

## TANAKA -Data Protection Notice

In this data protection notice, TANAKA (hereinafter “we” and “us”) wishes to inform you as the controller pursuant to the General Data Protection Regulation (hereinafter “GDPR”) of how we process your personal data relating to a specific or specifiable natural person in the European Economic Area (“EEA”) during your visit to our website.

TANAKA refers to TANAKA PRECIOUS METAL GROUP Co., Ltd., TANAKA PRECIOUS METAL TECHNOLOGIES Co., Ltd., TANAKA ELECTRONICS Co., Ltd., EEJA Ltd., TANAKA PRECIOUS METAL RETAILING Co., Ltd., and the various subsidiaries and controlled companies thereof. However, the Metalor Group is excluded.

- TANAKA PRECIOUS METAL GROUP Co., Ltd. (TKG),
- TANAKA PRECIOUS METAL TECHNOLOGIES Co., Ltd. (TKK),
- TANAKA ELECTRONICS Co., Ltd. (TD),
- EEJA Ltd. (EEJA),
- TANAKA PRECIOUS METAL RETAILING Co., Ltd. (TKR),

### 1. Which personal data about you do we collect?

Personal data covers all information about a specific or specifiable natural person which you notify to us or which is generated or collected by us. This is, for example:

Registration data: When you order goods via our online shop, you can register yourself and open a customer account. When you register, you must enter your name and contact details (e.g. address, telephone number, e-mail address) and set a personal password.

Note: All of the above is applied only to TKR.

Order data for online shop: When you order goods via our online shop (via your customer account or as a guest), the content data inserted by you or generated about you are processed, such as your orders, delivery and invoicing address, and payment data. We also collect information on the time, scope and, if applicable, location of your order.

Note: All of the above is applied only to TKR.

Content data: When you use other services of our website, for example the use of forms, sweepstakes, newsletters or posting of blog posts, the data entered by you or collected about you in this context as well the information provided to us by you will be processed.

Server log data: When you use our websites, data on your usage (such as the date and time of your visit, pages called up and files requested, type and version of the web browser used by you, type and operating system of the end device you use as well as your IP address) is temporarily stored in a log file on our server.

## **2. What do we use your personal data for, on what legal basis and for how long?**

### **2.1 Your queries**

Should you submit queries to us via a contact form, per e-mail or via a service telephone, we process the information given therein to answer your query as well as the IP address and date/time of the request in order to avoid misuse of the contact form.

The legal basis for the processing is our legitimate interest pursuant to Art. 6 (1) letter f GDPR in providing you with the aforesaid “queries” service. If your query concerns the initiation or processing (including customer service or warranty) of a contract, the additional legal basis for the processing is Art. 6 (1) letter b GDPR.

You may oppose the processing of your data on grounds of Art. 6 (1) letter f GDPR. In this case, upon proving mandatory reasons for the processing we can continue the processing. This can, in such case, be particularly necessary in order to prove past queries and communications with you. If no such mandatory reasons exist, we will cease our communication with you and delete already collected data.

This data will be deleted when our communication with you has ended, i.e. when the factual situation at issue has been conclusively clarified and no further legitimate interest exists for the storage, respectively no further statutory obligations exist to store such data.

### **2.2 Advertising and product development (user data, newsletters, etc.), right of opposition**

We also wish to use the data entered by you in any event or collected during your use of the websites to inform you about products and services relating to the product range (“**Services**”) or to introduce our products and to improve our product offers and services (product development).

#### **2.2.1 Anonymised usage data**

We use the anonymised and/or aggregated data collected with the aid of analysis tools, to be able to understand the surfing behaviour of all visitors and therewith improve the design of our website and of our product range in general. For details of the analysis tools, see point 4 below.

#### **2.2.2 Personalised and pseudonymised usage data**

Moreover, we use your usage data to understand your surfing behaviour and thereby improve the offers displayed to you and to offer personalised information.

You may at any time wholly or partially object to the creation of pseudonymised data, the use of your personal data for advertising and product-development purposes as well as the ensuing contact for such purposes in a specific form or may revoke any consents you may have granted. Please use the corresponding functions that are already provided for your use (e.g. the unsubscribe function in your personal customer account) or e-mail to the contact details given in point 9.

The legal basis for the processing is your consent (Art. 6 (1) letter a GDPR) and our legitimate interests (Art. 6 (1) letter f GDPR, where applicable in connection with Sec. 7 para. 3 German Unfair Competition Act (UWG)).

This data will be deleted by us following your objection, respectively revocation of any consents given, or otherwise upon the end of your use at the latest, respectively it will be stored in aggregated, anonymised form. To the extent necessary, we will store the fact that you have objected in order to prevent you from being contacted further.

### **2.3 Provision of the website and rendering of services**

The processing of the server log data is necessary for technical reasons in order to provide the website and render the services and thereafter to ensure the system security.

The legal basis for the processing is our legitimate interest in providing the website with our services (Art. 6 (1) letter f GDPR). The processing is a mandatory prerequisite for the use of our website; no objection right is hence available.

The server log data may then be assessed in anonymised form for statistical purposes and to improve the quality of our internet presence. There is no link between the server log data and your personal data nor is the server log data combined in any way with other personal data sources.

### **2.4 Job application for recruitment**

[Recruitment activities]

Data collected : Application data (the name, address, e-mail address, telephone number, and family structure, etc. of an applicant)

[Legal basis]

Consent by a data subject, legitimate interest (for recruiting individuals to our company and confirming the applicant matches the job requirement), and compliance.

[Retention period]

We store your personal data only within a reasonably necessary period of time.

### **2.5 Response to the media**

Response to enquiries from the media or media personnel

Data collected : the name of the media, the name and address of the media operating company, and the name, e-mail address, website URL and telephone number of the person in charge at the media operating company.

[Legal basis]

Consent by a data subject; processing personal data for “performance of contract”

[Retention period]

We store your personal data only within a reasonably necessary period of time.

### **3. Transfer of the data**

#### **3.1 Transfer of data to data processors**

We partially use service providers, in observance of the statutory requirements, by means of data processor relationships, i.e. processing is performed on the basis of a respective contract, for our account, according to our directions and subject to our control.

Data processors are, in particular

- technical service providers whose services we retain for the provision of the website, e.g. service providers for software maintenance, data-processing operations and hosting.
- technical service providers, whose services we retain for the provision of functionalities, e.g. technically required cookies.
- service providers for the practical execution of advertising and marketing measures, e.g. service providers for e-mail distribution and analysis cookies.

In such cases we remain responsible for the data processing; the transfer and processing of personal data to or by our data processors is made on the legal basis upon which we are permitted to process data in each case. No separate legal basis is required.

#### **3.2 Data transfer to third parties**

We partially also transmit your data to third parties, i.e. partners with whom we collaborate outside of a contracted processing. Such partners render their services on their own responsibility; the processing of your data by our partners is exclusively governed by the data protection notices of such third party.

##### **3.2.1 Data transfers to other group entities**

We may forward your enquiry together with the data specified by you to the responsible group subsidiaries in other countries whenever this may be required to answer your enquiry (e.g. because your enquiry refers to a business transaction or quotation from another country). The legal basis for the transfer is the performance of a service requested by you, Art. 6 (1), letter b GDPR, and/or our legitimate interest to answer your enquiry, Art. 6 (1), letter f GDPR.

##### **3.2.2 Logistic enterprises**

In order to transport the goods we transmit your address and contact details, to the extent necessary, to parcel transportation enterprises. The legal basis for the transfer is the performance of the contract with you, Art. 6 (1) letter b GDPR.

### **3.2.3 Social networks**

To the extent you want to share one of our websites in a social network (e.g. Facebook or X) and click “share” buttons, our websites information will be transferred to the social network. You have to be logged into the respective social network. The legal basis for the transfer is our legitimate interest to provide you with the opportunity to “share”, Art. 6 (1) letter f GDPR.

## **4. Cookies and web analysis**

### **4.1 What are Cookies?**

We use so-called “Cookies” to fashion our website in a most user-friendly way and to enhance the relevance of advertisements for the users of our website and the convenience of our website. Cookies are small files stored on the user’s device. They allow the storage of information for a determinate period of time and the identification of the user’s device. For this purpose, also tracking-pixel might be used that are not stored on the user’s hard drive, but that may in the same way help to recognize a user’s device. When using the term “cookie”, this refers to cookies in the technical sense as well as tracking pixel and other technologies.

### **4.2 What Cookies do we use on what legal basis and for how long?**

On this website we use three types of Cookies: (1) Cookies required for technical purposes, without which the functionality of our website would be reduced, (2) optional Cookies for analytics, and (3) optional Cookies for targeting and advertising purposes, generally set by third-party providers:

#### **4.2.1 Cookies required for technical purposes**

These Cookies are indispensable if we want to ensure proper functioning and easy navigation of our website. We use data obtained through such Cookies solely for the purpose of helping users conveniently use our website, enabling us to offer more services and analysing users utilization of our website. A deactivation of this type of Cookies would reduce all or part of the functions of the website.

The legal basis for this processing is our legitimate interest (Art. 6 (1) lit f GDPR).

These Cookies are specifically set for individual sessions and expire when you leave the website and end the session.

#### **4.2.2 Cookies for analytics / Google Analytics**

Analytics Cookies gather general information on how users use a website, e.g. which pages they visit most frequently and whether they receive any error messages from websites. These Cookies do not collect any data that may lead to an identification of the user. The data collected with these Cookies will not be merged with any other

information on the visitors of our website. All information collected with the aid of such Cookies exclusively serves the purpose to comprehend and improve the functionality and services of the website.

This website uses **Google Analytics**, a web analysis service of Google Inc. (“Google”). The information regarding your usage of this website generated by the use of Google Analytics is transmitted to and stored on a Google server in the US. However, due to the activated IP anonymisation on this website, Google will previously abbreviate your IP address within the member states of the European Union and in other contracting states under the Agreement on the European Economic Area. Only in exceptional cases will a full IP address be transmitted to a Google server in the U.S., where it will then be shortened. The IP address transmitted by the browser of the user will not be merged with any other Google data.

Google will use this information on our behalf to analyse the usage of our online offer by users, to compile reports on the activities regarding the use of the online offer, and to render further services to us in connection with the use of our online offer and internet usage. In this context, pseudonymous user profiles may be created from the processed data.

Users can prevent the storage of cookies by adjusting the setting out their browser accordingly; moreover, users can prevent that the data generated by the cookie on their use of the online offer is transmitted to and processed by Google by downloading and installing the browser plugin available at: <http://tools.google.com/dlpage/gaoptout?hl=de>. The legal basis for this processing is our legitimate interest (Art. 6 (1) lit f GDPR).

The data collected by the use of such Cookies will be anonymised prior to analysis. You can deactivate or delete Cookies and the information stored therein at any time (cf. 4.3).

#### **4.2.3 Targeting and advertising Cookies**

Targeting and advertising Cookies are used to better customise advertisements to your interests. They limit the number of times the same advertisement is shown to you, evaluate the efficacy of an advertising campaign, and analyse how the viewing of a certain advertisement influences the conduct of individual users. Such Cookies are usually placed by advertising networks with the consent of the respective website operator (in this case us). They register a user’s visit of the website and either pass such information on to other entities, e.g. advertising companies, or directly adapt advertisements accordingly. Frequently, they are linked to certain website functions provided by such third companies. We use these Cookies to create a link to social networks, which in turn may use the information on your use of the website to customise advertisements on other websites to your interests, and also to provide the advertising

networks used by us with information about your visit so that, based on your browsing behaviour, you will be shown exactly such advertisements as may potentially interest you. Also in these cases the data collected via such Cookies will not be merged with any other information on the visitors of our website.

The legal basis for this processing is your consent obtained by means of the cookie banner displayed upon access to our website (Art. 6 (1) lit a GDPR).

You can deactivate or delete Cookies and the information stored therein at any time (cf. 4.3).

#### 4.2.4 Deactivation of Cookies for analysis, targeting and advertising

A deactivation of this types of Cookies for analysis, targeting and advertising purposes could reduce the functionality of or the services offered through our website. The Cookies of this type presently used by us are offered by the following providers, to whom you may refer for information on /description of the respective Cookies or if you wish to object to their use

<b>Tool</b>	<b>Datenschutzinformationen des Anbieters</b>	<b>Widerspruchsmöglichkeit (Opt-out)</b>
Facebook	<a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a>	<a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>  Bitte klicken Sie hier, um Ihre Zustimmung zu widerrufen <a href="https://www.facebook.com/ads/website_custom_audiences">www.facebook.com/ads/website_custom_audiences</a>
Google Analytics	<a href="https://support.google.com/analytics/answer/6004245?hl=de">https://support.google.com/analytics/answer/6004245?hl=de</a>	<a href="https://tools.google.com/dlpage/gaoptout?hl=de">https://tools.google.com/dlpage/gaoptout?hl=de</a>
youtube	<a href="https://policies.google.com/privacy?hl=de">https://policies.google.com/privacy?hl=de</a>	<a href="https://policies.google.com/technologies/product-privacy?hl=de">https://policies.google.com/technologies/product-privacy?hl=de</a>  <a href="https://policies.google.com/technologies/managing?hl=de">https://policies.google.com/technologies/managing?hl=de</a>

#### 4.3 How can I deactivate Cookies?

If you wish to generally deactivate analytics, targeting and advertising Cookies, you can

easily do so by accessing our Cookies Settings. Alternatively, you may deactivate individual Cookies by clicking on one of the links in the above table (opt out). Finally, you may prevent the use of any Cookies whatsoever by adjusting the settings in your browser accordingly. We wish to point out, however, that in such case the functionality of our website will be reduced if also Cookies required for technical purposes are blocked. For further information on Cookies and individual providers, you may e.g. refer to [www.youronlinechoices.com](http://www.youronlinechoices.com), where you may also object to usage-based online advertising via certain or any tools. Visit following URL to be forwarded directly to the preferences manager.

[<http://www.youronlinechoices.com/de/praferenzmanagement>]

## **5. Links**

We use links to other internet presences of us on websites and services of third parties, e.g. to social media channels such as Facebook, X, Instagram or YouTube. These third parties are exclusively responsible for the data processing by such other service providers on their websites and their data protection notices apply.

## **6. Data transmission to social networks**

### **6.1 Social plugins of Facebook**

This website uses social plugins (“recommend buttons”) of the social network of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (“Facebook”). The buttons are identified by a Facebook logo.

To protect your privacy, you first have to activate each of such buttons on our pages; inactive buttons are grey. When you activate them, your browser makes a direct connection with Facebook’s servers. Facebook transmits the content of the button directly to your browser and integrates it into the website.

With the integration of the button, Facebook then receives the information that and when you called up the corresponding page of our Internet presence, as well as your IP address, information on the browser you use, your operating system and the language settings. When you click on the recommend button, your click is transmitted to Facebook (USA) and used according to Facebook’s data usage guidelines.

For the purpose and scope of the collection of data and its further processing and use by Facebook as well as your pertaining rights and configuration options to protect your privacy, please see the information contained on Facebook, currently available under <http://www.facebook.com/about/privacy/>.

If you do not want Facebook to collect data on you via our website, you should not activate the transmission of data to Facebook.

If you are logged into Facebook, Facebook can match your visit to our website with your Facebook account. If you do not want this, you must log out beforehand.

Note: All of the above is applied only to TKR.



## **7. Security**

We and our service providers take technical and organisational security measures to protect your personal data managed by us against accidental or deliberate manipulation, loss, destruction or access by unauthorised persons. Our data processing and our security measures are improved on a constant basis according to the technical developments.

During the transfer of your personal data to us it is encrypted with Secure Socket Layer (SSL). Personal data which is exchanged between you and us or other participating enterprises is fundamentally transmitted via encrypted connections which meet the latest technical standards.

Our employees and our retained service providers are naturally obliged to maintain confidentiality.

## **8. Your rights to information, correction, blocking or deletion**

Every natural person whose personal data we process has, in principle (i.e. depending on the respective preconditions), the following rights vis-à-vis us:

- Should you have questions regarding our processing of your personal data, we would be pleased to provide you at any time and at no charge with information on the data stored about you (Art. 15 GDPR).
- You have a right to the correction of incorrect data as well as completion of incomplete data (Art. 16 GDPR).
- You have a right to the blocking/limitation of the processing or to deletion of personal data concerning you which is no longer required or stored on grounds of legal obligations (Art. 17, 18 GDPR).
- You have a right to the transfer of the data in a structured, standard and machine-readable format, insofar as you have provided us with the data on grounds of a consent or contract between us and you (Art. 20 GDPR).
- You have the right to object to a processing on the basis of legitimate interest, in which case we are entitled to demonstrate our compelling reasons (Art. 21 para. 1 GDPR). We have pointed out above (clause 2) in which cases this right applies.
- Insofar as you have consented to a data processing, you can revoke this consent at any time with effect for the future, i.e. the legality of the data processing remains unaffected until the date of the revocation. After a revocation of consent, you may no longer be able to use our services.

PLEASE address your concerns in writing or by e-mail to the contact details given in point 9 below. We reserve the right to check your identity to ensure that your personal data is not disclosed to unauthorised persons.

However, we may charge a reasonable fee for your request or refuse your request that is clearly unfounded or excessive, particularly if it is repetitive.

In addition to the above right, you have the right to lodge a complaint at any time with a supervisory authority, especially in the EU member state of your habitual residence, your place of work or the place of the alleged infringement of the GDPR. We would, however, appreciate the chance to deal with your concerns before you approach the authority so please contact us in the first instance.

## **9. Data protection officer and contact details**

If you have any enquiries, please contact our data protection officer at:

<p>Data Protection Officer (DPO) Corporate Sustainability &amp; Communications Division TANAKA PRECIOUS METAL GROUP Co., Ltd 2-6-6, Nihonbashi-Kayabacho, Chuo-ku, Tokyo (103-0025), Japan [e-mail address] <a href="mailto:tkg-gdpr@ml.tanaka.co.jp">tkg-gdpr@ml.tanaka.co.jp</a></p>
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Note: You can ask enquiries related to any company of TANAKA described on page [1] as well as enquiries related to TKG.

## **10. Amendments**

From time to time the content of this data protection notice may have to be modified. We therefore reserve the right to amend them at any time. We will also publish the amended version of the data protection notice at this place. When you revisit us, you should therefore reread the data protection notice.

**Last updated: January 1, 2025**