

Personal Data Protection Policy

NITORI RETAIL SINGAPORE PTE.LTD. (the “**Company**”, “**we**”, “**our**” or “**us**”) as a member of the Nitori Group, recognize that handling personal data acquired from customers and other parties in a strict and appropriate manner is our social responsibility, and shall comply with matters specified in this Personal Data Protection Policy (this “**Policy**”).

This Policy contains the personal data protection and privacy policy adopted by the Company to manage your personal data in accordance with the Personal Data Protection Act 2012 (No.26 of 2012) (as amended from time to time) and/or other relevant laws and regulations as well as guidelines applicable in Singapore (collectively, the “**Act**” or “**PDPA**”). Please take a moment to read this policy to understand the purposes for which we collect, use and/or disclose your personal data. The term “personal data” we use herein has the same meaning as defined in the PDPA.

In addition, if you access or use our e-commerce service, please also visit our Privacy Policy for the EC website situated at <https://www.nitori.com.sg/pages/privacy-policy>.

1. Concerning the observance of laws and standards

- 1.1 The Company respects the privacy of individuals and recognizes the need to treat personal data in an appropriate and lawful manner, and is committed to comply with its obligations in this regard, in respect of all personal data it handles.
- 1.2 The Company may change some parts or all of the contents of this policy from time to time to ensure that this policy is in line with the legal and regulatory requirements, as well as the regulations and constitutive documents of the Company. Hence, we advise you to check regularly for updated information on the handling of your personal data.
- 1.3 If you consider that this policy does not follow the PDPA in respect to the personal data about you or others, you should raise the matter with our Data Protection Officer as soon as possible.

2. Concerning the collection, use and/or disclosure of personal data

- 2.1 In general, we collect your personal data in several ways, including but not limited to the following:
 - 2.1.1. When you contact us for enquiries, via your selected mode of communication;
 - 2.1.2. When you request us to contact you; and
 - 2.1.3. When you submit your personal data to us for employment purposes.We will not obtain any of your personal data by improper means.

2.2 Personal data that is collected by the Company may include some or all of the following information:

- 2.2.1. Name;
- 2.2.2. Nationality;
- 2.2.3. Marital status;
- 2.2.4. Date of birth;
- 2.2.5. Gender;
- 2.2.6. Contact information such as email addresses and telephone numbers;
- 2.2.7. Demographic information such as address, postal code, preferences and interests;
- 2.2.8. Thumbprint;
- 2.2.9. Signature;
- 2.2.10. Photographs, audio/video recordings and digital images.

Notwithstanding, the Company will not collect your NRIC/FIN/Passport number unless permitted by the Act or any other applicable laws or regulations.

2.3 Generally, the Company collects, uses and/or discloses your personal data for the following purposes:

2.3.1. In relation to the customers,

- (a) Execution of contracts on our products/services, management after contract period, and after-sale service implementation;
- (b) Product launch;
- (c) Registration or withdrawal from membership;
- (d) Inquiries, correspondence to consultation, inquiries, requests and complaints;
- (e) Communication about recall or defective products;
- (f) Announcement of products, service, campaign;
- (g) Product development, conducting questionnaire or monitor survey and implementing market research;
- (h) Contacting for business or other meetings; and/or
- (i) Preventing crime or disaster by security camera or sound recording machine;

2.3.2. In relation to the business partners,

- (a) Execution of contracts; and/or
- (b) Contacting for business meetings;

2.3.3. In relation to our Employees, Recruitment Applicants, Retirees and their families,

- (a) Business communication, business control, facility management;
- (b) Personnel management such as hiring or assignment decision, other notifications and attendance management, etc.;
- (c) Sending recruitment information and activities;
- (d) Payment of salaries, bonus, welfare benefits, offer, etc.;
- (e) Health management; and/or
- (f) Administer tax or social insurance; and/or

2.3.4. Internal record keeping for any of the above.

Please note that, however, we may alter any of the purpose(s) stated above within the reasonable scope relevant to the aforesaid purposes. In this case, we will disclose to you the altered purpose(s) on our website and other platforms.

2.4 Notwithstanding clause 2.3, to the extent the Act allows, we may not disclose nor state a purpose to you in the case of the following:

2.4.1. there is a possibility of harming the life, body, property or other rights and interests of the individual or a third party;

2.4.2. there is a possibility of harming our rights or legitimate interests;

2.4.3. it is necessary for a national agency or local public entity to cooperate in carrying out the affairs prescribed by laws and regulations and there is a possibility of interfering with the performance of the affairs;

2.4.4. the purpose would be considered obvious by a reasonable person from the situation of acquiring personal data; and

2.4.5. any other situation the Act or other law allows.

2.5 We handle personal data within the necessary scope to achieve the purpose(s) set out in clause 2.3. In cases beyond the said scope, we will obtain your consent in advance, except in the following cases;

2.5.1. there is a need to protect a human life, body or fortune, and when it is difficult to obtain your consent;

2.5.2. there is a special need to enhance public hygiene or promote fostering healthy children, and when it is difficult to obtain your consent;

2.5.3. there is a need to cooperate in regard to a central government organization or a local government, or a person entrusted by them performing affairs prescribed by laws and regulations, and when there is a possibility that obtaining your consent would interfere with the performance of said affairs; and

2.5.4. any other situation the Act or other law allows.

2.6 Your personal data will be retained by the Company for as long as necessary according to our internal policy for the fulfilment of the purposes stated in clause 2.3 or is required to satisfy any legal or business purposes.

2.7 The Company will take reasonable steps to protect your personal data against unauthorized collection, use and/or disclosure. Subject to the provisions of any applicable law or regulations, your personal data may be collected, used and/or disclosed for any purposes listed in clause 2.3 (where applicable), to the following:

2.7.1. the Company's staff;

- 2.7.2. researchers, agents, contractors or third party service providers who provide services to the Company;
- 2.7.3. our professional advisers such as auditors and lawyers;
- 2.7.4. relevant government regulators, statutory boards or authorities, or law enforcement agencies to comply with any laws, rules, guidelines, regulations or schemes imposed by any governmental authority; and
- 2.7.5. any other party to whom you authorise us to disclose your personal data to.

In this case, we appoint an appropriate person in the third party who can handle the personal data properly, and set proper security control, confidentiality, conditions and other matters regarding handling personal data in the contract with such third party, so to comprehend the situation of the third party, and exercise necessary and appropriate supervision over such third party.

- 2.8 In addition to clause 2.7, the Company will transfer your personal data to the entities outside Singapore (i.e. [Nitori Co., Ltd. in Japan] and other overseas entity(ies) the Company will notify you from time to time), for any purposes listed in clause 2.3.
- 2.9 In order to provide the best service possible, the Company may engage a data intermediary to process and handle personal data on its behalf. In these cases, we will only work with recognized personal data management firms and shall enter into contracts with these data intermediaries to include provisions that clearly set out the data intermediaries' responsibilities and obligations to ensure compliance with the Act.
- 2.10 We will not disclose your personal data to any third party without obtaining your prior consent unless otherwise stated in the following and prescribed in this Policy:
 - 2.10.1. there is a need to protect a human life, body or fortune, and when it is difficult to obtain your consent;
 - 2.10.2. there is a special need to enhance public hygiene or promote fostering healthy children, and when it is difficult to obtain your consent;
 - 2.10.3. there is a need to cooperate in regard to a central government organization or a local government, or a person entrusted by them performing affairs prescribed by laws and regulations, and when there is a possibility that obtaining your consent would interfere with the performance of the said affairs;
 - 2.10.4. when personal data is to be jointly utilized in accordance with the following article; and
 - 2.10.5. any other situation the Act or other law allows.

3. Concerning the consent for collection, use and/or disclosure of personal data

- 3.1 By submitting your personal data to the Company, you agree and consent to the collection, use

and/or disclosure of your personal data by the Company for a part or all of the purposes set out in clause 2.3.

- 3.2 If at any time we decide to collect, use or disclose your personal data in a different manner as to the purposes set out above, we will request your consent to the additional purpose(s) in writing, in which you may refuse to give at your discretion.
- 3.3 If you provide us with personal data relating to a third party (e.g. information of your spouse, children, parents or relatives), you represent to us that you have obtained the consent of such third party to provide us with their personal data for the relevant purposes.
- 3.4 You may at any time withdraw any consent given in respect of the collection, use or disclosure of your personal data by giving prior notice in the form of a formal written request addressed to the Data Protection Officer.
- 3.5 In the event that you withdraw your consent to the Company in relation to the purposes mentioned above, the Company shall cease to collect, use and/or disclose your personal data within thirty (30) days upon receiving your withdrawal request. Please note that once consent is withdrawn, it may not be possible for us to accomplish the purposes as set out in clause 2.3, and hence, we may be unable to continue providing the requisite services to you.

4. Concerning personal data management and security measures

The Company will take reasonable measures to protect your personal data from unauthorized access or modification, improper collection, use or disclosure, unlawful destruction or accidental loss. You should be aware, however, that no method of transmission over the internet or electronic storage is 100% secure. While security cannot be guaranteed, we strive to protect the security of the personal data and will constantly review and enhance our information security measures. In the event that we have credible grounds to believe that an incident of personal data breach has occurred, we will take reasonable and expeditious steps in accordance with the Act.

5. Concerning access, correction and accuracy of personal data

- 5.1 We will keep your personal data accurate and up to date within the necessary scope to achieve the relevant purpose. You may apply for a copy of your personal data held by the Company, or request for your personal data to be updated or corrected, by sending a formal written request to our Data Protection Officer. Please be informed that we are entitled to charge a fee to recover the costs directly related to the access of the personal data for the time and effort spent by us in responding to the same, and will let you know the amount accordingly.

- 5.2 Within thirty (30) days upon receiving your request, the Company shall:
- 5.2.1. provide you with a copy of your personal data under our custody and/or other relevant information in accordance with the Act therein;
 - 5.2.2. correct your personal data as soon as practicable and inform you that the relevant correction has been made; or
 - 5.2.3. inform you that your request for access or correction of your personal data is rejected, if the request was made in circumstances predefined by the Act where such access or correction is prohibited or not required.
- 5.3 You should ensure that all personal data submitted to us is complete and accurate. Failure to do so may result in our inability to provide you with the information or services you requested.

The Company shall make a reasonable effort to ensure that the personal data collected by or on behalf of the Company is accurate.

6. Concerning transfer of personal data outside of Singapore

The personal data we collect from you may be transferred to multiple destinations outside Singapore [including but not limited to Japan] for the fulfilment of the purposes stated in clause 2.3. The Company will ensure that any transfers of your personal data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to personal data so transferred that is comparable to the protection under the PDPA, by [].

7. Joint use of personal data

- 7.1 Each member of NITORI group may jointly use personal data within the members and business alliances of the group. Members of NITORI group jointly use personal data handled in each of the members of NITORI group and business alliances in order to provide high value services for parties concerned (specifically as stated below). Nevertheless, in case of a change in the scope of joint users or the responsible official for controlling joint utilization, the individual will be informed in advance or we will create a method so that the individual could easily access said information.
- 7.2 Personal data that may be jointly used:
Name, address, date of birth, telephone number, fax number, e-mail address, purchase (cancellation) history, usage history of member cards, coupon usage history, and provision or inquiry contents.

7.3 Scope of joint users

< Nitori Group Companies >

Please refer to the URL: <https://www.nitorihd.co.jp/en/division/group.html>

< Business Alliance Companies >

KATITAS Co., Ltd.: <https://katitas.jp/>

REPRICE Co.,Ltd.: <https://reprice.co.jp/>

7.4 Purpose of joint use

- (a) Shipments of products provided by any member(s) of NITORI group;
- (b) Taking over after-sales service etc.;
- (c) Notice of new products information;
- (d) Market research or data analysis for product development, etc.;
- (d) Notice about events of Nitori group or business partners; and/or
- (e) Notice or proposal of services of Nitori group companies or business alliance companies.

8. **Concerning the establishment and continual improvement of a management system for personal data protection**

In order to appropriately manage personal data, the Company shall continually work towards improving the development of our data management system (including the necessary supervision and training to our employees) and internal company regulations.

9. Cookie Policy

9.1 Use of Cookie

Cookie is information that is saved in the browser when you visit a site. The website and services managed by NITORI Group use Cookie to make the website more convenient for customers and to improve the website continuously (please note that, however, any personal data is not included in Cookie itself). In addition, NITORI Group has formed alliances with advertising distributors to post advertisements on other websites on the Internet.

9.2 Purpose of use

To improve customer convenience by simplifying entry

For displaying information of interest to customers

To improve NITORI Group's website and services

For unidentified access analysis

9.3 How to disable Cookies

9.3.1. How to Disable All Cookies

You can disable Cookie by changing the browser settings. In this case, some of the features of some websites may be unavailable, some pages may not be displayed correctly, and or some of our services may not be available. If you want to change the browser settings, check with the manufacturer of each browser.

9.3.2. How to disable a particular Cookie

By disabling (opt-out) Cookie from each company's opt-out page, customers can stop using the identifiers and customer attributes we grant to this site by NITORI Group. The method for stopping the provision of information is described in the link destination (link paste, change the destination page each time updating is performed). In this case, the products and services provided by each company may not be accessible.

9.4 About Google Analytics

The website managed by NITORI Group uses Google Analytics, a Google access analysis tool, to continuously improve this site. Google Analytics uses Cookie to collect data. This data is collected anonymously and does not identify individuals. This feature can be rejected by disabling Cookie. To disable Cookies check your browser settings. For information about how data is collected and processed by Google Analytics, see "GOOGLE use of information collected from sites and applications using GOOGLE services"Open a new window.

9.5 Opt-out Links

Yahoo CorporationOpen a new window

Google Godo-KaishaOpen a new window

Facebook JAPAN Co., LtdOpen a new window

LINE Co., Ltd.Open a new window

Twitter JAPAN Co., LtdOpen a new window

Rakuten, Inc.Open a new window

Cyber Agent, Inc.Open a new window

Freak Out Co., Ltd.Open a new window

Smart News Co., Ltd.Open a new window

Google Godo-KaishaOpen a new window

Opt Co., Ltd.Open a new window

Sinara Systems, Inc.Open a new window

RELAIID Inc.Open a new window

ByteDance Co., Ltd.Open a new window

Supership Co., LtdOpen a new window

CRITEO Co., Ltd.Open a new window

Brain Japan Co., Ltd.[Open a new window](#)

Microad Co., Ltd.[Open a new window](#)

Gunosy CO., LTD.[Open a new window](#)

SMN Corporation[Open a new window](#)

10. Contact information

Should you have a complaint or require more information about how we manage your personal data, please contact our Data Protection Officer at:

Phone: +65 69163861

Email: nrs_store-inquiry@nitori.com.sg

Data Protection Officer (DPO): ERI NAKAJIMA

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