

Languages: English, French, German

CUSTOMER PRIVACY POLICY



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1 NIKONS COMMITMENT TO PRIVACY

1.1 Purpose of the policy

Nikon Metrology NV and its subsidiaries (**Nikon**) are committed to protecting your personal information and maintaining the accuracy, confidentiality and integrity thereof. This privacy policy (**Policy**) describes:

- (i) the personal information that Nikon collects from or about you,
- (ii) how Nikon uses your personal information and for which purposes,
- (iii) to whom Nikon discloses the information.

You will also find herein all relevant information on your rights and how to exercise these rights.

1.2 Scope of the Policy

The Policy applies to all data processing of your Personal Information that are collected and further processed as a result of you being a former, existing or potential customer of Nikon.

The Policy applies to all the companies of the Nikon Metrology group, which includes Nikon Metrology NV, with its offices at Geldenaaksebaan 329, 3001 Leuven, Belgium and its subsidiaries, which are located in different Member States of the European Union as well as in the United States of America and Canada. These group companies and subsidiaries are:

Nikon Metrology Europe NV Geldenaaksebaan 329 3001 Leuven Belgium Tel.: 00 32 16 74 01 01	Nikon Metrology GmbH Siemensstrasse 24 63755 Alzenau Germany Tel.: +49 6023 91 733 200
Nikon Metrology SARL Rue du Bois Chaland 39 91090 Lisses France Tel. : +33 1 60 86 09 76	Nikon Metrology UK Ltd Derby Argosy Road, DE74 2SA East Midlands Airport UK Tel.: +44 133 281 13 49
X-Tek Systems Ltd Tring Business Centre Icknield Way Tring Hertfordshire HP23 4JX UK Tel.: +44 144 282 87 00	Nikon Metrology Inc. (Canada) 55 Fleming Drive Units 13 and 14 Cambridge Ontario N1T 2A9 Canada Tel.: +1 519 885 94 90

Nikon Metrology Inc. (USA) 12701 Grand River Brighton MI 48116 USA Tel.: +1 810 220-4360	
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1.3 Policy of Compliance

It is Nikon's policy to comply with all privacy legislation within each jurisdiction in which it operates. Nikon implements additional procedures, standards, and policies wherever needed to meet these requirements.

Nikon makes sure that its employees and any of its contractors, suppliers, agencies, temporary workers, or any other parties acting on Nikon's behalf (collectively, **External Parties**) who collect or manage Customers' Personal Information to abide by the terms described in this notice, whether they are utilizing Nikon and/or their own electronic systems and data management tools.

Nikon and its employees are responsible for ensuring that any External Parties they work with in support of Nikon's operations comply with this policy and with any additional specific standards and procedures that are applicable.

2 DEFINITIONS

For the purpose of this Policy the following terms and expressions shall have the meanings specified or referred to hereafter:

Customer(s): means any individual, acting in its own name or on behalf of a legal entity to whom Nikon provides its products or services.

Data Controller: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Personal Information: means any information relating to an identified or identifiable individual.

Process or Processing: means any operation or set of operations which is performed on Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Special Categories of Personal Data: means personal Information revealing race, ethnicity, political views, religion, health, sexual orientation, trade union membership, genetic or biometric data, information about criminal convictions and offenses, and as otherwise defined by law.

3 COLLECTION OF PERSONAL INFORMATION

3.1 What categories of Personal Information does Nikon collect?

Nikon collects the following categories of information from or about you:

- identification data on the contact person (e.g., name, email address, work address, work phone number); and
- e-identification data on the contact person (e.g., IP address, cookies);
- occupation and employment of the contact person;
- contractual history consumption habits.

3.2 How does Nikon collect Personal Information?

Nikon may collect your Personal Information:

- directly from you,
- from third parties such as Nikon's official agents and resellers,
- by purchasing contact lists from third parties.

4 PROCESSING OF YOUR PERSONAL INFORMATION

4.1 Purposes and legal basis of the processing of your personal information

4.1.1 Current purposes and legal basis

Purpose <i>Nikon processes your Personal Information to:</i>	Legal ground <i>These processing activities are necessary for:</i>
- Communication of information on the products and services upon request of a customer	- to take necessary steps prior to entering into a contract
- the management of customers	- the performance of the contract
- the administration of orders and deliveries	- the performance of the contract
- the promotion of our products	- the legitimate interests pursued by Nikon, namely the promotion of its products and services.

Your Personal Information is not used in any automated decision-making, including profiling.

If you do not wish to receive any promotional messages, you object thereto, free of charge, when your Personal Information is collected, and each time that a message is sent, by sending an e-mail to: Koenraad.vanderelst@nikon.com.

4.1.2 Future purposes

If Nikon considers processing your Personal Information for other purposes than those mentioned under 4.1.1, Nikon will inform you thereof before starting to process your Personal Information for the new purpose.

4.2 How long will your personal information be retained?

Your Personal Information will be for a maximum of 5 years after your last order has been completed.

4.3 To whom will your Personal Information be disclosed?

For the purposes described above (see 4.1) Nikon may disclose your Personal Information to:

- senior managers, our marketing department staff, our sales and services department staff;
- public services;
- our official resellers and agents;
- other Nikon entities.

Nikon requires that any External Parties to whom your Personal Information is disclosed provides the same level of protection as applied by the Company when handling your Personal Information.

We contractually require data processors to only process the data in accordance with our instructions and to secure the data. These data processors may not use or disclose the information, except as authorized by Nikon, and/or to comply with legal requirements.

There are certain situations where you will share personal information directly with service providers associated with Nikon, where Nikon does not control how your data is processed. In those situations, please ensure you read and understand the privacy policies and practices of such providers.

4.4 Transfer of Personal Information outside of the European Union

Nikon operates globally and your Personal Information may be transferred, from time to time, to other entities of the Nikon group , including to its headquarters in Japan as well as its subsidiaries in the United States and Canada.

Where your Personal Information is transferred to entities located in countries that are not deemed to provide the same level of protection as the European Union (including, Japan, the United States and Canada), Nikon has ensured that necessary guarantee are offered by entering into the European Commission approved standard contractual clauses (SCC) with relevant companies. You may obtain a copy of these SCC by sending an email to Koenraad.vanderelst@nikon.com.

4.5 Cookies

Our website <https://www.nikonmetrology.com> (the **Website**) uses cookies or similar technology to collect information about your access to the Website. You may consult our Cookie Policy on our website <https://www.nikonmetrology.com/en-gb/nikon-metrology-nv/cookie-policy>.

4.6 Security

Nikon implements appropriate physical, administrative and technical measures, such as pseudonymizing, encryption and access controls, designed to protect Personal Information of Customers against accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or access or use, and all other unlawful forms of processing.

5 YOUR RIGHTS

5.1 What are your rights ?

You have the right to request access to your Personal Information at any time and request that inaccurate, outdated or no longer necessary information be corrected, erased or restricted.

You may obtain, within the limits of the applicable data protection regulations:

- the erasure of your data, in particular (i) if it is no longer necessary for the purpose described in point 4.1.1, (ii) if you have withdrawn your consent and the processing is no longer necessary for the performance of the contract or (iii) if you object to the processing of your data (see below),
- the restriction of the processing of your data (i) if you challenge the accuracy of your data, for the time necessary for Nikon to verify the basis of your claim, (ii) if the processing is considered illegal, but you do not want your data to be deleted, (iii) if Nikon no longer needs your data but you wish to retain it for the purposes of determining, exercising or defending your rights, (iv) if you object to the processing of your data (see below), for the time necessary for Nikon to verify the basis of your request.

You may object to the use of your data at any time, provided that your request is justified on your own grounds, within the limits of applicable data protection regulations.

You may receive or have your data transmitted to another data controller in a structured, commonly used and readable format.

5.2 How to exercise your rights ?

You can exercise the rights described above by sending a letter by email to Koenraad.vanderelst@nikon.com, indicating your decision to exercise any of those rights or by sending us the form that is available on the following URL: <https://www.nikonmetrology.com/gdpr>. After Nikon has received your letter, it will answer you as soon as possible.

If you are not satisfied with our response to your request with regard to your exercise of those rights, you may file a complaint with the data protection authority in the country where you have your habitual residence, your place of work or where the alleged infringement of your rights occurred. The coordinates of those authorities are described below.

Belgium

Commission de la protection de la vie privée

Rue de la Presse 35

1000 Bruxelles

Tel. +32 2 274 48 00

Fax +32 2 274 48 10

e-mail: commission@privacycommission.be

Website: <http://www.privacycommission.be/>

France

Commission Nationale de l'Informatique et des Libertés - CNIL

8 rue Vivienne, CS 30223

F-75002 Paris, Cedex 02

Tel. +33 1 53 73 22 22
Fax +33 1 53 73 22 00
e-mail:
Website: <http://www.cnil.fr/>

Germany

Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit
Husarenstraße 30
53117 Bonn
Tel. +49 228 997799 0; +49 228 81995 0
Fax +49 228 997799 550; +49 228 81995 550
e-mail: poststelle@bfdi.bund.de
Website: <http://www.bfdi.bund.de/>

The Netherlands

Autoriteit Persoonsgegevens
Prins Clauslaan 60
P.O. Box 93374
2509 AJ Den Haag/The Hague
Tel. +31 70 888 8500
Fax +31 70 888 8501
e-mail: info@autoriteitpersoonsgegevens.nl
Website: <https://autoriteitpersoonsgegevens.nl/nl>

United Kingdom

The Information Commissioner's Office
Water Lane, Wycliffe House
Wilmslow - Cheshire SK9 5AF
Tel. +44 1625 545 745
e-mail: international.team@ico.org.uk
Website: <https://ico.org.uk>

6 FUTURE MODIFICATIONS

Nikon reserves the right to modify this notice as needed to comply with changes in laws, regulations, practices and procedures, or to respond to new threats or new requirements imposed by data protection authorities.

7 ANY QUESTIONS?

If you have questions about your Personal Information as a Customer, or have concerns about a potential data breach, please email us at: Koenraad.vanderelst@nikon.com.