

Privacy Statement

Effective Date or last modified date: January, 20th, 2026

1. Introduction

This Privacy Statement applies to the TOPPAN TOF *senSPure*™ Website ("Site") operated by TOPPAN Holdings Inc. ("we", "us", or "our").

We are committed to respecting and protecting your privacy. This Statement explains how we collect, use, disclose, and protect your personal data through the Site and related online services we manage, in compliance with applicable data protection and privacy laws. It does not apply to third-party websites or services that may be linked from our Site.

For the purposes of this Statement, "personal data" (also referred to as "personal information" in some jurisdictions) means any information relating to an identified or identifiable individual.

2. What Personal Data We Collect

Depending on how you interact with us, we may collect the following types of personal data:

- Name, job title, company/organization, company/organization URL, country/region
- Contact details (such as email address, telephone number, and postal address)
- Information you provide in inquiries, web forms, event registrations, or surveys
- Website usage data (such as IP address, browser type, device information, access logs, and cookies or similar technologies)
- Your marketing/communication preferences
- Any other information you voluntarily provide to us

We may collect information directly from you (for example, when you submit an inquiry form, register for a newsletter, or participate in an event), from our business partners, or from public sources, as permitted by applicable law. We may also automatically collect certain information when you visit our Site, such as your IP address, browser and device information, operating system, browsing activities on the Site, and information collected through cookies or similar technologies.

Our services and Site are not intended for the collection of sensitive personal data. We ask that you do not send us, and that you do not disclose, any sensitive personal data (for example, data relating to racial or ethnic origin, political opinions, religion or other beliefs, health, biometric or genetic characteristics, criminal background, or trade union membership) on or through the Site or otherwise to us.

In this Statement, “applicable law” refers to data protection and privacy laws that apply to our processing of your personal data, which may include the laws of the country or region where you reside.

3. How We Use Your Personal Data & Legal Basis

We process your personal data for the purposes described below. In jurisdictions requiring a specific legal basis for processing (such as the EEA and UK), we rely on the lawful bases set out in the table below corresponding to each purpose.

Purpose of Processing	Legal Basis (Where Required)
1. Responding to your requests: To respond to your inquiries and requests, and to provide the information, products, or services you request (for example, information about TOPPAN TOF <i>senSPure</i> [™] or our newsletter).	Performance of a Contract or Legitimate Interests
2. Customer and vendor relationship management: To manage and perform our relationships and	Performance of a Contract or Legitimate Interests

contracts with customers, partners, and suppliers.	
3. Event and survey management: To organize and manage events, webinars, surveys, or other promotional or informational activities in which you choose to participate.	Performance of a Contract or Consent
4. Website operation and improvement: To operate, maintain, analyze, and improve our Site and services, including through the use of cookies and analytics tools (see “7. Cookies & Analytics” below).	Legitimate Interests and/or Consent
5. Marketing communications: To send you marketing or promotional communications about our products, services, events, or newsletters, in accordance with your preferences and with your consent where required by applicable law.	Consent or Legitimate Interests
6. Legal compliance: To comply with applicable laws and regulations, law enforcement requests, and legal processes.	Compliance with a Legal Obligation and/or Legitimate Interests
7. Protection of our rights and interests: To protect our legitimate business interests, such as ensuring the security of our Site and systems, preventing fraud or misuse, and exercising or defending legal claims.	Legitimate Interests

Description of Legal Bases

Below is a description of the legal bases referred to above:

- **Performance of a contract:** When the processing is necessary to provide our products or services to you or to respond to your requests (e.g., handling inquiries you submit) or to take steps prior to entering into a contract.
- **Compliance with a legal obligation:** When we are required to process your data to comply with laws and regulations.
- **Legitimate interests:** When the processing is necessary for our legitimate

business interests, and those interests are not overridden by your interests or fundamental rights and freedoms (for example, ensuring the security of our Site, improving our services, or managing business relationships).

- **Consent:** When we rely on your consent, such as for sending certain marketing communications or using non-essential cookies where required. You may withdraw your consent at any time by contacting us as described in the “Contact Us” section or by using the mechanisms provided (for example, an “unsubscribe” link in our emails). The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

4. Data Subject Rights

We are committed to ensuring that you can exercise your rights over your personal data. Depending on the data protection laws that apply to you, you may have some or all of the following rights:

- **Right of access:** To obtain confirmation as to whether we process your personal data and, if so, to receive a copy of such data.
- **Right to rectification:** To request that we correct or update any inaccurate or incomplete personal data about you.
- **Right to erasure:** To request the deletion of your personal data under certain conditions (for example, when the data is no longer necessary for the purposes for which it was collected).
- **Right to restriction of processing:** To request that we restrict the processing of your personal data in certain circumstances (for example, while we verify the accuracy of your data).
- **Right to object:** To object to our processing of your personal data, in particular where we process your data based on our legitimate interests or for direct marketing purposes.
- **Right to withdraw consent:** When we rely on your consent, to withdraw your consent at any time. This will not affect the lawfulness of processing carried out before the withdrawal.
- **Right to data portability:** To receive your personal data in a structured, commonly used, and machine-readable format and to request that we transmit it to another controller, where technically feasible.

- **Right to lodge a complaint:** To lodge a complaint with a data protection supervisory authority in the country or region where you live, work, or where you believe that your rights have been infringed, if you consider that the processing of your personal data infringes applicable laws.
- **Right to non-discrimination:** To not receive discriminatory treatment by us for the exercise of your privacy rights conferred by applicable laws.

To exercise any of these rights, please contact us using the details in the “**10. Contact Us**” section below. To protect your privacy and security, we may need to verify your identity before processing your request. We will respond within the timeframe required by applicable law.

Where provided by applicable law, you also have the right to lodge a complaint with a data protection authority or other competent supervisory authority in your country or region.

5. How We Share and Protect Your Data

Your trust is important to us. This section explains how we share your personal data—both within our corporate group and with external third parties—and the measures we take to protect your data.

A. Sharing Within the TOPPAN Group (Joint Use)

We may share (jointly use) your personal data within the TOPPAN group of companies as necessary to: (i) respond to your inquiries and requests; (ii) provide products and services; and (iii) carry out internal administrative and management purposes.

Depending on your request, relevant departments—such as sales, IT, marketing, or logistics—within the group may access your personal data on a need-to-know basis only. All joint use of personal data within the TOPPAN Group is carried out in accordance with our internal policies and standards, including the “TOPPAN Group Basic Information Security Rules” and related regulations, to ensure a consistent and high level of data protection.

1. Categories of jointly used data: Name; contact details (such as email address,

telephone number, and postal address); organization information (such as company name and job title); inquiry details; and other information collected as described in Section 2 ("What Personal Data We Collect").

2. Scope of joint users: TOPPAN Group companies listed on our website (<https://www.holdings.toppan.com/en/group/companies.html>) that have a base or bases in Japan.

3. Purposes of joint use: To respond to inquiries; provide products and services; manage business relationships; organize events and other promotional activities; and for other purposes described in Section 3 ("How We Use Your Personal Data").

4. Entity responsible for the management of jointly used data: TOPPAN Holdings Inc. (<https://www.holdings.toppan.com/en/about-us/company-profile.html>)

5. Method by which data is obtained: As described in Section 2 ("What Personal Data We Collect").

B. Sharing with Third Parties (External)

We may also share your personal data with trusted external third parties. These third parties fall into the following categories:

i. Service Providers Acting on Our Behalf (Processors)

We engage third-party service providers to perform certain functions for us. These providers process personal data only on our instructions and for the purposes described in this Statement. Examples include:

- **IT and cloud service providers:** Companies that provide web hosting, data storage, software, and IT support, such as Alphabet Inc. and DataSign Inc.
- **Marketing and sales platforms:** Providers of customer relationship management (CRM) systems, marketing automation tools, and email delivery services, such as RAKUS Co., Ltd.
- **Business support partners:** Distributors, shipping and logistics partners, event management companies, and similar service providers.

We enter into appropriate data processing agreements with these service providers, requiring them to keep your data confidential and secure and to use it only in accordance with our documented instructions.

ii. Other Third Parties (Independent Controllers)

In certain circumstances, we may share your personal data with third parties that determine the purposes and means of processing themselves (independent controllers). Examples include:

- **Public authorities and regulators:** Law enforcement agencies, courts, or regulatory bodies when we are legally required to do so, or when it is necessary to protect our rights, your rights, or the rights of others.

We do not sell your personal data to third parties for monetary consideration. However, we may share identifiers and internet or other network activity information with social media platforms and advertising partners to deliver relevant advertisements to you. This activity may be considered “sharing” or “selling” under certain U.S. state laws. You have the right to opt out of such sharing or selling by adjusting your preferences in the ‘Privacy Settings’ screen, accessed by clicking the settings icon (the gear symbol) displayed at the bottom left of this Site.

C. International Data Transfers

Some companies within the TOPPAN Group and some of the third parties described above are located outside the country or region where you reside. As a result, your personal data may be transferred to and processed in countries that may have different data protection laws than those in your country.

Where we transfer personal data internationally, we take steps to ensure that your data is protected in accordance with applicable law. These safeguards may include:

- Transfers to countries that have been recognized by the European Commission or other competent authorities as providing an adequate level of data protection; and/or
- The use of appropriate contractual safeguards, such as the European

Commission's Standard Contractual Clauses (SCCs) or other legally recognized transfer mechanisms.

You may contact us using the details in the **"10. Contact Us"** section if you would like more information about the safeguards we use for international data transfers.

6. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, as described in this Privacy Statement, or as required or permitted by applicable law. The criteria we use to determine our retention periods include:

- The duration of our relationship with you (for example, the period during which you use our services, subscribe to our newsletter, or maintain an account with us);
- The time needed to respond to and manage your inquiries or requests;
- Our legal obligations to retain certain data; and
- The period during which we may need to retain data to establish, exercise, or defend legal claims.

Once the applicable retention period expires, your personal data will be securely deleted, anonymized, or otherwise processed in accordance with applicable law.

7. Cookies & Analytics

We use cookies and similar technologies to operate and improve our Site, to remember your preferences, and to analyze how visitors use our Site.

When you first visit our Site, you will be presented with a cookie banner that allows you to manage your preferences for non-essential cookies. You can change these preferences at any time by clicking the settings icon (the gear symbol) displayed at the bottom left of this Site to access the 'Privacy Settings' screen and adjusting your settings.

For more detailed information about the types of cookies we use, the purposes for which we use them, and how you can manage your cookie preferences, please see our [Cookie Policy](#).

8. Children's Privacy

Our products and services are designed for and provided to business customers. The Site is not directed to, and we do not knowingly collect, use, or disclose personal data from children under the age of 18 (or such other age as may be defined by applicable law in your jurisdiction).

If we become aware that we have collected personal data from a child in violation of applicable law, we will take appropriate steps to delete such data promptly. If you believe that a child has provided personal data to us, please contact us using the details in the **"10. Contact Us"** section.

9. Data Security

We implement appropriate organizational, human, physical, and technical security measures to protect personal data against unauthorized access, disclosure, alteration, loss, or destruction.

In accordance with the "TOPPAN Group Basic Information Security Rules" and related internal regulations, our measures include, for example:

- **Organizational measures:** Designation of persons responsible for information security and personal data protection, development of internal policies and procedures, employee training and awareness programs, and establishment of internal audit mechanisms.
- **Human measures:** Confidentiality obligations for employees and contractors, appropriate management of access rights, and procedures for onboarding and offboarding personnel.
- **Physical measures:** Access controls for offices and server rooms, anti-theft measures, and appropriate management of equipment and media containing personal data.
- **Technical measures:** Access control and authentication, measures against unauthorized access (such as firewalls), encryption and pseudonymization where appropriate, vulnerability management, and log monitoring.

While we strive to protect your personal data, no method of transmission over the internet or method of electronic storage is completely secure. Accordingly, we cannot guarantee absolute security. However, if we become aware of a data breach affecting your personal data, we will take appropriate steps in accordance with applicable law,

which may include notifying you and/or relevant authorities.

10. Contact Us

If you have any questions about this Privacy Statement, our privacy practices, or if you wish to exercise your privacy rights, please contact us using the details below:

TOF Business Development Center, Business Development Division, TOPPAN Holdings Inc.

Email: btcp_contact_pii@toppan.co.jp

If you are located in the European Economic Area, the United Kingdom, or another jurisdiction that grants you specific data protection rights, you may also have the right to lodge a complaint with your local data protection authority, as described in Section 4 above.

11. Basic information on TOPPAN as a business operator handling personal data

TOPPAN Holdings company name, location, and the name of the president and representative director can be found on the "Company Profile" page of our corporate website (<https://www.holdings.toppan.com/en/about-us/company-profile.html>).

12. Changes to This Statement

We may update this Privacy Statement from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons.

If we make material changes, we will provide you with a prominent notice before the changes take effect, such as by sending you an email (if we have your email address) or by posting a notice or pop-up banner on our Site. Where required by applicable law, we may also seek your consent to certain changes.

For all other (non-material) changes, we will update the "Effective date / Last modified" line at the top of this Statement and post the revised version on our Site. We encourage

you to review this Statement periodically to stay informed about how we handle your personal data.