

In accordance with the Policy on Protection and Use of Personal Information, the company handles customers' personal information on this website as described below.

If you have provided your personal information to the Company or using our Mobile Application or any other application that links to this privacy notice, you will be regarded as having agreed to the following privacy policy.

1. Collection and Use of Information

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

The Company collects and uses personal information (name, address, phone number, e-mail address, location etc.) for the following purposes:

- Responses to inquiries and requests from customers
- Responses to orders and applications from customers
- Execution of the Company's duties under agreements with customers
- Settlement and prevention of problems concerning products and services provided to customers
- Development of products and services that meet customer needs
- E-mail newsletter delivery

Provision of services as part of a campaign such as delivery of promotional products

Application Data. If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

- **Geolocation Information.** We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Data.** We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.
- **Push Notifications.** We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

***In Short:** Some information — such as your device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Background Location Tracking

We are committed to protecting your privacy and ensuring the security of your personal information. This Privacy Policy explains how we collect, use, disclose, and protect your location data when you use our mobile application ("the App"). By using the App, you consent to the practices described in this Privacy Policy.

The App may collect and process your location data, including but not limited to GPS coordinates. We may collect this information when the App is running in the background to provide you with location-based services, improve our App's functionality, and for analytics purposes.

How We Use Your Location Information

We use your location data for the following purposes:

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- We use your location data to calculate the distance and working hours, after start attendance we track your activities like distributor check-ins and your visits and order collection.
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- Legal Compliance: We may disclose your location data to comply with legal obligations, such as responding to subpoenas or government requests.
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- Business Transfers: In the event of a merger, acquisition, or sale of all or part of our assets, your location data may be transferred as part of the transaction. We will ensure that your data remains protected and subject to the terms of this Privacy Policy.
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2. Protection of Personal Information

In order to protect the privacy of customers who have visited this website, the Company takes necessary measures within a reasonable scope. Depending on the services it offers, this website may ask you to provide highly confidential information. In that case, the Company strives to protect said information through means such as encryption thereof.

3. Use of Customers' Personal Information Provided to Other Websites

In cases where you access third-party websites via this website, the Company is not responsible for any privacy policies or bylaws of other websites.

4. Cookies and Web Beacons

This website uses cookies and web beacons*1 to improve the effectiveness of the website functions, measure performance, provide social media functions, and display highly relevant content. The use thereof does not infringe your privacy or damage your computer environment.

You may disable cookies by changing your browser settings. However, please note that without them, certain functionality on this website may become unavailable. Cookies on this website cannot read cookie files created by other websites or data stored on your hard disk.

A web beacon is a small transparent graphic image (1x1 pixel GIF) that is placed on a website or in a HTML type e-mail to monitor the behavior of users who visit the website or read the e-mail. It's used to take note of what you are doing while you visit the website or if you have opened or previewed an email.

5. Access History (Log)

The Company stores the website user access history (log) on a server, with the aim of utilizing it to improve the website or in cases where technical problems arise.

Information to be stored includes source IP address, browser type, originating URL, etc. This set of information does not enable the Company to identify specific individual users.

6. Encrypted Communication

This website uses SSL (Secure Sockets Layer protocol)*2 encrypted communication to protect the confidentiality of information you provide to the Company when filling in an inquiry form, etc.

SSL is the technology used to establish an encrypted link between a browser and the web server. By encrypting customers' personal information, SSL allows it to be transmitted more securely. You need to use a browser with SSL capability to establish SSL communication.

Handling and Use of Personal Information

1. Purposes of Use of Personal Information

The Company uses the personal information provided only within the scope necessary for achieving the purposes listed below, unless the Company informs the relevant person otherwise. As for the scope of use of personal identification numbers, the Company limits this to personal identification number-related affairs stipulated under applicable laws.

1. Use of personal information in business activities

- Conclusion and execution of contracts between customers and the Company and other transaction management
- Liaison between customers and the Company, and notices and greetings in accordance with social convention
- Provision of information regarding the Company's products, services, campaigns, etc.
- Surveys on, analysis of, and R&D for, the Company's business
- Production of statistical information and anonymously processed information, and other processing of personal information for use by the Company
- Information exchange and liaison with people from sectors and organizations related to the Company's business
- Confirmation of audits conducted on the Company's business
- Management of, and notices to, shareholders under the Companies Act, etc.
- Other matters associated with and related to the Company's business

2. Use of personal information provided by job candidates and retirees

- Screening of, and decisions to hire, job candidates (from job applications to joining the company)
- Fulfilment of obligations to retirees under labor laws and liaison with them, and retiree association-related notices

However, in any of the following cases as permitted by applicable laws, the Company may use personal information for purposes other than the purposes of use stated above:

- When the use of personal information is necessary to protect the life, body, or property of an individual and when it is difficult to obtain the consent of the person;
- When the use of personal information is especially necessary to improve public health or promote the sound growth of children and when it is difficult to obtain the consent of the person;
- When the use of personal information is necessary to cooperate with a state administrative body, a local government, or a person entrusted by either of the former two in executing affairs prescribed by laws and when obtaining the consent of the person is likely to impede the execution of the affairs concerned; or
- Other cases in which personal information is used in accordance with applicable laws.

Any change in the purposes of use will be released on this site or notified through other means.

2. Provision of Personal Information to Third Parties

The Company will not provide personal information to third parties without prior consent of the person, excluding the following cases as permitted by applicable laws:

- When the handling of personal information, in whole or in part, is commissioned only within the scope necessary for achieving the purposes of use;
- When personal information is provided in association with business succession due to a merger or other reason; or
- When personal information is shared under the provisions of 3. Shared Use of Personal Information.

We may need to share your personal information

- **When we use Google Maps Platform APIs.** We may share your information with certain Google Maps Platform APIs (e.g., Google Maps API, Places API).

Procedures for Disclosure, Correction and Deletion of Retained Personal Data

1. Scope of Information Disclosure

Information subject to disclosure refers to objective facts included in personal data concerning the customer retained by the Company (electronic information processed by and stored on a computer as well as paper-based information filed in a way that makes it easily searchable).

2. Applicants for Disclosure, etc.

Persons eligible to file an application with the Company for disclosure, correction and deletion of personal information (hereinafter, the “Applicant for disclosure, etc.”) are as follows:

- The customer
- Statutory agent
Person in parental authority (if the customer is a minor)

Guardian (if the customer is a ward or minor without a person in parental authority)

- Mandatary
Attorney or the like (when entrusted by the customer)
- Public agency
only when a written application is filed which has a responsible manager's seal affixed.

3. Disclosure Application Procedures

Disclosure application procedures are as follows:

- 1. As a general rule, the Company only accepts applications which the Applicant for disclosure, etc. has prepared using the Application Form for Personal Information Disclosure prescribed by the Company and sent by post to the Company along with any valid government photo identity document.

Basic Policy on Protection of Personal Information, etc. (Link to Basic Policy on Protection of Personal information, etc.)

4. Cases in Which Information Will Not be disclosed

In any of the following cases, the Company will not disclose any information, but will notify the Applicant for disclosure, etc. to that effect using the Personal Information Disclosure Report:

- When the Company does not possess the personal data requested to be disclosed;
- When the Company has already deleted the personal data requested to be disclosed;
- When conditions provided for in the Company's disclosure manuals are not met, in part or in whole;
- When disclosure is likely to harm the life, body, property, or other rights or interests of the customer or a third party;
- When disclosure is likely to impede the proper execution of the business of the Company; or
- When disclosure would violate laws and regulation of Country.

5. Correction/Deletion

The Company will correct or delete the contents of the personal data set it has disclosed, in accordance with the following procedures:

- **Submission of an Application Form for Personal Information Correction/Deletion and Implementation of Investigation**
The Applicant for disclosure, etc. is asked to submit an Application Form for Personal Information Correction/Deletion prescribed by the Company, based on which the Company will conduct an investigation into the correction or deletion to confirm whether there is any data set that needs correction or deletion
- **Measures to be taken after completion of the investigation**
If the investigation finds any data set that needs correction or deletion, it is immediately corrected or deleted.
- **Notification using Personal Information Correction/Deletion Report**
After the investigation is completed, we either inform the Applicant for disclosure, etc. using the Personal Information Correction/Deletion Report that a certain data set that needed correction or deletion has been corrected or deleted, or that no data set that needs correction or deletion has been found.
- **Time required for correction or deletion**
The Company will correct or delete the relevant data set within about 10 business days from the date of receiving the Application Form for Personal Information Correction/Deletion from the Applicant for disclosure, etc.

6. Burden of Expenses Necessary for Correction/Deletion

As a general rule, the Company do not pays the expenses necessary for correction or deletion.

7. Point of Contact for Disclosure, etc. of Personal Information Retained by the Company

Only those requests for disclosure, correction, deletion, etc. that are sent by post will be accepted. Please send necessary documents to the address below.

- Customers who have bought products and services from Idemitsu Lube India Pvt. Ltd.