

Privacy Policy

OREC Co.,Ltd. (the “**Company**”, “**we**” or “**our**”) hereby declares to promote the protection of Personal Information, in regard to the handling of Personal Information of Users (the “**Users**”, “**you**” or “**your**”) of the Company’s services, through setting out the privacy policy as defined below (this “**Policy**”), establishing a system for protecting Personal Information, and ensuring that all employees observe and understand the importance of protecting Personal Information together with the rigorous implementation of these measures.

Article 1 (Definitions)

1. Terms such as "**Personal Information**" and "**Personal Data**" shall be interpreted in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679, "**GDPR**") and other applicable personal data protection laws and regulations in relevant countries and regions (including but not limited to the Personal Data Protection Act 2012 of Singapore ("**SG PDPA**"), the Personal Data Protection Act B.E. 2562 of Thailand ("**TH PDPA**")).
2. "**Processing**" in this Policy means any operation performed on personal data, such as collection, recording, organization, storage, use, disclosure, transfer, erasure, and any other handling of personal data.

Article 2 (Scope of Application and Compliance with Laws)

1. This Policy applies to all services provided by the Company, including our website, mobile applications, offline business activities, and any other services (collectively, the "**Services**").
2. In addition to Japanese law, the Company complies with the GDPR, SG PDPA, TH PDPA, and other personal data protection laws of major Southeast Asian countries, and maximally respects the privacy rights of Users.

Article 3 (Types of Personal Information Collected)

The Company may collect the following information to the extent necessary for the provision of the Services:

- Identifiers such as name, date of birth, address, telephone number, email address;
- Account information such as username, password, membership number;
- Internet usage information such as device identifiers, IP address, cookie information, browsing history, log information;
- Technical information such as location data, device settings, language used;
- Employment-related information such as job title, position, and other business information; and/or
- Other information voluntarily provided by Users.

Article 4 (Purposes of Processing and Legal Basis)

The Company uses the collected personal information within the scope of the following purposes and legal bases. If the Company intends to use personal information beyond these purposes, prior written consent (including electronic methods) will be obtained.

Purpose	Main Legal Basis (GDPR Art.6)
(a) Provision of the Services / Contract performance	Performance of contract (Art.6(1)(b))
(b) Improvement of the Services / Development of new services	Legitimate interest (Art.6(1)(f))

(c) Notification of new features and other updates, campaigns, etc.	Consent (Art.6(1)(a)) or legitimate interest
(d) Maintenance / Important notifications	Performance of contract or legitimate interest
(e) Responding to inquiries / User identification	Performance of contract
(f) Reporting usage status, conducting surveys	Legitimate interest
(g) Requesting to answer questionnaires or reporting the results	Consent or legitimate interest
(h) Analysis of usage history, advertisement distribution	Consent or legitimate interest
(i) Provision to third parties such as event participants	Consent
(j) Prevention of Terms of Use violations / unauthorized use	Legitimate interest
(k) Compliance with laws or requests from authorities	Legal obligation (Art.6(1)(c))

Article 5 (Use of Cookies and Similar Technologies)

1. The Company uses Cookies and other information collection modules (“**Cookies**”) for analyzing access to the Services in order to obtain access information, browsing information of Users to the Services. In addition, this information obtained through Cookies (“**Cookie Information**”) does not contain any information that can identify and determine the Users on a standalone basis.
2. Users can set their preferences for the use of Cookies on the Services. If you do not allow the use of Cookies, you may disable them in the settings of the Users’ browser; provided, however, that if you disable the Cookies, the convenience of the Services may be impaired or the scope of use of services provided by the Services may be limited.
3. In addition to the purpose of operating, maintaining and improving the quality of the Services, the Company will use Cookie Information for the development and improvement of the Company’s products and services, and for the distribution of advertisements tailored to the status of usage of the Services by the Users.

Article 6 (Management and Protection of Personal Information)

We will carefully and closely manage Personal Information and will not disclose or provide such Personal Information to any third parties without the prior written consent of Users whose Personal Information is concerned, except in the following circumstances and shall take precautional and correctional measures to an illegal access to Personal Information, risks of loss, destruction or leakage of Personal Information considering a security perspective:

- (a) if such disclosure of Personal Information is necessary for the protection of the life, body, or property of a person and it is difficult to obtain the consent of such person;
- (b) if such disclosure of Personal Information is necessary for improving public health or promoting the sound growth of children and it is difficult to obtain the consent of the person whose Personal Information is concerned;
- (c) if such disclosure of Personal Information is necessary for cooperating with a state organ, a local government, or an individual or a business operator entrusted by such state organ or local government in executing the affairs required by laws and regulations, and if

- obtaining the consent of the person whose Personal Information is concerned is likely to hinder the execution of such affairs; and
- (d) if it is permitted by laws and regulations.

The Company implements organizational, physical, technical, and personnel security measures such as access restrictions, encryption, log monitoring, and employee training to prevent unauthorized access, leakage, loss, or damage of personal information. In the event of a data breach or similar incident, the Company will promptly report to the relevant authorities in accordance with applicable laws and guidelines and implement measures to prevent recurrence.

Article 7 (Entrustment of Personal Information Handling)

We may entrust an individual or a business operator to handle Personal Information in whole or in part. In such case, we will examine their eligibility sufficiently, obligate such individual or business operator to maintain confidentiality obligations by contract, and will perform the necessary and appropriate supervision over such individual or business operator.

Article 8 (Joint Use of Personal Information)

We may jointly use Personal Information of Users to the extent necessary for the following scope and purpose of use:

<Items of Joint Use>

- Name
- Address
- Telephone number
- Email address
- Purchase history
- Inquiry details

<Purpose of Joint Use>

For business administration

<Persons for Joint Use>

OREC Holdings Co., Ltd.

<Person Responsible for Managing Personal Information>

OREC Holdings Co., Ltd. (Representative Director: Takeji IMAMURA)

Personal Information Protection Officer : Managing Director Kento IMAMURA

Address: 548-22, Hiyoshi, Hirokawa-machi, Yame-gun, Fukuoka Japan 834-0195

Article 9 (Disclosure of Personal Information)

Users may request the Company to disclose Personal Information held by the Company in accordance with the procedures set forth in Article 12. Upon receiving such a request from the Users, We will disclose the information to the Users without delay; provided, however, if the

following would be applicable, We may decide not to disclose whole or part of the information, in which case we will send a notification to that effect without delay.

- (a) if such disclosure is likely to harm the life, body, property, or other rights or interests of such User or any other third parties;
- (b) if such disclosure is likely to hinder the proper execution of our business; and
- (c) if such disclosure may result to violation of any laws and regulations.

Article 10 (Correction of Retained Personal Data)

1. If Personal Information of Users held by the Company is false, the Users may request that We make the correction of, the addition to, or the deletion of such Personal Information (“Correction”) in accordance with procedure prescribed in Article 12.
2. If We receive the request as stipulated in the immediately preceding paragraph, We will conduct necessary research without delay, and if the result of such research finds any ground, Correction will be made to such Personal Information without delay.
3. If We makes any judgment as to whether to implement the Correction in accordance with the immediately preceding paragraph, We will notify the Users of such judgment without delay.

Article 11 (Discontinuation of Personal Information Use)

1. Any Users may request that we cease to make the utilization of, make the erasure of, or cease the third-party provision of, personal data retained by the Company (“Cessation”), in accordance with procedures set out in Article 12.
2. Upon request as stipulated in the immediately preceding paragraph, We will conduct necessary research without delay. If We consider as a result of such research that such request is well-grounded, we will implement Cessation of such personal data without delay; provided, however, that if such Cessation is unduly expensive or is otherwise difficult to implement and alternative measures to protect the rights and interests of the Users are available, then We will take such measures instead.
3. If We reach any conclusion as to whether to implement Cessation in accordance with the immediately preceding paragraph, We will notify the Users of such conclusion without delay.

Article 12 (Procedures for Disclosure of Personal Information)

When making a request as stipulated in Articles 9 through 11, the Users shall fill out the request form stipulated in (a) below and send it together with the identification documents stipulated in (b) to the address stipulated in (c).

(a) Request form

Please inquire through the inquiry form you can find in the URL.

URL : <https://orec-asia.com/contact>

(b) Identification documents

[In the case of a request from the Users]

A copy of the User’s driver’s license, passport, or health insurance card (whichever is

applicable).

[In the case of a request by a representative]

- (i) A copy of the User's driver's license, passport, or health insurance card (whichever is applicable).
- (ii) A copy of the representative's driver's license, passport, or health insurance card (one of the above).
- (iii) A letter of attorney indicating that the proxy is the User's representative.

(c) Postal Address

548-22, Hiyoshi, Hirokawa-machi, Yame-gun, Fukuoka Japan 834-0195

Article 13 (Procedures for Amending Privacy Policy)

We will review the content of this Policy appropriately and endeavor to improve this Policy. The content of this Policy can be amended unless otherwise stipulated in laws, regulations, and this Policy. The amended Policy will be valid when notified to all Users or uploaded on our website in accordance with our procedures.

Article 14(Response to Complaints and Consultations)

We will respond to any complaints from Users and will provide consultation to any User whose Personal Information is concerned as to the handling of his or her Personal Information. We will respond appropriately and promptly to any request for disclosure, correction, addition, deletion, refusal of use or provision regarding Personal Information.

Article 15 (Security Measures)

As to Personal Information provided by Users to the Company shall be protected from illegal access, loss, destruction, falsification, leakage and other issues through organizational, physical, personal and technical measures such as restricting access to Personal Information files, recording access logs, and taking security measures to prevent illegal access from outside. If, by chance, any leakage and other incidents are occurred, we will make report to the relevant authorities in accordance with the Personal Information Protection Act and relevant guidelines, and as per instructions to be given by the authorities, will take required measures to avoid an occurrence of similar incidents or the same type of incidents.

Article 16 (User Rights)

1. Users have the following rights under GDPR Chapter III, SG PDPA, TH PDPA, and other applicable laws:
 - Right of access (request for disclosure)
 - Right to rectification (including addition and deletion)
 - Right to erasure (right to be forgotten)
 - Right to restriction of processing
 - Right to data portability
 - Right to object (including direct marketing)
 - Right to withdraw consent (withdrawal does not affect the lawfulness of processing before withdrawal)

2. To exercise these rights, please contact us using the method described in **Article 18 (Customer Desk)**. We may ask you to provide additional information for identity verification.

Article 17 (Personal Information of Minors)

The Company does not knowingly collect personal information from children under the age of 13. If it is discovered that such information has been collected, it will be promptly deleted.

Article 18 (Customer Desk)

For inquiries concerning our policy of handling of Personal Information, please contact us as below at:

Customer Desk of OREC Co., Ltd.

548-22, Hiyoshi, Hirokawa-machi, Yame-gun, Fukuoka Japan 834-0195

E-mail: orec.group.lg@orec.co.jp

Established on and valid from [January 14, 2026].