

## Privacy Policy

1. Identification of the person responsible for the treatment.
2. Essential points of our policy.
3. What information will we collect from you?
4. What is the legal legitimacy for the treatment of your data?
5. Transfer of data and international transfers.
6. Exercise of your rights and Delegation of Data Protection.
7. Security and confidentiality.
8. Kids.
9. Update of the privacy policy.

### 1. Identification of the person responsible for the treatment.

Equativ Japan KK, is responsible for the treatment of your personal data in order to provide you with the services identified in section 4 of this privacy policy (the "Website").

Equativ Japan KK was incorporated the 27th of November 2024 with the Corporate No 0200-01-160428. Registered by c/o Shimada & Associates International Tax Consulting Office, Salute Bldg., 8F, 72 Yoshida-machi, Naka-ku, Yokohama-shi, Kanagawa (hereafter "Equativ Japan KK").

At Equativ Japan KK, we are committed to the fundamental right of the protection of your personal data and this privacy policy is intended to inform you of your rights under the General Data Protection Regulations ("GDPR").

We inform you that Equativ Japan KK has a Data Protection Delegate in accordance with the GDPR, who is at your disposal for any questions or queries that you want to make in relation to this matter, and to which you can contact from here.

## 2. Essential points of our policy.

In this privacy policy, we explain each of the services that Equativ Japan KK offers that require the processing of your personal data.

Therefore, you will be informed of:

- The purposes for processing your personal data or to which means Equativ Japan KK treats your personal data.
- The legal basis that justifies said treatment for each purpose.
- If there is any communication of your data to third parties or an international transfer of the same. In this sense, we inform you that we do not transfer your data to any third parties, unless there is a legal obligation (derived from a request from the State Security Forces or Courts or Courts), or unless it is essential to lend you a service, in which case, we will ask for your express consent.
- The period of conservation of your data that is necessary to maintain the relationship or to provide the service or function that you have requested. Therefore, if we do not need your data to provide you with any services, these will be blocked and will only be accessible by the Public Authorities in case there are legal, administrative, and tax claims according to the deadlines established by each regulation. Once the blocking period has elapsed, the data will be completely deleted.

## 3. What information will we collect from you?

You should know that there are different ways to collect personal data:

- a. The data that you provide us directly.
  - We collect information about you when you contact us through the channels enabled for it, such as the contact form or when you register on our Website.
  - When you contact us through these channels, we will request your express consent to collect your email, your name and surname, date of birth, and other data that may be necessary to meet your request.
  - All the fields that appear marked with an asterisk (\*) in the forms provided to you on the channels will be required to be completed, so that the omission of any of them could lead to the impossibility of being able to provide the requested services. You must provide truthful information, understanding that identity theft or the use of aliases or anonymous names is forbidden.
  - You cannot, at the time of providing any data that you may be asked in the channels, choose injurious expressions, coinciding with brands, trade names, names or pseudonyms of characters of public or famous relevance for which use you are not authorized.
  - It is essential that you safeguard at all times your reference data, passwords and access codes that you generate. You will be solely responsible for the use of your personal account, and in this sense, you undertake to make diligent use of said information, not to make it available to third parties, and to inform us, without delay, of any loss or theft of this information.

- In order for the information provided to always be up-to-date and free of errors, you must inform Equativ Japan KK, as soon as possible, of any changes to your personal data that may occur through an email to the address given here.
  - Also, by clicking on the "I accept" button (or equivalent) incorporated in the aforementioned forms, you declare that the information and the data that you have provided are accurate and true.
- b. The data obtained indirectly.
- c. At Equativ Japan KK, we take the privacy of users very seriously, which is why we limit the uses and situations in which information is collected indirectly. As a result, in many situations the collection and storage of data is totally excluded.
- Some of the blocked uses are:
- Any data related to users under 16 years of age.
  - Elements that allow the user to be identified, by way of example and not limitation: Name, address, place of work, date of birth, telephone number, email, etc.
  - Elements related to confidential user data (health, political, religious or sexual orientation, etc.).
  - Unique Technical Identifiers: Any mechanism that allows to identify the user in a unique way without the possibility of opposition by the user (MAC Address, Apple UDID, Machine Fingerprint, etc ...).

#### 4. What is the legal legitimacy for the treatment of your data?

Equativ Japan KK will treat your personal data in accordance with the following legitimizing bases, depending on the type of data that is provided, as well as the interactions that, as a user, you entail with Equativ Japan KK:

- a. The processing of your data related to the contact form, or commercial or advertising communications related to the products and services of Equativ Japan KK are based on the management and processing of the legal relationship established between both parties, i.e., in the management of your own request, in the maintenance of the contact, in the provision of the service that you have requested and, where appropriate, in the legitimate interest of Equativ Japan KK.
- b. The treatment of your data for the purpose of segmentation and profiling, is based on your explicit, free and unambiguous consent.

#### 5. Transfer of data and international transfers.

In Equativ Japan KK, we do not transfer your personal data to third parties for their processing with the purposes described. However, if necessary, they will always be transferred based on a legal basis that legitimizes this processing.

## 6. Exercise of your rights and Delegates of Data Protection.

We inform you that you can exercise the following rights:

- a. Right of access to your personal data to know what data is being used and the operations carried out with this data.
- b. Right to rectify any inaccurate personal data.
- c. Right to delete your personal data, when possible.
- d. Right to request the limitation of the processing of your personal data when the accuracy, legality or necessity of the use of the data is doubtful, in which case, we can keep this data for the exercise and/or the defence of claims.
- e. Right to oppose automated decision-making.
- f. Right to oppose the processing of your personal data when the legal basis that enables us to process it, according to section 4 above, is the legitimate interest.
- g. Right to the portability of your data, when the legal basis that enables us to treat those indicated in section 4 above relies on the existence of a contractual relationship or your consent.
- h. Right to revoke the consent granted to Equativ Japan KK.

You can exercise your rights at any time and for free in the following ways:

- a. By sending an email to the address listed here identifying who you are and indicating the right you wish to exercise.
- b. Addressing a written request to the following address: Equativ Japan KK. Registered by c/o Shimada & Associates International Tax Consulting Office, Salute Bldg., 8F, 72 Yoshida-machi, Naka-ku, Yokohama-shi, Kanagawa, identifying who you are and indicating the right you wish to exercise.
- c. In addition, when you receive any communication from us, you can unsubscribe from all future commercial communications previously accepted by going to the bottom of that communication and clicking on the unsubscribe button.

Likewise, we inform you that you have the right to file a claim with the Spanish Data Protection Agency if you believe that we have committed an infringement of the legislation on data protection regarding the processing of your personal data.

## 7. Security and confidentiality.

We are committed to the security of your information. In order to prevent unauthorized access or unauthorized disclosure of personal data, we have taken appropriate technical and physical measures, as well as management processes to safeguard and secure the information we collect from you.

#### 8. Kids.

Children under 16 years can not use the services available through the website without the prior authorization of their parents, guardians or legal representatives, who will be solely responsible for all acts performed through the website by minors under their care, including the completion of the forms with the personal data of said minors and the marking, where appropriate, of the boxes that accompany them. In this sense, and to the extent that Equativ Japan KK does not have the capacity to control whether users are minors, parents and guardians must authorize the necessary mechanisms to prevent minors from accessing the website and/or provide personal data without their supervision, not giving Equativ Japan KK any responsibility in this regard.

#### 9. Update of the privacy policy.

We make our best efforts to keep our privacy policy fully updated monthly. If we make changes, these will be clearly identifiable in a clear and specific way, as allowed in the relationship we have established with you (for example: we can communicate these changes by email).