

PRIVACY POLICY

SMM Precision Co., Ltd. (hereinafter referred to as “SMMP”) declares to comply with laws and regulations inside and outside Japan, under the “Compliance with Laws and Regulations” in the SMM Group Code of Conduct.

Under this Code of Conduct, SMMP has established the following privacy policy to properly handle personal information, in compliance with laws concerning personal information protection and related ordinances (hereinafter referred as “laws and ordinances”). SMMP will strive to protect your personal information through adherence to this privacy policy by its corporate officers and employees.

1. Corporate Name and Address

SMM Precision Co., Ltd.

4-4, Ougibuchi, Aza Ougida, Noshiro-shi, Akita-ken, 016-0122, Japan

For details regarding the representative’s name, etc., please refer to the company information from the following URL.

<https://www.smmp.co.jp/>

2. Compliance with Relevant Laws, Regulations, and Guidelines

SMMP handles personal information appropriately in compliance with laws and regulations, the Personal Information Protection Commission’s guidelines, and other relevant guidelines.

3. Purpose Specification

When acquiring personal information, except where exceptions are provided by law, we will publicly announce or notify the purpose of use (including announcement under this policy). Furthermore, when acquiring personal information directly from the individual concerned that is recorded in a contract

or other documents (including electromagnetic records), we will clearly state the purpose of use in advance and acquire it by lawful and fair means.

Except where otherwise publicly announced or notified separately, we will use personal information appropriately within the scope necessary to achieve the purposes of use listed below.

- 1) Personal information of customers who inquired via our website
 - To respond to, confirm, and record customer inquiries and consultations
 - To provide information about our products, services, exhibitions, etc.
 - To verify identity
 - To conduct and analyze surveys and campaigns
 - To develop our products and services
 - To prevent, investigate, and identify fraud, cyberattacks, and other potentially illegal or improper activities, thereby protecting the rights and interests of SMMP or third parties
 - To investigate and address actions prohibited by our website terms of use, etc.
- 2) Personal information concerning business partners (and their officers and employees in the case of corporate business partners)
 - For business-necessary communications, contract fulfillment, business negotiations, etc.
 - For managing business partners' information
- 3) Personal information concerning shareholders (and their officers and employees in the case of corporate shareholders)
 - To exercise rights and fulfill obligations under the Companies Act
 - To provide various conveniences related to shareholder status
 - To implement measures for smoothing relations between shareholders and SMMP
 - To fulfill legal obligations such as creating records based on various laws and regulations, filing reports with government agencies, and managing shareholders
- 4) Personal information concerning recruitment applicants

- To contact and provide information to recruitment applicants
- For other uses necessary for recruitment activities

4. Ensuring Accuracy

When handling personal information, SMMP strives to keep it accurately and up to date within the scope necessary to achieve for the purpose of use.

5. Shared Use

SMMP may share personal information as outlined below.

For inquiries regarding shared use, please contact us listed in section 11.

1) Items of Information Subject to Shared Use

- a) Name
- b) Address
- c) Employer or Affiliated Organization
- d) Telephone Number
- e) Email Address
- f) Inquiry Details

2) Scope of entities sharing the information

Group companies of Sumitomo Metal Mining Co., Ltd.

(For the scope of group companies sharing information, please refer to the URLs below)

Domestic Group Companies in Japan

https://www.smm.co.jp/en/corp_info/location/domestic_group/

Overseas Group Companies

https://www.smm.co.jp/en/corp_info/location/overseas_group/

3) Purpose of Use by Joint Users

The purpose of use stated in section 3.

4) Responsible Manager for Personal Information

SMM Precision Co., Ltd.

4-4, Ougibuchi, Aza Ougida, Noshiro-shi, Akita-ken, 016-0122, Japan
<https://www.smmp.co.jp/>

6. Security Control Measures

To ensure the security of personal information, SMMP implements the following measures to prevent unauthorized access, loss, destruction, falsification, leakage, and other risks to personal information.

1) Internal Safety Management Measures

SMMP implements necessary and appropriate measures to manage the security of personal information handled, including introducing mechanisms to protect information systems handling personal data from unauthorized external access or malicious software.

2) Supervision of Employees

When assigning employees (including employees, directors, auditors, executive officers, and temporary staff; the same applies throughout this section) to handle personal information, SMMP establishes rules and internal records concerning the handling of personal information. SMMP monitors the handling status and provide necessary and appropriate supervision, such as training, to ensure the secure management of the relevant personal information.

3) Supervision of Contractors

When outsourcing all or part of the handling of personal information, SMMP shall concludes necessary contracts with the contractor and conduct necessary and appropriate supervision, such as inspecting the handling status of personal information, to ensure the safe management of the outsourced personal information.

4) Understanding External Environments

When handling personal information in foreign countries, SMMP collects and understands information regarding the personal information protection systems of those countries and implements appropriate security measures.

7. Restriction of Provision to a Third Party

SMMP shall not, except in cases in which the provision of personal data is based on laws and regulations, provide personal data to a third party without obtaining the prior consent of the person.

8. Relation to other Privacy Policies

In SMMP, in addition to this Privacy Policy, other privacy policies may be established by each business segment. In such cases, such other privacy policies take priority over this Privacy Policy.

9. Continuous Improvements of the Regulations

SMMP has established in-house regulations concerning personal information protection, and shall strive to make continuous improvements to such regulations by reviewing them.

10. Requests for Disclosure of Personal Information

Upon receiving requests for disclosure, correction, suspension of use, deletion, or other actions regarding personal information, SMMP will promptly respond after verifying the identity of the individual through our prescribed procedures. For inquiries regarding this policy or to exercise your rights, please contact us listed in section 11.

11. Contact Information

For inquiries or complaints regarding SMMP's handling of personal information, please contact us as follows.

General Affairs Group
81-185-70-1161

Established: September 22, 2025
SMM Precision Co., Ltd.