

Information Notice for Whistleblowing System

(for users in Europe)

PLEASE READ THIS INFORMATION NOTICE CAREFULLY

1. OUR PRIVACY STATEMENT

The protection of your personal data is of great importance to TEIJIN LIMITED and our company group (“**Company**” or “**We**”). Therefore, this Information Notice (the “**Information Notice**”) intends to inform you of how the Company acting as a data controller processes your personal data in the process of the whistleblowing system. We process your personal data in accordance with the applicable EU and Member State data protection legislations including, the General Data Protection Regulation No 2016/679 (“GDPR”).

The Information Notice provides the information on processing of personal data of you who are a whistleblower, an alleged wrongdoer, a witness, or a relevant party (collectively “**Relevant Persons**”). We encourage you to read the Information Notice carefully.

If you have any queries or comments relating to this Information Notice, please contact us at

2-1, Kasumigaseki 3-Chome, Chiyoda-Ku, Tokyo, 100-8585, Japan,

Corporate Ethics and Compliance Group, CSR and Compliance Department, TEIJIN LIMITED

2. HOW DO WE USE YOUR PERSONAL DATA?

2.1. Purpose of processing

We process your personal data in order to:

- carry out internal investigation and take appropriate measures to identify and correct the alleged wrongdoings, and make necessary decision on such wrongdoings;
- perform legal obligations, including to notify authorities of the wrongdoings and respond to requests from authorities; and
- establish, exercise and defend claims regarding the wrongdoings in the proceedings before authorities, judicial courts, and any other similar proceedings.

2.2. Categories of personal data and data subjects

For the purposes specified in the Information Notice, we process personal data which we obtain directly from you or through third parties, that include the followings: Name, position, contact details

- Information concerning the alleged wrongdoings reported in the whistleblowing system.

In the context of the whistleblowing system, we process personal data of the Relevant Persons.

We ensure that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. We process your data for specified, explicit and legitimate purposes as described above, and do not further process the personal data in a way that is incompatible with these purposes.

3.3. Legal basis

For those purposes of processing, we rely on the following legal grounds:

(1) Legitimate interest

In principle, we process your personal data based on legitimate interest (Article 6(1)(f) GDPR). In processing your personal data in the process of the whistleblowing system, we have legitimate interests of detecting, investigating, taking appropriate measures and conducting afterward follow-ups to identify and correct the alleged wrongdoings to ensure a good corporate governance and compliance in our company group. In case where you wish to obtain information concerning the balancing test on legitimate interest, please contact us at:

2-1, Kasumigaseki 3-Chome, Chiyoda-Ku, Tokyo, 100-8585, Japan,

Corporate Ethics and Compliance Group, CSR and Compliance Department, TEIJIN LIMITED

(2) Legal obligation

In case where we are required to process your personal data under any legislations in the countries in the European Economic Area, we process your personal based on legal obligation (Article 6(1)(c) GDPR).

3. HOW LONG DO WE KEEP YOUR DATA?

We retain your information as long as it is necessary for us to fulfil the aforementioned purposes of processing your personal data.

4. HOW DO WE SHARE YOUR PERSONAL DATA?

We share your personal data between the Company Group entities and with third parties in accordance with the GDPR. Where we share your data with a data processor, we establish the appropriate legal framework in place in relation to the processing of your personal data (Articles 26, 28 and 29 GDPR).

4.1. Categories of recipients

In order to achieve the aforementioned purposes, your personal data may be transferred to, stored and processed by our following companies and partners:

- TEIJIN LIMITED as the headquarters in Japan;
- Affiliates in our company group, where necessary to share your personal data in order to carry out investigations (please see the list of our affiliates which may receive your personal data: [\[URL\]](#));
- External vendor managing our system of the whistleblowing system in Germany, France and Japan.
- Legal counsel in relevant countries in Europe and Japan.
- Competent authorities, where necessary to report by law, legal process, litigation, or requests from public and governmental authorities within or outside your country of residence.

Your personal data will be shared with these companies only for the purposes specified above in this Information Notice. In case if you are a whistleblower, your name, position or contact details are not shared with TEIJIN LIMITED and other affiliates in our company group unless explicit consent for such sharing is made from you.

4.2. Data Transfers (outside of the EEA)

In the event we transfer personal data to our partners and corporate affiliates outside the EEA, we enter into standard contract clauses as defined by the European Commission decisions 2004/915/EC and 2010/87/EU, or by any standard data protection clauses adopted by the European Commission pursuant to Article 46(2)(c) GDPR.

You may obtain a non-confidential copy of the mentioned safeguards of transfers we carry out by contacting us at the contact details provided below.

5. YOUR RIGHTS

You have the following rights regarding personal data processed by us.

- Information regarding your data processing: you have the right to obtain from us all the requisite information regarding our data processing activities that concern you (Articles 13 and 14 GDPR).
- Access to personal data: you have the right to obtain from us confirmation as to whether or not personal data concerning you are being processed, and, if that is the case, you have the right of access to the personal data and certain related information (Article 15 GDPR).
- Rectification or erasure of personal data: you have the right to obtain from us the rectification of inaccurate personal data concerning you without undue delay, and the right to complete any incomplete personal data (Article 15 GDPR). You may also have the right to procure that we erase personal data concerning you without undue delay, when certain legal conditions apply (Article 17 GDPR).
- Restriction on processing of personal data: you have the right to obtain from us the restriction of processing of personal data, when certain conditions apply (Article 18 GDPR).
- Objection to processing of personal data: you have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, when certain conditions apply (Article 21 GDPR).
- Data portability of personal data: you have the right to receive from us your personal data in a structured, commonly used and machine-readable format, and have the right to transmit such data to another controller without our hindrance, when certain conditions apply (Article 20 GDPR).

If you intend to exercise any of such rights, please refer to the contact section below.

If you are not satisfied with the way in which we have proceeded with your request, or if you have any complaint regarding the way in which we process your personal data, you may lodge a complaint with a relevant Supervisory Authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of GDPR.

6. Special Country Regulations

Throughout much of the European Union and surrounding areas, reports may be limited in topics, to concerns about accounting, auditing, bribery, competition law, discrimination and harassment and environment, health, hygiene, and safety matters.

Any issues or concerns relating to topics not permitted by law to be reported via the Whistleblowing system should be reported directly to your line manager, your local Human Resources or Legal representative; alternatively the President of Teijin Holding Europe B.V. as appropriate for the subject matter of the possible violation. In some countries, anonymous reports may not be permitted under the law.

7. UPDATES TO INFORMATION NOTICE

We may revise or update this Information Notice from time to time. Any changes to this Information Notice will become effective upon posting of the revised Information Notice via our website.

CONTACT

For any questions or requests relating to this Information Notice, you can contact us at:

TEIJIN LIMITED

Corporate Ethics and Compliance Group, CSR and Compliance Department

Address: [2-1, Kasumigaseki 3-Chome, Chiyoda-Ku, Tokyo, 100-8585, Japan]

Telephone: [+81-3-3506-4670]

Email: [rinri@teijin.co.jp]

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