

Privacy Policy for EEA Residents

Processing of Personal Data

Shapla Neer = Citizens' Committee in Japan for Overseas Support (hereinafter referred to as Shapla Neer, we, or us) recognizes the importance of personal data and carries out its processing to strictly ensure its protection. This Privacy Policy applies to the processing of personal data obtained from data subjects residing in the European Economic Area (EEA) who make donations to Shapla Neer through the Tokyo Marathon Charity or Tokyo Legacy Half Marathon Charity (hereinafter referred to as Donors) or who visit our website (hereinafter referred to as Visitors).

1. Types of Personal Data

In this Privacy Policy, personal data means any data relating to an identified or identifiable natural person. We may collect and process the following types of personal data. Please note that some of the following types of data may not be categorized as personal data by the applicable laws and regulations, depending on the context thereof.

- Personal data of "Donors"
We collect and process personal data about Donors, including name, gender, date of birth, email address, address, nationality, and whether a guide runner is needed.
- Personal data of "Visitors" to our website
We may collect cookies, device information, software information, and website browsing history, etc. of the Visitors.
- Other personal data provided to us
We collect and process personal data, including name, email address, telephone number, and postal address, which is necessary for specific procedures, such as responding to inquiries about the Tokyo Marathon Charity or requests for information of our activities or donation.

2. Compliance with All Applicable Laws and Regulations and Performance of Statutory and Regulatory Obligations

We have established internal rules in accordance with the EU General Data Protection Regulation (GDPR) and other applicable laws and regulations. We strictly manage the personal data we collect, use, and disclose in compliance with such rules.

3. Collection, Use and Disclosure of Personal Data

When processing personal data, we clearly indicate the purposes of the processing to Donors/Visitors prior to processing, unless otherwise stipulated by laws and regulations, and we carry out the processing to the extent necessary to achieve such purposes.

(1) Purposes of Processing Personal Data

We process personal data for the purposes listed below or for the purposes notified to Donors/Visitors.

- To provide and manage services related to Donors and to carry out relevant procedures
- To provide information on various events or campaigns and to carry out relevant procedures
- To carry out procedures related to inquiries or requests for information regarding the services mentioned above

(2) Additional Processing

When processing personal data for purposes other than those listed above, we will notify Donors/Visitors, prior to such processing, of such purposes and other matters as required by applicable laws and regulations.

(3) Legal Basis

For the purposes mentioned in the sub-section 1, we shall, in principle, process the personal data of Donors/Visitors based on their consent to this Privacy Policy or the legitimate interests in conducting Shapla Neer's activities.

Donors/Visitors may withdraw such consent at any time. Withdrawal of consent, however, does not affect the lawfulness of the processing of personal data based on the prior consent. If Donors/Visitors wish to withdraw their consent, they can do so by contacting us through the channels indicated in the section 7.

(4) Necessity of Providing Personal Data

The personal data of Donors/Visitors is necessary for Shapla Neer to provide its services to Donors/Visitors. Therefore, there may be cases where Donors/Visitors who have not provided such data may be unable to receive our services or make donations to us.

(5) Retention Period

We retain the personal data of Donors/Visitors as long as we need it to provide services to Donors/Visitors, and will promptly delete such data when it is no longer necessary. The criteria used for us to determine the retention period include: (i) the duration of the ongoing relationship with the Donors/Visitors and (ii) whether there are any legal obligations applicable.

(6) Transfer of Personal Data

We may disclose the personal data of Donors/Visitors to third parties, including those acting on our behalf to execute certain operations, for the processing purposes mentioned above.

Consequently, the personal data of Donors/Visitors may be disclosed to parties based in countries or jurisdictions outside the EEA, including, but not limited to, Japan (the same shall apply hereinafter). In such countries or jurisdictions, there may not be data protection laws equivalent to those of the EEA, and the rights granted to Donors/Visitors in the EEA may not potentially be recognized. However, when transferring personal data to a third party in such countries or jurisdictions, we will ensure that sufficient measures are taken to protect the personal data of Donors/Visitors, including the conclusion of Standard Contractual Clauses based on GDPR.

If Donors/Visitors wish to obtain further information, they can do so by contacting us through the channels indicated in the section 7.

(7) Sensitive Data

Information regarding whether a guide runner is needed as mentioned in the section 1 will be processed only to the extent necessary for us to provide and manage services related to Donors and to carry out relevant procedures. In addition, in case we obtain special categories of personal data that are stipulated by GDPR, the processing will be conducted, unless otherwise stipulated by laws and regulations, only to the extent to which Donors/Visitors have consented.

4. Prevention of Leakage, Falsification, Loss, or Damage of Personal Data

When processing personal data, we shall ensure to store and manage such data in an accurate and current state, while securely accumulating and storing such data under strict control by implementing our security measures in order to prevent leakage, falsification, loss, or damage. Furthermore, we will continue to improve the personal data protection management system at Shapla Neer.

Our security measures include the establishment of rules and guidelines for the processing of personal data, the appointment of staff in charge of the processing of personal data, the implementation of periodic educative training for and supervision of the staff, data access control, and

periodic self-inspection of the status of the processing of personal data. In addition, in cases where the processing of personal data is outsourced, we will conclude an outsourcing contract that imposes appropriate management obligations on the outsourcee, while we ensure to monitor and supervise the status of the outsourcee's processing of personal data.

5. Collection of Cookies

We may collect Visitors' cookies, device information, software information, etc. on our website. We use this information as general statistical information for understanding and analyzing trends in the use of our website, but not for personal identification.

We use Google Analytics and Google Ads to understand and analyze Visitors' usage of our website. Such services use cookies to collect information about Visitors. The information collected will be managed by Google in accordance with its Terms and Conditions and Privacy Policy. For more information on how data is collected and processed, please refer to "How Google Uses Information from Sites or Apps That Use Our Services." If Visitors do not wish to have their information collected by Google Analytics on our website, Visitors can opt out by using the "Google Analytics Opt-Out Add-On." Additionally, If Visitors do not wish to have their information collected by Google Ads, Visitors can refer to "How Google Uses Cookies in Advertising" for opting out.

Google Analytics Terms and Conditions

<https://marketingplatform.google.com/about/analytics/terms/us/>

Google Ads Terms and Conditions

<https://support.google.com/adspolicy/answer/54818?hl=en>

Google Privacy Policy

<https://www.google.com/intl/en/policies/privacy/>

How Google Uses Information from Sites or Apps That Use Our Services

<https://www.google.com/intl/en/policies/privacy/partners/>

Google Analytics Opt-Out Add-On

<https://tools.google.com/dlpage/gaoptout?hl=en>

How Google Uses Cookies in Advertising

<https://policies.google.com/technologies/ads?hl=en>

6. Rights of Donors/Visitors

Donors/Visitors may request, regarding their personal data processed by us, access, rectification, erasure, restriction of processing, data portability (data transfer to the designated destination), etc. in accordance with the data subject's rights as defined in GDPR.

Donors/Visitors have the right to object to Shapla Neer as well as to lodge a complaint with the data protection authority having jurisdiction over the place of residence of the Donors/Visitors regarding the processing of their personal data.

7. Inquiries and Requests

The purposes and means of processing the personal data of Donors/Visitors are determined by us. If you have any questions or concerns regarding this Privacy Policy or our processing of personal data or if you have, concerning your personal data, any requests for access, rectification, erasure, restriction of processing, or data portability, you can contact us through the channels indicated below.

Please note that if there are requests for access, etc., we may request you to present your personal data in order to verify your identity by referencing the personal data registered. In case a representative makes such requests on your behalf, we may request the representative to present documents proving the representation and the identity.

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Tel: +81-3-3202-7863 (Tue - Sat 10: 00 ~ 18: 00 (JST))

Email: marathon@shaplaneer.org

EU Personal Data Management Officer: Secretary General

8. Revision of This Privacy Policy

Shapla Neer may make changes to this Privacy Policy. If we change the contents of this Privacy Policy, we will present the latest Privacy Policy on our website. We kindly ask Donors/Visitors to check the contents of this Privacy Policy as necessary.

Last revised in June 2023