

Privacy Policy

Recognizing that the appropriate handling and thorough protection of personal information is a social responsibility, Toppan Interamerica, Inc. adopts the following Privacy Policy and company regulations regarding the protection of personal information.

I. Toppan Interamerica, Inc. Personal Information Protection Policy

As a part of the information communication industry, we declare that in order to protect the rights of individuals and reciprocate customers' trust, the protection of personal information is a vital management issue related to corporate social responsibility, and we implement it appropriately.

1. We hold great respect for the dignity of the individual and endeavor to protect the personal information handled by the Company in line with our internal rules, fully complying with laws, government guidelines and other regulations related to personal information, and with the principles of social order.
2. Taking into consideration the business and scale of the Company, we will obtain, use and provide personal information using fair and lawful procedures **while implementing concrete measures to ensure it is not used for purposes other than those specified.**
3. We are acutely aware of the risks that threaten the personal information handled by the Company, such as wrongful access, loss, damage, manipulation, and leakage, and shall take all necessary and reasonable safety measures. In the case of a problem arising, we shall rectify it quickly and appropriately.
4. **We will establish an information desk** to deal with inquiries related to the personal information handled by the Company. If we are consulted by or receive a complaint or other communication from the person whom the information concerns, we will respond sincerely and deal with it appropriately and without delay.
5. **We shall establish,** implement and continually improve its personal information protection management system.

Bob Kolar
Toppan Interamerica, Inc.
President & COO

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II. Principles concerning the handling of Personal Information at Toppan Interamerica, Inc.

1. Compliance with laws and social order

In cases where Toppan Interamerica, Inc. (hereinafter “TIA” or “the Company”) obtains personal information for the purpose of its business, the Company complies with related laws, regulations and other rules.

2. Safe management of personal information

TIA strictly manages and protects personal information that it obtains for the purpose of its business. In order to protect personal information from risks including unauthorized access, loss, destruction, falsification and leakage, **TIA implements reasonable safety measures based on in-company rules**, and in the case of a problem occurring will respond promptly and appropriately.

3. The purpose of use of personal information

In cases where TIA obtains personal information itself, **it will be used for the following purposes**:

- (1) In order to respond to inquiries regarding TIA’s business;
- (2) In order to dispatch materials requested concerning TIA’s business;
- (3) In order to deliver E-mail newsletter to subscriber and to improve such E-mail newsletter delivery service (As for details about E-mail newsletter, please refer to [here.](#));
- (4) In order to carry out surveys by TIA and reflect the results in its services; and
- (5) In order to provide guidance and supporting information for TIA’s services.

Also, **in cases where it becomes necessary to use information for purposes other than those listed above**, the person or persons concerned will be notified by written document, electronic mail, fax or other means and consent will be obtained.

Furthermore, in cases where TIA itself obtains personal information, **if the purpose of use of the personal information handled is to be changed**, it will be changed within a scope that can be reasonably acknowledged to be adequately relevant to the purpose of use before the change, and **the person or persons concerned will be notified of the change in the purpose of use** and their consent will be obtained.

4. Provision of personal information to third parties

Except in the following cases (1) to (5), as a principle, TIA does not provide customers' personal information to third parties. In cases other than cases (1) to (5), **if it becomes necessary to provide personal information to third parties, the person or persons concerned will be notified by written document, electronic mail, fax or other means and consent will be obtained:**

- (1) When necessary information is provided to a related operational partner in order to respond to an inquiry from the person concerned;
- (2) When necessary information is provided to a related operational partner in order to dispatch materials requested by the person concerned;
- (3) When necessary information is provided to a related operational partner in order to provide information such as guidance and support information for services;
- (4) When an official referral is received and disclosure is required based on the law from an official body such as court or the police and the Company responds appropriately; and
- (5) When a referral must be made to a related organization in order to protect the life, person, property or other assets of the person concerned or another person or other persons.

5. The consignment of personal information

Within the scope necessary for achieving the purpose of use, there are cases where the processing of personal information is consigned to an operational partner with a contractual relationship.

6. Amendments

Based on changes to TIA's operations and services, these principles may be amended as necessary. In such cases, **the up-to-date principles will always be posted on the TIA website.**

7. Scope of application

These principles are applied to TIA's operations handling personal information. They are not applicable to operations handling personal information other than those of TIA (the websites of other parties for which there are links on the TIA website, etc.)

8. Response to the disclosure, amendment, cessation of use, etc. of personal information from customers that is subject to disclosure.

With regards to personal information obtained by TIA itself (personal information subject to disclosure), when an inquiry is received from the person concerned regarding notification of the purpose of use; disclosure; amendment, addition or deletion of content; cessation of use; deletion; or cessation of provision to third parties (hereafter "disclosure etc.") of his or her personal information, TIA will respect the wishes of the person concerned and handle the matter appropriately and without delay. (Please note that with regard to TIA services for which personal information is essential,

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there may be situations where the amendment, updating or deletion of personal information results in it no longer being possible to use part or all of TIA's services.)

For the point of contact regarding disclosure etc. please see the address for inquiries given below.

Inquiries :

Toppan Interamerica, Inc.

Email: tpn-privacycontact@toppaninteramericainc.com