

## **PRIVACY POLICY**

This policy outlines the basic mindset that Shimano Inc. as well as its Group companies (hereinafter referred to as “the Company”) have with respect to the protection and handling of personal information.

1. When handling personal information, the Company will comply with the items set forth by relevant law such as the Japanese Personal Information Protection Act, privacy laws applicable in other jurisdictions in which we operate, as well as this policy.
2. The Company will acquire personal information by lawful and fair means.
3. The Company will utilize personal information upon making clear the purpose of utilization, and will only use the personal information within the scope of the purpose, or where otherwise permitted by applicable law.
4. The Company will not provide acquired personal information to a third party, except in cases in which the consent of the person is given or the provision is based on legal provisions.
5. The Company will appropriately manage personal information in order to secure its accuracy, and will also take reasonable safety measures in order to prevent leakage, loss, damage, etc. of personal information.
6. The Company will manage personal information appropriately and take reasonable safety measures when personal information is utilized jointly with Group companies or business partners within the scope of its purpose of utilization or if personal information handling is outsourced.
7. The Company will announce the procedures regarding inquiries and requests for disclosure of personal information that the Company possesses, and will respond promptly and sincerely to such requests.
8. In order to implement the aforementioned policy items, the Company will assign an individual responsible for the management of personal information.
9. The Company will continuously revise and improve its personal information management system and structure in order to effectively protect personal information in accordance with future changes in laws or circumstances.

Notice on the information obtained from the Internet site

This Privacy Policy is designed to tell you about the practices regarding collection, use, and disclosure of information that may be collected by Shimano Inc. and the Group Companies (which mean the Joint Users of Personal Information as defined in Section 4(1) and together with Shimano Inc., hereinafter referred to as “Shimano”). Please be sure to read this entire Privacy Policy and the Terms and Conditions of Use (the “Terms”), available here, before using or submitting information to the websites owned or operated by Shimano (collectively, the “Sites”)\*.

### **1. Consent**

By using the Sites, you agree to the Terms of this Privacy Policy. Whenever you submit information via the Sites, you consent to the collection, use, and disclosure of that information in accordance with this Privacy Policy.

### **2. Information Collected**

Personal Information

Shimano uses fair and proper means to collect your Personal Information (which means information about a living individual which can identify the specific individual by name, date of birth or other description contained in such information (including such information as will allow easy reference to other information and will thereby enable the identification of the specific individual) such as your name, date of birth, e-mail address, credit card information, shipping and billing address, etc.) to the extent necessary to achieve the purpose for use prescribed in this Privacy Policy.

We do not collect information regarding your race, nationality, ancestry, lineage, religion, political views or membership of workers’ unions, philosophical views, sexual orientation, & health & biometric information.

Information Collected Automatically

Shimano also automatically collects your IP address and referring website address, browser type, domain name and website access frequency. This information is intended to help facilitate your online experience on the Sites. Shimano uses cookies to track usage patterns on the Sites and to control the display of ads, as well as to offer other functionalities (such as screening for age and “recognizing” you to speed up your log-in when you visit the Sites). You can turn off cookies, but that will affect your online experience. See below for more detail on cookies.

If you choose not to provide all or some of this information, Shimano may not be able to provide the goods or services that you have requested.

Shimano does not normally collect personal information about you from anyone other than you, however we may do so for delivery or gift purposes.

### **3. Purposes of Use of Collected Information**

Shimano uses information other than Personal Information you provide for the purpose of fulfillment of your requests and improvement of the Sites and materials contained thereon and for any other purposes which we deem reasonable and necessary. Shimano may, from time to time, produce reports for advertisers, sponsors, Group Companies and vendors containing anonymous, aggregate information about our users and customers, such as demographic, age and online usage information. This information allows Shimano to provide content and offers that are most relevant to our users to work more closely with advertisers. We do not include any Personal Information of our users in these reports.

Shimano uses Personal Information only for the purpose described in this Privacy Policy or as otherwise permitted by applicable law. Shimano uses Personal Information so that we may supply specific information requested by customers, undertake surveys or competitions, etc., manage orders for products and services, display or send custom, personalized content to our users and send newsletters, mail, e-mails, features, promotional material, surveys and other updates, information or offers to our users. Shimano also uses collected information to evaluate and administer our products and services, fulfil customers request, respond to any future problems, such as difficulties in navigating our Sites or accessing certain features, and to gauge user trends to determine what products and services are most popular with users. Other uses of Personal Information are described on each Site page on which you record your Personal Information. Shimano may combine Personal Information with other collected information for the purposes of use unless otherwise specified.

### **4. Sharing of Collected Information**

Shimano may share your Personal Information as follows:

- (1) Joint Users of Personal Information and third parties to whom Shimano outsources the handling of personal information.

See Here for More Details on Joint Users of Personal Information.

All companies working for and with Shimano must comply with our Privacy Policy, and are not permitted to sell or otherwise disclose your Personal Information to third parties except as authorized by us and you, or as permitted or required by law.

- (2) Shared Personal Data

Your name, address, telephone number, gender, date of birth, occupation and e-mail address.

- (3) Purposes of Use of Shared Information

Personal information is shared to enable joint users to supply specific information requested by customers, undertake surveys or competitions, etc., manage orders for products and services, display or send custom, personalized content to our users and send newsletters, mail, e-mails, features, promotional material, surveys and other updates, information or offers to our users.

- (4) Manager of Shared Personal Information

Shimano Inc.

Sharing of Information Not Containing Personal Information

Shimano shares anonymous, aggregate demographic information, and anonymous information obtained from cookies and similar technologies, with each of our distributors, our sponsors, promotional and business partners, and participating vendors. No Personal Information, such as credit card information, is disclosed to any of these third parties in sharing such anonymous information.

### **5. Supply of Information to Customers**

We may extend e-mail offers to users or customers on behalf of our business partners about a particular product or service that may be of interest to you without sharing your name or e-mail address with or disclosing your name or e-mail address to those business partners. Of course, you may opt out of receiving these offers at any time.

Sometimes we will give you the opportunity to opt in to receive e-mail offers from third parties not affiliated with us. If you decide to accept these offers, we will provide, upon your consent, your contact information to the third party. We urge you to review carefully the privacy policies of these firms. We are not responsible for the privacy policies and procedures of any third party.

You should be aware that if you voluntarily disclose information, personal or otherwise, online in any community area, that information can be collected and used by others.

For example, if you use chat, forums, bulletin boards or message boards, or if you post Personal Information online (such as your e-mail address), you may receive unsolicited messages from others. We have no control over this use of your Personal Information.

### **6. Credit Card Companies**

In the event that you choose to transact using a credit card, Shimano will supply to your credit card company all relevant information about the name of the vendor, item(s) purchased, purchase date, total cost and other information necessary to process the transaction. Shimano will not otherwise provide any Personal Information to your credit card company without your permission.

### **7. Disclosure to Third Parties**

Shimano will not disclose your Personal Information to any third parties without your consent; provided, however, that Shimano reserves the right to use or disclose to a third party any information without a customer’s consent in the following circumstances:

- (i) If it is requested by any laws and regulations;
- (ii) If Shimano deems it necessary for protection and security of human life or body-but only where it is unreasonable or impracticable to obtain your consent;
- (iii) If Shimano deems it particularly necessary for improvement of public health, but only where it is unreasonable or impracticable to obtain your consent.
- (iv) If Shimano deems it particularly necessary for cooperation with a governmental body or other public organization or its designee in discharging its duties pursuant to the laws and regulations (including investigating breach of laws)
- (v) If Shimano outsources the handling of personal information to the extent necessary for its business operation.

### **8. Personal Data Request**

(1) The individual customer that is identifiable by the personal information (the “Owner”) may request Shimano for the notification of the purpose of use of personal information that is held by Shimano (including Retained Personal Data as defined in the Japanese Personal Information Protection Law) (the “Personal Data”) of the Owner, disclosure of such Personal Data in Shimano’s possession, correction, addition to or deletion of the content of such Personal Data, cessation of use or deletion of such Personal Data or cessation of supply of such Personal Data to a third party (where permitted by applicable law), such request being referred to herein collectively as “Personal Data Request”).

(2) The Owner is requested to submit a Personal Data Request by using the method prescribed on the respective page of the Site on which the Owner recorded the subject personal information or by submitting a written application form prescribed by Shimano. The prescribed processing fee will be charged if we are requested to deliver a hard copy of our response to the Owner. Shimano will only charge a fee in relation to the provision of personal information it holds about the individual who requested that information, as distinct to giving effect to a request for a correction or cessation of provision of information.

(3) In the event of a Personal Data Request, Shimano will confirm the identity of the applicant and/or the authority if he/she is an agent by one of the following means:

- (i) Confirmation of the Owner’s Personal Information in our possession such as name, address, telephone number, e-mail address, etc.
  - (ii) Documentary evidence such as driver’s license, passport, basic resident register card, health insurance certificate, certificate of registered seal, etc.
  - (iii) Confirmation by personal phone call, etc. to the Owner.
  - (iv) In the event of an application by the Owner’s agent confirmation of the power of attorney from the Owner.
- (The agent’s authority will be confirmed by conformance of the seal on the power of attorney with the certificate of registered seal or by personal phone call, etc. to the Owner)

(v) Other method of confirmation which Shimano deems appropriate.

(4) If the applicant's identity is confirmed pursuant to paragraph (3) above, we will reply in writing or such other means as the Owner and we consider reasonable and respond in the following manner:

(i) In the event that the Personal Data Request is for disclosure of Personal Data or notification of purpose of use of Personal Data, we will make disclosure or notification within a reasonable timeframe and to a reasonable extent.

(ii) In the event that the Personal Data Request is for correction of, addition to or deletion of Personal Data for the reason that the content of the Personal Data is incorrect, we will correct, add to or delete the incorrect Personal Data within a reasonable timeframe and to a reasonable extent.

(iii) In the event that the Personal Data Request is for cessation of use or deletion of Personal Data, or cessation of disclosure of Personal Data to a third party, we will cease use, delete or cease disclosure to a third party within a reasonable timeframe and to a reasonable extent. Please note that if we partly or fully cease use of or delete the Personal Data, or cease disclosure of the Personal Data to a third party, we may be unable to provide services that meet the Owner's requirements.

(5) We may be unable to respond to a Personal Data Request if:

(i) We are unable to confirm the applicant's identity or authority pursuant to paragraph (3) above;

(ii) The applicant does not follow the procedures described above;

(iii) The information, in relation to which the Personal Data Request is made, does not fall within the definition of Personal Data;

(iv) We hold a reasonable belief that fulfilment of the request threatens to cause damage or injury to the life, body or health of a third party or to public health or public safety;

(v) We are permitted under applicable law to refuse to provide access

(vi) Fulfilment of the request constitutes violation of laws and regulations.

## **9. Cookies**

Your web browser offers so-called "cookies" which, if you allow their use, store small amounts of data on your computer when you visit a website.

Cookies do not contain any Personal Information about you and therefore cannot be used to identify you personally. However, cookies assist us in tracking which of our features you like best.

Therefore, cookies enable us to customize our content according to your preferences. You have the ability to accept or decline cookies by modifying your browser settings. Our Sites

are viewable even if you disable the cookie function on your browser. However, if you disable cookies, some advanced and customized features will not be available to you.

## **10. Hot jar**

Some of our webpages use services provided by Hot jar Ltd. Hot jar provides services including Heat maps, Visitor recordings, Funnels and Form Analysis, Feedback Polls, Surveys and Recruiters.

The information generated by the tracking code and cookie about your use of the website will be transmitted to and stored by Hot jar on servers in Ireland.

Through the Hot jar tracking code the information collected includes:

Device-specific data

The following information may be collected through your device and browser:

- your device's IP address (collected and stored in an anonymized format);
- your email address including first name and surname;
- device screen size;
- device type (unique device identifiers) and browser information;
- geographic location (country only);
- preferred language used to display the webpage.

Log data

Our servers automatically record information which is created upon using Hot jar. Data includes:

- referring domain;
- pages visited;
- geographic location (country only);
- preferred language used to display the webpage;
- date and time when website pages were accessed;

Hot jar will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Hot jar uses a variety of services hosted by third parties, such as Google Analytics and Optimize.

These services may collect information sent by your browser as part of a web page request, such as cookies or your IP request. For information on how Google Analytics and Optimize collect and use your information, please refer to their privacy policies. By continuing to use this website, you consent to the processing of the above data by Hot jar and by the third parties used by Hot jar in accordance with their respective privacy policies. The cookies used by Hot jar have differing durations; some persist for the session only, others will persist for a longer period, with a maximum of 365 days.

To opt out please go to the following link:

<https://www.hotjar.com/opt-out>

## **11. Web Beacons**

Some of our web pages may contain electronic images known as web beacons, which are also called "single-pixel gifs". These images allow us to count users who have visited those pages and to deliver co-branded services. We may also include web beacons in promotional e-mail messages or newsletters in order to count how many messages have been opened and acted upon. Web beacons are not used to access your Personal Information but they are a technique we use to compile aggregated statistics about usage on the Sites.

Web beacons collect only a limited range of information including the time and date of page view, cookie number and description of the page on which the web beacon resides.

## **12. Security of Personal Information**

We use Secure Sockets Layer (SSL) technology to encrypt important information, such as your credit card data, in an effort to prevent unauthorized access during transmission of your orders over the Internet. We implement standard industry practices internally and with our service providers to maintain the security of your Personal Information depending on its sensitivity and to avoid disclosure of such Personal Information unpermitted under this Privacy Policy.

Although we have implemented systems and procedures to secure the data maintained by us, security during Internet transmissions can never be assured. Shimano employees are made aware of our privacy practices through periodic communications and training. Our policy is to limit access to Personal Information to those Shimano employees or agents with a specific need to access or retrieve the information. We store data on multiple service systems, in controlled environments. To maintain security, we conduct internal reviews of our security measures on a regular basis. Please note, however, that any Personal Information you post in chat rooms or message boards is available to anyone.

WHILE SHIMANO HAS TAKEN COMMERCIALLY REASONABLE PRECAUTIONS TO SAFEGUARD PERSONAL INFORMATION, SHIMANO CANNOT AND DOES NOT GUARANTEE COMPLETE SECURITY OF PERSONAL INFORMATION BECAUSE COMPLETE SECURITY DOES NOT PRESENTLY EXIST ON THE INTERNET.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential.

We ask you not to share a password with anyone.

## **13. Transfer of Personal Information**

The data that we collect from you may be transferred to, and stored at, a destination outside the jurisdiction in which you are located, including Japan and the European Economic Area ("EEA")

It may also be processed by staff operating outside the jurisdiction in which you are located, including Japan and the EEA who work for Shimano or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

Some of the countries to which Shimano may disclose your personal data may not have similar privacy protections as the jurisdiction in which you are located.

While Shimano will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy,

Shimano can't guarantee that the disclosed data will receive the same protection as it would have in the jurisdiction in which you are located. By submitting your personal data you acknowledge and consent to this.

## **14. Third Party Advertising**

Advertisements appearing on our Sites may be delivered to users by us or one of our advertising partners. Our advertising partners may set cookies.

These cookies allow the ad server to recognize your computer each time they send you an online advertisement. In this way, ad servers may compile information about where you, or others who are using your computer, saw their advertisements and determine which ads are clicked on. This information allows an ad network to deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by Shimano only, and does not cover the use of cookies by any advertisers.

## **15. Children**

We will not knowingly collect Personal Information via the Sites from visitors younger than thirteen (13) years of age.

We encourage parents to talk to their children about their use of the Internet and the information they disclose on websites.

## **16. Changes in Corporate Structure**

In developing our business, we may engage in the sale or transfer of certain assets and the company itself, or parts of it, may be sold, merged or otherwise assigned.

In such transactions and changes in ownership, user information, whether personally identifiable or otherwise, may constitute one of the transferred assets.

If required by law, we will notify affected users of such transfer or assignment in accordance with the procedure for changing this Privacy Policy described below.

## **17. Changes to our Privacy Policy**

We will occasionally update this Privacy Policy as necessary to protect our users and to accommodate a changing environment.

The changes to our Privacy Policy will be deemed to be effective from the date of posting on our Sites unless we specify otherwise.

We recommend that you check the Privacy Policy when you visit our Sites to be sure that you are aware of and understand our current policy.

If we make material changes to this Privacy Policy, we will make efforts to prominently post such changes prior to implementing the change.

We will not make any retroactive material changes in how we handle previously collected Personal Information unless you allow us to do so, or unless

we are legally required to do so, and in such a case we will make efforts to inform registered visitors of information on material changes to this Privacy Policy via email.

## **Contact Information for Questions or Complaints**

Please contact us if you have any questions, comments or complaints regarding this Privacy Policy, our privacy practices or our treatment of your Personal Information.

Please refer to contact information of Shimano and the respective Group Companies posted on our Sites.

### **1. CONTACT**

Please forward all correspondence in respect of this policy to:

Privacy Manager

Shimano Oceania Holdings Pty Ltd

2 Wurook Circuit

Caringbah NSW 2229

P/ (02) 9533 0000

If we receive a complaint about how we handle personal information, we will contact you as soon as practicable to resolve your complaint.

This Privacy Policy was last updated in January 2018. "Policy for protection of personal information" and "Handling of customer information", which was posted on the Japanese website of Shimano, was abolished as of 19 June 2012.

\*The following Sites are covered by this privacy policy. This is not an exhaustive list, and it -may be updated without notice:

<http://www.shimano.com>,  
<http://www.shimano.com.au>,  
<http://www.shimano-china.com>,  
<http://cycle.shimano-eu.com>,  
<http://www.shimano-benelux.com>,  
<http://www.shimano-nordic.com>,  
<http://www.shimano-france.com>,  
<http://cycle.shimano.co.jp>,  
<http://bike.shimano.com>,  
<http://pro-bikegear.com>,  
<http://www.shimano-eyewear.com>,  
<http://www.shimano-cyclingwear.com>,  
<http://techdocs.shimano.com>,  
<http://www.shimanofish.com.au>,  
<http://fish.shimano-eu.com>,  
<http://shimanofireblood.com>,  
<http://fishing.shimano.co.jp>,  
<http://boat.shimano.com>,  
<http://aifie.net>