

Privacy Policy

This privacy policy (“**Policy**”) describes how Kansai Electric Power FTS Pte. Ltd (referred to as “**we**”, “**our**”, “**us**” or “**Company**”), especially our London Office, uses and protects your personal data.

1. Application of this Policy

- 1.1. This Policy gives you information about how the Company collects and uses your personal data through your use of our service or your work with us.
- 1.2. This Policy shall apply to all our activities to which General Data Protection Regulation ((EU) 2016/679) and/or the retained EU law (assimilated law) version of the said EU regulation as defined in the Data Protection Act 2018 (collectively referred to as “**EU/UK GDPR**”).
- 1.3. This Policy is not intended to restrict or deviate from your rights and freedoms regarding data privacy as set out in our head office’s [privacy policy](#). If there is a discrepancy between the provision of the two, it will be interpreted in accordance with the policy that is more favourable to you.

2. The types of personal data we collect about you

- 2.1. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Categories	Examples
Identity Data	First name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender
Contact Data	Billing address, delivery address, email address and telephone numbers
Financial Data	Bank account and payment card details
Transaction Data	Details about payments to and from you and other details of products and services
Technical Data	Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website
Profile Data	Your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses
Usage Data	Information about how you interact with and use our website, products and services
Marketing and Communications Data	Your preferences in receiving marketing from us and our third parties and your communication preferences

- 2.2. We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity.

3. How is your personal data collected

3.1. We use different methods to collect data from and about you including through the following methods:

3.1.1. Your interactions with us.

You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

3.1.2. Automated technologies or interactions.

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

3.1.3. Third parties or publicly available sources.

We will receive personal data about you from various third parties as set out below:

- Technical Data is collected from analytics providers, advertising networks, and search information providers
- Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services.
- Identity and Contact Data is collected from publicly available sources.

4. How we use your personal data

4.1. **Legal basis**

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases.

4.1.1. **Performance of a contract with you**

Where we need to perform the contract we are about to enter into or have entered into with you.

4.1.2. **Legitimate interests**

We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before

we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

4.1.3. Legal obligation

We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

4.1.4. Consent

We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

4.2. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or policies (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

Purpose/Use	Type of data	Legal basis
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) OR Consent, having obtained your prior consent to receiving direct marketing communications

4.3. Direct marketing

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving the marketing. You can ask to stop sending you marketing communications at any time. If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

5. Disclosures of your personal data

5.1. We may share your personal data where necessary with the parties set out below for the purposes set out in the table “Purposes for which we will use your personal data” above.

- Our group companies
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Policy.

5.2. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

6.1. Our London Office may share your personal data within our head office in Singapore. However, this does not constitute an international data transfer under the EU/UK GDPR as our London Office and head office are the same legal entity.

6.2. We may share your personal data within our group companies in Japan. This will involve transferring your data outside the EU or UK to Japan.

6.3. Whenever we transfer your personal data out of the EU or UK to third parties who are in countries which have laws that do not provide the same level of data protection as the UK law, we always ensure that a similar degree of protection is afforded to it by ensuring that the appropriate safeguards are implemented.

7. Data security

7.1. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

7.2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

8.1. We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

8.2. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

9. Your legal rights

9.1. Subject Access Request

You have the right to request access to your personal data (commonly known as “subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

9.2. Request for correction of the personal data

You have the right to request correction of your personal data. 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.

9.3. Request for erasure of the personal data

You have the right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to 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 law. 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.

9.4. Objection to processing of the personal data

Where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests), you have the right to object to processing of your personal data. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object. You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.

9.5. Request for the transfer of the personal data

You have the right to request the transfer of your personal data to you or to a third party. 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 perform a contract with you.

9.6. Request for restriction of processing of the personal data

You have the right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:

- If you want us to establish the data's accuracy;
- Where our use of the data is unlawful but you do not want us to erase it;
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

9.7. **Withdrawal of consent**

You may withdraw consent at any time we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

9.8. **Exercise of your rights**

9.8.1. **Where you can contact**

If you wish to exercise any of the rights set out above, please see our contact details (paragraph 10).

9.8.2. **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

9.8.3. **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. **Contact details**

If you have any questions about this Policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: kefts-risk-management@a2.kepco.co.jp
- Postal address: 79 Robinson Road #19-04 CapitaSky, Singapore 068897

11. **Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk), or, where applicable, to the other EU data protection authorities in your jurisdiction. We would, however, appreciate the chance to deal with your concerns before you approach the ICO or other EU data protection authorities so please contact us in the first instance.

12. **Change to the Policy and your duty to inform us of changes**

12.1. We keep the Policy under regular review.

12.2. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.