

Shimano 100th Anniversary Photo Contest - Data Protection Notice

Last updated: 13th March 2020

1. Data Controller and Data Protection Officer

The entity responsible for the processing of personal data as data controller is

SHIMANO INC. (“SHIMANO”)
3-77 Oimatsu-cho, Sakai-ku, Sakai-shi, Osaka 590-8577, Japan

You can contact SHIMANO under the postal address above (attn. Shimano Inc. 100th Anniversary Photo Contest Secretariat) or from the contact form [here](#).

For inquiries regarding the processing of your personal data, you can contact our data protection officer at privacy@shimano-eu.com.

You can find more information about how we process the personal data of California consumers by reviewing the “Additional Disclosures for California Consumers” section of this notice below, or by clicking [here](#).

2. Details of the processing of personal data

SHIMANO will process the following categories of personal data:

- First and last name of the participants
- Contact details of the participants (postal address, email address, telephone number)
- Submitted photograph, including date and place of the photographing, as well as any additional comments submitted by the participant

as necessary for the purposes of (i) organizing the photo contest, (ii) our legitimate interests in carrying out promotional and marketing activities, as well as (iii) based on the participants' consent.

More specifically, the organization of the contest consists of:

- Contest management, including the notification of participants and winners, handling complaints and inquiries, winner selection and sending the relevant prizes; and
- Publishing selected photographs (including nickname of the participant, date and place of the photographing, as well as any additional comments submitted by the participant) on our contest website and social media profiles, including the social media profiles of SHIMANO's subsidiaries ([please refer to the attached](#)) (“Subsidiaries”)

Participation in the contest requires participants to provide their personal data as specified on our photo contest website. Failure to do so results in the impossibility of entering into the photo contest.

In addition, SHIMANO will compile anonymous statistical data out of the information submitted by participants for the purposes of analyzing the reach and success of SHIMANO's photo contest.

3. Recipients of data

Recipients of the participants' personal data are:

- Subsidiaries
- IT service providers engaged for the maintenance of the contest website; and
- Service providers trusted with the implementation of the SHIMANO 100 year foundation anniversary project, if any

4. International Data transfers

The personal data submitted to enter into the photo contest is processed at SHIMANO's headquarters in Japan, which has been recognized by the European Commission as providing an adequate level of data protection.

For the purposes of publishing the selected photographs, we will send your data (photographs, nickname, date and place of the photographing, and any additional comments) to Subsidiaries, including subsidiaries located in countries outside of the European Economic Area. For some of the countries, the European Commission has issued adequacy decisions (the list of countries recognized as having an adequate level of data protection is available at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en). For the remaining countries to which we send your data, we rely on your explicit consent for the data transfer.

5. Retention periods

SHIMANO will not process personal data longer than necessary for the purpose for which it was originally collected.

Subject to statutory retention periods, SHIMANO will delete your personal data as soon as the SHIMANO centennial site ends in accordance with the Application Requirements.

6. Data subject's rights

Under applicable data protection law, you have the following rights with regard to the processing of your personal data:

- Right of access to your personal data;
- Right to rectification of inaccurate or incomplete personal data;
- Right to erasure of your personal data;
- Right to restriction of processing;
- Right to data portability, when the processing of your personal data is based on your consent or on a contract, and the processing is carried out by automated means;
- Right to withdraw consent with effect for the future;
- Right to lodge a complaint with a supervisory authority; and
- Right to object to the processing of your personal data on grounds relating to your particular situation, and **right to object to the processing of your personal data for direct marketing purposes.**

7. Miscellaneous

This notice may be revised from time to time to reflect and comply with changes in applicable legislation. SHIMANO will inform you about any updates in an appropriate manner, e.g. via email or a banner in our website. The date of the last notice update is available at the top of this notice.

Additional Disclosures for California Consumers

These disclosures describe how we collect, use, process, and disclose personal data of California consumers in the context of the photo contest, as well as the rights you may have under California law. These disclosures are intended to supplement the Data Protection Notice with information required by the California Consumer Privacy Act ("CCPA").

Personal Data We Collect

California law requires that we describe the personal data we collect about California consumers, including by identifying specific categories of data. We collect personal data directly from consumers. As we describe in more detail above in the "Details of the processing of personal data" section of this notice, we have collected the following categories of personal data in the past 12 months in the context of the photo contest:

- **Identifiers** (e.g., first and last name of the participants, postal address, email address, telephone number)
- **Visual Data** (e.g., submitted photograph and associated details)

- **Location Data** (e.g., location where the submitted photograph was taken)

For information about our business or commercial purpose(s) for collecting, or possibly sharing, your personal data, please refer to the “Details of the processing of personal data” section of the notice above.

How We Share Personal Data

We may share personal data with third parties as described in the “Recipients of data” section of the notice above. We do not sell personal data. California law also requires that we provide you with information about certain disclosures of personal data to third parties, where the disclosures are made for “business purposes”, such as disclosures to service providers. We disclose the following types of personal data for our business purposes:

<u>Category of Personal Data</u>	<u>Recipient</u>
Identifiers	Subsidiaries IT service providers for the maintenance of the contest website Other service providers
Visual Data	Subsidiaries IT service providers for the maintenance of the contest website Other service providers
Location Data	Subsidiaries IT service providers for the maintenance of the contest website Other service providers

California Rights

California law grants certain rights to California consumers. These include the rights to:

- Access specific pieces of personal data (“**Right to Access**”)
- Learn about how we process and share personal data (“**Right to Know**”)
- Request deletion of personal data we collected from you (“**Right to Request Deletion**”)
- Opt out of “sales” of personal data, as that term is defined under California law
- Not to be denied goods or services for exercise

To exercise the Right to Access, Right to Know, or Right to Request Deletion: please submit a request form the contact form or Shimano Inc. 100th Anniversary Photo Contest Secretariat address: 3-77, Oimatsu-cho, Sakai-ku, Sakai-shi, Osaka, Japan. Only you or a person that you authorize to act on your behalf may make a request related to your personal data. A request to exercise any of these rights must (1) provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal data (or an authorized representative of that person); and (2) describe your request with sufficient detail that allows us to understand, evaluate, and respond to your request. We will verify your identity by asking for [certain identifying information] and matching that against the information we have on file. In certain cases, we may need to ask for more information. We may not be able to respond to your request or provide you with the information you requested if we are unable to verify your identity (or establish the authority of an authorized agent acting on your behalf).

Additionally, under California Civil Code Section 1798.83, California residents have the right to request in writing from businesses with whom they have an established business relationship, (a) a list of the categories of personal data that a business has disclosed to third parties during the immediately preceding calendar year for the third parties' direct marketing purposes and (b) the names and addresses of such third parties. To exercise this right, please contact us from the contact form [here](#).

At this time, the contest website does not respond to "do not track" signals sent by Internet browsers.

Contact Us

If you have any questions regarding the processing of your personal data, please contact us from the contact form [here](#).

Attachment

Netherlands	SHIMANO BENELUX B.V. Industrieweg 24, 8071 CT Nunspeet, the Netherlands Phone: +31-341-272327/ Fax: +31-341-272291
Germany	SHIMANO GERMANY FISHING GMBH Diessemer Bruch 114F, 47805 Krefeld, Germany Phone: +49-2151-55670 / Fax: +49-2151-556750
Belgium	SHIMANO BELGIUM N.V. Zandvoortstraat 21, 2800 Mechelen, Belgium Phone: +32-15-209480 / Fax: +32-15-209410
Belgium	LAZER SPORT N.V. Lamorinièrestraat 33-37 2018 Antwerpen, Belgium Phone: +32-3216-0900
Italy	SHIMANO ITALY FISHING S.R.L. Via Jucker 22, 20025 Legnano (MI), Italy Phone: +39-0331-742711 / Fax: +39-0331-465687
Italy	SHIMANO ITALY BICYCLE COMPONENTS SRL. Via Jucker 22, 20025 Legnano (MI), Italy Phone: +39-0331-936911 / Fax: +39-0331-936955
France	SHIMANO FRANCE COMPOSANTS CYCLES S.A.S. Zone Actiparc, 777 Rue Commios, 62223 St.-Laurent-Blangy Cedex, France Phone: +33-321-732525
Sweden	SHIMANO NORDIC CYCLE AB Edsbrogatan 1F, 75228 Uppsala, Sweden Phone: +46-18-56-16-00 / Fax: +46-18-50-03-95
Finland	SHIMANO NORDIC CYCLE OY Teknobulevardi 3-5, 01530 Vantaa, Finland Phone: +35-8201-550800 / Fax: +35-8201-550801
Norway	SHIMANO NORDIC CYCLE AS Vakåsveien 7, 1395 Hvalstad, Norway Phone: +47-66-77-80-10 / Fax: +47-66-77-80-11
Denmark	SHIMANO NORDIC DENMARK APS Forbindelsesvej 4, 2100 København, Denmark Phone: +45-699-11-660
Poland	SHIMANO POLSKA SP. Z O.O. Ul. Jana Gutenberga, 62-023 Żerniki, Poland Phone: +48-61-62-52-100 / Fax: +48-61-62-52-110

Turkey	SHIMANO BİSİKLET PARÇA VE EKİPMANLARI SATIŞ SERVIS TICARET ANONİM ŞİRKETİ Şair Eşref Bulv. İsmet Kaptan Mah. Osman Şahin İş Mrk. No:4 K:7 D.:71, Çankaya - Konak / Izmir, Turkey Phone: +90-232-402-93-93 / Fax: +90-232-484-07-40
Turkey	SHIMANO BALIKÇILIK MALZEMELERİ VE EKİPMANLARI SATIŞ TICARET ANONİM SİRKETİ İKİTELLİ OSB MAHALLESİ, HURRIYET BULVARI, DEPARKO SANAYİ SİTESİ, HTK İS MERKEZİ, 1/12-6, BASAKSEHIR, İSTANBUL, TURKEY Phone: +90-212-659-8152 / Fax: +90-212-659-82-47
United Kingdom	SHIMANO UK LTD. Unit 2, Elm Court, Copse Drive, Meriden Business Park, Coventry. CV5 9RN, United Kingdom
U.S.A.	SHIMANO NORTH AMERICA BICYCLE, INC. One Holland, Irvine, California 92618 U.S.A. Phone: +1-949-951-5003 / Fax: +1-949-768-0920
U.S.A.	SHIMANO NORTH AMERICA FISHING, INC. 9560 Palmetto Commerce Parkway Ladson, South Carolina 29456 U.S.A. Phone: +1-949-951-5003 / Fax: +1-949-768-5071
Canada	SHIMANO CANADA LTD. 427 Pido Road Peterborough, Ontario K9J 6X7 Canada Phone: +1-705-745-3232 / Fax: +1-705-745-1949
Brazil	SHIMANO LATIN AMERICA REPRESENTAÇÃO COMERCIAL LTDA. São Paulo, Brazil
Argentina	SHIMANO ARGENTINA S.A.U. Azcuena 1860 Piso 3, Ciudad Autónoma de Buenos Aires, Argentina (ZIP:C1128AAF) Phone: +54-11-4801-4177 / Fax: +54-11-4801-4177
Uruguay	SHIMANO URUGUAY S.A. Ruta 8 km 17.500 S/N Edificio Costa Park - C.P. 91.600 - Montevideo Phone: +598-2518-2566 / Fax: +598-2518-2127
Australia	SHIMANO AUSTRALIA CYCLING PTY. LTD. 2 Wurrook Circuit, Caringbah, NSW, 2229, Australia Phone: +61-2-9526-7799 / Fax: +61-2-9526-7622
Australia	SHIMANO AUSTRALIA FISHING PTY. LTD. 2 Wurrook Circuit, Caringbah, NSW, 2229, Australia Phone: +61-2-9533-0000 / Fax: +61-2-9524-8822
New Zealand	SHIMANO NEW ZEALAND LIMITED 79 Apollo Drive, Albany, North Shore City 0632 Auckland, New Zealand Phone: +64-9-478-1969 / Fax: +64-9-479-6288
Singapore	SHIMANO (SINGAPORE) PTE. LTD. 20 Benoi Sector, Singapore 629852 Phone: +65-6265-4777 / Fax: +65-6265-1575
China	SHIMANO (SHANGHAI) SALES CORPORATION Room 1701---1705 Sheng Gao International Tower, No. 137 Xian Xia Road, Shanghai 200051, China Phone: +86-21-52061212 / Fax: +86-21-52062797

Taiwan	SHIMANO (TAIWAN) CO.LTD. 4F-3, Grand Asia Plaza, 138 Zhongming S.Road, Taichung, 40361 Taiwan Phone: +886-4-2319-5318 / Fax: +886-4-2319-4020
India	SHIMANO SOUTH ASIA PRIVATE LTD. No. 19, Kumarakrupa Road, Bangalore, Bangalore, Karnataka, India, 560001 Phone: +91-80-4125-3331
Japan	SHIMANO INC. 3-77 Oimatsu-cho, Sakai-ku, Sakai-shi, Osaka 590-8577, Japan Phone: +81-72-223-3957 / Fax: +81-72-223-6045
Japan	SHIMANO SALES CO., LTD. 1-5-15 Chikukou-Shinmachi, Nishi-ku, Sakai-shi, Osaka, 592-8331, Japan Phone: +81-72-243-2820 / Fax: +81-72-243-2830