

Privacy Policy

SOMEK Corporation (“SOMEK”) is committed to building strong trusting relationships by providing ORIX Group's quality services toward the various needs of our stakeholders, including our customers not just in Japan but also those overseas in the Americas, Europe, Asia, Oceania and the Middle East. To this end, we ensure our collection of personal information is conducted in an appropriate manner that is in compliance with laws and regulations and treat, manage, and protect this information as our most valuable asset, in accordance with the disclosure below.

This Privacy Policy (this “Policy”) discloses the purposes for which we process personal information and explains regarding our processing of such personal information.

1. Legal Compliance

We recognize the need for, and are fully committed to, ensuring that all officers and employees are fully aware of and comply with laws and regulations regarding the processing of personal information in order to protect personal information we process and ensure its safety.

2. Continuous Improvement of Compliance Program

We have established a compliance program that includes elements relating to the processing of personal information and periodically review those elements and strive to continuously improve them.

3. Scope of Application

This Policy applies to all personal information that we process in all countries and regions where we have business operations.

For details about our use of cookies, please refer to our “Cookie Policy.”

4. Types of Personal Information

We collect and process the following personal information.

1. Contact information: name, address, telephone number, fax number, and email address;
2. Identifying information: date of birth (age), gender, nationality, place of origin, residence, licenses, photographs, passport, visas or other government-issued identification data, background (education, job history, etc.), company name, job title, and family structure;
3. Information for creating online accounts: username, password, and security questions and answers;
4. Financial information: invoice address, credit or debit card number or other payment-related data, and bank account information;
5. Details regarding use of services and details regarding inquiries made;
6. Locational information and actions on networks: IP address, mobile device locational information, access information for our home page, device settings, log information, usage time, browser version information, operating system, browsing history, user ID, types of information viewed, and cookie and similar data;
7. Audio and video information: The content of calls made to us to when making inquiries and images from security cameras when at our properties;
8. Credit information: Information that must be collected pursuant to relevant laws and regulations, such as information for identity confirmation purposes;
9. Customer preferences and hobbies; and
10. Any other information you elect to provide directly to us in connection with your use of services we provide.

5. Methods of Acquiring of Personal Information

We collect personal information through the following means:

1. Information provided by individuals: acquired through face-to-face, telephone, mail and e-mail interactions, acquired through the filing out of applications, contracts, online forms, and questionnaires;
2. Information provided by others: acquired through group companies, subcontractors, business partners, company-operated stores, franchise stores, and service providers, etc.;
3. Technical information: acquired during the use of services; and
4. Information: acquired as a result of merger and other transactions that result in business succession:

Individuals may refuse to provide personal information to us but the decision not to provide certain personal information to us may result in SOMEK not being able to provide certain products and services to such individual.

6. Legal Basis for Processing

SOMEK's legal basis for processing your personal information will typically be one of the following.

1. Your consent;
2. Necessary for the performance of a contract with you;
3. Necessary for SOMEK to fulfill its legal obligations;
4. Necessary to protect vital interests; or
5. Required for our legitimate interests or those of a third party, provided that if such interests are overridden by your interests or fundamental rights and freedoms, we will not process your personal information. Our legitimate interests are specified in more detail in Section 7 "Purpose for Processing of Personal Information" below. More information on the balancing test is available upon request.

7. Purpose for Processing of Personal Information

SOMEK may process your personal information that we collect for the following purposes. If we seek to process your personal information in ways that exceed the scope necessary for achieving these purposes, we will obtain your prior consent to such processing after disclosing information regarding the purpose(s) for which we intend to process it.

1. To deal, in an appropriate manner, with you in any business discussion based on a request for materials, inquiry or application from you, a proposal from SOMEK to you or otherwise, relating to any kind of business conducted by SOMEK (for details on ORIX Group's business, refer to the section "<https://www.somek.jp> " on our website).
2. To carry out examination or to make an appropriate judgment and response when identification of you is required, in respect of credit granting transactions (including, but not limited to, leases and loans) or of financial investment transactions involving you.
3. To manage any agreement between you and SOMEK or fulfill obligations of SOMEK or respond to your exercise of your rights under any agreement or applicable laws and regulations in an appropriate manner. In addition, both before and after expiration of the agreement, to respond to any references to the agreement or when doing so is required for administration in conformance with applicable laws or regulations in an appropriate manner.
4. To support or commission various procedures relating to our provision of products and services (such as financing, registration and administrative procedures).
5. To introduce SOMEK and other companies, various products and services, and conduct surveys, through direct mailing, e-mails and other methods.
6. To develop and improve our products and services in order to provide you better products and services.
7. To conduct marketing analysis to improve your satisfaction.
8. To conduct various administrative tasks necessary from a management perspective of SOMEK.

9. To share with third parties, to the extent necessary to executing a task, such as when the information needs to be provided to personal credit information organization for conducting credit-related business.
10. To request advice from specialists (including lawyers, certified public accountants, tax accountants, real estate appraisers, judicial scriveners, social insurance consultants).
11. To execute our operations and incidental and related matters in an appropriate and smooth manner.

In the case of personal information of job applicants, the following purposes apply instead of those noted above.

- ① To screen for internships and for candidates for interviews, testing and similar activities.
- ② To conduct hiring activity on behalf of the ORIX Group (including communications and provision of various information introducing seminars relating to our hiring activity and questionnaires related to improving hiring activity in the future).
- ③ In the case of personal information of persons that are hired as a result of screening activity, to manage matters within the ORIX Group related to human resources, such as training and employee benefits, following your employment.
- ④ To conduct statistical and other analyses of data for purpose of hiring activity.

8. Protection and Management of Personal Information

SOMEK has established internal rules and regulations on the protection of personal information and pays the utmost attention to managing personal information appropriately and protecting against leakage of such personal information. We have also implemented appropriate and reasonable levels of safety measures to protect against unauthorized access, loss, destruction, or alteration of personal data from outside the company.

9. Provision of Personal Information to Third Parties

Your personal information may be shared with the following third parties under certain circumstances.

1. ORIX Group companies

In order to meet diverse needs of our stakeholders through the comprehensive strength and consolidated management of the ORIX Group, we may share your personal information within the ORIX Group for the purposes described in this Policy.

2. Contractors and specialists

In order to support the provision of products and services by SOMEK or have others provide services on behalf of SOMEK, [we may share your personal information with other companies, agents and contractors that we use].

3. Business partners, directly managed stores, and franchisees

In order to provide services jointly with other companies or to provide services to you pursuant to a contract, we may share personal information with relevant business partners, directly operated stores and franchised stores.

4. Business successors

We may sell of certain of our businesses to other companies in connection with reorganizations of our overall business. As a consequence of such sales, we may transfer or sell to third parties your personal information that was held in connection with the business sold.

Our website may from time to time contain links to and from websites of our business partners. Please be aware that each of these websites has its own privacy policy and SOMEK has no control over how each business partner uses personal information [that it receives from you]. Prior to providing personal information to any of our business partners, please confirm the privacy policy of the relevant third party's website.

10. Transfers to a Third Country

Your personal information may be transferred to and processed in a country or region other than the one where you are located by SOMEK or a third party described in Section 9 “Provision of Personal Information to Third Parties” of this Policy for the purposes set forth in Section 7 “Purpose for Processing of Personal Information” of this Policy. Such countries and regions include countries that have different standards of data protection than those of the country where you are located. SOMEK will take all reasonable steps required by applicable law, including the execution of appropriate contracts, to ensure that your personal information is handled in a safe and secure manner and in accordance with this Policy and applicable data-protection laws and regulations.

11. Your Rights

You can exercise the following rights to the extent permitted by laws and regulations of the country or region in which you reside.

1. Notice of intended use of personal information

You can request we inform you of our intended use for your personal information that we possess. In the event you make such a request, we will respond to the request promptly and appropriately in accordance with applicable laws and regulations.

2. Access to personal information

You have the right to verify whether or not we process personal information about you and, if we process such personal information, you have the right to request access to it. You also have the right to obtain a copy of your personal information that we process. In the event you request we disclose your personal information to you, we will respond to the request promptly and appropriately in accordance with applicable laws and regulations.

3. Correction of personal information

If your personal information is inaccurate or incomplete, you have the right to request that we correct, supplement or otherwise complete such personal information ("Rectify"). In the event you request we Rectify your personal information, we will respond to such request promptly and appropriately in accordance with applicable laws and regulations.

4. Deletion of personal information

You have the right to require us to delete any of your personal information that we process. Provided, however, that we are not obligated to take such action if our

retention of such personal information is necessary to comply with our legal obligations or to assert, enforce or defend our legal rights.

5. Restrictions on the processing of personal information

If your personal information processed by SOMEK is inaccurate, the processing by SOMEK is illegal or it is no longer necessary for SOMEK to process the personal information for a particular purpose, you have the right to restrict the processing of your personal information. However, if SOMEK is unable to delete your personal information due to the need to comply with legal or other obligations or you do not request deletion of your personal information by SOMEK, we are not obligated to take such action.

6. Data portability

If your personal information is (1) personal information provided to us by you, and (2) we process such personal information based on your consent or in order to perform a contract with you, you have the right to obtain the personal information held by us with respect to you in a structured, commonly used and machine-readable format and the right to transmit such personal information to another controller. You also have the right to have us directly transmit such personal information to another controller, where technically feasible.

7. Withdrawal of consent

If you consent to processing of your personal information, you have the right to withdraw your consent at any time without charge. This includes cases where you wish to stop receiving marketing communications.

8. Complaints

You have the right to file a complaint about the processing of your personal information by us.

If you wish to exercise the right described above, please contact us through the e-mail address listed in Section 15 "Contact Information for Inquiries about Personal Information" of this Policy. In order to respond to your request and protect your privacy and security, we may request you provide information necessary for us to confirm your identity. In cases where we are unable to confirm your identity based on the information that we receive from you and information in our possession, we may request you provide additional information. We are committed to responding to your request to exercise your rights in accordance with applicable laws and regulations.

If you believe that SOMEK is not in compliance with applicable laws and regulations on the protection of personal information, you have the right to file a complaint with the competent supervisory authority with oversight over data protection in accordance with applicable laws and regulations.

12. Retention Period for Personal Information

SOMEK will generally only retain personal information we collect for a period of time reasonably necessary to achieve the particular business purposes for which we collected the personal information. In some cases, we may need to retain personal information for longer periods of time pursuant to laws or regulations applicable to our business. Personal information that is no longer needed will be promptly deleted.

13. Special Provisions regarding Japan's Act on the Protection of Personal Information

In the event the Act on the Protection of Personal Information of Japan is applicable to the processing of your personal information, the following terms apply:

1. Shared users of personal information

SOMEK will share the personal information described in Section 4 "Types of Personal Information" of this Policy for the purposes described in Section 7 "Purpose for Processing of Personal Information" of this Policy. The scope of shared use of personal information will be limited to ORIX Group companies as described in "1. ORIX Group companies" in Section 9 "Provision of Personal Information to Third Parties" of this Policy. Please note that this category of ORIX Group companies includes companies that do not contain "ORIX" in their name. For details regarding such companies, please see our "[List of Shared Users](#)."

※Listed companies subject to change.

SOMEK will not disclose or provide your personal information to third parties without your consent, except for cases of shared use, disclosure to contractors, or where otherwise permitted by applicable law and regulations.

For details in information sharing among Member Stores (those that use mobile payment services), please refer to "Shared Use of Member Store Information" (only available in Japanese).

SOMEK Corporation is responsible for the management of shared personal data.

14. Party Responsible for Handling Personal Data (Controller)

SOMEK Corporation
World Trade Center Bldg., 2-4-1 Hamamatsu-cho,
Minato-ku, Tokyo, 105-6135, Japan
Representative of the entity:

15. Contact Information for Inquiries about Personal Information

Email address: info@somek.jp

Changes to this policy:

This policy may be updated. The date on which this policy was most recently updated is noted below.

Last modified: June, 26th, 2026