

## Privacy Statement for Products, Services and Solutions

Version: 1.0

Last updated: April 2022

### 1 Introduction

NTT Ltd. and all of its subsidiaries globally ('NTT', 'us', 'we' and 'our') understand the importance of ensuring that we collect, use, store, share and dispose of (collectively 'Use') Personal Data about our clients and their representatives ('you') in a fair, open, secure and lawful way.

This Privacy Statement describes what Personal Data we Use about you, how we Use it, and your choices and rights in relation to your Personal Data.

This Privacy Statement applies to our Use of your Personal Data in our delivery of our products, services and solutions ('Services'). Additional information on our privacy practices with respect to certain products, services and solutions, may be provided in specific privacy statements and/or privacy sheets and/or other notices provided to you. To the extent that a specific statement, sheet or notice differs from this Privacy Statement, the specific statement, sheet or notice will take precedence.

If you have any questions about how we Use your Personal Data or would like to lodge a complaint, please contact us at [privacyoffice@global.ntt](mailto:privacyoffice@global.ntt)

### 2 Information we collect about you

Personal Data is any information that identifies you or relates to you.

We collect Personal Data about you from different sources when you use our Services. The type of Personal Data that we collect about you varies based on our interactions with you.

- **Personal Data that we collect directly from you**

We collect Personal Data directly from you in the following circumstances:

- When we onboard you as a client or representative of our client (we collect your name, business contact information, job title, the company you work for, financial and payment information (where applicable)).
- When you place an order for our Services or otherwise interact with us, you may be required to create an account (see above for information collected).
- When we communicate with you (via email, chat, voice calls and/or self-service portal).
- When you interact with us (we may collect your name, contact details such as phone numbers and email address, the company your work for, user credentials, device details, and location).
- When you subscribe to our mailing lists or newsletters (we may collect your name, business contact information, email address, job title, the company you work for).
- When you register and attend our events, workshops, or seminars (we may collect your name, contact details such as phone numbers and email address, the company your work for, meal preferences, contact preferences, additional information as may be noted in our event forms, video and/or audio recordings of the event).
- When you access some of our premises (we may collect your name, contact details such as phone numbers and email address, the company your work for, biometric information, video and/or audio recordings of you at our premises).
- When we collect technical information in relation to delivery of our Services.

- **We collect any Personal Data automatically**

We, and our Service Providers (defined below), automatically collect the following information about you when you interact with us through chat, automated chat bots, security tools, ticketing systems and any self-service portals: your domain name; your browser type and operating system; your IP address and the length of time of your interaction with us. We may also collect your approximate location through collection of your IP address. Typically, we do not combine this information with other information that we have collected about you, including other Personal Data.

- **Personal Data we collect from other sources**

We also collect Personal Data from other sources, as follows:

- **Our NTT subsidiaries and affiliates:** We may collect information about you from our subsidiaries and affiliated entities.

- **Our Service Providers:** We may collect information about you from our Service Providers where we have sub-contracted out parts of our Services; where we engage third party applications, services or products; or where we engage third parties to administer NTT internal business processes. For purposes of this Privacy Statements all such Service Providers and third parties are referred to as 'Service Providers'.
  - **Our Business Partners:** We collect information about you from our Business Partners with whom we offer joint services to you.
  - **The company you work for:** We may access information about you from the company you work for when we provide Services as specified in our agreed contract with you or the company you work for ('contract').
- **Special Categories of Personal Data we collect about you**

We only collect Special Categories of Personal Data about you in certain instances, such as:

- For access to some of our premises, we may collect biometric information from you such as your fingerprints.

Special Categories of Personal Data includes information relating to your health, biometric or genetic information, religion, political beliefs, union membership, race or sexual orientation. We ask that you do not send or provide this information to us.

You can choose not to provide Personal Data to us, in certain circumstances. However, if your Personal Data is necessary to provide you with Services as required by our contract or to perform customer relationship management and/or administrative functions related to our contract, we may be unable to provide this Service without your Personal Data.

### 3 Our lawful basis for using information about you

When we Use your Personal Data in connection with the purposes set out in this Privacy Statement, we may rely on one or more of the following legal bases, depending on the purpose for which your Personal Data was collected and our relationship with you:

- **Performance of contract:** To provide Services as specified in our contract.
- **Our legitimate business interests:** To protect our legitimate business interests or those of a third party with whom we share your Personal Data. Whenever we rely on this lawful basis to Use your Personal Data, we assess our business interests to ensure that they do not override your rights. Additionally, you may have the right to object to our Use of your Personal Data in certain circumstances. See 'Your Personal Data Rights' section of this Privacy Statement.
- **Compliance with a mandatory legal obligation:** To ensure that we comply with applicable laws and regulations that govern and regulate how we do business.
- **Consent:** Where you have provided consent to the Use of your Personal Data.

### 4 We may use your Personal Data for

- **Performance of Contract and Pre-Contractual Activities.** To provide Services to you as specified in our contract, including provisioning of Services and enabling the use of certain features.
- **Account Management:** To process orders, including billing and payment for Services.
- **Customer Relationship Management and Administration:** To perform general business administration, management and operations of our contract, including managing our business relationship with you and sending administrative information and notices to you.
- **User Account Management:** To create and manage user accounts required for the Services.
- **Ticket Resolution:** To communicate and co-ordinate with you in a timely manner to assist in resolution of support requests logged with us.
- **Business Process Improvements:** To improve the way we deliver Services to you, including obtaining feedback from you about our products, services and solutions including through client satisfaction surveys.
- **Reporting on Contract Performance:** To report on the Services and resolution activities.
- **Communications:** To send communications to you related to the Services;
- **Marketing:** To send marketing communications to you; provide you with current information about our products, services and solutions; provide you with a more personalized experience when you interact with us; enable you to subscribe to our newsletters and mailing lists; enable you to register for events, workshops and seminars hosted by us.

## 5 How we share information about you

We may share your Personal Data with the following parties for the purposes set out in this Privacy Statement (as applicable):

- **Our NTT subsidiaries and affiliates:** We may share information about you with our subsidiaries and affiliated entities for the purposes of operating our business, delivering, analyzing, improving, securing, and customizing our Services, sending marketing and other communications related to our business, and for other legitimate purposes permitted by applicable law or otherwise with your consent.
- **Authorized personnel and advisors:** We may share information about you with authorized NTT personnel, agents and professional advisors of NTT including legal advisors, auditors, and consultants to NTT, where required.
- **Our Service Providers:** We may share information about you with our Service Providers where we have sub-contracted out parts of our Services; where we engage third party applications, services or products; or where we engage third parties to administer NTT internal business processes. Examples include processing of orders and credit card transactions, hosting websites, hosting seminar registration, assisting with sales-related efforts or post-sales support, and providing customer support.
- **Our business partners:** We may share information about you with our Business Partners with whom we jointly offer Services, with respect to providing additional technical assistance in resolving the issue logged.

We also may share Personal Data in the following circumstances:

- When you consent to the sharing of your Personal Data.
- In connection with the agreed terms of contract for the Service provided.
- In connection with, any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company and to our advisors and the advisors of the other company in such transactions.
- To protect the rights, property or safety of NTT, its business partners, you, or others, or as otherwise required by applicable law.
- To respond to a request for information by a competent authority in accordance with, or required by any applicable law, regulation or legal process; or where necessary to comply with judicial proceedings, court orders or government orders.
- In aggregated, anonymized, and/or de-identified form that cannot reasonably be used to identify you.
- For other legal reasons.

Any Service Providers or other parties with whom we share Personal Data are contractually required to implement appropriate physical, administrative and technical safeguards to protect Personal Data and are not permitted to use Personal Data for any purpose other than the purpose for which they are provided with or given access to Personal Data by us.

## 6 How we protect information about you

We are committed to protecting your Personal Data from accidental or unlawful destruction, loss, alteration, unauthorized access or disclosure by using a combination of physical, administrative and technical safeguards, and contractually require our Service Providers to whom we disclose your Personal Data to do the same.

Please note that we cannot guarantee 100% security of your Personal Data, and, we recommend that you take reasonable steps to protect your Personal Data.

## 7 How long we keep information about you

We keep information about you for as long as is necessary to fulfil the purpose for which it was collected, unless we are required to keep it for longer to comply with our legal obligations, resolve disputes, protect our assets, or enforce our rights. The criteria we use to determine how long we keep Personal Data includes:

- We are under a legal, contractual or other obligation to keep your Personal Data, or as part of an investigation for litigation purposes.
- Your Personal Data is needed to maintain accurate business and financial records.
- If there are automated means (if any) to enable you to access and delete your Personal Data at any time.

- The information about you is sensitive Personal Data, in which event we will generally retain this for a shorter period of time.
- You have consented to us keeping your Personal Data for a longer time period and we keep your Personal Data in line with your consent.
- Where Personal Data is contained in backups and/or archived copies and the removal, deletion, or destruction of the Personal Data is impossible for any reason, NTT will retain such Personal Data in compliance with applicable Data Protection Laws.

In some instances, we may anonymize your information in accordance with our policies and may keep those anonymized records for longer periods.

## 8 Cross-border transfers

As a global company operating in over 70 countries worldwide, we may transfer your Personal Data to countries where we, our Service Providers or Business Partners do business or to international organizations in connection with the purposes identified above and in accordance with this Privacy Statement.

When we transfer your Personal Data outside of the country from where it was originally collected to a third country or international organization we ensure that appropriate safeguards are in place, in line with applicable law, to ensure that your Personal Data is protected. You may obtain a copy of these safeguards by contacting us in accordance with the 'How to contact us' section below.

## 9 Your Personal Data rights

You have rights under various data protection laws in various countries in relation to your Personal Data to access and control your Personal Data, but we offer them irrespective of your location.

We are committed to upholding the following rights:

- **Right to be informed:** You have a right to know what Personal Data we have about you, what we do with it, where we get it from, who we share it with, how long we keep it and why we need it.
- **Right of access:** You have the right to access your Personal Data and obtain a copy of your Personal Data from us.
- **Right to rectification:** You have the right to update inaccurate and/or incomplete Personal Data about you.
- **Right to be forgotten:** You have the right to have your Personal Data erased, deleted or destroyed.
- **Right to data portability:** You have the right to move, copy or transfer your Personal Data in a safe and secure way and reuse it for your own purposes.
- **Right to withdraw consent:** You have the right to withdraw consent at any time regarding the Use of your Personal Data or in relation to direct marketing activities.
- **Right to restrict Use:** You have the right to limit the way we Use your Personal Data.
- **Right to object:** You have the right to stop or prevent us from Using your Personal Data. In particular, you can object to our Use of your Personal Data for direct marketing or the sale of your Personal Data.
- **Right to challenge automated decisions:** You have the right to query and review decisions made about you using purely automated means (i.e. without human involvement or intervention).
- **Right to complain:** You have the right to make a complaint or raise a concern about how we Use your Personal Data. Complaints may be made directly to us or a relevant Data Protection Authority.

Where you contact us, we may request specific information from you to verify your identify to enable us to search for and provide you with access to or a copy of your Personal Data, as permitted under applicable law. Where permitted under applicable law, we may charge you a reasonable fee to access your Personal Data; however, we will advise you of any fee in advance.

Individuals may hold additional rights in certain countries, which must be recognized and upheld.

In some situations, we may not be required to enforce these rights, where permitted under applicable law. We may also have a legitimate business interest to decline a request to action your rights.

You may contact us with requests, complaints or questions regarding these rights as set forth in the 'How to contact us' section, below.

## 10 Changing your consent preferences

In some instances, you may provide NTT with consent to process your Personal Data such as where you have opted into receiving direct marketing communications from us. You can change your consent preference at any time, and manage your communication preferences by:

- Selecting the option to 'Unsubscribe' included in our communications with you.
- Updating your preferences in our online Preference Center.
- Sending an email to [privacyoffice@global.ntt](mailto:privacyoffice@global.ntt).

Once we have received and verified your opt-out request, we will comply with your request as soon as is reasonably practicable.

If you opt-out of receiving marketing related communications from us, we may still send you administrative messages or other required communications as part of your ongoing use of our products, services and solutions, which you are unable to opt-out of.

We do not provide your Personal Data to unaffiliated parties for their own direct marketing purposes or sell, rent, distribute or otherwise make Personal Data commercially available to any third party.

## 11 Third Party Websites and Applications

Our Services may provide links to the websites and/or applications of other parties. You may further interact with us through third party applications, owned and operated by the company you work for or other third parties such as LinkedIn, WhatsApp, Slack, Microsoft Teams, and other social media sites or applications.

We are not responsible for and make no representations or warranties in relation to the security, privacy practices and content of these third-party websites and applications. Please ensure that you read the applicable privacy and cookie policies before sharing Personal Data on these websites applications. Your use of such websites and applications is at your own risk.

## 12 Updates to our Privacy Statement

We may update our Privacy Statement at any time. If we do, we will update the 'Version' and 'Last update' information at the top of our Privacy Statement.

We encourage you to regularly review our Privacy Statement to stay informed about how we Use your Personal Data and privacy practices.

## 13 How to contact us

If you have any questions about how we Use your Personal Data, have a privacy concern, or wish to make a request or complaint relating to your Personal Data, please contact us at [privacyoffice@global.ntt](mailto:privacyoffice@global.ntt)