

Special Olympics Nippon Foundation

Privacy Policy for EEA Residents

1. Introduction

Special Olympics Nippon (“**We**” or “**we**”) recognizes the importance of Personal Data (as defined below) and will handle it strictly in order to ensure its protection. This Privacy Policy (“**Privacy Policy**”) applies to the handling of Personal Data obtained from persons residing in the European Economic Area (“**EEA**”) who donate to us through projects organized by the Tokyo Marathon Foundation (“**TMF**”) and who visit our website (“**Personal Data**”).

Our contact details are as follows:

Nishi-Shimbashi 2-chome Mori Bld. 7F,
2-22-1 Nishi-Shimbashi, Minato-ku,
Tokyo, 105-0003, Japan
E-Mail-Address: tokyo_office@son.or.jp
Phone Number: [+81-3-6809-2034](tel:+81-3-6809-2034)

2. General Information

We are designated as a donation organization for events held by TMF and the collection of donations for charity events held by TMF. Within these donation collection procedures, we collect your Personal Data.

To the extent that you are a donor from EEA and fall under the scope of the General Data Protection Regulation (“**GDPR**”), we ensure that the collection and processing of your Personal Data complies with the GDPR as set forth in this Privacy Policy.

We are the controller for the collection and further processing of the Personal Data we obtain from you. This data is used exclusively for managing and tracking our donation activities. Your Personal Data may be collected when you provide us with your information in the context of the events held by TMF, whether through direct communication, email, mail, or through a contact form (Google Forms) on (one of) our website(s).

The protection of your Personal Data is of great importance to us. Below, we inform you about how we collect, use, and share your Personal Data. We handle this Personal Data in accordance with applicable laws, regulations, and guidelines on the protection of Personal Data, and in accordance with generally accepted norms and rules regarding the same.

3. Types of data processed and purpose

(1) Type of Personal Data collected and stored

We may collect and store (or otherwise process):

- Name (First Name, Middle Name, Surname)
- Passport number (if listed voluntarily)
- Gender
- Date of birth
- E-mail address
- Address
- Telephone number
- Nationality

(2) Purpose of use of Personal Data

Your Personal Data is used for the following purposes. Otherwise, we will only use it if we have received your specific consent.

- a. Selection of charity runners
- b. Inquiry of recipients of donation receipts
- c. Inquiry at the time of donation payment
- d. Sending commemorative gifts to selected charity runners (original goods, use of activity reports, etc.)
- e. Sending of thank-you emails after the event
- f. Inquiries about runners from TMF etc.

When you access our website on your device, our server automatically collects certain browser- or device-generated information (so-called “server log files”) including the following:

- date and time of access
- duration of visit
- your operating system
- volume of data sent
- type of access
- IP address
- domain name
- browser information including version and language setting

(3) No sharing of your Personal Data outside of our organisation

Your Personal Data we collect will not be shared, resold or otherwise passed on to third parties outside of our organisation, except for TMF as set out in Section 4.1.

(4) Exceptional provision of Personal Data to third parties

As a rule, Personal Data shall not be automatically disclosed to third parties, except where it is shared with TMF as described above. However, if we are required by laws and regulations, litigation and legal processes within or outside of your country of residence, or requests from the public and governmental authorities, and/or if we determine that the disclosure is necessary or appropriate for the purposes of national security, law enforcement, or other issues of public importance, it may be necessary for us to disclose your Personal Data. In addition, we may disclose your Personal Data if we determine that the disclosure is reasonably necessary to protect our rights and interests, pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.

4. Obtaining Personal Data and data storage

(1) Obtaining Personal Data

TMF obtains Personal Data through its own website and is responsible for this processing procedure of Personal Data and the compliance with the GDPR. You can find the Privacy Policy of TMF under the following link:

https://tokyo42195.org/common/pdf/privacypolicy_en.pdf?20240801

We collect applicants' Personal Data through the charity runner applicant management system managed by TMF. This access is strictly limited to the data of donors to us.

In some events such as the Tokyo Legacy Half Marathon, we will obtain your Personal Data through our donation application form.

(2) Data storage

We store your Personal Data on our own secure server or in cloud storage services to which only our staff has access. From time to time, our IT staff, the technical support staff of our IT service and hardware suppliers may have access to your data. We have strict controls over how, why and when they can do this. In general, such access is only granted as far as necessary for the maintenance of our systems and on a need-to-know-

basis only. In any case, we will only transfer Personal Data to recipients that provide an adequate level of data protection or as permitted by applicable data protection laws by implementing appropriate safeguards. With respect to transfers to Japan, we are relying on the adequacy decision adopted by the European Commission on 23 January 2019. A copy of the safeguards can be provided to you at your request.

5. Tracking technologies that we use

Our website uses so-called tracking technologies. We use these technologies to optimize our offers and services for you.

6. Links to other websites and third-party services

We may provide hypertext links from our website to third-party websites or internet sources, as shown below for illustration purposes. Since we have not examined the privacy policies of third parties and specific content at each link, we cannot be held liable for the content. Please read carefully the respective privacy policies to find out how they collect and handle your Personal Data.

Google-Forms (an example)

We may use the Google Forms provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“Google”). This service helps us obtain your Personal Data through a form.

When Google Forms is embedded in a webpage, your IP address is transmitted directly to Google as soon as you visit the webpage, and a cookie is stored. You can obtain information about, and opt out of, data handling by Google anytime at:

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

If you do not agree to have your Personal Data transmitted to Google when using Google Forms, you also have the option to disable the Google Forms web service completely by turning off JavaScript on your browser. This will fully disable the display of Google Forms on the websites.

7. Legal basis

We will process your Personal Data based on performance of contract (Art. 6 (1) b GDPR) if we are dealing with you as data subject in connection with an ongoing or

starting donation relationship, because this is necessary in order for us to fulfil our obligations within this donation process for you (or the company you represent) and perform our contract with you or your company and/or taking steps at your request to enter into such a contract.

For such reason, in case you fail to provide us the required Personal Data, we may not be able assist you and fulfil our obligation and/or services, and our contract may not be performed in a proper manner.

In all other cases we will process our donation contacts' Personal Data based on our legitimate business interests (Art. 6 (1) f GDPR) or your consent given upon our requests (Art. 6 (1) a GDPR). We have an interest in cultivating contacts that arise during the donation process, to establish a relationship and to stay in touch by providing information and communications that we think will be of interest to donors. This supports our mission to ensure long-term engagement and the success of our charitable activities. We carefully balance this with the rights and interests of donors by limiting the scope of data processing to what is necessary and ensuring communications are relevant and non-intrusive.

Where we rely on your consent to process Personal Data, you can withdraw your consent at any time. Please note that the withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

8. Security Measures

We handle your Personal Data in a manner that appropriately ensures its security (including protection against unauthorized or unlawful handling, accidental loss, destruction, or damage). Moreover, we use appropriate technical or organizational measures designed to protect your Personal Data effectively, and we integrate the protection measures into our company regulations to achieve this level of protection.

9. Notification of infringement of Personal Data

In case of a breach of security where your Personal Data is transmitted, stored, or otherwise handled externally due to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access thereto, we have mechanisms and company regulations in place to identify and investigate the event promptly. Depending on the outcome of our assessment, if an incident such as a leakage occurs, we will take

appropriate actions under the circumstance, such as making reports to the supervisory authorities and contacting the individuals who may be affected.

10. How long will your data be stored

We keep your Personal Data for as long as we are engaged with you and/or the period necessary to provide you with our services, and comply with our relevant legal obligations (purpose limitation). We regularly review Personal Data we hold to ensure that it's accurate and updated. Once you ask us to delete your Personal Data or when an engagement closes, or when we no longer need that data, we will remove it from our databases unless we are under a legal obligation to keep the Personal Data for a longer period.

11. What rights do you have?

We recognize the following rights for those individuals concerned.

- a. You can ask us whether we handle your Personal Data and, if so, ask for access and related details (Art. 15 GDPR).
- b. You can request deletion if the data is no longer necessary or correction if incorrect (Arts. 16, 17 GDPR).
- c. You can request transfer of your data in a machine-readable format, except when not possible due to legitimate reasons prevent (Art. 20 GDPR).
- d. You can object to data processing (Art. 21 GDPR).
- e. You can request restriction or suspension of data processing in certain cases (Art. 18 GDPR).

Please email us or contact us in writing if you wish to exercise these rights.

12. Right to lodge a complaint with a supervisory authority

If you're unsatisfied with how we handle your complaint or believe your data protection rights were violated, you can file a complaint with the relevant Data Protection Authority. Contact details are available here:

https://edpb.europa.eu/about-edpb/board/members_en

13. Updates to this Privacy Policy

We shall observe all applicable laws, regulations, guidelines and any other standards related to our handling of Personal Data and shall periodically review and improve this Privacy Policy. Any changes to the Privacy Policy will become effective upon the posting of the revised Privacy Policy on the Websites.

14. Contact and request for disclosure, etc.

If you have any further queries, consultations and requests based on right to be informed, right to rectification, right to data portability, right to oppose, and right to restriction of processing, regarding data protection in connection with our websites or the services offered, please contact our General Affairs Department below.

In the event of a request for disclosure, etc., your Personal Data must be presented in order to verify your identity by comparing it with the registered information of the retained Personal Data. In the case of a proxy, a power of attorney indicating representation and documents proving the identity of the proxy may also be required.

General Affairs Department, Special Olympics Nippon Foundation

E-mail address: tokyo_office@son.or.jp

Phone number: +81 3-6809-2034