

# EPA CONSULTATION DESK

## DATA PROTECTION NOTICE

### Introduction

References to "our", "us", "we" and "TKAO" within this Data Protection Notice are to Tokyo Kyodo Accounting Office. For more information about us, please see our website; <https://www.tkao.com/e/about/index.html>.

This Data Protection Notice applies when you visit or use the EPA Consultation Desk website or when you receive communications in connection with TKAO.

We are committed to protecting your privacy and your personal data. This Data Protection Notice explains the types of personal data we collect; how we use that data; who we share it with; how we protect that data; and your legal rights. We are committed to abiding by this Data Protection Notice, as well as the requirements of applicable laws, in the operation of our business.

For the purpose of applicable data protection laws, the data controller is TKAO, located at 9F, Kokusai Building, 3-1-1 Marunouchi, Chiyoda-ku, Tokyo 100-0005, Japan. This means that TKAO is responsible for determining how and why your personal data is processed.

Please note that our website is not intended for minors and we do not knowingly collect data relating to minors.

### Contents

Below is a table of Contents of this Data Protection Notice. Please select to skip directly to the different sections of this Data Protection Notice to understand our practices and your rights with respect to your information:

<b>How we collect information .....</b>	<b>2</b>
<i>Information covered by this Data Protection Notice .....</i>	<i>2</i>
<i>Information you provide to us .....</i>	<i>2</i>
<b>How we use personal data.....</b>	<b>2</b>
<b>With whom we share personal data .....</b>	<b>3</b>
<b>Where we transfer your personal data .....</b>	<b>3</b>
<b>How long we keep your personal data for .....</b>	<b>3</b>
<b>Your Rights .....</b>	<b>4</b>
<b>Contact us .....</b>	<b>5</b>

## How we collect information

### *Information covered by this Data Protection Notice*

This Data Protection Notice explains how we collect and process personal data. In this Data Protection Notice, "personal data" means information that (either in isolation or in combination with other information) enables you to be identified as an individual or recognised directly or indirectly.

### *Information you provide to us*

We may collect personal data from you when you access our website, contact us, communicate with us or otherwise provide information to us:

Category of Personal Data	Details
Identification and Contact Information	Name, job title, company, department, email address and phone number
Information about your interactions with TKAO	Responses to survey questions on events organised by TKAO.

In some cases, you may provide personal data to us about another person. In such cases, it is your responsibility to ensure that you have the authorisation of such person to provide us with such information.

## How we use personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- With your consent if required by data protection laws.

We use the personal data we collect from and about you for a variety of purposes and based on one or more legal justifications, as set out below:

Purpose	Categories of Personal Data	Justification
- To allow you to register for and access our online webinars.	• Identification and Contact Information	• Legitimate interest of TKAO to organise webinars for clients and prospective clients
- To conduct surveys related to our webinars.	• Identification and Contact Information • Information about your interactions with TKAO	• Legitimate interest of TKAO to understand the needs and preferences of its clients and prospective clients

Where we process your personal for other purposes, without your consent and other than to comply with our legal obligations, we will take steps to ensure that these purposes are compatible with the purposes of collection set out above. Where appropriate, we will update this Data Protection Notice.

### **With whom we share personal data**

Your personal data is intended for TKAO, and may be shared with third parties in certain circumstances.

Our website may, from time to time, contain links to and from the websites of our partners. If you follow a link to any of these websites, please note that these websites have their own Data Protection Notices and that we have no control over how they may collect or use your personal data. You should check the Data Protection Notices of third-party websites before you submit any personal data to them.

We may share your personal data with the following third party organisations:

- **Our service providers.** We use other companies or contractors ("Service Providers") to perform services on our behalf. In particular, we will provide your personal data to service providers or suppliers as part of our normal business operations. Such service providers include (i) hosting services providers and (ii) security services providers.

In the course of providing such services, these Service Providers may have access to your personal data. However, we will only provide our Service Providers with the information that is necessary for them to perform the services, and we ask them not to use your information for any other purpose. We will always use our best efforts to ensure that all the Service Providers we work with will keep your personal data secure.

- **Other Third Parties:** We may, in limited circumstances, transfer your personal to government agencies and regulators (e.g., tax authorities), courts and administrative authorities, all in accordance with applicable law, and to external advisors (e.g., attorneys, accountants, auditors, etc.), all of whom act as data controllers. TKAO may also transfer your Data to third parties when it receives a request from an authority entitled by law to do so, in accordance with applicable laws and regulations.

### **Where we transfer your personal data**

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"), particularly in Japan, by staff operating outside the EEA and who work for us or for one of our Service Providers.

Please note that Japan benefits from an adequacy decision adopted by the European Commission. This means that it has been recognized to offer a high level of data protection. As a result, transfers to Japan are assimilated to personal data transfers within the EU.

However, if TKAO sends your information to another country that is not in the EEA, we will take the steps necessary to ensure that your personal data is protected in accordance with applicable data protection laws, including, where required, entering into EU standard contractual clauses (or equivalent measures) with the party outside the EEA (as applicable) receiving the personal data.

You have the right to request a copy of the appropriate or suitable safeguards TKAO relies on by contacting us at [epa-desk@epa-info.go.jp](mailto:epa-desk@epa-info.go.jp).

### **How long we keep your personal data for**

We will only retain your personal data for as long as it is reasonably necessary for the purpose for which that data was collected and to the extent permitted by applicable laws. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our

relationship with you. When we no longer need to use your information, we will remove it from our systems and records.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, or other requirements.

For example, personal data related to your registration to our webinars will be deleted after the end of the webinar you signed up to attend.

## Your Rights

You have various rights in connection with our processing of your personal data, each of which is explained below.

- **Access.** You can obtain a confirmation as to whether or not your personal is processed by TKAO. As applicable you may get more information on the personal data we hold and how your personal data is processed, and get a copy of your personal data.
- **Rectification.** you have the right to request rectification of personal data if it is inaccurate or incorrect or out-of-date. You may also have incomplete personal data completed.
- **Erasure:** you may request the erasure of your personal data, e.g. if you object to the processing of your personal data (see below). However, we may have legal or legitimate reasons for retaining the personal data depending on the context.
- **Restriction.** You have the right to restrict our processing of your personal data where you believe such data to be inaccurate, our processing is unlawful or that we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it. In such case, we would mark stored personal data with the aim of limiting particular processing for particular purposes in accordance with your request, or otherwise restrict its processing.
- **Portability.** You have the right to obtain personal data we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal data which you have provided to us, and (b) if we are processing that data on the basis of your consent or to perform a contract with you and (c) the data is processed by automated means. Additionally, you have the right to require us to transmit such personal data directly to another controller, where technically feasible.
- **Giving directives.** You have the right to define specific directives concerning the conservation, deletion and communication of your personal data after your death.

You may also **object** to the processing of your personal for certain purposes where such processing is based on a legitimate interest as described above. Please describe the reasons relating to your particular situation to justify your request. If applicable, we will stop the processing unless we have compelling legitimate grounds.

You can make a request to exercise any of these rights in relation to your personal data by sending the request by mail to TKAO, 9F, Kokusai Building, 3-1-1 Marunouchi, Chiyoda-ku, Tokyo 100-0005, Japan or email to [epa-desk@epa-info.go.jp](mailto:epa-desk@epa-info.go.jp). Please note that we may require you to provide us with information allowing us to identify you in order to process your request. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

You also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with our data protection obligations. If you are based in, or the issue relates to, France, the Commission nationale de l'informatique et des libertés (CNIL) can be contacted as follows:

**Website:** [www.cnil.fr](http://www.cnil.fr)

**Address:** 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07 France

If you are based or the issue you would like to complain about took place elsewhere in the European Economic Area (EEA), please click here; [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en) for a list of local data protection authorities in the countries within the EEA in which we operate.

### **Changes to this Data Protection Notice**

We reserve the right to change our Data Protection Notice from time to time. If we decide to change our Data Protection Notice we will notify you of these changes via an alert on the home page of our website and notify you by email if we have your email address.

### **Contact us**

If you have any questions about this Data Protection Notice and/or about the privacy policies and practices of our service providers, please contact us at [epa-desk@epa-info.go.jp](mailto:epa-desk@epa-info.go.jp) at: TKAO, 9F, Kokusai Building, 3-1-1 Marunouchi, Chiyoda-ku, Tokyo 100-0005, Japan.