

Anritsu Group Privacy Policy

This is the privacy policy ("Privacy Policy") of the ANRITSU CORPORATION and [its Group Companies](#) ("Anritsu", "Anritsu Group Companies", "we", "us" or "our"). Whenever dealing with one of the Anritsu Group Companies, the controller of your personal data will be the company that decides how and why your personal data is processed.

We recognize our social responsibility to appropriately protect the personal data of all individuals we have dealings with, including our customers, shareholders/investors, business partners and employees, and as such, we have adopted the following Privacy Policy and will take all possible measures to ensure the proper handling and protection of personal data in our possession.

1. Anritsu will strictly comply with all applicable laws, regulations and other social standards concerning the protection of personal data.
2. Anritsu will properly administer personal data by appointing a person in charge of overall control of personal data and by placing a personal data administrator in each department that handles personal data.
3. Anritsu will educate its officers, staff and other personnel with regard to the protection of personal data.
4. Anritsu will collect, use and provide personal data in an appropriate manner. Specifically:
 1. We will collect personal data in an appropriate and fair manner, clearly stating the intended use at the time of collection;
 2. We will use personal data only for the purposes specified in notifications or public announcements, or that were made clear at the time of collection, except in cases where permissible by applicable laws;
 3. We will not collect special categories of personal data, except in cases where advance explicit consent of the person concerned has been obtained or where permissible or required by applicable laws;

4. We will not provide personal data to third parties other than to Group Companies or their service providers, except in cases where advance consent of the person concerned has been obtained or where permissible or required by applicable laws;
 5. In cases where personal data is provided to third parties, or received from third parties, we will keep appropriate records of such sharing or transferring in compliance with all applicable laws; and
 6. In cases where personal data is provided to service providers or others, we will take appropriate measures, in the form of a written contract or otherwise, to ensure that adequate safeguards are put in place to protect your personal data.
5. Anritsu will respond reasonably and appropriately to requests from individuals regarding their own personal data, upon confirming their identities.
 6. Anritsu will take all appropriate, reasonable and possible individual, physical, technical, and operational measures to ensure that personal data is handled safely and shall use its best efforts to prevent unauthorized access to leakage or loss of personal data.
 7. From time to time, Anritsu will review this policy and associated company regulations and operating procedures, making revisions and improvements on an ongoing basis. Please refer to the latest version online.

April 1, 2022
ANRITSU CORPORATION

What does this Privacy Policy apply to?

This Privacy Policy explains how we collect and use your personal data in compliance with all applicable laws.

When is this Privacy Policy applicable?

This Privacy Policy applies to all your personal data collected by Anritsu, whether through Anritsu websites or otherwise communicated to us. For example, by phone or in writing obtained through postal mail or e-mail, or by any other means. If the domestic laws and regulations of your locale requires so, this Privacy Policy may be supplemented by such laws and regulations.

Anritsu websites or applications may contain links to the websites of our partner networks and/or affiliates. Please note that, these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

We wish to help you make informed decisions, so please take a few moments to read the sections below and learn how we may use your personal data.

1. How will we use your personal data;
2. For what purposes do we collect and/or use your personal data;
3. When and why will we share or transfer personal data within Anritsu Group Companies and with other organizations;
4. How will we retain your personal data;
5. The rights and choices you have when it comes to your personal data; and
6. How to contact us.

How will we use your personal data?

We may collect personal data that you provide us with through various channels, including websites, social media platforms, events, telephone contacts, email or otherwise.

Such personal data may include:

1. identification information (e.g. first name, surname, date of birth);
2. contact details (e.g. postal address, e-mail address, phone number);
3. job title/position in your company, if you are acting in a professional manner; and
4. records of correspondence/transaction records with Anritsu and responses to our surveys.

We may also collect your personal data by automatic means, including cookies and other tracking devices. For more information, please see Anritsu Web Privacy Statement, which applies to the website "anritsu.com". With respect to other websites, please refer to each website directly.

We may obtain your personal data from external sources, for example from third party companies or publicly available sources. This Privacy Policy applies to any items of the personal data obtained from such external sources and, whenever possible, we will inform you of the source from which we have obtained such personal data.

For what purposes do we collect and/or use your personal data?

We will utilize your personal data for the following purposes:

	Type of use/purposes	Legal Basis
1	Processing orders, delivering products, issuing invoices to you, and providing other services to you;	Contract Performance; Legitimate Interest
2	Verifying your identity and responding to your requests;	Contract Performance; Legitimate Interests
3	Managing product claims or performing other contractual obligations;	Contract Performance; Legitimate Interests
4	Conducting surveys to improve our services and products;	Consent; Legitimate interests
5	Generating statistics for marketing analysis;	Consent; Legitimate interests
6	Providing useful information regarding our products (including information on systems and software) and services related to the business purposes that may interest you;	Consent; Legitimate interests

	Type of use/purposes	Legal Basis
7	Sending you (shareholders/investors) news regarding investor relations as well as business activities related to our company's business;	Consent; Legitimate interests
8	Administrating our shareholders and our list of shareholders (we will utilize the permanent representative's personal data, if applicable);	Consent; Legitimate interests
9	Communicating with Anritsu Group Companies or our service providers regarding our products, services and projects, e.g. by responding to inquiries or requests or providing you with technical information about purchased products	Contract Performance; Legitimate Interests
10	Planning, performing and managing the relationship with Anritsu Group Companies or our service providers; e.g. by performing transactions and orders in relation to products or services, processing payments, performing accounting, auditing, invoicing and collection activities, arranging shipments and deliveries, facilitating repairs and providing support services;	Contract performance; Compliance with legal obligations; Legitimate interests
11	Ensuring compliance with legal obligations (such as record keeping obligations), export control and customs, compliance obligations, and our policies or industry standards; and	Compliance with legal obligations; Legitimate interests

	Type of use/purposes	Legal Basis
12	Solving disputes, enforcing our contractual agreements and to establish, exercise or defend our legal claims.	Compliance with legal obligations; Legitimate interests

Generally, the legitimate interests pursued by us in relation to our use of your personal data is the efficient performance or management of (i) your online use, and/or (ii) our business relationship with you. Where the above tabulated types of use state that we rely on our legitimate interests for a given purpose, we are of the opinion that our legitimate interests will not be overridden by your interests and rights or freedoms, given (i) the regular reviews and related documentation of the processing activities described herein, (ii) the protection of your personal data by our data privacy processes, (iii) the transparency we provide in relation to our processing activities, and (iv) the rights you have in relation to the processing activities.

When and why will we share or transfer personal data within Anritsu Group

Companies and with other organizations?

1. We may share your personal data with or transfer such data to:
 1. other [entities within Anritsu Group](#) for internal administrative purposes and to develop, improve, sell, offer, install, provide after services, repair and maintain, market and promote Anritsu products (including systems and software) and services relating to our business purposes, to provide useful information regarding our

products (including systems and software), services and activities relating to our business purposes and for research and questionnaire purposes relating to the above services;

2. our trusted third party service providers to perform a range of business services on our behalf, such as IT services including server providers and CRM vendors;
3. third parties that may offer products or services in relation to our own products and services including distributors, agents, and maintenance service providers; or
4. judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law.

In all cases, we will only share or transfer your personal data on a “need-to-know” basis to fulfill the purposes defined above. Moreover, we will enter into an agreement with the relevant third party on how to handle your personal data as necessary and appropriate to fully protect your personal data.

2. We will not disclose or provide personal data to a third party other than for the above purposes or unless the following criteria applies:
 - Your consent has been voluntarily provided;
 - In a manner where personal data is no longer identifiable such as a statistical data base;
 - It is requested under local laws and/or regulations;
 - For the protection of human life, physical well-being or property and it proves difficult to obtain consent from you;
 - In cases where there is a need to cooperate with a central government organization or a local government, or a person entrusted by them to perform the affairs prescribed by laws and regulations, and when there is a possibility that obtaining your consent would interfere with the performance of the said affairs; or
 - For use among the group companies of the individual data.

3. We may share or transfer personal data internationally:

We may share or transfer personal data globally as necessary for Anritsu Group Companies worldwide to pursue the purposes described herein. The destinations may include countries or regions that, in opinion of an authority having jurisdiction over your country or region, do not offer an adequate level of data protection. If so, we will take reasonable safeguard measures to ensure the level of data security which is included in the SCCs under the GDPR.

How will we retain your personal data?

We retain personal data only for as long as necessary for the purposes described herein. However, in some circumstances, we may keep your personal data for a longer period of time in order to satisfy legal, accounting or reporting requirements.

We delete personal data without unreasonable delay when such retention is no longer necessary.

The rights and choices you have when it comes to your personal data

1. Under certain circumstances, you have the following rights in relation to your personal data:

1. Right to access

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it upon your request.

2. Right to correct

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

3. Right to erasure

This enables you to request that we delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to request that we delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local laws. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

4. Right to object

This enables you to object where we are relying on legitimate interests (or those of a third party) but there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

5. Right to restrict

This enables you to request that we suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you require us to retain the data, even though we no longer require it, as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

6. Right to data portability

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to conclude a contract with you.

7. Right to withdraw

This enables you to withdraw your consent if the legal basis of the processing was your consent. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Please note that, if you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

2. Once we confirm that your request to exercise one of your rights is being communicated from you, we will answer you within a timely manner and reasonable scope.
3. Please note that, deletion or termination of usage of part or the entirety of the personal data may hinder us from providing you satisfying services.
4. Please also be aware that, we may not be able to delete or terminate usage of the information we possess under certain legal requirements.

Supervisory Authority

You always have the right to approach the competent data protection authority with your request or complaint.

How to contact us?

Contact Information

1. Please use the inquiry form ([Contact Us](#)) for any inquiries on your personal data or any questions regarding the Privacy Policy.
2. As a general rule, an answer to an inquiry will be in writing.
3. For certain information, we may ask you to fill out our corresponding forms. In these circumstances, we will send such forms to you, so please fill them out and send same back to us.