

# PRIVACY STATEMENT

## 1. INTRODUCTION AND PURPOSE OF THIS PRIVACY STATEMENT

qNMR-J/Committee is committed to protecting your privacy. This Statement of Privacy applies to this Web site and governs data collection and usage.

In addition, this Privacy Statement complies with the General Data Protection Regulations (“GDPR”), where it informs you the means of collection of your personally identifiable data; the means of processing that data; our obligations and your rights under the GDPR where applicable.

If your residence or working place is located within EEA (European Economic Area) at the time of visiting this website, you should particularly read the sections where they are marked “[GDPR]” at the beginning of a section or a sentence along with other sections stated in this statement to understand your rights under the GDPR. Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Statement.

## 2. CONTROLLER [GDPR]

qNMR-J/Committee is the controller and responsible for your personally identifiable data (collectively referred to as “we”, “us” or “our” in this Privacy Statement).

## 3. COLLECTION OF YOUR PERSONAL INFORMATION

qNMR-J/Committee may collect, use, store and transfer different kinds of personally identifiable data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
- Contact Data includes delivery address, email address and telephone numbers.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Where we need to collect personally identifiable data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel your request but we will notify you if this is the case at the time.

You should not disclose personally identifiable information or personally sensitive data through qNMR-J/Committee public message boards unless you have explicitly agreed that this information may be collected and used by others.

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity and Contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Interact with us at shows, exhibitions, workshops, seminars, meetings.
- create an account on our website;
- subscribe to our service or publications; or
- give us some feedback.

We do not collect personal data by using cookies and other similar technologies.

#### 4. USE OF YOUR PERSONAL INFORMATION

We will only use your personally identifiable data when the law allows us to. Most commonly, we will use your personally identifiable data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

To find out more about the types of lawful basis that we will rely on to process your personally identifiable data, please refer to the “Glossary “section of this statement.

#### 5. PURPOSE FOR WHICH WE WILL USE YOUR PERSONALLY IDENTIFIABLE DATA

We have set out below, in a table format, a description of all the ways we plan to use your personally identifiable data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personally identifiable data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personally identifiable data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest [GDPR]
To register you as a new member	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your request	(a) Identity (b) Contact (c) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests
To complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Performance of a contract with you (b) Necessary for our legitimate interests

We will only use your personally identifiable 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. 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 personally identifiable data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personally identifiable data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 6. DISCLOSURE OF YOUR PERSONALLY IDENTIFIABLE DATA

We may have to share your personally identifiable data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.

We require all third parties to respect the security of your personally identifiable data and to treat it in accordance with the law. We do not allow our third-parties to use your personal data for their own purposes and only permit them to process your personally identifiable data for following specified purposes subject to a non-disclosure agreement and in accordance with our instructions.

qNMR-J/Committee may disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal

process served on qNMR-J/Committee or the site; (b) act under exigent circumstances to protect the personal safety of users of qNMR-J/Committee, or the public.

## 7. INTERNATIONAL DATA TRANSFER

We may not share your personally identifiable data with any party outside Japan.

## 8. DATA RETENTION [GDPR]

We will only retain your personally identifiable data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personally identifiable data, we consider the amount, nature, and sensitivity of the personally identifiable data, the potential risk of harm from unauthorized use or disclosure of your personally identifiable data, the purposes for which we process your personally identifiable data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our members (including Contact, Identity, Transaction Data) for at least seven years after they cease being members for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS [GDPR]

Under certain circumstances, you have rights under the GDPR in relation to your personally identifiable data. Please see the subsection "Your legal rights" in section 15 to find out more about these rights:

- Request access to your personally identifiable data.
- Request correction of your personally identifiable data.
- Request erasure of your personally identifiable data.
- Object to processing of your personally identifiable data.
- Request restriction of processing your personally identifiable data.
- Request transfer of your personally identifiable data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

## 10. NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personally identifiable data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## 11. WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personally identifiable data (or to exercise any of your other rights). This is a security measure to ensure that personally identifiable data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## 12. TIME LIMIT TO RESPOND [GDPR]

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 13. SECURITY OF YOUR PERSONAL INFORMATION

qNMR-J/Committee secures your personal information from unauthorized access, use or disclosure. qNMR-J/Committee secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information (such as a credit card number) is transmitted to other Web sites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

We have put in place procedures to deal with any suspected personally identifiable data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 14. CHANGES TO THIS STATEMENT AND YOUR DUTY TO INFORM US OF CHANGES

qNMR-J/Committee will occasionally update this Statement of Privacy to reflect company and customer feedback. qNMR-J/Committee encourages you to periodically review this Statement to be informed of how qNMR-J/Committee is protecting your information.

It is important that the personally identifiable data we hold about you is accurate and current. Please keep us informed if your personally identifiable data changes during your relationship with us.

You agree that any dispute over privacy or the terms contained in this Privacy Statement, or any other agreement we have with you, will be governed by the laws of Japan. You also agree to arbitrate such disputes in Tokyo, and to abide by any limitation on damages contained in any agreement we may have with you.

Contact Information

qNMR-J/Committee welcomes your comments regarding this Statement of Privacy. If you believe that qNMR-J/Committee has not adhered to this Privacy Statement, please contact us. We will use commercially reasonable efforts to promptly determine and remedy the problem.

In addition you have the right to make a complaint to the Personal Information Protection Commission Japan (“PPC”) on-line, by phone or in writing at the following:

PPC: <https://www.ppc.go.jp/en/contactus/piinquiry/>

T: +81-(0)3-6457-9849 (in Japanese Only)

Personal Information Protection Commission Japan’s Office, Kasumigaseki Common Gate West Tower 32nd Floor, 3-2-1, Kasumigaseki, Chiyoda-ku, Tokyo, 100-0013

We would, however, appreciate the chance to deal with your concerns before you approach the PPC so please contact us in the first instance.

## 15. GLOSSARY

### LAWFUL BASES [GDPR]

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personally identifiable data for our legitimate interests. We do not use your personally identifiable data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us .

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personally identifiable data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### THIRD PARTIES

#### INTERNAL THIRD PARTIES

Companies to which each member of qNMR-J/Committee belong

#### EXTERNAL THIRD PARTIES

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based within Japan who provide consultancy, banking, legal, insurance and accounting services.

National Tax Agency, regulators and other authorities acting as processors or joint controllers based in Japan who require reporting of processing activities in certain circumstances.

### YOUR LEGAL RIGHTS

You have the right to:

- Request access to your personally identifiable data (commonly known as a “data subject access request”). This enables you to receive a copy of the personally identifiable data we hold about you and to check that we are lawfully processing it.

- Request correction of the personally identifiable data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personally identifiable data. This enables you to ask us to delete or remove personally identifiable data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personally identifiable data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personally identifiable data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personally identifiable data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personally identifiable data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.
- Request restriction of processing of your personally identifiable data. This enables you to ask us to suspend the processing of your personally identifiable data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personally identifiable data to you or to a third party. We will provide to you, or a third party you have chosen, your personally identifiable data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personally identifiable data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

#### LEGAL BASES FOR PROCESSING [GDPR]:

- Consent:  
Consent must be freely given, specific, informed and unambiguous. There must be a positive opt-in – consent cannot be inferred from silence, pre-ticked boxes or inactivity. It must also be separate from other terms and conditions, and simple ways for the withdrawal of consent will be required. Consent has to be verifiable and individuals generally have more rights where consent is being relied upon to process data.
- Contract:  
Processing is necessary for a contract with an individual, or because that individual has asked that specific steps be taken before entering into a contract.
- Legal obligation:  
Processing is necessary to comply with the law (not including contractual obligations).

- Vital interests:  
Processing is necessary to protect an individual's life.
- Public task:  
Processing is necessary for the performance of a task in the public interest or for official functions, and the task or function has a clear basis in law.
- Legitimate interests:  
Processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.