

## Privacy Notice for FINAL FANTASY XIV × instax™ X Social Campaign for European Union (EU) and European Economic Area (EEA)

### 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 Social Campaign (“Campaign”) users. This Privacy Notice applies to the collection, processing and use of personal data collected when applying to and participating in this Campaign.

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

#### 1.2. Controller

The data controller in relation to any personal data that is collected through this Campaign 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 representative can be contacted as follows:

FUJIFILM Europe GmbH

Data Protection Officer

Balcke-Duerr-Allee 6, 40882 Ratingen, Germany

or

[privacyoffice\\_eu@fujifilm.com](mailto:privacyoffice_eu@fujifilm.com)

For further information about FUJIFILM please access the following link:

[http://www.fujifilm.com/about/profile/fact\\_sheet/](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 Campaign, FUJIFILM will process the following personal data:

- (a) “Profile Data”: The information of your X account information (account name, screen name, account ID, etc.);
- (b) “Technical Data”: cookies for entrants;
- (c) “Inquiry Data”: information you may provide together with an inquiry (e.g. FINAL FANTASY XIV game information such as game (Home World name), character name, picture, URL, in-game items, date, place, tag etc).

#### 2.2 Purpose of use of Personal data

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

Profile Data, Technical Data and Inquiry Data

- (a) “Performance Purpose”: for providing you with the services, features and functions within this Campaign or reinforce and perform what is established in the Terms and Conditions which is applicable to this Campaign. The legal basis for the processing of such personal data is the contract on the participation in this Campaign concluded with you (Art. 6 (1) lit. b GDPR);
- (b) “Improvement Purpose”: for customizing and improving our products and services including this Campaign, 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) lit. f GDPR), which results from the data processing purposes listed above.).

(c) “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) lit. a) GDPR. You may withdraw your consent at any time.

(d) “Statistic Purpose”: for creating statistical information to be used for market research and marketing purpose.

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 regulations, or if we are authorized or required to use your personal data in support of any legal or criminal investigation.

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

We will retain your Profile Data and Inquiry Data 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.

### 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 Campaign;

(c) our business is assigned or transferred either by operation in law or otherwise including mergers, consolidations and dissolution or transfer of operations;

(d) 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

(e) 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 may transfer the personal data we collect or receive to recipients which are located outside the EU or European Economic Area ("EEA"), and store such information in, other countries outside the EU or EEA which do not provide for an adequate level of data protection. The countries that are recognized to provide for an adequate level of data protection from an EU law perspective (Art. 45 GDPR) are stated at [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en). To the extent your personal data is transferred to countries that do not provide for an adequate level of data protection from an EU law perspective, we will base the respective transfer on appropriate safeguards, such as standard data protection clauses adopted by the European Commission (Art. 46 (2) GDPR) 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.

### 2.6 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:

FUJIFILM Europe GmbH

Data Protection Officer

Balcke-Duerr-Allee 6, 40882 Ratingen, Germany

or

[privacyoffice\\_eu@fujifilm.com](mailto:privacyoffice_eu@fujifilm.com)

You also have the right to lodge a complaint with a competent supervisory authority in accordance with the applicable laws if you consider that the processing of personal data relating to you infringes the applicable laws. For this purpose, you may contact in particular the supervisory authority in the country of your habitual residence or the place of the alleged infringement.

### 3. Use of Webtools

This Campaign uses Google Analytics for Firebase (only when you choose an area other than EU or EEA as the area you reside) and PostHog (only when you choose area EU or EEA as the area you reside), web analytics tools that use “Cookies” or similar technologies to collect and process Technical Data. On this

Campaign, 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 Campaign.

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 the 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.

#### 4. 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 this Campaign site.

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