right to object to its processing.

When any data subject exercises any of these rights, Ritzwell shall respond to his or her claim without delay in accordance with procedures that we set forth.

6. Contact for Inquiries or Complaints

For any claims in exercising your data subject rights, and inquiries or complaints about our handling of your personal data, please contact us at the following office.

Reception desk: General Affairs Department, Ritzwell & Co.

Telephone: +81-92-584-2240

E-mail: somu@ritzwell.com

7. To lodge a Complaint with a Supervisory Authority

When any data subject considers that our processing of his or her personal data infringes the GDPR, the data subject has the right to lodge a complaint with a supervisory authority, in particular, in the member state of his or her habitual residence, place of work, or place of the alleged infringement.

As of September 1, 2018

Shinsaku Miyamoto, President

Ritzwell & Co.