

Privacy Notice for FINAL FANTASY XIV × instax™ Screenshot Competition on X for the United Kingdom (UK)

1. Scope of This Privacy Notice

1.1 Scope of Application

FUJIFILM Corporation (“FUJIFILM” or “we”) cares about your privacy. This Privacy Notice describes our commitment to the protection of data privacy and how we treat the personal data we receive from the FINAL FANTASY XIV × instax™ X Screenshot Competition (“Competition”) entrants. This Privacy Notice applies to the collection, processing and use of personal data collected by us when persons in the United Kingdom (UK) apply to and participate in this Competition by.

This Privacy Notice applies to FUJIFILM to the extent applicable related to the processing of data under the conditions defined herein.

1.2 Controller and Data Protection UK Representative

The data controller in relation to any personal data that is collected in relation to this Competition is:

FUJIFILM Corporation

324, Uetake-cho 1-chome, Kita-ku, Saitama-shi, Saitama 331-9624, Japan

<https://global.fujifilm.com/all-regions>

Imaging Solutions Div.

FUJIFILM's Data Protection UK representative in relation to this Competition can be contacted as follows:

Data Protection Officer

FUJIFILM UK Limited

Fujifilm House, Whitbread Way

Bedford, Bedfordshire

MK42 0ZE

E-Mail: DPO_UK@fujifilm.com

For further information about FUJIFILM please access the following link:

http://www.fujifilm.com/about/profile/fact_sheet/

2. Collection and Management of Personal Data

2.1 Collection of Personal Data

When you apply for and participate in this Competition, FUJIFILM will process the following personal data:

- (a) “Profile Data”: information about your X account, including account name, handle, display name, screen name, account ID, and other related account information;
- (b) “Technical Data”: cookies for entrants and technical information including cookies, web beacons, pixel tags and other tracking technologies;
- (c) “Inquiry Data”: any information that you voluntarily submit to us when you make an inquiry, submit a comment, or otherwise contact us;
- (d) “Country of Residence Information”: information regarding your country of residence.

We collect personal data from the following sources:

- (a) Directly from You - we collect personal data that you provide to us, for example, when you choose to submit information through this Competition.
- (b) Third Parties - in some cases, devices and products from third parties may connect to this Competition, and third parties may send us information about the use of those devices, including usage data. We may also obtain information about you from service providers, analytics providers, social media companies, and other parties.
- (c) Through Tracking Technologies - we may automatically collect information or inferences about you through tracking technologies such as cookies, web beacons, pixel tags and other tracking technologies.

In the process of collecting Technical Data, information shall not be collected in a manner in which you may be identified, nor shall you be identified during the process of information analysis.

2.2 Purpose of use of Personal data

We process, store and use your personal data for the following purposes:

- (a) “Performance Purpose”: for providing you with the services, features and functions within this Competition, fulfilling our obligations related to this Competition, or reinforcing and performing what is established in the Terms and Conditions which is applicable to this Competition. The legal basis for the processing of such personal data is the contract on the participation in this Competition concluded with you (Art. 6 (1) (b) UK GDPR);
- (b) “Inquiry Response Purpose”: to respond to your inquiries and comments;
- (c) “Improvement Purpose”: for customizing and improving our products and services including this Competition, developing new ones and analyzing the demand for our products and services in accordance with your preferences. The legal basis for the processing of your personal data is legitimate interest (Art. 6 (1) (f) UK GDPR), which results from the data processing purposes listed above;
- (d) “Advertisement Purpose”: for advertising and market research based on your consent. We will process the Technical Data for advertising purposes only when you provide consent (Art. 6 (1) (a) UK GDPR). You may withdraw your consent at any time;
- (e) “Statistic Purpose”: for creating statistical information that does not identify individuals to be used for market research and marketing purpose;
- (f) “Exhibition Selection Purpose”: for enabling the potential selection of submitted images originating from the country where the event is held for exhibition at events hosted or participated in by FUJIFILM or its local subsidiaries. The legal basis for the processing of such personal data is your consent (Art. 6 (1) (a) UK GDPR).

The use of personal data provided by you shall be limited to the purposes above. However, we reserve the right to conduct additional processing to the extent permitted or required by relevant laws and regulation.

Furthermore, we may be required to use and retain personal data for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; or to combat fraud. We may also use personal data to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (c) to enforce terms and conditions; and (d) to protect our rights, privacy, safety, or property, or those of other persons.

We do not engage in automated decision-making in the context of the processing of personal data within this Competition.

We process your personal data based on your consent, for the performance of a contract or as necessary for the purposes of our legitimate interests, including for responding to your enquiries and to customize and improve our web offerings, products and services in accordance with your preferences (Art. 6 (1) (a), (b) and (f) UK GDPR).

We will retain your Profile Data, Inquiry Data, and Country of Residence Information for six months after the input of such data. We will retain Technical Data as long as necessary to achieve the purpose indicated above, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law. In addition, we will retain your personal data for as long as necessary to fulfill the purposes for which it has been collected, as outlined in this Privacy Notice, or any longer retention period required by law.

2.3 Data Sharing and Disclosure

We share your personal data when:

- (a) your consent is given in advance;
- (b) sharing your personal data with affiliated FUJIFILM companies or third-party companies including subcontractors processing on our behalf is necessary to provide you with our services regarding this Competition, including sending marketing communications, providing customer service, supporting our marketing and product distribution, or operating our systems or applications; these third parties are authorized to use your personal data only as necessary to provide these services;

- (c) within the FUJIFILM group if needed to provide services or fulfill product orders, for account administration, to facilitate sales and marketing, for customer and technical support, and to promote business and product development. Please click here <http://www.fujifilm.com/about/office/> to see a list of FUJIFILM Group locations we may share your personal data with. We may also forward inquiries regarding our products and services to a third-party distributor that is responsible for the relevant product or service category and region;
- (d) our business is assigned or transferred either by operation in law or otherwise including mergers, consolidations and dissolution or transfer of operations;
- (e) disclosure of your personal data is required by applicable laws and regulations or if we are authorized or required to such disclosure in support of any criminal or other legal investigation or proceeding conducted by relevant authorities; or
- (f) there is an immediate need for disclosure to protect human life or human rights.

We will not disclose or supply, share or otherwise distribute your personal data to third parties except as described in this Privacy Notice.

2.4 International Data Transfer

We will transfer the personal data we collect to and store such information in Japan and may do so in other countries, all of which will or may have different privacy or data protection laws to those in the UK.

This means that your personal data also may be transferred to and/or processed by FUJIFILM entities or, on their behalf, by third party service providers outside the United Kingdom (UK). The data protection regulation in the relevant countries where your personal data is collected or processed might deviate from the level of protection granted by legislation in the UK. However, FUJIFILM will ensure the adequate protection of your personal data in accordance with the applicable laws and the principles set out herein. By participating in the Competition you agree with the collection and transfer of your personal data outside the UK as described herein.

To the extent your personal data is transferred to countries that do not provide for an adequate level of data protection from an applicable law perspective, we will base the respective transfer on appropriate safeguards, such as standard data protection clauses and additional measures, where this is required under applicable law. You can ask for a copy of such appropriate safeguards by contacting us as set out in Section 2.6.

2.5 Data Security

FUJIFILM takes adequate technical and organizational security measures in order to protect your personal data from being misused and to prevent the loss of your information. Your personal data is saved in a secure operating environment that is not accessible to the public. All personal data provided by you in the course of registration or use of personalized services will be transferred in encrypted form in order to prevent misuse of the information by any third party.

2.6 Your rights relating to your personal data and contact information

Under applicable law, you have the following rights in relation to your personal data. These may be limited under applicable data protection laws.

- (i) Right to request access to personal data: You have the right to confirm with us whether your personal information is processed, and if it is, to request access to that personal information including the categories of personal information processed, the purpose of the processing and the recipients or categories of recipients. You have the right to obtain a copy of the personal data undergoing processing. However, this is not an absolute right and the interests of other individuals may restrict your right of access.
- (ii) Right to rectification: You have the right to obtain from us rectification of inaccurate or incomplete personal information concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- (iii) Right to erasure of your personal data (right to be forgotten): You have the right to ask us to erase personal information concerning you.
- (iv) Right to restriction of processing of your personal data: In limited circumstances, you have the right to request that we restrict processing of your personal information.

(v) Right to data portability: You may have the right to receive personal information concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that personal information to another entity without hindrance from us.

(vi) Right to object: Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal information, including profiling, by us and we can be required to no longer process your personal information.

Moreover, if your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case your personal data will no longer be processed for such purposes by us.

You may withdraw your consent on collection, use and processing of your personal data set forth in this Privacy Notice at any time with effect for the future. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

In case you have any questions or concerns about this Privacy Notice or wish to submit a data subject request, please contact the following address:

Data Protection Officer
FUJIFILM UK Limited
Fujifilm House, Whitbread Way
Bedford, Bedfordshire
MK42 0ZE
or
DPO_UK@fujifilm.com

You also have the right to lodge a complaint with a competent supervisory authority in accordance with the UK GDPR and applicable laws if you consider that the processing of personal data relating to you infringes the UK GDPR. For this purpose, you can contact the Information Commissioner's Office (ICO) at <https://ico.org.uk>.

3. Use of Cookies, Tracking Technology and Social Media Plug-ins

3.1 Use of Cookies and Tracking Technology

This Competition site ("Website") may use "Cookies" or similar technologies (analysis programs and social media services). Cookies are text files that are sent by a website to the user's browser in order to store information on the user's devices. Whenever the Website is accessed, the information contained in the Cookie is read by the Website.

3.2 Webtools

This Competition uses Google Analytics for Firebase and PostHog, web analytics tools that use "Cookies" or similar technologies to collect and process Technical Data, as applicable. For this Competition, Google Analytics for Firebase and PostHog track and analyze usage and volume of statistical information from you. Such service providers may set cookies on behalf of us. The statistical information collected by cookies is used to track and improve the effectiveness of this Competition.

For more information collected by Google LLC when using Google Analytics for Firebase, please visit: <https://support.google.com/firebase/answer/6318039?hl=en>

The information collected by Google LLC is handled in accordance with the Google Privacy Policy (<https://policies.google.com/privacy?hl=en>).

For details about PostHog, please visit:

<https://posthog.com/privacy>. As regards to the use of PostHog, we execute a data processing agreement with PostHog to ensure that the data is processed by the service provider in accordance with our instructions.

3.3 Social Network Plug-ins

The Website may offer plug-ins for social networks ("Networks"). Social network plugins are easy ways of sharing content with other people via Networks. When you access the Website, these plug-ins can potentially create a direct connection between your browser and the respective Networks. If you interact

with the plug-ins, for example in the case of Twitter by clicking on “Tweet This” or with Facebook by clicking the “I like” button or making a comment, the corresponding information will be transmitted directly from your browser to the Network. In some cases, information is already exchanged with a Network when you visit the Website, regardless whether you interact with the plug-ins or not. You can prevent information from being shared with a Network by not allowing the corresponding Cookies and/or logging off from the Network before using the Website.

4. Children’s Personal Data

We do not knowingly collect or solicit personal data from children. We encourage parents and guardians to take an active role in their children’s online activities and interests. In the event that we learn that we have collected personal data from a child, we will promptly take steps to delete that information. If you are a parent or legal guardian and think your child has given us their personal data, you can contact us at <https://global.fujifilm.com/all-regions/> or via one of the alternative methods in Section 6 below.

5. Changes to the Privacy Notice

FUJIFILM reserves the right to change, amend, or update this Privacy Notice. If we do decide to change our Privacy Notice, we will post the revised Privacy Notice by updating the Website and indicate the date of publication where applicable. On return visits, please remember to review the Privacy Notice for any changes, since continued participation in the Competition after any posted revision indicates your consent to our use of your information in accordance with the changed, amended, or updated Privacy Notice.

6. Contact Us

If you have any questions or comments regarding our privacy practices or wish to submit a request to exercise your privacy rights, you can email us at DPO_UK@fujifilm.com.

Or you may send us a letter at:

Data Protection Officer
FUJIFILM UK Limited
Fujifilm House, Whitbread Way
Bedford, Bedfordshire
MK42 0ZE

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