

## GDPR PRIVACY POLICY

DXDMED INC. (hereinafter collectively referred to as "we"/"us"/"our ") attach importance to the privacy of personal information and endeavor to protect it in accordance with applicable personal information protection legislation.

This GDPR Privacy Policy (hereinafter referred to as "Privacy Policy") only applies to the processing of personal data covered by the EU General Data Protection Regulation (hereinafter referred to as "GDPR") and describes how we collect your personal data, what types we collect, for what purposes we use it, with whom we share it, and what rights you are entitled to as a data subject.

This Privacy Policy also describes the measures we take to protect the security of your personal data. The use of this website is covered by this Privacy Policy.

### ARTICLE 1. HOW WE COLLECT PERSONAL DATA

We collect some personal data directly from you when you use our website, purchase our products, use our services or otherwise contact us. We also obtain your personal data from our business partners (such as sales agents, distributors and service representatives), or from the entities with whom we have entered into any contract for market survey purpose.

### ARTICLE 2. PERSONAL DATA WE COLLECT

We collect the following types of personal data:

- Contact details which you choose to provide to us, including names, name of workplace, job title, age, addresses, phone numbers, and e-mail addresses or other addresses to which we send messages and company information;
- History of participation in exhibitions, online exhibitions, seminars, online seminars, meetings, online meetings and so on;
- Marketing information which is useful to us, such as interest in products, method of contact , preference in products, languages, and so on;
- History of viewing or downloading certain marketing materials, documents and videos related to our products or services;
- Transaction information, such as purchase data, details of inquiries, client account data, order and agreement data, delivery details, transaction and contact histories, and exchange of messages on this website; or
- Data related to security and compliance needed to secure our interests, including image records necessary for the security of our facilities.

### ARTICLE 3. PURPOSES AND LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

We process your personal data only as required for lawful processing, where at least one of the conditions provided in GDPR applies. In particular, we will process your personal data for the following purposes on the following legal grounds:

Purpose	Legal Grounds (GDPR)
For any purpose where we have Your consent - We will ask you permission to process your personal data, and process it only for the purpose(s) you consented to. You, as a data subject, always have the right to withdraw your consent. (See Article 8 in this Privacy Policy)	Article 6 (1-a)
For performance of contract - for example, to carry out client management, including performing a contact with you, dealing with orders and requests, and taking steps at your request prior to entering into a contract.	Article 6 (1-b)
For compliance with legal obligations – for example, the submission of personal data to a public organization such as described in Article 4 of this Privacy Policy	Article 6 (1-c)
For protecting the vital interests of you or of another natural person.	Article 6 (1-d)
For the performance of a task carried out in the public interest or in the exercise of official authority vested in us.	Article 6 (1-e)
For legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, particularly when the data subject is a child – for example: <ul style="list-style-type: none"><li>• To keep in touch with our clients, and provide information and updates related to our products and services (updates refer to the most recent information, if the provided information has been updated);</li><li>• To offer our clients similar products and services;</li><li>• To maintain and improve our marketing, sales, and research and development activities;</li><li>• To maintain and improve services provided on this website to provide a customized experience;</li><li>• To carry out operational control, including agreement management, corporate governance, audits, and compliance; and</li><li>• To practice our fundamental rights under Articles 16 (freedom to conduct a business) and 17 (right to property) in the Charter of Fundamental Rights of European Union.</li></ul>	Article 6 (1-f)

### ARTICLE 4. SHARING PERSONAL DATA WITH OUTSIDE ORGANIZATIONS

We may share personal data we have collected from you with third parties.

Specifically, we will share or disclose your personal data under the following circumstances:

- **Business Partners**  
Subject to your prior consent, we may share your personal data with our business partners, including sales agents, distributors and service representatives;
- **Outsourcing**  
We may occasionally outsource all or part of our operations related to personal data processing to third parties, such as IT service providers. In that case, we may occasionally need to share your personal data in order to receive the service. Shared personal data will be used only under our instruction for such purposes.

- Legal Obligations

Pursuant to the provisions of laws and regulations, we may occasionally disclose personal data to public organizations connected with law enforcement in compliance with the requirements of laws and regulations, court orders, the requests of governmental organizations or law enforcement organizations (including those falling within requests for national security or law enforcement measures). (This includes the requests of the governmental organizations and courts of countries in which we conduct our business).

To the extent permitted by law, we disclose personal data to third parties (including legal advisers) as necessary to support the functions of proof, lawsuits or defense against legal claims, exercise of rights, protection of our property or another persons' rights, property or safety, external audits, compliance, or corporate governance.

#### ARTICLE 5. SECURITY MEASURES TO PROTECT PERSONAL DATA

We take appropriate organizational and technical security measures to protect your personal data and prevent misuse, loss or alteration thereof. In addition, we limit access to the personal data to our employees, agents, contractors and other third parties who need to access the personal data. The aforementioned persons are bound by confidentiality obligations, either in their employment agreements or (data processor) contracts.

In the case of a personal data breach, we will comply with our policies, guidelines and internal rules concerning personal information protection. Furthermore, we will notify the relevant supervisory authority and the data subjects involved if required under applicable privacy legislation.

#### ARTICLE 6. RETENTION PERIOD

We do not store your personal data any longer than is strictly necessary for the purposes for which we collect the personal data. If the personal data is no longer required for the purposes for which we collected it, we will delete the Personal Data.

You, as a data subject, may request that we delete your personal data at any stage. (See Article 8 of this Privacy Policy)

#### ARTICLE 7. AUTOMATICALLY COLLECTED DATA

We and our service providers use cookies, web beacons and other technologies to collect certain types of information from you when you visit our website or exchange e-mails with us. Such data will be collected once we have obtained your permission to do so. The collection of such online data enables us to provide customized online and offline experience and to analyze and improve your online experience.

##### 7.1 IP addresses

An Internet Protocol address (IP address) is a numerical label assigned to a device connected to a computer network (including the Internet) for communication. Such devices include personal computers, smart phones and tablets. We will record and use the IP address, collected from you for our marketing activities.

## 7.2 Cookies

Cookies are small data files sent from a web server to, and stored by, your browser and hard disk. Using cookies can make websites more useful by storing data about your usage of specific websites. The use of cookies is an industry-standard, and cookies are used by many websites for the purpose of providing valuable functions to you. In addition, cookies do not function to identify you individually.

We may use cookies in the following cases:

**Functional cookies:** cookies that are necessary for our website to function properly, including cookies that are necessary to create an account; and

**Analytical cookies:** cookies that allow us to gain insight into how you use (parts of) our website. This is useful in improving our website so that it fits as well as possible with what you find interesting and important. We only use the data obtained with these cookies to analyze how our website is being used.

We only use third-party cookies to improve the quality and effectiveness of our website.

Some parts of our website may display an informative banner requesting that you allow us to collect cookies. If you do not allow us to collect cookies, we will not track your device for the marketing purposes. You can withdraw this choice by deleting the cookies from your browser.

Most browsers are set to accept cookies by default. You can set the browser to disable cookies or indicate when a cookie is being sent. However, there is a possibility that some functions and services of our website and other websites will not function properly if cookies are disabled.

We process cookies to examine the number of unique visitors to the website, geographical information and online behavior, but this is not done with the goal of identifying you. Example of cookie information: IP address, domain name, webpage access, referral information, type of web browser, date and time of access, frequency of access, time spent on website, type of search engine used, keyword entered into search engine when accessing our website, and other identifying information.

## 7.3 WEB beacons

A web beacon is a tiny image file that allows your online activity to be examined by collecting specific data from your device. The data collected may include your IP address, type of web browser, date and time of access, frequency of access, time spent on the website, and the existence of cookies previously set by the same device.

We use web beacons in accordance with applicable laws and will notify you when we collect such data from WEB beacons. We and our service providers may use web beacons to track you for marketing and sales activities, such as gauging your interest and improving your online and offline experience.

For example, we use web beacons in e-mails and other communications to monitor your actions, such as your history of opening e-mails, downloading certain materials and viewing certain embedded links.

You can disable a web beacon by rejecting the cookies associated with the web beacon. Even if you do so, the web beacon may record anonymous visit information from your IP address, but will not record cookie information.

## ARTICLE 8. YOUR RIGHTS AS A DATA SUBJECT

As a data subject, you have the following rights to your personal data which we hold and use.

- **Right to withdraw:** you can withdraw your consent at any time after granting it to us in relation to our processing of your personal data. This right enables you to stop us from holding and using your personal data for the purpose(s) you consented to.
- **Right of access:** you can request access to your personal data. This right enables you to receive a copy of the personal data we hold.
- **Right to rectification:** you can request that we correct your personal data. This right enables you to have any incomplete or inaccurate data we hold corrected.
- **Right to erasure ('right to be forgotten'):** you can request that we delete your personal data. This right enables you to make us delete the personal data that we hold where there is no legal ground under the GDPR for processing it (including through withdrawal of your consent, and our acceptance of your objection pertaining to our processing for our legitimate interest).
- **Right to object:** you can object to our processing of your personal data for a legitimate interest. Insofar as the personal data processing takes place for direct marketing purposes, we will always honor your request. Regarding processing conducted for other purposes, we will also cease and desist such processing, unless we have compelling legitimate grounds for the processing that overrides your interests, rights and freedoms or for the establishment, exercise or defense of a legal claim.
- **Right to restriction of processing:** you can impose any restrictions on our processing of your personal data where the accuracy of the personal data is contested by you, where the processing is unlawful, or where we no longer need the personal data for the purposes of the processing, provided that such a restriction is required by you for the establishment, exercise or defense of legal claims and that you have objected to our processing.
- **Right to data portability:** you can request that we transfer your personal data to you or a third party of your choice. We will provide the personal data to you, or the third party, in a structured, commonly used, machine-readable format. Note that this right only applies to the information which is processed, by automated means, based on your consent or on a contract we have with you.

The exercise of the above-mentioned rights is free of charge. We will provide you with information about the follow-up to the request immediately, and within one month of receipt of the request, whatever the case may be. Depending on the request's complexity and the number of requests, this period can be extended by another two months. We will notify you of such an extension within 1(one) month of receipt of the request.

In addition to the above-mentioned rights, you have the right to lodge a complaint with a supervisory authority at any time (particularly if you reside or work in an EU Member State or in the case of an alleged infringement of the GDPR) However, we would appreciate the chance to deal with your concerns before you approach the supervisory authority. Therefore, please contact us beforehand.

#### ARTICLE 9. CONTACT DETAILS

For any questions, complaints, or in the event that you wish to make use of one of your rights as data subject mentioned in Article 8 of this Privacy Policy, you may contact us at the contact details below:

Contact: DXDMed Inc.

Address: Yebisu Garden Place Tower 18th floor, 4-20-3 Ebisu, Shibuya-ku, Tokyo, JAPAN

#### ARTICLE 10. DATE OF LAST UPDATE

This Privacy Policy was last updated on March, 2025.

#### ARTICLE 11. MISCELLANEOUS

We reserve the right to periodically modify this Privacy Policy It is your responsibility to regularly review the applicable conditions.

If a provision of this Privacy Policy is in conflict with the law, it will be replaced by a provision of the same purport that reflects the original intent of the provision, to the extent legally permissible. In that case, the remaining provisions remain applicable unchanged.