

PRIVACY NOTICE

Last updated - October 2021

Thank you for choosing to be part of our community at Musashi North America, Inc. (“**Company**”, “**we**”, “**us**”, “**our**”). We are committed to protecting your personal information, if you have any questions or concerns please contact us at info@musashina.com.

When you use our website, as the case may be (the “**site**”) and more generally, use any of our services (the “**Services**”, which include the site), we appreciate that you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. We hope you take some time to read it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our site), as well as, any related services, sales, marketing or events.

Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

1. WHAT INFORMATION DO WE COLLECT?

Information automatically collected

In short: Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – is collected automatically when you visit our site.

We automatically collect certain information when you visit, use or navigate the site. This information does not reveal your identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our site and other technical information. This information is primarily needed to maintain the security and operation of our site, and for our internal analytics and reporting purposes.

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our site and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the site (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you

take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).

- **Device Data.** We collect device data such as information about your computer, phone, tablet or other device you use to access the site. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model Internet service providers and/or mobile carrier, operating system and system configuration information.
- **Location Data.** We collect location data such as information about your device's location, which can either be precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the site. You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information collected through our Website

In short: We collect information regarding your geolocation and electronic device when you use our site.

If you use our site, we also collect the following information:

- **Mobile Device Data.** We automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our site, we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID and information about the features of our site you accessed.

This information is primarily needed to maintain the security and operation of our site, for troubleshooting and for our internal analytics and reporting purposes.

2. HOW DO WE USE YOUR INFORMATION?

In short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our site for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific

processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To deliver and facilitate delivery of services to the user.** We may use your information to provide you with the requested service.
- **To respond to user inquires/offer support to users.** We may use your information to respond to your inquires and solve any potential issues you might have with the use of our Services.
- **For other business purposes.** We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our site, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information.
- We will not use identifiable personal information without your consent.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.

We may process or share your data that we hold based on the following legal basis.

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved. More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will acquire those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

4. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In short: We may transfer, store, and process your information in countries other than your own.

Our servers are located in the North America. If you are accessing our site from outside North America, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information, in and other countries.

If you are a resident in the European Economic Area (EEA) or United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than 2 years.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other authorized third parties will not be able to defeat our

security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our site is at your own risk. You should only access the site with a secure environment.

7. WHAT ARE YOUR PRIVACY RIGHTS?

In short: You may review, change, or terminate your account at any time.

If you are a resident in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

<https://ec.europa.eu/newsroom/article29/items/612080>.

If you are a resident in Switzerland, the contact details for the data protection authorities are available here:

<https://www.edoeb.admin.ch/edoeb/en/home.html>

8. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standards for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

9. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the site, you have the right to request removal of unwanted data that you publicly post on the site. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the site, but please be aware that the data may not be completely or comprehensively removed from all our systems (eg. backups, etc.).

10. DO WE MAKE UPDATES TO THIS NOTICE?

In short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at info@musashina.com or by post to:

Musashi North America Inc.

50 West Big Beaver Rd. Suite 100

Troy, MI 48084

United States