

Privacy Policy

DIC Group Privacy Policy

In this DIC Group Privacy Policy (this “Privacy Policy”) we explain how we collect and use your personal data. This Privacy Policy applies to all your personal data that we process when you order, purchase or use our products and services, visit our websites, use our customer support or otherwise interact with DIC Corporation and its group companies (collectively “DIC Group”).

DIC Group is committed to safeguarding the privacy of the personal information that we gather concerning the contact persons at our current, former, and prospective customers, suppliers, vendors, website visitors, shareholders and partners of DIC Group. In this Privacy Policy, we explain which personal data we collect and how we use this data. Therefore, we encourage you to read this Privacy Policy carefully.

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I. DIC Group General Policy for Processing Personal Data

1 Who We Are

Your local DIC Group company, together with DIC Corporation, are responsible for the collection and use of your personal data as described in this Privacy Policy.

We have determined our respective responsibilities for compliance with the obligations under the Act on the Protection of Personal Information (“APPI”) and applicable privacy legislation for processing your personal data in relation to our global processing activities by means of an arrangement between us. In summary, if you want to exercise your rights, such as your right to access, correct, erase, restrict, object or port personal data or to withdraw your consent, or if you have any questions or complaints about the processing of your personal data, you can contact us in accordance with Section 11. Your local DIC Group company and DIC Corporation will assist each other where necessary to ensure that you can exercise your rights and your questions and complaints will be handled.

2 What Personal Data We Collect

If you only use our website for information purposes, i.e. if you do not register or otherwise provide us with information, we collect the following personal data that your browser transmits to our server, which is technically necessary for us to display our website to you and to ensure its stability and security:

IP address, date and time of the request, time zone difference to Greenwich Mean Time (GMT), content of the request (specific page), access status/HTTP status code, amount of data transferred in each case, website from which the request came, browser, operating system and its interface, language and version of the browser software.

Furthermore, we use Cookies on our website for marketing and analytics purposes. For more information and to Opt-Out visit our [Cookie Policy](#).

When you interact with us for business purposes, we may collect and process the following categories of personal data:

- Your name, the company you are associated with and your function;
- Your gender;
- Your contact information, such as your company address, region, country, division name, phone number, fax number and email address;
- Your participation in our trainings, symposia, congresses and seminars;
- Your professional interests; and
- Our communication with you.

3 What We Do with Your Personal Data

3.1. Personal Data of Those Other than Shareholders

Your personal data may be processed for the following purposes and on the basis of our legitimate interests as described in this Privacy Policy:

- Responding to inquiries regarding our business, products, services or events.
- Sending materials or products in response to a request regarding our business, products, services or events (including the fulfillment of contractual obligations).
- Providing guidance and supporting information regarding our business, products, services or events (including provision of

information corresponding to the preferences based on analyzed browsing history, purchase history, etc.).

- Allowing DIC Group to conduct its own surveys and to reflect the results of the same on its business, products, services or events.
- Confirming the payment method and payment status for users of the for-fee services operated by DIC Group.
- Performing statistics. We use automatic tools to perform statistical research into general trends regarding our services and products and your behavior and interests. To perform our research, we may merge and analyze the different types of data as described above, however we will only use aggregated data and do not use names, email addresses, or other directly identifying information.
- Complying with all statutory obligations including disclosure obligations. Where the processing of your personal data is required under applicable law or regulation, failure to provide us with your personal data could result in us and/or you being in violation or non-compliance with such law or regulation.

3.2. Personal Data of Shareholders

Personal data of shareholders may be processed for the following purposes and on the basis of our legitimate interests as described in this Privacy Policy:

- Exercising the rights or fulfilling the obligations of shareholders based on laws and regulations.
- Providing benefits to shareholders.

- Implementing measures to improve the relationship between shareholders and DIC Group.
- Implementing measures related to shareholder management, including compiling data pertaining to the shareholders based on prescribed standards in laws and regulations.

3.3. Others

When we process your personal data for our legitimate interests, we will take reasonable measures to prevent unwarranted harm to you. Our legitimate interests include our interest in performing contractual obligations for you or the company you are associated with, improving our products and services delivery by storing contact details, reducing costs, and improving our websites.

If we process your personal data for a purpose other than that for which we collected it initially (and we rely on a legal or regulatory basis other than consent or complying with statutory obligations for this new purpose), we will ascertain whether processing for this new purpose is compatible with the purpose for which the personal data were initially collected. More information on this assessment is available upon request (please see Section 9. Your Rights below).

4 How We Collect Your Personal Data

Most of the personal information we process is information that you knowingly provide to us. However, in some instances, we process personal information that we are able to infer about you based on other information you provide to us, from our interactions with you, or based on personal information about you that we receive from a third party.

5 How Long We Retain Your Personal Data

We will retain your personal data for as long as necessary to fulfil the aforementioned purposes for obtaining and processing your personal data. Specific retention periods are decided based on the following considerations: the purpose for obtaining and processing the personal data; the nature of the

personal data; and the necessity of retaining the personal data for legal or business reasons. However, such retention periods are subject to mandatory requirements or restrictions under applicable personal data protection laws.

6 Information Sharing and Joint Utilization

Your local DIC group company will process some of your personal data locally. However, as a global organization, many of our business activities can also be carried out (and business efficiencies achieved) by processing or consolidating information about you in specific or centralized databases and systems located at specific facilities worldwide. As a result, your information may be shared with other entities within DIC Group. However, we will only collect, receive, use, share, or otherwise process such personal data in accordance with applicable laws and regulations, this Privacy Policy, our internal privacy policy, any applicable specific local policy, and to support business purposes. Moreover, we maintain an internal strict access policy with regard to the processing of personal data. Only a limited group of authorized DIC Group staff with a need-to-know purpose (such as IT administrators, sales and marketing personnel, and account managers) will have access to your personal data.

As a general rule, we do not share your personal data with anyone outside DIC Group. However, we may share your personal data with trusted third parties that perform business functions or provide services to us. All such third parties will be required to adequately safeguard your personal data and will be subject to agreements that contain data protection requirements consistent with applicable laws and regulations. Your personal data may also be shared for investigations or compliance with legal obligation (e.g., disclosure to prevent crime or fraud, or to comply with a court order or legislation).

In Japan, we may use your personal data listed in Section 2 jointly with other entities within the DIC Group in Japan and overseas for the purposes specified in Section 3. In this case, we assume full responsibility for the management of your personal data in accordance with this Privacy Policy. In addition, when your data is used by or with DIC Group companies located overseas, each DIC Group company will take measures to comply with the

personal data protection laws of the countries, including Japan, where the data is provided.

DIC Corporation has the responsibility of managing personal data.

[Click here](#) to see the address and the name of representative of DIC Corporation.

7 Security Measures and Data Retention

We will secure your personal data properly in accordance with our IT and security policies so that your personal data are protected against unauthorized use, unauthorized access, or wrongful modifications, loss, or destruction. Your personal data will be stored no longer than is necessary for the purpose they were obtained or as required under applicable law and regulations, whichever is longer, including fulfillment of legal and fiscal obligations and for solving any disputes.

As shown below, we take measures to ensure the appropriate management of personal data, including the prevention of leakage, loss and damage of the data.

7.1. Formulation of the Basic Policy

We have established this privacy policy to ensure the proper handling of personal information and to inform you of the contact point for handling questions and complaints.

7.2. Development of Rules on Handling of Personal Data

The "Data Protection Policy" and other internal rules have been established for each stage (acquisition, use, storage, provision, deletion, disposal, etc.) regarding handling methods, the person in charge and their duties.

7.3. Organizational Safety Management Measures

- We set a person in charge of personal data protection.
- We have identified DIC Group staff that handle personal data and the range of the data to be handled by such DIC Group staff.

- We established a system for reporting to the person in charge of protecting personal data when the fact or sign of violating laws, regulations or internal rules is identified.
- We periodically conduct a self-inspection of the status of the handling of personal data, and conduct audits by other departments and external parties if necessary.

7.4. Human Safety Management Measures

We conduct a training periodically for DIC Group staff about matters concerning the handling of personal data.

Our internal rules include matters relating to the confidentiality of personal data.

7.5. Physical Safety Management Measures

We manage the entry and exit of DIC Group staff in areas where personal data is handled.

We take measures to prevent theft or loss of equipment, electrical media and documents that handle personal data.

We take measures to prevent personal data from being disclosed when equipment and electronic media are being transported, including transportation internally within a DIC Group office.

7.6. Technical Safety Management Measures

We restrict the access to personal data to the person in charge and we limit the range of personal data to be handled.

We introduced a mechanism to protect information systems that handle personal data from unauthorized external access or unauthorized software.

7.7. Understanding the External Environment

We implement security control measures after understanding the systems for protecting personal information in foreign countries where cloud servers that store personal information are located.

8 International Transfers of Personal Data

Your personal information may be transferred to countries outside the countries where you are in whose laws may not afford the same level of

protection of your personal information. Where necessary, we will ensure that adequate safeguards are in place to comply with the requirements for the international transfer of personal data under the APPI and other applicable data protection laws.

9 Your Rights

You can contact us to exercise any of the rights you are granted under applicable data protection laws, which includes (1) the right to access your data, (2) to rectify them, (3) to erase them, (4) to restrict the processing of your data (including deleting and stopping the provision to third parties) , (5) the right to receiving a file of your personal data and/or (6) the right to object to the processing, and where we have asked for your consent, to withdraw this consent. These rights will be limited in some situations. We will, for example, deny your request for access when necessary to protect the rights and freedoms of other individuals or refuse to delete your personal data in case the processing of such data is necessary for fulfillment of statutory obligations or in other cases specified in laws and regulations. The right to data portability, for example, does not apply in case the personal data was not provided by you or if we process the data not on the basis of your consent or for the performance of a contract.

When you would like to exercise your rights, please send your request to the contact details in Section 11. Please note that we may need you to provide additional information to confirm your identity. You can also contact us if you have any questions, remarks or complaints in relation to this Privacy Policy.

9.1. Right to Access

You may ask us whether or not we process any of your personal data and, if so, receive access to that data in the form of a copy. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal data concerned as well as any other information necessary for you to exercise the essence of this right.

9.2. Right to Rectification

You have the right to have your data rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal data about you and, taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.

9.3. Right to Erasure

You also have the right to have your personal data erased, which means the deletion of your data by us and, where possible, any other controller to whom your data has previously been made public by us. Erasure of your personal data only takes place in certain cases, prescribed by laws and regulations, or listed under Article 17 GDPR. This includes situations where your personal data are no longer necessary in relation to the initial purposes for which they were processed as well as situations where they were processed unlawfully. Due to the way we maintain certain services, it may take some time before backup copies are erased.

9.4. Right to Restriction of Processing

You have the right to obtain the restriction of the processing of your personal data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data was contested but some time is needed for us to verify their (in)accuracy. This right does not prevent us from continuing to store your personal data. We will inform you before the restriction is lifted.

9.5. Right to Receive Your File (Data Portability)

When it is permitted by laws or regulation, your right to data portability entails that you may request us to provide you with your personal data in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible, we will transmit your personal data directly to the other controller.

9.6. Right to Object

You also have the right to object to the processing of your personal data, which means you may request us to no longer process your personal data.

This only applies in case the “legitimate interests” ground (including profiling) constitutes the legal basis for processing (see Section 3 above).

At any time and free of charge you can object to direct marketing purposes in case your personal data are processed for such purposes, which includes profiling purposes to the extent that it is related to such direct marketing. In case you exercise this right, we will no longer process your personal data for such purposes.

10 How We Update this Privacy Policy

We have most recently updated this Privacy Policy on 31 January 2023 and it replaces earlier versions. We will update this Privacy Policy from time to time and notify you of any important changes by posting the revised Privacy Policy on our website.

11 Contact Details for Your Privacy Inquiries

Contact

Japan

DIC Corporation

Corporate Communications Department

DIC Building, 7-20, Nihonbashi 3-chome, Chuo-ku, Tokyo 103-8233, Japan

Tel: +81-3-6733-3034 Fax: +81-3-6733-3038

China region

DIC (China) Co., Ltd.

Corporate Communications Department

12th Fl., Metro Plaza, No. 555 Lou Shan Guan Road, Shanghai 200051,

People's Republic of China

Tel: +86-21-6228-9922 Fax: +86-21-6241-9221

Asia-Pacific region

Data Protection Officer

dpo@dic.com.sg

Quebec/Canada region
Innovation DIC Chimitroniques Inc
Data Protection Officer
RPRP@diccanada.com

For Inquiries Related to DIC Group Privacy Policy

II. Processing Personal Data of Data Subjects Living in Mainland China

Chapter I and Chapter II also apply to people who live in Mainland China. If any of the provisions of Chapter II conflicts with those set forth in Chapter I, the conflicting provisions of Chapter II take precedence with respect to processing personal data of data subjects living in Mainland China.

01 Personal Data Controller

Company	Contact Address and contact information	The purpose of processing personal data	The means of processing personal data	The type of personal data to be processed
Changzhou Huari New Material Co., Ltd.	No. 2, Donggang Road 3, Xinbei District, Changzhou 213127, People's Republic of China	The purpose listed in Chapter I Section 3	Collection/ Storage/ Use/ Processing/ Transmission/ Provision/ Disclosure/ Deletion of personal information, etc.	The personal information listed in Chapter I Section 2
DIC (China) Co., Ltd.	12th Fl., Metro Plaza, No. 555 Lou Shan Guan Road, Shanghai 200051, People's Republic of China			
DIC Graphics (Guangzhou) Ltd.	No. 77, Xin Zhuang Er Road, Yonghe Subzone, Guangzhou Economic & Technological Development District, Guangzhou 511356, People's Republic of China			
DIC Graphics (Shenyang) Co., Ltd.	6 Yuan Yi Jie, Taiwan Industrial Park, Yaopu Town , Tieling city, Liaoning Province 112000, People's Republic of China			

DIC (Guangzhou) Co., Ltd.	Room 8009-8010, No.284 Dongjiang Avenue, Huangpu District, Guangzhou 510060, People's Republic of China			
DIC (Shanghai) Co., Ltd.	Room 609, Hengshan international business building, 38 Yinglun Road, China (Shanghai) pilot Free Trade Zone			
DIC Synthetic Resins (Zhongshan) Co., Ltd.	No. 15, Shichong Road, Concentrated Constructed Area, Zhongshan Torch Hi-tech Industrial Development Zone, Zhongshan, Guangdong Province 528437, People's Republic of China			
DIC Zhangjiagang Chemicals Co., Ltd.	No. 511, Changjiang East Road, Jiangsu Yangtze River International Chemical Industry Park, Zhangjiagang, Jiangsu Province 215635, People's Republic of China			

Hainan DIC Microalgae Co., Ltd.	Jia Zi Zhen Xin Min Shi Lang Po, Qiongsan District, Haikou City, Hainan Province			
Nantong DIC Color Co., Ltd.	No. 11 Zhong Yang Road, Nantong Economic & Technological Development Area, Jiangsu Province 226009, People's Republic of China			
Qingdao DIC Finechemicals Co., Ltd.	No. 10, No. 177, Zhuzhou Road, Laoshan District, Qingdao, Shandong Province 266101, People's Republic of China			
Qingdao DIC Liquid Crystal Co., Ltd.	A Area, Hit Industrial City, 177 Zhuzhou Road, Qingdao, Shandong Province 266101, People's Republic of China			
Shanghai DIC Ink Co., Ltd.	No. 3888, Humin Road, Minhang District, Shanghai			

	201108, People's Republic of China			
Shanghai DIC Pressure-Sensitive Adhesive Materials Co., Ltd.	Part A of Floor1&2, (No.71 Warehouse) Building 3, No.17 Hancheng Road, China (Shanghai) Free Pilot Trade Zone, Province 200131, People's Republic of China			
Shenzhen-DIC Co., Ltd.	2nd Fl., Shenri Ink Company Office Building, 1035 Nanshan Road, Nanshan, Shenzhen 518052, People's Republic of China			
DIC Graphics (Dongguan) Ltd.	No.36 East Lisha Road, Shatian Town,Dongguan, Guangdong Province 523290, People's Republic of China			
Guangdong DIC TOD Resins Co., Ltd.	Huacai Chemical Coating Mall, Wengcheng Industrial Transfer Zone, Wengcheng Town, Wengyuan County, Guangdong			

	Province 512627, People's Republic of China			
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If the purposes and means of processing personal data and the categories of personal data to be processed are to be changed, we shall re-obtain your consent.

When collecting your personal data from a third party other than yourself or your parents or other guardians, we will confirm the following matters with the provider of personal data, and when it is necessary to collect data beyond the consent obtained by the provider of the personal data, we will obtain your consent.

- (i) The source and validity of personal data;
- (ii) The scope of consent obtained by the provider of the personal data and the purposes and means of its process, including consent to provision, transmission, public disclosure, etc.

02 How We Transfer Your Personal Information Overseas

Upon obtaining your separate consent, we will directly transfer your personal data to the following recipient, which is located outside of the territory of the PRC. We will process your personal data in accordance with the purposes and means of processing, etc. prescribed in this Privacy Policy.

Company	Contact Address and information	The purpose of processing personal data	The means of processing personal data	The type of personal data to be processed	The way and Procedure for you to Exercise rights
DIC Corporation	Corporate Communications Department	The purpose listed in Chapter I Section 3	Collection/ Storage/ Use/ Processing/ Transmission/ Provision/ Disclosure/	The personal information listed in Chapter I Section 2	Sending documents

	DIC Building, 7-20, Nihonbashi 3-chome, Chuo-ku, Tokyo 103-8233, Japan		Deletion of personal information, etc.		
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03 Your Rights

If you are living in Mainland China, Chapter I Section 9 does not apply to you. Instead, please refer to the contents in this Section 3 of Chapter II.

Your Rights are as below:

3.1. The right to access

You may have access to your personal data unless otherwise provided by laws and regulations. You may access your personal data by the following means:

Lodge a request through the contact details set forth in Chapter I Section 11 to contact us.

If you have problems in accessing your information, you may lodge a request through the contact details set forth in Chapter I Section 11 to contact us.

3.2. The right to correct your personal data

You may ask us to correct your personal data if you find any of your personal data we are processing are incorrect. You may send an email to the contact mentioned in Chapter II Section 5 to request such correction.

We will revert to you within 3 business days.

3.3. The right to delete your personal data

You may ask us to delete your personal data in the following circumstances:

- (i) the personal data have been unlawfully processed;
- (ii) we process your personal data without your consent;
- (iii) our processing of your personal data against your consent;
- (iv) you will no longer use our products or services, or you have deactivated your account; and
- (v) we will no longer provide our products or services to you.

When we delete your personal data upon your request, we will notify the entities who received your personal data from us and request such entities to delete your personal data unless otherwise provided by laws and regulations or such entities have already obtained your consent separately.

3.4. The right to withdraw consent

If you want to withdraw your consent, please contact the Personal Data Controller. We will revert to you within 5 business days.

Your withdrawal of consent shall not affect the validity of any activity of processing of your personal data already carried out prior to the withdrawal based on your consent.

3.5. The right to restrain automated decision-making by the information system

We may make decisions based on an automated decision-making process while providing our services. If such decisions significantly affect your legitimate rights and interests, you may request us to provide an explanation of the decision-making process.

We will also take suitable remedial measures to safeguard your legitimate rights and interests.

3.6. The right to have access to a copy of your personal data

You may ask us whether or not we process any of your personal data and, if so, receive access to that data in the form of a copy. When complying with an access request, we will also provide you with the following additional information,

- (i) the personal data related to you or the categories of personal data related to you which are in our possession;
- (ii) the source of the above personal data, the purposes of the processing and its retention period; and
- (iii) the recipients or categories of recipients to whom your personal data have been disclosed, if any, including their name and contact information.

3.7. Request-response mechanism

To ensure the security of your personal data, we may ask you to verify your identity before we process your request when you lodge a request.

We will revert to you within 5 business days. If you are not satisfied with our reply, you may make a complaint through the channels mentioned in Chapter II Section 5.

For reasonable requests, in general, no fees will be charged for processing your request. For repeated requests that exceed a reasonable limit, we will charge fees based on the cost as appropriate. As for unreasonably repeated requests, requests requiring excessive technical means, requests posing risks to others' legitimate rights and interests or impractical requests, we may

refuse to respond. In accordance with laws and regulations, we will not be able to respond to requests which:

- (i) are directly related to national security or national defence;
- (ii) are directly related to public safety, public health, and major public interests;
- (iii) are directly related to crime investigation, prosecution, trial and judgment enforcement;
- (iv) are lodged with subjective malice or related to abuse of rights;
- (v) will bring significant damages to you or other individuals' or organisations' legitimate rights and interests if a response is provided for such requests; and
- (vi) are related to trade secret.

04 How We Process Personal Data of Minors Under the Age of 14

Our Service is primarily for adults. Minors under the age of 14 shall not use our Service alone without the consent of their parents or other guardians.

In cases where the personal data of a minor under the age of 14 is collected with the consent of the parents or other guardians, we will use the personal data only if permitted by applicable laws, or with the express consent of parents or other guardians, or when it is necessary to protect a minor under the age of 14.

If we find ourselves collecting personal data of a minor under the age of 14 without the prior consent of verifiable parents or other guardians, we will endeavor to delete the relevant personal data as soon as possible.

05 The Channels and Mechanism to Handle Requests and Complaints by Personal Data Subjects

If you have any requests/complaints, you may lodge a request/complaint through the contact details set forth in Chapter I Section 11 to contact us. Your requests/complaints will be properly handled and we will revert to you within 5 business days. If you are still not satisfied with our reply or if you think your legitimate rights and interests have been damaged due to our data processing behaviour, you can also turn to competent authorities for help.

06 How We Update this Privacy Policy

As for major changes, we will provide notifications by email, message and/or pop-up notification. If your consent to such changes is required under relevant laws and regulations, we will obtain your consent accordingly.

Major changes in this policy include, but are not limited to:

- (i) when there are significant changes in our service model, such as changes in our purposes of processing personal data, categories of personal data we are processing, the way we use your personal data, etc;
- (ii) when there are significant changes in our company's ownership structure and organizational structure, such as the change of ownership due to business adjustment, merger or acquisition;
- (iii) when there are significant changes in the recipients who we share with, transfer to or disclose your personal data to;
- (iv) when there are significant changes in your rights and the way you exercise your rights under this policy;
- (v) when there are significant changes in our departments who process your personal data, our contacts and complaints channels; and
- (vi) when the risk assessment report shows that there are high risks.

We will also archive the old version of our policy to ensure your ability to access to it.

III. Processing Personal Data of Data Subjects Living in Thailand

Chapter I and Chapter III also apply to people who live in Thailand. If any of the provisions of Chapter III conflicts with those set forth in Chapter I, the conflicting provisions of Chapter III take precedence with respect to the processing of personal data of data subjects living in Thailand.

01 Your Rights

If you are living in Thailand, Chapter I Section 9 does not apply to you. Instead, please refer to the contents in this Section 1 of Chapter III.

Your Rights are as below;

1.1. The right to withdraw your consent at any time

If you have consented to our processing of your personal data, you have the right to withdraw your consent at any time. This will not affect the lawfulness of the processing of your personal data prior to the withdrawal of consent.

1.2. The right to request access to and obtain copy of the personal data related to you and to request the disclosure of the acquisition of the personal data obtained without your consent

We aim to respond to any requests for information promptly, and in any event, within the legally required time limits.

1.3. The right to data portability

You have the right to receive your personal data which is under our possession in a commonly used and machine-readable format, and you have the right to ask us to send, or transfer, your personal data in such format to other data controllers, if it can be done by automatic means.

1.4. The right to object the collection, use, or disclosure of the personal data concerning you at any time in certain circumstances, including when your data is being processed for direct marketing purpose.

1.5. The right to request us to erase or destroy your personal data, or anonymize your personal data to become the anonymous data which cannot identify the data subject

You have the right to request for the erasure, destruction or anonymization of your personal data in the following cases:

- The personal data is no longer necessary in relation to the purposes for which it was collected and processed;
- When you withdraw consent, and we have no other lawful basis to continue with the processing of the personal data;
- You object to our processing of the data in specific circumstances as prescribed by the applicable personal data protection law; or
- Your personal data has been unlawfully processed.

If we have made such personal data available to the public, we will inform other data controllers to stop processing, and to erase, destroy or anonymize personal data as well.

1.6. The right to request the Data Controller to suspend the use of the personal data

You have the right to request us to suspend our processing of your personal data in the following cases:

- You contest the accuracy of the personal data we process about you. We must restrict processing of the contested data, until we can verify the accuracy of your personal data;
- personal data which should be erased or destroyed, but you request the suspension of the use of such personal data instead;
- It is no longer necessary to retain such personal data for the purposes of which it has been collected, but you request us to retain such personal data for the purposes of the establishment, compliance, exercise or defense of legal claims; or
- When you request to exercise the right to object and such request is pending verification that there are compelling legitimate grounds to process such personal data, or the processing is for the establishment, compliance, exercise or defense of legal claims, or pending an examination whether the processing of the personal data is for scientific or historical research, or statistical purposes in order to carry out a task by us, which is carried out for reasons of public interest.

1.7. The right to request to us that the personal data remains accurate, up-to-date, complete, and not misleading

You have the right to request for your personal data to be amended, or rectified, where it is inaccurate (for example, if you change your name or address), and to have incomplete personal data completed.

When practically possible, once we are informed that any personal data processed by us is no longer accurate, we will carry out updates, as appropriate, based on your updated information. We reserve the right to

request for documentary evidence in certain circumstances when determining whether to proceed with your request.

1.8. The right to file a complaint to the personal data protection supervisory authority in Thailand in the event that we, including our employees, our service providers or the Data Processor violate or do not comply with this Privacy Policy, the applicable personal data protection law, or notifications, rules or regulations issued pursuant to the applicable personal data protection law.

The exercise of any of your rights specified above will be subject to the conditions and limitations of the applicable data protection law – for example, we may deny your request for access when necessary to protect the rights and freedoms of other individuals or refuse to delete your personal data in case the processing of such data is necessary for compliance with legal obligations. The right to data portability, for example, does not apply if we process the data not on the basis of your consent or for the performance of a contract, etc.

02 Cookie

DIC Group uses cookies on the www.dic-global.com website (the “Service”). By using the Service, you agree to the use of necessary cookies. You are entitled to determine whether you would like to grant consent for other types of cookies used on our website, as written below, or not.

03 Contact Details for Inquiries

Should you have any inquiries on this Privacy Policy or wish to exercise any of your Rights, please contact the Data Protection Officer.

IV. Processing Personal Data of Data Subjects Living in Taiwan

Chapter I and Chapter IV also apply to people who live in Taiwan. If any of the provisions of Chapter IV conflicts with those set forth in Chapter I, the conflicting

provisions of Chapter IV take precedence with respect to processing personal data of data subjects living in Taiwan.

01 Where We Process Your Personal Data

We may process your personal data in all countries in which there is a DIC Group company.

02 The Classification of Personal Data

When you interact with us for business or informational purposes, we may collect, process and use the following categories of personal data under the Taiwan Personal Information Protection Act (PIPA):

- Code C001 Personal identifiers: your name, the company you are associated with, and your job role; your contact information, such as your company address, region, country, division name, phone number, fax number and email address; your IP address used to access our server;
- Code C011 Personal descriptors: your gender;
- Code C054 Occupational specialization and expertise: your professional interests;
- Code C132 Unclassified: your participation in our trainings, symposia, congresses, seminars; Our communications with you, information regarding your access of our server, such as date and time of the request; time zone difference to Greenwich Mean Time (GMT); content of the request (specific page); access status/HTTP status code; amount of data transferred in each case; website from which the request came; the browser used; the operating system and its interface; the language and version of the browser software; cookies.

03 Your Rights

If you are living in Taiwan, Chapter I Section 9 does not apply to you. Instead, please refer to the contents in this Section 3 of Chapter IV.

Your Rights are as below;

3.1. The right to make an inquiry of and to review your personal data. We may charge a handling fee pursuant to Article 14 of the PIPA;

3.2. The right to request a copy of your personal data;

3.3. The right to supplement or correct your personal data. However, pursuant to Article 19 of the Enforcement Rules of the PIPA, you shall provide us with an explanation for the requested revision;

3.4. The right to demand the cessation of the collection, processing or use of your personal data; and

3.5. The right to erase your personal data.

Please note that pursuant to Article 10 of the PIPA, the preceding sections 3.1 and 3.2 may not be available to you when (i) national security, diplomatic or military secrets, overall economic interests or other material national interests may be harmed; (ii) a government agency may be prevented from performing its statutory duties; or (iii) the material interests of DIC Group or any third parties may be adversely affected.

In addition, pursuant to Article 11 of the PIPA and Article 21 of the Enforcement Rules of the PIPA,

the preceding section 3.4 may not be available to you when the processing and use of your personal data (A) is either “necessary for the performance of an official duty or business duty” as defined under Article 21 of the Enforcement Rules of the PIPA or has been agreed to by you in writing, and (B) if we have already recorded that there is a dispute over the accuracy of the personal data; and

the preceding section 3.5 may also not be available to you when continued processing or use of your personal data is either “necessary for the performance of an official duty or business duty” as defined under Article 21 of the Enforcement Rules of the PIPA or has been agreed to by you in writing.

04 DIC Group's Collection, Use and Processing of Your Personal Data

You consent to allow DIC Group to collect, use and process your personal data pursuant to the scope detailed in the DIC Group Privacy Policy above.

V. Processing Personal Data of Data Subjects Living in India

Chapter V applies to the collection and processing of personal information and sensitive personal information ("SPI") from within the territory of India. If you are an Indian resident, your data is collected and stored by DIC Group companies.

In addition to Chapter V, Chapter I also applies to persons who reside in India. If any of the provisions of Chapter V conflicts with those set forth in Chapter I, conflicting provisions of Chapter V take precedence with respect to the processing personal data of data subjects living in India.

The information that we collect from you may be personal information which is directly or indirectly capable of identifying you, or SPI under the Indian Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (Privacy Rules), which includes your financial information or health information.

01 Your Consent

You hereby consent to the collection, use, processing, transfer and disclosure of your personal information (including SPI) in accordance with and for the purposes stated in this Privacy Policy.

Notwithstanding anything contained in Chapter I, we will only collect, use, process, transfer or disclose your personal data to the extent that it constitutes SPI on the basis of your consent, unless otherwise required by applicable law.

Notwithstanding anything contained in Chapter I of this Privacy Policy, if we process your personal data including your SPI for purposes other than that for which it was collected initially, we will duly inform you and obtain your consent at the time for processing your personal data including your SPI for such new purpose.

02 Your Rights

Notwithstanding anything contained in Chapter 1, the rights available to you in relation to your personal data and SPI are:

- the right to review the personal information and SPI that you have provided to us
- the right to correct or amend this information, wherever feasible, to ensure its accuracy
- the right to withdraw your consent in relation to any SPI provided by you

03 Transfer

Notwithstanding anything contained in Chapter 1 of this Privacy Policy, we may transfer your personal information including your SPI outside India in accordance with applicable law. We will ensure that your SPI is only transferred to a recipient that maintains the same or better level of protection as required under the Privacy Rules.

We have adopted such security standards to protect the security of your information that are commensurate with the information that is collected by us as well as the nature of our business as may be required under applicable law.

04 Grievance Redressal

If you have any concerns or questions in relation to this Privacy Policy, you may address them to our Grievance Officer whose name and email address are as follows:

Asia-Pacific region
Data Protection Officer
dpo@dic.com.sg

VI. Processing Personal Data of Data Subjects Living in Indonesia

Chapter I and Chapter VI also apply to people who live in Indonesia. If any of the provisions of Chapter VI conflicts with those set forth in Chapter I, the conflicting provisions of Chapter VI take precedence with respect to processing personal data of data subjects living in Indonesia.

01 Your Rights

If you are living in Indonesia, Chapter I Section 9 does not apply to you. Instead, please refer to the contents in this Section 1 of Chapter VI.

Your Rights are as follows:

1.1. The right to the confidentiality of your personal data

1.2. The right to access your personal data

You are entitled to have access to your personal data that we retrieve for our use. Further, you may also request a historical personal data that you have submitted to us. Please see Chapter I Section 11 to access your personal data. Otherwise, please contact the contact details for more information.

1.3. The right to update your personal data

You may ask us to update your personal data if you find any of your personal data we are processing are updated. Please see Chapter I Section 11 to access your personal data.

We will revert to you within 5 business days.

1.4. The right to delete your personal data

You may ask us to delete your personal data in the following circumstances:

- (i) the personal data has been unlawfully processed;
- (ii) we process your personal data without your consent;
- (iii) our processing of your personal data against your consent;
- (iv) you will no longer use our products or services, or you have deactivated your account; and
- (v) we will no longer provide our products or services to you.

When we delete your personal data upon your request, we will notify the entities who received your personal data from us and request such entities to delete your personal data unless otherwise provided by laws and regulations or such entities have already obtained your consent separately. Your relatives or representatives may also request for deletion under certain circumstances which makes it impossible for you to submit your request in person (*such as, you have passed away*). We may request supplemental documents to support your reasons on delegating such request to your relatives or representatives.

1.5. The right to withdraw consent

If you want to withdraw your consent, please contact the Personal Data Controller.

1.6. The right to object to the utilization purpose of your personal data

You are entitled to object at any time to our utilization purpose of your personal data to achieve our legitimate interest outside those purposes set out herein or any other purposes in relation to it on grounds relating to your particular situation. In such case, we will cease to process your personal data unless we can demonstrate a compelling legitimate ground for the processing which override your rights and freedoms, or for the establishment, exercise or defense of legal claims.

VII. Processing Personal Data of Data Subjects Living in Quebec/Canada

Chapter I and Chapter VII also apply to data subjects who live in Quebec/Canada. If any of the provisions of Chapter VII conflicts with those set forth in Chapter I, the conflicting provisions of Chapter VII take precedence with respect to processing personal data of data subjects living in Quebec/Canada.

01 What We Do with Your Personal Data

1.1 If you are living in Quebec/Canada, Chapter I Section 3 does apply to you and your personal data is therefore processed for the purposes described in Chapter I Section 3. However, please note that your personal data is only processed in accordance with your consent or as otherwise permitted by the law.

1.2 In general, we collect your personal data in order to offer you our products and services and to improve them. Except as provided by law, if we need to use your personal data for purposes other than those set out in this Privacy Policy, we will obtain your consent before using this information.

02 How We Collect Your Personal Data

If you are living in Quebec/Canada, Chapter I Section 4 does apply to you. However, please note that if we collect your personal data from a third party, it will be in accordance with your consent or if permitted by the law.

03 Transfers of Personal Data

If you are living in Quebec/Canada, the contents of Chapter I Section 6 and 8 is completed by the contents in this Section 3.1 and 3.2 of Chapter VII.

3.1. We may disclose your personal data with trusted third parties that perform business functions or provide services to us.

3.2. When we disclose your personal data to third parties accordingly to Chapter I Section 6 and 8, we ensure that these third parties undertake to comply with the requirements specifically set out by law.

3.3. The contents of Chapter I Section 6 and 8 apply to any transfer of personal data outside the province of Quebec.

04 How We Process Personal Data of Minors Under the Age of 14

4.1 Our Service is primarily for adults. Minors under the age of 14 shall not use our Service alone without the consent of their parents or other guardians. We won't collect the personal data of minor under the age of 14 without the consent of the person having parental authority or of the tutor unless collecting the information is clearly for the minor's benefit.

4.2 In cases where the personal data of a minor under the age of 14 is collected with the consent of the person having parental authority or of the tutor, we will use the personal data only if permitted by applicable laws.

05 Your Rights

If you are living in Quebec/Canada, the contents of Chapter I Section 9 is completed by the contents in this Section 4 of Chapter VII.

5.1. Obtain information on the processing of your personal data

You have the right to obtain additional information relating to the processing of your personal data. If you cannot find the answer to your questions in the Privacy Policy, you can contact our Data Protection Officer at the coordinates provided in Chapter 1 Section 11.

5.2. Being informed if you are the subject of a decision based exclusively on automated processing (for the data subjects living in Quebec only)

If we use your personal data to make a decision based exclusively on automated processing, we will notify you no later than the time we inform you of the decision. In such a case, you also have the right, upon request:

- to be informed of the information used to make the decision;
- the reasons as well as the main factors and parameters that led to the decision;
- to have the personal data used to make the decision rectified; and
- to present your observations to a member of our team able to review the decision if necessary.

You may exercise this right by contacting our Data Protection Officer at the coordinates provided in Chapter 1 Section 11.

5.3. De-indexing, re-indexing and ceasing to distribute your personal data (for the data subjects living in Quebec only)

You have the right to require us to cease the distribution of your personal data or to de-index any hyperlink attached to your name allowing access to your information by a technological mean if the dissemination of your information contravenes the law or a court order.

The right also exists when:

- The distribution of the information causes you serious prejudice in relation to the respect of your reputation or privacy;
- This prejudice outweighs the interest of the public in knowing the information or the interest of any person in expressing themselves freely;
- The cessation of distribution, re-indexation or de-indexation does not exceed what is necessary for preventing the perpetuation of the prejudice.

You may exercise your right by contacting our Data Protection Officer at the coordinates provided in Chapter 1 Section 11. We generally respond to such requests within 30 days of receiving all necessary information. If we are unable to respond to your request, or if additional time is required to satisfy a request, we will inform you in writing.

5.4. Dissatisfaction with the management of your personal data

If you have any questions, concerns or dissatisfaction with this Privacy Policy or with the management of your personal data, you may contact our Data Protection Officer at the coordinates provided in Chapter 1 Section 11.

Cookie Policy

DIC Group uses cookies on the www.dic-global.com website (the “Service”). By using the Service, you consent to the use of cookies.

Our Cookie Policy explains what cookies are, how we use cookies, how third-parties we may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

What Cookies Are

Cookies are small pieces of text sent to your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you.

Cookies can be “persistent” or “session” cookies. Persistent cookies remain on your personal computer or mobile device when you go offline, while session cookies are deleted as soon as you close your web browser.

How We Use Cookies

When you use and access the Service, we may place a number of cookies files in your web browser.

We use cookies for the following purposes:

- To enable certain functions of the Service
- To provide content personalized to reflect visitors' specific interests and preferences (including displaying or introducing recommended products and services)
- To improve products and services, and compiling usage statistics

We use both session and persistent cookies on the Service and we use different types of cookies to run the Service:

Essential cookies. We may use cookies to remember information that changes the way the Service behaves or looks, such as a user's language preference on the Service.

Analytics cookies. We may use analytics cookies to track information how the Service is used so that we can make improvements. We may also use analytics cookies to test new advertisements, pages, features or new functionality of the Service to see how our users react to them.

Third-party Cookies

In addition to our own cookies, we may also use various third-parties cookies to report usage statistics of the Service, deliver advertisements on and through the Service, and so on.

Cookies Examples

Examples of cookies used on this Website are as follow:

Cookie Name	Company Name	The purpose of processing personal data	The type of cookie	Retention period of personal information
docodoco_id	Geolocation Technology, Inc.	Used in marketing activities.	Analytics cookie	180 days
surfpoint_id	Geolocation Technology, Inc.	Used in marketing activities.	Analytics cookie	180 days
ANONCHK	Microsoft Corporation	Indicates whether MUID is transferred to	Analytics cookie	10 minutes

		ANID, a cookie used for advertising. Clarity does not use ANID and so this is always set to 0.		
MUID	Microsoft Corporation	Indicates whether or not to refresh MUID.	Analytics cookie	7 days
SM	Microsoft Corporation	Used in synchronizing the MUID across Microsoft domains.	Analytics cookie	Session

What are Your Choices Regarding Cookies

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

- For the Chrome web browser, please visit this page from Google: <https://support.google.com/accounts/answer/32050>
- For the Microsoft Edge web browser, please visit this page from Microsoft: [Delete cookies in Microsoft Edge](#)
- For the Firefox web browser, please visit this page from Mozilla: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- For the Safari web browser, please visit this page from Apple: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

For any other web browser, please visit your web browser's official web pages.

We will cease processing a cookie when you disable that cookie. If, however, we have already collected information from that cookie prior to its being disabled, we may still use that information after you have disabled the cookie.

Your current state: Allow all cookies.