

PRIVACY POLICY

Please read this Privacy Policy so that you are aware and understand the purposes for which we collect, use and disclose your Personal Data. This Privacy Policy informs you of how Alliance Tire Group K.K. and/or its related entities, affiliates and subsidiaries (individually and collectively referred to herein as "YOHT", "us", "we" or "our") manages your Personal Data.

You hereby agree and consent to YOHT, collecting, using, disclosing and sharing your Personal Data, and disclosing such Personal Data in the manner set forth in this Privacy Policy.

This Privacy Policy does not affect any rights which YOHT may have at law in connection with the collection, use or disclosure of your Personal Data. YOHT may from time to time update this Privacy Policy. You agree to be bound by the prevailing terms of the Privacy Policy as updated from time to time on our Site.

For avoidance of doubt, this Privacy Policy forms a part of the Site's Terms and Conditions ("**Terms and Conditions**"). In the event of any conflict or inconsistency between this Privacy Policy and the Terms and Conditions, the Privacy Policy shall prevail. All defined terms contained in the Terms and Conditions shall apply to this Privacy Policy unless otherwise specifically stated.

For data subjects of the European Union, our EU privacy policy which can be found at <https://73475755.r.worldcdn.net/wp-content/uploads/2021/03/EU-Facing-Privacy-Policy.pdf>, shall be applicable and forms part of this Privacy Policy. In the event of any conflict, for EU data subjects, the terms of the EU privacy policy shall prevail.

1) Your Personal Data

In this Privacy Policy, "**Personal Data**" refers to data or information about you from which you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access. Depending on the nature of your interaction with us, Personal Data which you may provide to us includes:

- a) Personal information such as your name, passport, social security number or other identification number, telephone numbers, mailing address, email address and any other information relating to you which you have provided us in any forms you may have submitted to us, or in other forms of interaction with you;
- b) Information about your use of our Site and services, including cookies, IP address or other unique identifiers, and newsletter subscription details, but only to the extent that YOHT may identify you from such information;
- c) Payment related information, such as your bank account or credit card information, and your credit history, credit score; and
- d) Information about your usage of and interaction with our Site including computer and connection information, device capability, bandwidth, statistics on page views, and traffic to and from our Site.

2) Collection of Personal Data

- a) YOHT collects Personal Data when you:
 - i) Request information about our products or services;

- ii) Submit forms (online or otherwise) relating to any of our products or services;
 - iii) Register for, create an account, or use any of our services on our Site, or other websites owned or operated by us or when you register as a member of our Site or other websites owned and/or operated by us, or use services on such other websites;
 - iv) Use some of our services, e.g. our newsletter subscription service;
 - v) Request to be included in an email, other mailing lists, or for marketing materials to be sent to you;
 - vi) When you respond to, or enter into, our promotions, contests and other initiatives;
 - vii) When you contact us or provide us with feedback; and/or
 - viii) When you submit your Personal Data to us for any other reason.
- b) When browsing our Site, you generally do so anonymously but please see the section below on cookies.
 - c) If you provide us with any Personal Data relating to a third-party (e.g. information of spouse, children, parents, employees, employers and/or authorised representatives), by submitting such information to us, you represent to us that you have obtained the consent of such third-party to you providing us with their Personal Data for the relevant purposes.
 - d) You should ensure that all Personal Data submitted to us is complete, accurate, true and correct.

3) Purposes for the Collection, Use and Disclosure of Your Personal Data

- a) YOHT collects, uses and discloses your Personal Data for the following purposes:
 - i) Responding to your queries and requests and responding to feedback and complaints;
 - ii) Matching any Personal Data held which relates to you for any of the purposes listed herein;
 - iii) Verifying your identity;
 - iv) Providing you with a customised experience, including personalisation services, interactive communication, online commerce and other types of services;
 - v) Performing, protecting and/or enforcing our contractual and legal rights and obligations;
 - vi) Compliance with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and/or
 - vii) Any other purpose relating to any of the above.
- b) YOHT may also collect, use and disclose your Personal Data for the following purposes, depending on the nature of our relationship with you:
 - i) If you have a newsletter subscription with us:
 - A) to process your application for newsletter subscription;

- B)** to maintain your newsletter subscription with us;
 - C)** to verify and process your personal particulars and payments (if applicable) in relation to provision of our newsletter subscription service;
 - D)** to provide you with the goods and services which you have signed up for;
 - E)** communicating with you to inform you of changes and development to YOHT policies, terms and conditions and other administrative information, including for the purposes of servicing you in relation to products and services offered to you;
 - F)** conducting market research for statistical, profiling and statistical analysis for the improvement of products and services provided to you;
 - G)** resolving complaints and handling requests and enquiries; and/or
 - H)** processing of your Personal Data in relation to any of the purposes stated above.
- ii)** Where permitted, we may also collect, use and disclose your Personal Data for the following purposes:
 - A)** Providing services, products and benefits to you, including promotions, loyalty and reward programmes;
 - B)** Matching Personal Data with other data collected for other purposes and from other sources (including third-parties) in connection with the provision or offering of products and services, whether by YOHT or other third-parties;
 - C)** Administering contests, competitions and conducting lucky draws, including, where necessary, in order to announce the results of these contests, competitions and lucky draws and identify and contact the winners, and in order to publicise and conduct marketing strictly related to these contests, competitions and lucky draws;
 - D)** Sending you details of products, services, special offers and rewards, either to our customers generally, or of particular products and services which may be of interest to you; and/or
 - E)** Conducting market research, understanding and determining customer location, preferences and demographics for us to review, develop and improve our products, services and also develop special offers and marketing programmes.
- c)** In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, then we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.
- d)** Please note that we may collect, use and disclose your Personal Data for more than one lawful ground, depending on the particular purpose for which we are using your data. Please contact us at info@yokohama-oh.com should you require further details.

4) Disclosure of Personal Data

- a) YOHT will take reasonable steps to protect your Personal Data against unauthorised disclosure.
- b) Subject to the provisions of any applicable law, Personal Data may be disclosed for the purposes listed above (where applicable), to the following third-parties:
 - i) YOHT and/or its related entities, affiliates or subsidiaries;
 - ii) Vendors or any third-party business partners who offer goods and services or sponsor contests or other promotional programs on YOHT's sites, whether in conjunction with us or not;
 - iii) Our professional advisors such as our auditors and lawyers;
 - iv) Relevant government regulators or authorities or law enforcement agencies to comply with any laws or rules and regulations imposed by any governmental authority; and/or
 - v) Any other party to whom you authorise us to disclose your Personal Data.

5) Change of Purpose

- a) We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.
- b) If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- c) Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6) International Transfers

Your Personal Data may be transferred, stored, and processed in any country in which YOHT operates.

7) Third-Party Sites

- a) YOHT may provide links to other/external sites, plug-ins and applications ("**Third-Party Sites**") that may be of relevance and interest to users. Clicking on those links or enabling those connections may allow third-parties to collect or share data about you. When you leave the Site, we encourage you to read the privacy policy of every website that you visit.
- b) YOHT has no control over, and is not responsible for the content on the Third-Party Sites or for any damage you may incur from the Third-Party Sites (including any virus, spyware, malware, worms, errors or damaging material contained in the Third-Party Sites) or the availability of any content on the Third-Party Sites, and you hereby irrevocably waive any claim against us with respect to the Third-Party Sites.

8) Use of cookies

- a) When accessing our Site, we may collect or analyse anonymised information from which individuals cannot be identified (“**Aggregate Information**”), such as frequency of use, the number of page views (or page impressions) that occur on the Site and common entry and exit points into the Site.
- b) We use cookies, where a small data file is sent to your browser to store and track Aggregate Information about you when you enter our Site. The cookie is used to track information such as the number of users and their frequency of use, profiles of users and their preferred sites.
- c) Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, please note that you may not be able to enter or use certain parts of our Site after doing so.
- d) We may use an independent company (the “**Third-Party Market Research Company**”) to measure and analyse the Aggregate Information from our Site. Please note that we do not have access to or control over the cookies or other technologies which the above-mentioned Third-Party Market Research Companies may use to collect your information. The use of cookies or other technologies by these Third-Party Market Research Companies are not covered by this Privacy Policy and are subject to their own privacy policies.
- e) In particular, the Site uses website analytics, including but without limitation to, Google Analytics, a web analytics service provided by Google, Inc. (“**Google**”). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the Site. The information generated by the cookie about your use of the Site (including your IP address truncated by the last octet prior to its storage using the “anonymizeIp()” method) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Site, compiling reports on Site activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third-parties where required to do so by law, or where such third-parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Site. By using the Site, you consent to the processing of data about you by Google in the manner and for the purposes set out above. You can opt-out from being tracked by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add on for your current web browser: <http://tools.google.com/dlpage/gaoptout?hl=en>.

9) Objections, Correction of Personal Data and Contacting Us

- a) Should you wish to:
 - i) object to the collection, use and/or disclosure of your personal data provided to us for any of such purpose listed above;

- ii) have any enquiries or feedback with regard to the collection, use and/or disclosure of your personal data provided to us for any of such purpose listed above;
- iii) obtain access to your personal data in our records; or
- iv) make corrections to your personal data in our records,

please contact us at: info@yokohama-oht.com

- b) In the event your Personal Data has been provided to us by a third-party, you should contact such party directly to make any queries, feedback, and access and correction requests to YOHT on your behalf.
- c) Please note that if you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, YOHT may not be in a position to continue to provide its products or services to you or administer any contractual relationship in place, and this may also result in the termination of any agreements with YOHT and you being in breach of your contractual obligations or undertakings, and YOHT's legal rights and remedies in any such event are expressly reserved.

10) Governing Law

- a) This Privacy Policy shall be governed by and construed in accordance with the laws of Japan.
- b) You hereby agree to submit to the exclusive jurisdiction of the courts in Tokyo.