

Privacy Policy

Last updated: September 1, 2026

This Privacy Policy ("Policy") is provided by Zeon Corporation. This Policy describes how we collect, use, disclose, and otherwise process personal information under the EU General Data Protection Regulation ("GDPR") and the UK GDPR.

This Policy applies to personal information we process about:

- individuals who access or interact with Zeon websites, digital platforms, or offices;
- representatives or employees of our customers, suppliers, and other business partners; and
- individuals who apply for employment with Zeon or its Group companies.

For purposes of the EU GDPR and UK GDPR, to the extent applicable, Zeon Corporation, located at 1-6-2 Marunouchi, Chiyoda-ku, Tokyo 100-8246, Japan, acts as the data controller unless otherwise stated.

By accessing our websites or providing personal information to Zeon, you acknowledge that you have read and understood this Policy.

1. Categories of personal information we collect

We may collect, use, store and process the following categories of personal information, depending on your relationship with Zeon:

- **Customers and business partners**
 - Contact details: name, company name, position, postal and email addresses, telephone numbers, fax numbers.
 - Billing data: invoicing contacts, bank account identifiers, VAT/tax IDs (where they relate to a person/sole trader).
 - Information related to inquiries and communications addressed to Zeon.
- **Suppliers and vendors**
 - Identification and contact details: name, company name, position, postal and email addresses, telephone numbers, fax numbers.
 - Information related to inquiries and communications addressed to Zeon.
- **Job applicants**
 - Contact details: name, company name, position, postal and email addresses, telephone numbers.
 - Demographic and association-related information: age and date of birth, place of birth, residency information, family member information, face photo.
 - Educational background, qualifications, employment history, and professional references.
 - Financial, immigration, or health-related information required by applicable employment laws.

- Any other information voluntarily provided in connection with a job application.
- **Shareholders or employees of shareholders**
 - Identification and contact details: name, company, position, date of birth, nationality, postal address, email address, fax numbers and telephone numbers.
 - Identity verification information: copy of identification document, identification number, and proof of address (where required) and shareholder reference number.
 - Financial information: bank account details for dividend payments and tax identification number.
 - Information related to inquiries and communications addressed to Zeon.
 - Any other information voluntarily provided in connection with shareholding activities.
- **Website visitors**
 - Contact details: name, company name, position, postal and email addresses, telephone numbers, fax numbers.
 - Technical and website usage data: IP address, browser type, device identifiers, cookies, and interaction history.

We may also obtain personal information indirectly from public sources, references, or third-party intermediaries (e.g., recruitment agencies or distributors).

2. Sources of personal information

We collect personal information from a range of sources, including:

- Directly from you when you communicate with us or provide your details via forms, correspondence, or applications;
- From your employer or colleagues if you represent a corporate client, supplier, or business partner;
- Automatically through cookies and similar technologies when you visit our websites;
- From public registers, professional databases, governmental authorities, or background check providers where legally permitted.

3. Purposes for which we use personal information

We use personal information for the following purposes, in accordance with applicable data protection laws:

- **Client and business relationship management:** administering sales, customer service, procurement, and related contractual arrangements.
- **Marketing and communications:** providing information about Zeon's products, technologies, events, and business opportunities.
- **Supplier and vendor management:** evaluating the suitability and quality of goods and services.
- **Recruitment and human resources:** assessing job applications, making hiring decisions, and complying with employment obligations.

- **Shareholder administration and corporate governance:** maintaining shareholder registers, verifying shareholder identity, administering shareholdings, processing dividend payments, managing shareholder reference numbers, organising and administering general meetings (including voting and proxy management), distributing annual reports and corporate communications, handling shareholder inquiries and complying with corporate, securities and tax law requirements.
- **Compliance and risk management:** meeting legal, regulatory, and audit requirements, preventing fraud, and protecting Zeon's legitimate interests.
- **IT and security management:** maintaining the integrity and security of our systems, networks, and facilities.
- **General business operations:** accounting, record-keeping, research, and internal administrative purposes.

4. Legal bases for processing

We rely on the following legal bases under Article 6 GDPR, depending on the context of our relationship with you:

- **Consent:** when you have freely given your consent for one or more specific purposes, such as receiving electronic marketing communications or accepting optional website cookies.
- **Performance of a contract:** when processing is necessary to enter into or perform a contract with you or your organisation (for example, to supply or receive products or services, or to evaluate job applications).
- **Legal obligation:** when processing is required to comply with laws to which Zeon is subject, such as employment, accounting, or regulatory record-keeping obligations.
- **Legitimate interests:** when processing is necessary for Zeon's legitimate business interests or those of a third party, provided such interests are not overridden by your fundamental rights and freedoms.
- **Vital interests:** in rare circumstances, where processing is necessary to protect someone's life or physical safety.

When processing is based on legitimate interests, Zeon performs and documents a balancing assessment to ensure that your rights and freedoms are respected.

The table below shows how Zeon applies these legal bases to specific categories of processing:

Purpose	Legal bases
Client and Business Relationship Management	Performance of a contract; Legitimate interests (business relationship management).
Supplier and Vendor Management	Performance of a contract; Legitimate interests (procurement efficiency and quality control).
Marketing and Communications	Consent for electronic marketing; Legitimate interests for permitted B2B communications (with opt-out option).
Recruitment and Job Applications	Performance of a contract; Legal obligation (employment law), Legitimate interests (efficient talent acquisition)
Shareholder Administration and Corporate Governance	Performance of a contract (administration of shareholdings and dividend payments); Legal obligation (corporate, securities, tax, and transparency requirements, including

	maintenance of shareholder registers and identity verification); Legitimate interests (corporate governance, shareholder communications, fraud prevention, and protection of Zeon's assets and reputation).
Compliance and Risk Management	Legal obligation; Legitimate interests (protecting Zeon's assets, reputation, and compliance posture).
IT and Security Management	Legitimate interests (safeguarding information assets and ensuring business continuity)
General Business Operations	Legal obligation for statutory record-keeping; Legitimate interests (efficient management and internal governance).

5. Sensitive (special category) personal information

We may process limited categories of sensitive personal information, such as health data, or other information revealing racial or ethnic origin or union membership, only where necessary and where permitted by law (e.g., to comply with employment, health, or safety requirements).

6. Disclosure of personal information

We may share personal information with the following categories of recipients:

- Other Zeon Group companies, including wholly or majority-owned subsidiaries of Zeon Corporation, for internal administrative and operational purposes;
- Authorised distributors, trading companies, and agents supporting sales, logistics, and marketing;
- Service providers that perform services on our behalf, such as IT, data hosting, transport, insurance, legal, and financial advisors;
- Regulatory authorities, courts, and governmental bodies, where disclosure is required by applicable law; and
- Business transferees or successors, in connection with a merger, reorganization, or sale of assets.

All recipients are required to process personal information in compliance with applicable data protection laws and Zeon's contractual safeguards or Zeon Group companies' internal policies.

7. Cookies and Analytics

Our websites may use cookies and similar tracking technologies to enhance your browsing experience, analyse website performance, and tailor content. Cookies collect limited data such as IP addresses, device identifiers, and browsing behaviour. You may control or delete cookies through your browser settings. If you block essential cookies, some parts of our website may not function properly.

8. International data transfers

Due to the global nature of Zeon's operations, your personal information may be transferred to and processed in countries outside the European Economic Area ("EEA") and the United Kingdom, including **Singapore, Thailand, India, and the United States**.

These jurisdictions may not provide the same level of data protection as the EEA or UK. In such cases, Zeon ensures an adequate level of protection through the use of **European Commission-approved Standard Contractual Clauses (SCCs)** or other legally recognised safeguards.

You may request a copy of these transfer mechanisms using the contact details provided below.

9. Retention of personal information

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected or as required by law.

Retention periods depend on the nature of the relationship and may include:

- The duration of any contractual or business relationship and up to 10 years thereafter, unless longer retention is legally required.
- For unsuccessful job applicants, up to six months after completion of the recruitment process.
- For employees, the term of employment and generally three years thereafter.

At the end of the applicable retention period, data are securely deleted, anonymised, or archived in accordance with Zeon's internal data governance standards.

10. Data security

Zeon implements appropriate **organisational, technical, contractual, and physical safeguards** to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

These safeguards are regularly reviewed and updated in light of technological developments and business practices. Only personnel with a legitimate need to access personal information are authorised to do so.

11. Rights of individuals

Under the EU GDPR and UK GDPR, you may have the following rights in relation to your personal information:

- **Right of access:** you have the right to request confirmation of whether we process your personal data and to obtain a copy.
- **Right of rectification:** you have the right to request correction of inaccurate or incomplete personal information.
- **Right of erasure ("Right to be Forgotten"):** you have the right to request deletion where processing is no longer necessary or lawful.
- **Right to restrict:** you have the right to request limitation of processing in certain circumstances.
- **Right to object:** you have the right to object to processing based on legitimate interests or for direct marketing.
- **Right to data portability:** you have right to receive your personal data in a structured, commonly used, machine-readable format and transmit it to another controller.
- **Right to withdrawal of consent:** where processing is based on consent, you have the right to withdraw consent at any time (without affecting prior lawful processing).
- **Right to complaint:** you have the right to lodge a complaint with the relevant supervisory authority. You can find the contact details of the supervisory authorities in the EU [here](#) and the UK authority (the Information Commissioner's Office, ICO) [here](#).

To exercise your rights, please contact us using the details provided in Section 14.

12. Automated decision-making and profiling

Zeon does **not** engage in automated decision-making, including profiling, that produces legal or similarly significant effects on individuals.

13. Updates to this Policy

We reserve the right to amend or update this Policy at our discretion. If we make material changes, we will revise the “Last Updated” date and, where appropriate, provide additional notice.

14. Contact information

If you have any questions or wish to exercise your rights under this Policy, please contact:

Zeon Corporation

1-6-2 Marunouchi, Chiyoda-ku, Tokyo 100-8246, Japan

Fax: +81-3-3216-0501

Email: compliance@ml.zeon.co.jp