

## **Privacy Policy**

**Last Updated: January 20<sup>th</sup>, 2022**

Tokyo Gas Co., Ltd. (“Tokyo Gas”, “we”, “us”) collects certain categories of information to improve the user experience on our website. Tokyo Gas partners with several third parties (“our third-party service providers”, “our partners”, “third-parties”) to use services analyzing how and what categories of users visit our website (“analytics”), so that we can improve our products and services. We also use third-party services to provide targeted advertising services that are customized based on your online activities over time and across unaffiliated websites (“interest-based advertising”), and on other related services. This Policy provides further explanations regarding the data collected on our website and used by these services, and your rights in this respect.

### ***What Information Do We Collect?***

We and our third-party service providers collect and use various types of information on our website, including the following:

*Cookies.* We use first-party cookies and collect data generated by the cookies. We also allow our third-party service providers to set cookies for their services. Cookies are small files that are stored on your computer or other device by your web browser. Cookies remember information such as which browsers have visited our website. These cookies serve to provide additional functionality and a more user personalized experience. These cookies also allow us and our partners to show you ads for Tokyo Gas products and services that we think are of interest to you, on any devices you use, and to track the performance of Tokyo Gas advertisements. You can learn more about Cookies [here](#).

*Web beacons or pixels.* Our third-party service providers may use an application known as a “web beacon” (also known as a “clear gif” or “pixel tag”). A web beacon is an electronic file that usually consists of a single-pixel image. It can be embedded in a web page or in an email to transmit information, which could include personal data.

*IP addresses.* We and our third-party service providers collect IP addresses on our website.

*Tracking ID.* Tracking ID is a feature used by various third-party service providers to associate multiple sessions (and any activity within those sessions) with a unique ID. When you send a unique ID and any related engagement data, all activities are attributed to one user in the reports we receive from the third-party service providers.

*Other End-User Data.* This is data that your browser transmits about itself when submitting an HTTP request. This data includes the user agent, language and encoding setting, display area and color depth of your browser, date and time of your visit, URLs, titles and meta keywords of the webpages you visited, etc.

### ***How Do We Use Your Information?***

*Analytics.* Information collected by third-party service providers on our website may be used to engage in analysis, auditing, research and reporting. These service providers may collect information about your online activities across different websites or services overtime, including on websites that are unrelated to Tokyo Gas. These service providers provide us with analyses as to how and what categories of users visit our website.

*Interest-based advertising.* Information collected by third-party service providers may be used to provide interest-based advertising. These service providers may use cookies, web beacons, and device identifiers, and similar technologies (including clear GIFs, tracking pixels, JavaScript, and tags) to collect information about your activity on our website, and they may combine it with information about your activity on other unaffiliated websites. For example, service providers may use the fact that you visited our website to target online ads for Tokyo Gas products or services to you on websites unaffiliated to Tokyo Gas, or on another platform, such as Facebook or Twitter. In addition, such service providers might use information about your visits to our website to help target advertisements that are unrelated to Tokyo Gas, based on your online behavior in general. For information about interest-based advertising practices, including privacy and confidentiality, visit the [Network Advertising Initiative website](#).

We and our third-party providers may use collected information to establish connections among related web browsers. We may match your browsers or devices if you log into the same online service on multiple devices, or if your devices share similar attributes that support an inference that they are used by the same person or household. This means that information about your activity on websites or apps on your current browser or device may be combined and used with information collected from your other browsers or devices. For example, we or our third-party providers may use this information to deliver the same ad on multiple devices, or to limit the number of times you see an ad across your devices, etc.

*Measuring the Impact of Advertising.* Certain third-party service providers may use information collected on our website to help measure the impact of the target online advertisements that we have launched for our products and services. The services provided by these third-party service providers will help us learn and optimize the effectiveness of our advertisements.

*Marketing Survey.* We may use information collected on our website for marketing surveys. This includes studies and/or surveys conducted to improve our existing products and services, as well as to create new ones. Using information collected on our website helps us understand how visitors use our website, and their potential needs.

*Security Measures against Cyberattacks.* Information collected on our website may also be used to prevent cyberattacks against our website. This will further improve the user experience on our website, as well as prevent possible data breaches that may arise from our website or servers.

### ***Lawful Basis for Processing***

We only process personal data where we have a lawful basis to do so, such as the following:

*Consent.* We may process your information when you have given us permission to process your information for a given purpose. You have the right to withdraw this consent at any time.

*Legitimate Interests.* This is where we have a legitimate interest to process your information. As mentioned above, we and our partners will use your information in the manner described in the section entitled “How Do We Use Your Information?” We believe many of the benefits created by the use of your information in such manner will be helpful not only for us but also for you, as it will allow us to improve our products and services to be more oriented to your needs. It will also enable us to provide advertising services that are tailored to your interests, which will allow you to receive more specific information you need. The analysis that we will develop using your data will help us better understand potential business needs, without raising privacy concerns. We will take due care so that the use of your information in the manner described above does not result in a risk to your rights and freedoms.

*Contractual Necessity to Perform a Contract.* – We may process your information when it is necessary to meet our contractual obligations to you.

*Compliance with Legal Obligation.* We may process your information when we have to do so in order to comply with the law.

### ***How Do We Disclose Information to Third Parties?***

As stated above, we partner with various third-party service providers to analyze the behavior of users and to provide targeted advertisements, so that we can improve our products and services. These third-party service providers include Google Analytics and other similar online analytics and advertising tools. These service providers collect the information stated in the section entitled “What Information Do We Collect?” Information collected by the third-parties will be used in the manner stated in the section entitled “How Do We Use Your Information?” If you wish to know about our partners other than Google Analytics, please contact us using our contact details in the section entitled “Contact Us”.

In addition, we may disclose your information to other Tokyo Gas related entities that provide us with support when we use your information in the manner described above.

### ***How Long Do We Keep Your Information?***

We will store your information to the minimum extent necessary, from the viewpoint of maintaining the safety and secrecy of personal data. With respect to data collected by third-party service providers, the period for which the data will be stored depends on each category of data, and differs for each third-party service provider, as well. Our partners are subject to all applicable data protection laws, and store data for a period admissible under such laws. In addition, we and our partners may retain your information as long as such information is needed (a) to comply with legal obligations, (b) to resolve disputes, and (c) to enforce agreements.

### ***Security of Your Information***

We and our partners use appropriate, commercially reasonable physical, electronic, and procedural safeguards to protect your personal data from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. Many of our partners, such as Google Analytics, have earned the independent security standard ISO 27001 certification. You may find more information about Google’s security standards by clicking [here](#).

### ***Cross-Border Transfer of Your Information***

Personal data and other information collected by our partners may be transferred to and stored on their computers and servers located outside Japan. When it comes to data transfer to the United States, many of our partners, such as Google Analytics, comply with the EU-US Privacy Shield to ensure an adequate level of protection of your personal data when it is transferred to the States. You may find more information on the compliance with the EU-US Privacy Shield by Google Analytics by clicking [here](#).

### ***Opt-Out***

You can opt out of the use of cookies in web browsers by Google Analytics by clicking [here](#). If you wish to learn about how to opt out of the use of cookies by our partners other than Google Analytics, please contact us using our contact details, in the section entitled “Contact Us”.

If you are concerned about having cookies on your computer, you can set your browser to refuse all cookies, or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your computer or device. However, if you choose to block or delete cookies, certain features of our website may not operate correctly. Information about how to delete cookies from your computing device can be found [here](#).

Please note that these opt-outs will apply only to the specific browser or device from which you opt out, and therefore you will need to opt out separately on all of your browsers and devices. If you delete or reset your cookies, change browsers, or use a different device, any opt-out cookie or tool may no longer work and you will have to opt out again.

### ***Rights to Control Your Information***

You also have the right under the GDPR to access, review, correct, delete, or inquire about information that we hold about you. You also have a right to oppose or limit the collection and processing of your information, as described in this Policy, or to revoke your consent.

If you would like to access, review, correct, delete, or inquire about your information, place limitations on the collection or processing of your information, or revoke your consent, you can send us a request by using our contact details in the section entitled “Contact Us.” In your message, please indicate the right you would like to exercise and the information that you would like to access, review, correct, or delete. Please note that we may need to take additional steps, such as verification of your identity, before we can grant your request. We will endeavor to respond to your requests within 30 days.

### ***Rights to Lodge a Complaint and to a Judicial Remedy***

You have the right to lodge a complaint with a Data Protection Authority in the jurisdiction where you reside, work, or where the alleged infringement of your rights took place. You also have the right to an effective judicial remedy where you have your habitual residence.

### ***Changes to This Privacy Policy***

We may change or modify this Privacy Policy from time to time, and will post the updated Policy with a “Last Updated” effective date of the revisions. We recommend that you review this Privacy Policy periodically. If we make a material change to this Policy, we may choose to post a separate indication on our home page that this Policy has been updated.

### ***Contact Us***

If you have any questions about our Privacy Policy, your rights under our Privacy Policy, or any other issues regarding the protection of your Personal Data, you can contact one of our following addresses.

*For general inquiries:*

- E-mail: [tgcomp@tokyo-gas.co.jp](mailto:tgcomp@tokyo-gas.co.jp);
- Address: 1-5-20 Kaigan, Minato-ku, Tokyo 105-8527, Japan

*For requests and inquiries concerning your right to control your information:*

- [Request and inquiry format](#)
- Address: 1-5-20 Kaigan, Minato-ku, Tokyo 105-8527, Japan.

*Contact information of our representative in the EEA:*

Chief Representative, General Manager of Tokyo Gas Paris Representative Office

- Address: 223, Rue Saint-Honore 75001 Paris, France
- Telephone Number: +33-1-45-62-00-59

*Contact information of our representative in the UK:*

DP Data Protection Services UK Ltd., Attn: Tokyo Gas

- E-mail: [tokyogas@gdpr-rep.com](mailto:tokyogas@gdpr-rep.com)
- Address: 16 Great Queen Street, Covent Garden, London, WC2B 5AH, United Kingdom
- Website: [www.dp-dock.com](http://www.dp-dock.com)