

Customer Privacy Notice – Marketing & Sales

Updated: April 5th, 2024

This Customer Privacy Notice provides basic guidelines for the processing of personal data of customers at Kuraray Co., Ltd. and its affiliates ([“Kuraray Group,”](#) “we,” “us,” or “our”). Kuraray Group recognizes the importance of personal data protection and will protect personal data by ensuring compliance with applicable laws and regulations related to personal data protection.

This Customer Privacy Notice is composed of four chapters. Chapter 1 provides general information for customers (including prospects) whose personal data may be processed by Kuraray Group. Chapters 2, 3, and 4 provide region-specific information for those located or residing in Japan, the European Union/the United Kingdom, or California (U.S.). In the event of a conflict or inconsistency, Chapters 2, 3, and 4 shall prevail over Chapter 1.

Chapter 1: For all customers

1. Collection of personal data

Kuraray Group will specify the purposes of use and collect personal data in a lawful and appropriate manner. Kuraray Group may collect personal data by your provision of personal data to us, through your accessing our websites or other means, or from business partners, suppliers, vendors, service providers, or third parties with which we transact. Personal data collected and processed by Kuraray Group includes:

- Name, job title, address, phone number, and e-mail address
- Information on use of the Internet and digital services (information collected by Kuraray Group or provided by third parties other than Kuraray Group, such as website browsing history, application use, search keywords, number of views and clicks on advertisements and content, browsing time, browsing method (e.g., type of browser), use environment of each terminal used for browsing (connection environment, location, and carrier information), cookies, IP addresses, and the International Mobile Equipment Identity of each terminal)
- Other personal data necessary for performance of Kuraray Group’s business

2. Purposes of use of personal data

Kuraray Group will use personal data for the following purposes and to the extent deemed relevant to those purposes. Except otherwise stipulated by applicable laws and regulations, Kuraray Group will not use personal data for any purpose outside of those stated below or in region-specific chapters, without data subject consent.

- Planning, researching, and developing products and services; and information gathering, surveys, or analysis related to these activities
- Providing and proposing products, services, and related information (including announcing special offers)
- Sending newsletters and optimizing their content

- Sending greeting letters to survey respondents and other greetings, such as season's greetings, etc.
- Responding to inquiries, document or other requests, complaints, etc. (including contacting data subjects to obtain additional information needed to respond)
- Improving the usability of websites (e.g., authentication at login) and distributing and optimizing advertisements and content
- Enhancing data protection and security, preventing fraud, and cooperating in the investigation of crimes (e.g., cyberattacks)
- Exercising rights and fulfilling obligations under laws and regulations or contracts
- Managing business relationships other than stated above

3. Requests for disclosure, correction, etc. of personal data

In accordance with applicable laws and regulations, Kuraray Group will respond appropriately to requests for disclosure or correction of personal data stored by Kuraray Group after verifying the identity of the data subject making the request.

4. Disclosure of personal data to third parties

Kuraray Group will not disclose or provide personal data to third parties without data subject consent, except where otherwise stipulated by applicable laws and regulations.

5. Retention period of personal data

Kuraray Group will retain personal data for the duration of our relationship with data subject, and for as long as necessary to fulfill the purposes for which we collect it, including fulfilling contractual or legal obligations.

6. Data security practices

Kuraray Group secures your personal data from unauthorized access, use, and disclosure. Kuraray Group secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, and disclosure.

Kuraray Group will continue to revise policies and implement additional security features as new technologies become available. Unfortunately, no system is perfect; therefore, Kuraray makes no representations or warranties with regard to the sufficiency of present or future security measures. Kuraray Group shall not be responsible for any actual or consequential damages (or any other damages or liability of any kind whatsoever) that result from a lapse in compliance with its security measures because of a security breach or technical malfunction.

7. Disclosure of personal data via links to third-party websites, services, and applications

Using our websites or services may link to third-party websites, services, and applications. Kuraray Group is not responsible for any personal data collected through these means. Information collected is governed through each website's privacy policy. Any interactions you have with these

websites, services, and applications are beyond the control of Kuraray Group.

8. Website use information, including cookies

Our websites utilize a standard technology called “cookies” and web server logs to collect information about how our websites are used. Information gathered through cookies and web server logs may include the dates and times of visits, the pages viewed, time spent on our websites, and the websites visited just before and just after visiting our websites.

Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject cookies or to alert you when a cookie is placed on your computer, tablet, or mobile device. Although you are not required to accept cookies, if you block or reject them, you may not have access to all features available through our websites. For more information, visit the help page for your web browser.

9. Changes to this Customer Privacy Notice

We may change this Customer Privacy Notice from time to time. Unless otherwise stipulated by applicable laws and regulations, any changes to this Customer Privacy Notice will become effective when we post the updated Customer Privacy Notice.

10. Contact details

If you have any questions regarding this Customer Privacy Notice, requests for disclosure or correction of personal data, or any other inquiries about the processing of personal data, please contact:

Kuraray Co., Ltd.

Email: CustomerPersonalDataProtection.Global@kuraray.com

Chapter 2: For customers located or residing in Japan

Updated: April 5th, 2024

1. Joint use of personal data

We may share personal data within Kuraray Group as follows.

Categories of personal data to be jointly used: Personal data as described in Chapter 1 above

Parties involved in joint use: Kuraray Group

Purpose of joint use: Purposes of use as stated in Chapter 1 above

Party responsible for managing personal data to be jointly used:

<https://www.kuraray.com/global-en/company/overview/>

2. Security control measures

We will take necessary and appropriate security control measures to prevent leakage or loss of, and damage to, personal data. We will also properly supervise our employees, and if we entrust the handling of personal data to a processor in whole or in part, we will appoint a processor who is deemed to handle personal data properly and supervise them appropriately.

A) Formulation of guidelines

- To ensure the proper handling of personal data, we will provide guidelines in this Customer Privacy Notice with respect to compliance with relevant laws and regulations, security control measures, and requests for inquiries, including for disclosure or correction of personal data.

B) Development of rules for personal data handling

- We will develop internal policies regarding personal data handling, responsible persons, and their duties, etc.

C) Organizational security control measures

- We will appoint a person responsible for handling personal data and clearly define the responsibilities and authority of employees who handle personal data.
- We will establish a system to notify responsible persons of any violations of laws or internal policies or occurrences of personal data breaches.

D) Personnel security control measures

- We will provide regular training to our employees on matters to be noted regarding the handling of personal data.

E) Physical security control measures

- In areas where personal data is handled, we will control the entry and exit of our employees and take measures to prevent unauthorized persons from accessing personal data.
- We will take measures to prevent theft or loss of equipment, electronic media, and documents containing personal data.

F) Technical security control measures

- We will implement access control to limit the scope of persons in charge and personal information databases handled.
- We will introduce mechanisms to protect information systems that handle personal data from unauthorized external access and unauthorized software.

G) Understanding of external environments

- When handling personal data in a country other than Japan, we will obtain information on the personal information protection system in the country concerned and take necessary security control measures.

3. Requests for disclosure, correction, etc. of personal data

In accordance with applicable laws and regulations, we will respond appropriately to requests for disclosure (including disclosure of provision records to third parties), correction, addition, removal, suspension of use or erasure, suspension of provision to third parties, or notification of purpose of use with regard to the personal data we acquire and maintain ("Requests for Disclosure, Correction, etc.") after confirming that the person making such a request is the individual concerned. Please note that a handling fee may be charged for requests for disclosure or notification of the purpose of use.

4. Handling of personal data for each product and service

We may individually determine and disclose the purpose of use for each product and service, determine whether or not we will provide personal data to third parties, and update contact information, etc. In such cases, the relevant individual provisions that differ from this Customer Privacy Notice will prevail.

5. Contact details

If you have any questions regarding this Chapter 2, Requests for Disclosure, Correction, etc., or any other inquiries about the handling of personal data, please contact:

Kuraray Co., Ltd.

E-mail: CustomerPersonalDataProtection.Global@kuraray.com

Chapter 3: For customers located or residing in the European Economic Area/the United Kingdom

Updated: April 5th, 2024

1. Identity and contact details of the controllers

The controllers for purposes of the General Data Protection Regulation, other data protection laws applicable in member states of the European Economic Area (the "EU GDPR"), the United Kingdom Data Protection Act 2018, and the EU GDPR, as it forms part of UK law by virtue of

Section 3 of the European Union (Withdrawal) Act 2018 (the “UK GDPR”; collectively, the “GDPR”), are:

Kuraray Europe GmbH

Philipp-Reis-Straße 4, 65795 Hattersheim, Germany

Phone: +49 (0)69 305 85300

Email: [Contact form](#)

Chemviron S.A.

Parc Industriel de Feluy Zone C, B-7181 Feluy, Belgium

Phone: +32 (0)64511811

Email: [dataprotection.ccc\(at\)kuraray.com](mailto:dataprotection.ccc(at)kuraray.com)

2. Contact details of the data protection officer

Data Protection Officer for Kuraray Europe GmbH and its subsidiaries

Philipp-Reis-Straße 4, 65795 Hattersheim, Germany

Phone: +49 (0)69 305 85358

Email: [datenschutz\(at\)kuraray.com](mailto:datenschutz(at)kuraray.com)

Any data subject may, at any time, contact our Data Protection Officer directly with questions and suggestions concerning data protection.

3. Contact details of the EU/UK representatives

The EU and UK representatives are:

EU representative

Kuraray Europe GmbH

Philipp-Reis-Straße 4, 65795 Hattersheim am Main, Germany

Phone: +49 (0)69 305 85300

Email: [dataprotection.eu\(at\)kuraray.com](mailto:dataprotection.eu(at)kuraray.com)

Chemviron S.A.

Parc Industriel de Feluy Zone C, B-7181 Feluy, Belgium

Phone: +32 (0)64 511 811

Email: [dataprotection.ccc\(at\)kuraray.com](mailto:dataprotection.ccc(at)kuraray.com)

UK representative

Chemviron Carbon Limited

Edgar House, South Lancs Industrial Estate, Lockett Road, Ashton-in-Makerfield

Lancashire WN4 8DE, United Kingdom

Phone: +32 (0)64 511 811

Email: [dataprotection.ccc\(at\)kuraray.com](mailto:dataprotection.ccc(at)kuraray.com)

Any data subject may, at any time, contact the representatives above directly with questions and

suggestions concerning data protection.

4. Purpose and legal basis for processing personal data

The purpose of use and legal basis under the GDPR for processing personal data at Kuraray Group are as follows:

	Purpose of processing	Legal basis
A)	Business communications, providing information on products and services offered by Kuraray Group: <ul style="list-style-type: none">➤ handling orders from data subjects and providing data subjects with progress updates through our website or by phone or e-mail➤ sending data subjects our newsletter when they subscribe➤ promoting our products and services➤ providing data subjects with downloads of our documentation	Consent of the data subject (GDPR Art. 6(1) a) or Legitimate interest (GDPR Art. 6(1) f)
B)	Responding to inquiries and requests submitted to us through a contact form on our website or by phone, e-mail, or other correspondence	Consent of the data subject (GDPR Art. 6(1) a) or Legitimate interest (GDPR Art. 6(1) f)
C)	Performing obligations or enforcing rights in relation to contractual or business relationships: <ul style="list-style-type: none">➤ Managing business relationships➤ Organizing meetings with representatives➤ Participating in public or private tenders	Performance of a contract (GDPR Art. 6(1) b) or Legitimate interest (GDPR Art. 6(1) f)
D)	Marketing in the broadest sense: <ul style="list-style-type: none">➤ Analyzing the behavior and preferences of customers and prospects➤ Market research➤ Direct marketing➤ Statistical research	Consent of the data subject (GDPR Art. 6(1) a) or Legitimate interest (GDPR Art. 6(1) f)

E)	Performing background compliance checks, such as part of export and anti-bribery/corruption compliance	Compliance with a legal obligation (GDPR Art. 6(1) c) or Legitimate interest (GDPR Art. 6(1) f)
F)	Performing any legal obligation, including abiding by or enforcing an order from a court or from a governmental body or authority	Compliance with a legal obligation (GDPR Art. 6(1) c) or Legitimate interest (GDPR Art. 6(1) f)
G)	Analyzing the behavior of data subjects on our website to improve and maintain our website and to tailor our services to data subject preferences, when data subjects visit our website	Consent of the data subject (GDPR Art. 6(1) a) or Legitimate interest (GDPR Art. 6(1) f)

5. Legitimate interests pursued by controllers or third parties

Where the processing of personal data is based on Article 6(1) f of the GDPR, our legitimate interest is the transmission and receipt of information in order to conduct our business activities, including but not limited to, expanding or building business relationships, development of our products and services, prevention of fraudulent activities, unauthorized access to our website and other illegal activities, and compliance with applicable legal requirements.

6. Categories of recipients of personal data

We may pass on personal data to the following categories of recipients:

- A) Kuraray Group
- B) Service providers providing web analytics, IT services, legal and compliance services, etc.

7. Transfer of personal data to a third country or international organization

When Kuraray Group transfers personal data to its affiliates or service providers, personal data may be transferred to countries outside the European Economic Area and the UK. We make sure that we transfer personal data to countries that the EU Commission/the UK Information Commissioner's Office have decided ensure an adequate level of protection of personal data or we provide appropriate or suitable safeguards over the personal data transferred, specifically by executing standard contractual clauses approved by the EU Commission/the UK Information Commissioner's Office.

8. Data subject rights

You have the following rights granted under the GDPR. If you wish to avail yourself of these rights, you may, at any time, contact the data protection officer as the central contact. Where we have reasonable doubts concerning the identity of a person making a request, Kuraray Group will comply with the request only after verifying the identity of the requestor.

A) Right of access

You have the right granted under the GDPR to obtain from the Controller confirmation as to whether your personal data is being processed. Where that is the case, you also have the right to obtain from the Controller information about your personal data stored at any time and a copy of this information subject to the GDPR.

B) Right to rectification

You have the right to require that the Controller correct inaccuracy of your personal data without undue delay, as well as the right to have incomplete personal data completed, when certain legal conditions apply.

C) Right to erasure (right to be forgotten)

You have the right to require that the Controller erase your personal data without undue delay when certain legal conditions apply.

D) Right to restrict processing

You have the right to require that the Controller restrict processing when certain legal conditions apply.

E) Right to data portability

You have the right to receive your personal data, which has been provided to the Controller, in a structured, commonly used, and machine-readable format. You have the right to transmit those data to another controller without hindrance from the Controller to which the personal data has been provided when certain legal conditions apply.

F) Right to object

You have the right to object, on grounds relating to your particular situation, at any time, to the processing of your personal data, when certain legal conditions apply.

G) Right to withdraw data processing consent

You have the right to withdraw your consent to processing of your personal data at any time. A withdrawal shall not affect the lawfulness of processing based on consent before the withdrawal. Also, we may still be entitled to process your personal data if we can rely on other legal grounds for doing so.

H) Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint about the processing of your personal data with a competent supervisory authority, particularly in the Member State of your habitual residence, place of work, or place of the alleged infringement of the GDPR.

The following URLs provide information on the competent authorities:

https://edpb.europa.eu/about-edpb/about-edpb/members_en

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>

9. Providing personal data as a statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide personal data; possible consequences of failure to provide such data

We clarify that providing personal data is partly required by law (e.g., tax regulations) or can also result from contractual provisions (e.g., information on counterparties). Sometimes it may be necessary to conclude a contract requiring that a data subject provide us with personal data, which must subsequently be processed by us. Data subjects are, for example, obliged to provide us with personal data when our company signs contracts with them. Not providing personal data could result in contracts with data subjects not being concluded. Our employees inform data subjects whether providing personal data is required by law or contract or is necessary for the conclusion of a contract, whether there is an obligation to provide personal data, and the consequences of not providing personal data.

Chapter 4: For customers residing in California

Updated: April 5th, 2024

1. Identity and contact details

If you have any questions about how we collect, store and use your personal data, or if you have any other data protection-related questions, please contact the following company to which you provided your personal data.

Kuraray America, Inc.

3700 Bay Area Blvd., Suite 680 Houston, Texas 77058

Phone (toll-free): 833-874-1860

E-mail: [KAI.DataPrivacy\(at\)Kuraray.com](mailto:KAI.DataPrivacy(at)Kuraray.com)

Calgon Carbon Corporation

3000 GSK Drive Moon Township, Pennsylvania 15108

Phone (toll-free): 800-4CARBON (800-422-7266)

E-mail: [dataprotection.ccc\(at\)kuraray.com](mailto:dataprotection.ccc(at)kuraray.com)

MonoSol, LLC

707 East 80th Place, Suite 301 Merrillville, Indiana 46410

Phone (toll-free): 888-902-9951

E-mail: [DataProtection.Mon\(at\)kuraray.com](mailto:DataProtection.Mon(at)kuraray.com)

In your communications, please be clear that you are trying to contact us about a data protection concern.

2. Collection and use of personal data

We receive and store the information you provide on our website or by other means, like e-mail. You provide and control the personal data Kuraray Group collects about you. Your consent, for example, providing personal data through the opt-in forms on our website, creates the legal basis for the collection and processing of your personal data. We conduct our website business, collect, and use (process) your information in the following ways:

A) Personal data we collect

We have collected the following categories of personal data within the last 12 months:

- Identifiers, including real name, postal address, email address, and IP address;
- Other information, including phone number;
- Internet or other electronic network activity information, including information on use of the Internet and digital services (information collected by Kuraray Group or provided by third parties other than Kuraray Group, such as website browsing history, application use, search keywords, number of views and clicks on advertisements and content, browsing time, browsing method (e.g., type of browser), use environment of each terminal used for browsing (connection environment, location, and carrier information), cookies, IP addresses, and the International Mobile Equipment Identity of each terminal); and
- Geolocation information, including location of the terminal used for browsing.

We collect these categories of personal data from you and your device. We retain each personal data category as described in section 5 (Retention period of personal data) [HYPERLINK] of Chapter 1 above.

B) Purposes of collecting personal data

Section 2 (Purposes of use of personal data) [HYPERLINK] of Chapter 1 above lists the business purposes for which we collect and process your personal data.

3. Transfers of personal data to service providers and third parties

We do not sell or share, and in the past 12 months have not sold or shared, personal data for monetary or other valuable consideration or for cross-context behavioral advertising, including personal data of individuals we know to be under 16 years of age.

Kuraray Group may transfer your following personal data to the following service providers and third parties for the following purposes:

Category of service provider and third party: Web Analytics

Purpose: To better understand the behavior and interests of visitors to our website

Category of personal data: Internet or other electronic network activity information, including, but

not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.

Category of service provider and third party: Government agencies

Purpose: Compliance with applicable laws and regulations; Response to requests for information

Category of personal data: Identifiers, including real name, postal address, and email address; and other information, including phone number.

Category of service provider and third party: Legal and compliance services

Purpose: Compliance with applicable laws and regulations

Category of personal data: Identifiers, including real name, postal address, and email address; other information, including phone number; and internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.

Category of service provider and third party: IT services

Purpose: Maintenance and support

Category of personal data: Identifiers, including real name, postal address, and email address; other information, including phone number; and internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.

4. Data Subject Requests

Kuraray Group supports your ability to find out what personal data we hold about you and how we use it. This ability is called a Subject Access Request. If you would like a copy of the personal data we maintain about you, please contact the company to which you provided your personal data stated in "Identity and contact details".

In your communications please be clear that you are making a Subject Access Request (i.e., address your correspondence to the attention of "Subject Access Request", and include your name and contact information so that we can verify your identity).

You should also contact the company to which you provided your personal data stated in "Identity and contact details" if you believe there are updates or corrections to your personal data (for example, an address or phone number change request), if you want to restrict Kuraray Group's use of your personal data (for example, a request to stop sending product information e-mails) or a request to delete your information if there is no appropriate reason for Kuraray Group to retain your information (for example, requesting the removal of your personal data that you entered via our web form).

Kuraray Group also facilitates, at the request of a user, personal data "transfer" or "porting" in structured, commonly used, and machine-readable format like the World Wide Web Consortium's Extensible Markup Language (XML). This is called data portability, the ability for you to obtain and reuse personal data you have provided to Kuraray Group for your own purposes across different services. You can request a portable version of your personal data be sent to yourself, or to a third party, by contacting the company to which you provided your personal data stated in "Identity and contact details" (to the extent this right to data portability is provided to you by applicable law).

If you are requesting the transfer of the portable version of your personal data to a third party (e.g.,

another company), please provide the company name and address to which the personal data should be sent. Please note, a third party cannot make a data transfer request on behalf of a person. The data transfer request must come from you.

Prior to disbursing any personal data in response to a Subject Access Request, we will confirm the identity of the individual making the request. Kuraray Group will not disburse personal data until it can confirm the identity of the requestor through reasonable means (for example, identity confirmation by using government issued identification). Kuraray Group will work with the requestor to confirm their identity. Personal data is not disbursed until the identity of the requestor is confirmed by Kuraray Group.

If you use an authorized agent to make a request on your behalf, we may require the authorized agent to provide proof that you gave the agent signed permission to make the request, to the extent permitted by law. Also, we may require you to either (1) verify your own identity directly with us (as described above), or (2) directly confirm with us that you provided the authorized agent permission to submit the request, to the extent permitted by law.

5. California user rights

If you are a resident of California, you have the following rights with respect to how Kuraray Group processes your personal information (as defined under the California Consumer Privacy Act (CCPA) – California Civil Code Section 1798.140(v)).

- A) You have the right to know what categories of personal data are being collected about you.
- B) You have the right to know the categories of sources from which your personal data are collected.
- C) You have the right to know the business or commercial purpose for collecting personal data.
- D) You have the right to know the categories of third parties to whom we disclose your personal data.
- E) You have the right to know the specific pieces of your personal data we have collected.
- F) You have the right to request that Kuraray Group erases your personal data.
- G) You have the right to correct inaccurate personal data

California residents who wish to exercise any of these rights or have questions or concerns about this Chapter 4 should contact to which the company you provided your personal data stated in "Identity and contact details".

Because we do not sell or share personal data, we do not process opt-out preference signals for Global Privacy Control.

Additionally, you have the right not to receive discriminatory treatment by us for the exercise of privacy rights conferred by applicable law.

Please note, we do not process sensitive personal information (as defined under the California

Consumer Privacy Act (CCPA) – California Civil Code Section 1798.140(ae)), for the purposes that, under applicable law, require us to support the right to limit the use or disclosure of sensitive personal information.

6. Children

Kuraray Group does not intentionally or knowingly solicit data from children under the age of 13, and we do not knowingly market to children under the age of 13.

7. Governing law and jurisdiction

All matters relating to this Chapter 4, and any dispute or claim arising therefrom or related thereto (in each case, including non-contractual disputes or claims), shall be governed by and construed in accordance with the internal laws of the state corresponding to the company you are interacting with in the table below without giving effect to any choice or conflict of law provision or rule. Any legal suit, action or proceeding arising out of or related to this Chapter 4 shall be instituted exclusively in the federal courts of the United States or the courts of the state corresponding to the company you are interacting with in the table below. You waive any objection or defenses to this venue including forum non convenience.

Company	State
Kuraray America, Inc.	Texas
Calgon Carbon Corporation	Pennsylvania
MonoSol, LLC	Indiana

8. Miscellaneous

Any cause of action or claim you may have with respect to the collection, storage, use of your personal data or this Chapter 4 must be commenced within one (1) year after the claim or cause of action arises. Kuraray Group's failure to insist upon or enforce strict performance of any provision of this Chapter 4 shall not be construed as a waiver of any provision or right. Neither the course of conduct between the parties nor trade practice shall act to modify any of these terms and conditions. Kuraray Group may assign its rights and duties under this Chapter 4 to any party at any time without notice to you. Kuraray Group is entitled to recover all costs and expenses in enforcing this Chapter 4, including attorneys' fees.

