Global Privacy Policy

Last Updated: April 1, 2026

Tokyo Gas Co., Ltd. ("**Tokyo Gas**", "**we**" or "**our**"; the same applies in the Global Privacy Policy) processes the personal information of customers of Tokyo Gas (including persons who access our websites and potential customers; the same applies in the Global Privacy Policy), business partners, shareholders of Tokyo Gas, and job applicants for Tokyo Gas (for customers, business partners, and shareholders that are companies, this includes the officers, employees, and the like of such companies; the same applies in this Global Privacy Policy; those persons whose personal information is subject to processing are collectively referred to as "**Data Subjects**" unless specified otherwise) as follows.

We may prescribe individual privacy policies, and if this Global Privacy Policy conflicts with an individual privacy policy, then such individual privacy policy will prevail to the extent that such conflicts exist.

1. What does this Global Privacy Policy cover?

This Global Privacy Policy applies to Data Subjects who are based outside of Japan. For Data Subjects residing in Japan, please refer to the Japanese privacy policy (個人情報保護方針 | 東京ガス).

2. What categories of personal information are subject to processing?

We process the following personal information:

(1) Personal information of customers

- **Personal identity and contact detail information.** Name, address, name and location of the corporation to which the customer belongs, website URL for that corporation, division of the corporation to which the customer belongs, job type, job title, career information and contact information, such as telephone number, e-mail address, fax number, facial portrait, date of birth, gender, age, nationality, signature, and other information stated on the documents provided by Data Subject including business card, information on electronic systems or online information, information taken by camera, and information on social media accounts
- **Business transaction information.** Sales negotiation histories and information regarding details of transactions (including details of purchased products, sales negotiations, and inquiries and estimates)
- **Buildings access monitoring information.** Buildings access monitoring information, such as CCTV images, time recording software
- **Other information.** Other personal information necessary for the purpose set out in "**3. Why is personal information processed?**" below

(2) Personal information of business partners

- **Personal identity and contact detail information.** Name, address, name and location of the corporation to which the business partner belongs, website URL for that corporation, division of the corporation to which the business partner belongs, job type, job title, career information and contact information, such as telephone number, e-mail address, fax number, facial portrait, ID card number, passport number, date of birth, gender, age, nationality, signature, and other information stated on the documents provided by Data Subject including business card, information on electronic systems or online information, information taken by camera, and information on social media accounts
- **Buildings access monitoring information.** Buildings access monitoring information, such as CCTV images, time recording software
- **Other information.** Other personal information necessary for the purpose set out in "**3. Why is personal information processed?**" below

(3) Personal information of shareholders of Tokyo Gas

- **Contact detail and shareholding information.** Name, address, contact information such as e-mail address, number of shares owned, date of share acquisition, shareholder number, dividend payment history, and account for dividends
- **Personal identity information.** Date of birth, gender, age, nationality, signature, information on electronic systems or online information, and any other information necessary for personal identification
- **Other information.** Other personal information necessary for the purpose set out in "**3. Why is personal information processed?**" below

(4) Personal information of job applicants for Tokyo Gas

- **Personal identity and contact detail information.** Name, address, contact information such as telephone number, e-mail address, date of birth, gender, age, school history, job history, facial portrait, reason to work with us and other information stated on the application documents (including in an electromagnetic manner) or provided as attachments to those documents, information on electronic systems or online information, information taken by camera, and information on social media

(5) Personal information of website visitors for Tokyo Gas

- **Website usage information.** Cookies, IP addresses, provider information, terminal information, web beacons or pixels, web browser information, IP addresses, Tracking ID, user activity (language, time of day when the website was visited, session length, frequency, transitions, traffic sources, and clicks and scrolling on the website), and attribute (such as age, gender, and interest and affinity categories), or other end-user data
- **Other information.** Other personal information necessary for the purpose set out in "**3. Why is personal information processed?**" below

3. Why is personal information processed?

We process personal information for the following and other similar purposes permitted by applicable laws and regulations:

(1) Personal information of customers

(a) To provide the products and services (including websites) of Tokyo Gas and perform executive agreements with regard to such provision

(b) To carry out necessary communication, including negotiations, meetings, and correspondences

(c) To respond to inquiries

(d) To develop and improve the products and services (including websites) of Tokyo Gas

(e) To customize products and services, including the provision of products and services (including websites) that are personalized based on customer preferences

(f) To provide information regarding the products and services of Tokyo Gas

(g) To conduct direct marketing activities, including the distribution of e-mail newsletters and advertisements

(h) To manage and operate promotions and events

(i) To conduct research and questionnaires

(j) To make reports to, make filings with, cooperate with, and carry out procedures for government agencies, various industry associations, etc.

(k) To carry out audits, operate the internal reporting system, and to otherwise prevent and address unjust acts

(l) To generate statistical and other non-personal information

(m) To respond to urgent needs to process personal information to protect important rights and interests, such as human life and human rights, within the scope of applicable laws and regulations

(n) To perform duties and exercise rights based on applicable laws and regulations

(o) To check whether customers and we are in compliance with any legal obligations (including legal obligations arising from data protection legislation)

(p) To gather evidence for the establishment, exercise or defense of legal claims

(q) To prevent fraud

(r) To prevent any criminal conduct or any conduct that may result in criminal offence or convictions

(s) To prevent unlawful use of our place of business and our office equipment (including our information and communication systems)

(t) For any other purposes necessary in the course of business operations at Tokyo Gas

(2) Personal information of business partners

(a) To communicate with our business partners about their products and services, or about our products and services;

(b) To plan, perform and manage the business relationship with our business partners,

such as placing or receiving orders, making payments, delivery of products or services, receiving invoices, billing and collection, etc.;

(c) To administer and perform surveys, marketing activities, market analysis, etc.;

(d) To make decisions about continuing the business relationship with our business partners;

(e) To make arrangements for the termination of the contract with our business partners;

(f) To check whether our business partners are in compliance with any legal obligations (including legal obligations arising from data protection legislation);

(g) To gather evidence for the establishment, exercise or defense of legal claims;

(h) To prevent fraud;

(i) To prevent any criminal conduct or any conduct that may result in criminal offence or convictions;

(j) To prevent unlawful use of our place of business and our office equipment (including our information and communication systems).

(k) For any other purposes necessary in the course of business operations at Tokyo Gas

(3) Personal information of shareholders of Tokyo Gas

(a) To conduct administrative work regarding shares

(b) To address the exercise of rights by shareholders

(c) To perform obligations and exercise rights under applicable laws (including the Companies Act)

(d) To provide shareholders with (i) the information of timely disclosure and (ii) the URLs about our press release article or our annual reports

(e) To conduct communication as necessary and to plan, perform and manage the relationship such as IR events including large or small meeting;

(f) To check whether shareholders and we are in compliance with any legal obligations (including legal obligations arising from data protection legislation)

(g) To gather evidence for the establishment, exercise or defense of legal claims

(h) To prevent fraud

(i) To prevent any criminal conduct or any conduct that may result in criminal offence or convictions

(j) To prevent unlawful use of our place of business and our office equipment (including our information and communication systems)

(k) For any other purposes necessary in the course of business operations at Tokyo Gas

(4) Personal information of job applicants for Tokyo Gas

(a) For recruitment and screening of applicants for Tokyo Gas

(b) To perform obligations and exercise rights under applicable laws

(c) To conclude employment contracts when job applicants are hired

(d) To conduct communication as necessary

(e) For any other purposes necessary in the course of business operations at Tokyo Gas

(5) Personal information of website visitors for Tokyo Gas

(a) To engage in analysis, auditing, research and reporting
(b) To provide interest-based advertising use cookies, web beacons, and device identifiers, and similar technologies (including clear GIFs, tracking pixels, JavaScript, and tags) and combine personal information of website visitors with information about website visitors' activities on other unaffiliated websites
(c) To use information about website visitors' visits to our website to help target advertisements that are unrelated to Tokyo Gas, based on their online behaviors in general.
(d) To establish connections among related web browsers and match website visitors' browsers or devices if they log into the same online service on multiple devices, or if their devices share similar attributes that support an inference that they are used by the same person or household
(e) To help measure the impact of the targeted online advertisements that we have launched for our products and services
(f) To market surveys. This includes studies and/or surveys conducted to improve our existing products and services, as well as to create new ones. and help us understand how visitors use our website, and their potential needs.
(g) To prevent cyberattacks against our website. This will further improve the user experience on our website, as well as prevent possible data breaches that may arise from our website or servers.
(h) For any other purposes necessary in the course of business operations at Tokyo Gas

4. What is the legal basis for processing personal information? Is provision of some types of personal information obligatory?

We process personal information in accordance with the legal basis under the applicable data protection regulations (such as Data Subject consent, performance of contractual obligations, legitimate interests, and compliance with laws and regulations).

The provision of personal information may be mandatory for various reasons, such as being a statutory or contractual requirement or being a necessary condition for entering into a contract. Specific details are as follows:

(1) Personal information of customers and business partners

Regardless of whether the provision of personal information is a requirement, if a Data Subject does not provide his or her personal information, we may not be able to provide products, services, and the like (includes websites of Tokyo Gas) to that Data Subject or carry out transactions with him or her. For example, the acceptance of cookies that are strictly necessary for using Tokyo Gas' websites and the provision of information regarding user activity and the like obtained through those cookies, IP addresses, and web browser types is a necessary condition for accessing our websites. If a Data Subject does not provide this information, we may not be able to offer all or part of our websites' features.

(2) Personal information of shareholders of Tokyo Gas

The provision of the name, address, e-mail address, number of shares owned, date of

share acquisition, shareholder number, dividend payment history, and account for dividends of the shareholder is mandatory in the acquisition of shares. If a Data Subject does not provide us with this information, he or she may not be able to exercise certain rights or perform certain obligations under the Companies Act or other laws or regulations.

(3) Personal information related to job applicants for Tokyo Gas

Certain types of personal information regarding each job applicant must be submitted when applying in response to recruitment activities by Tokyo Gas. If that personal information is not submitted, the applicant may not be able to complete the application or undergo screening.

(4) Personal information of website visitors for Tokyo Gas

The collected information will allow us to improve our products and services to be more oriented to your needs. It will also enable us to provide advertising services that are tailored to your interests, which will allow you to receive more specific information you need. The analysis that we will develop using your data will help us better understand potential business needs, without raising privacy concerns.

5. How long is personal information retained for?

In order to decide the appropriate retention period for personal information, Tokyo Gas considers the following: the volume, nature, and confidentiality of the personal information; the potential risk of damage caused by unjust use or disclosure of the personal information; the purposes for which Tokyo Gas processes the personal information, and whether Tokyo Gas can achieve those purposes by other means; and applicable legal requirements. If a Data Subject's personal information collected by Tokyo Gas becomes no longer necessary, we will delete or anonymize the personal information. If such measures are impracticable (for example, if the personal information has been stored in back-up archives, or retention of the personal information is required by applicable laws, regulations or rules), we will retain the Data Subject's personal information safely until its deletion becomes practicable and ensure that no new processing will be conducted with respect to the Data Subject's personal information.

6. From what sources is personal information obtained?

We obtain Data Subjects' personal information directly from the Data Subjects (including in cases where personal information is obtained automatically) or indirectly from third parties. Cases where personal information is obtained indirectly are as follows:

(1) Personal information of customers and business partners

- When obtaining personal information from other companies within Tokyo Gas Group companies (we and our group companies; the same applies hereinafter)
- When a customer or business partner is a corporation, and Tokyo Gas obtains the personal information of the corporation's officers and employees from the corporation

- Any other cases where personal information is lawfully obtained from a third party (including public information)

(2) Personal information of shareholders of Tokyo Gas

- When a shareholder is a corporation, and Tokyo Gas obtains the personal information of the corporation's officers and employees from the corporation
- Any other cases where personal information is lawfully obtained from a third party (including public information)

(3) Personal information of job applicants for Tokyo Gas

- When obtaining personal information from employment agencies, job search websites, or the like
- Any other cases where personal information is lawfully obtained from a third party (including public information)

(4) Personal information of website visitors for Tokyo Gas

- When obtaining personal information from websites, applications or the like
- Any other cases where personal information is lawfully obtained from a third party (including public information)

7. With whom is personal information shared?

We may share personal information as set out in "**2. What categories of personal information are subject to processing?**" above with third parties in the following cases:

- Sharing of personal information with other Tokyo Gas Group Companies to fulfill the purpose stated in "**3. Why is personal information processed?**" above*
- Sharing of personal information with processors (including the following: service providers that provide services necessary for the business activities of Tokyo Gas; distributors of products and services; service providers that provide cyber security services; credit reference agencies; banks and financial institutions; employment agencies and job search websites; and attorneys, accountants, financial advisors, and the like) to fulfill the purpose stated in "**3. Why is personal information processed?**" above
- Sharing of personal information of website visitors for Tokyo Gas.

  We partner with various third party service providers to analyze behavior of users and to provide targeted advertisements, so that we can improve our products and services. These third party service providers include Google Analytics, Adobe Analytics, and other similar online analytics and advertising tools. These service providers collect the information of website visitors stated in the section entitled "**2. What categories of personal information are subject to processing?**" Information collected by the third parties will be used for the purposes stated in the section entitled "**3. Why is personal information processed?**" If you wish to know about our partners other than Google Analytics and Adobe Analytics, please contact us using our contact details in the section entitled "**12. Contact details**".

In addition, we may disclose your information to other Tokyo Gas Group companies that provide us with support when we use your information in the manner described above.

- Sharing of personal information associated with the corporate sale, merger, acquisition, or other transfer of all or part of our assets
- Sharing of personal information that is required by laws or orders of governmental agencies and the like
- Sharing of personal information with third parties that is (i) necessary for the protection of life, body, or property in relation to Tokyo Gas, Data Subjects, or third parties (including attorneys, accountants and other agents or advisors), and (ii) permitted by applicable data protection regulations
- Sharing of personal information with Data Subject consent
- Sharing of personal information that is otherwise permitted under applicable data protection regulations

* **Regarding joint use of personal information under the Act on the Protection of Personal Information of Japan**

With regard to the processing of personal information to which the Act on the Protection of Personal Information of Japan applies, Tokyo Gas Group companies may jointly use personal information as stated in "**2. What categories of personal information are subject to processing?**" above to fulfill the purpose stated in "**3. Why is personal information processed?**" on the grounds of joint use under the Act on the Protection of Personal Information of Japan. Tokyo Gas shall be responsible for the management of personal information that is jointly used.

8. Is personal information transferred across international borders?

We may transfer personal information to the following countries and regions and other countries and regions to which transfer of personal information is required to fulfill the purpose stated in "**3. Why is personal information processed?**" above:

- Japan
- USA
- Denmark
- Portugal
- UK
- Australia
- Singapore
- Thailand
- Vietnam
- Indonesia
- Philippines

9. What kinds of safety management measures are being taken?

Tokyo Gas will take necessary and appropriate measures such as countermeasures against unauthorized access and computer viruses to prevent loss, destruction, falsification, leaking, and the like of personal information.

Tokyo Gas will process and store your personal information in an encrypted form and exercise necessary and appropriate supervision over employees of Tokyo Gas, contractors, etc. to protect personal information.

10. Reference information regarding use of cookies and Google Analytics

- **Regarding the use of Cookies**

Cookies and other technologies are used on the websites of Tokyo Gas. A cookie is a technology used to identify the browser used to browse a website. (If you prefer to avoid the use of cookies, you may reject cookies for the website in question or change the settings in your internet browser so that cookies are rejected, deleted, or deactivated. Detailed information on the cookies used on our website can be viewed by clicking the gear icon on the lower-left side of the page, where you can also configure your cookie preferences.)

- **Regarding the use of Google Analytics**

We may use Google Analytics for analytics and marketing purposes.

With Google Analytics, website visitor information is collected using cookies and other technologies. For more information about how Google Analytics collects and uses information when a Data Subject accesses our websites, please visit https://policies.google.com/technologies/partner-sites?hl=en.

Moreover, our website enables the functions for advertising of Google Analytics. If the functions for advertising are enabled, our website can collect traffic data using Google Ads cookies (https://policies.google.com/technologies/cookies?hl=en#types-of-cookies) and identifiers in addition to data collected in accordance with the standard setting on Google Analytics. Therefore, our website may create a remarketing user list based on data regarding behavior, age, gender, and interest categories of a specific customer and share such list with Google Ads, use data regarding age, gender, and interest categories in analytics reports, or create segments based on data about age, gender, and interest categories.

You can manage the Google Ads to be displayed or disable customized advertising by using the My Ad Center (https://myadcenter.google.com/personalizationoff?ref=privacy-policy). Please read the following website (https://policies.google.com/technologies/ads?hl=en) for further information including other methods.

You can read the explanation of how to opt-out of Google Analytics by using a specific plug-in at the following link (https://tools.google.com/dlpage/gaoptout?hl=en). Please note that this opt-out applies only to Google activities.

11. What rights do Data Subjects have with regard to personal information?

We respect the rights that Data Subjects hold under the applicable data protection regulations of each country or region. For example, to the extent granted under the applicable data protection regulations of each country or region, each Data Subject may have rights such as the following: right to access; right to rectification; right to erasure; right to restriction of processing; right to objection to processing; right to withdraw consent (which may be granted if the Data Subject has given consent regarding certain types of processing activities; however, the Data Subject's withdrawal of consent does not affect the lawfulness of processing conducted based on his or her consent before the withdrawal); right to data portability; and right not to be subject to automated decision-making. The Act on the Protection of Personal Information of Japan grants the right to request the following in relation to retained personal information (meaning retained personal information as prescribed in Article 16, Paragraph 4 of the Act on the Protection of Personal Information of Japan): notification of the purpose of use; disclosure; correction, addition, or deletion of content; suspension of use or erasure; suspension of third-party provision; and disclosure of records of third-party provision (meaning records of third-party provision as prescribed in Article 37, Paragraph 2 of the Act on the Protection of Personal Information of Japan).

Data Subjects wishing to exercise their rights granted under the data protection regulations of the country or region in question may contact us using the contact details stated in "**12. Contact details**" below.

12. Contact details

For questions and inquiries regarding this Global Privacy Policy, please contact us using the following contact details:

- E-mail: TGlegal-kaigaidp@tokyo-gas.co.jp
- Address: 1-5-20 Kaigan, Minato-ku, Tokyo 105-8527, Japan

For requests and inquiries concerning your right to control your information:

- Request and inquiry format
- Address: 1-5-20 Kaigan, Minato-ku, Tokyo 105-8527, Japan

13. What procedures are involved when this Global Privacy Policy is amended?

We may amend all or part of, or make an addition to, this Global Privacy Policy by publishing that amendment or addition on our websites, sending an e-mail to that effect to our customers, or giving notice by any other method that we deem appropriate. In such cases, the post-amendment version of this Global Privacy Policy will be applied from the date on which you first use a product or service of Tokyo Gas or access our websites after receiving such notice, whichever comes first.

Annex for residents of the EEA or UK

This Annex applies to Data Subjects who are in the EEA or UK.

The provisions of each section described below are supplementary to the provisions of the respective sections with the same numbers and same titles of the Global Privacy Policy unless otherwise specifically stipulated in such section below.

Tokyo Gas is the data controller of personal information processed in line with the purposes as stated in the Global Privacy Policy and this Annex.

4. What is the legal basis for processing personal information?

We process the categories of personal information described in **"2. What categories of personal information are subject to processing"** of the Global Privacy Policy for the purposes set out below. The legal basis for each purpose is specified.

(1) Personal information of business partners

Purpose	Legal Basis
To communicate with our business partners about their products and services, or about our products and services	· necessary to perform a contract with you or to take steps at your request prior to entering into a contract with you. · where contractual necessity doesn't apply, our legitimate interest in managing our business, providing services to our clients, and continuously improving those services or in tailoring our products, services, and communications to align with the preferences of our business partners and to keep them informed about our offerings.
To plan, perform and manage the business relationship with our business partners, such as placing or receiving orders, making payments, delivery of products or services, receiving invoices, billing and collection, etc	· necessary to perform a contract with you or to take steps at your request prior to entering into a contract with you. · where contractual necessity doesn't apply, our legitimate interest in managing our business, providing services to our clients, and continuously improving those services
`To administer and perform surveys, marketing activities, market analysis, etc	· our legitimate interest in tailoring our products, services, and communications to align with the preferences of our business partners and to keep them informed about our offerings.
To make decisions about continuing the	· necessary to perform a contract with

business relationship with our business partners	you or to take steps at your request prior to entering into a contract with you. · where contractual necessity doesn't apply, we rely on our legitimate interest in managing our business, providing services to our clients, and continuously improving those services.
To make arrangements for the termination of the contract with our business partners	
To check whether our business partners are in compliance with any legal obligations (including legal obligations arising from data protection legislation)	· legal obligation in respect of compliance with EU law, member state law, and UK law · our legitimate interest in respect of compliance with other laws · If a legal obligation does not apply, we rely on our legitimate interest in ensuring the security and integrity of our organisation. In the UK, this is a recognised legitimate interest when we do this to prevent, detect, or investigate a crime.
To gather evidence for the establishment, exercise or defense of legal claims	
To prevent fraud	
To prevent any criminal conduct or any conduct that may result in criminal offence or convictions	
To prevent unlawful use of our place of business and our office equipment (including our information and communication systems)	

(2) Personal information of shareholders of Tokyo Gas

Purpose	Legal Basis
To conduct administrative work regarding shares	· necessary to perform a contract with you or to take steps at your request prior to entering into a contract with you. · where contractual necessity doesn't apply, we rely on our legitimate interest in managing our business, providing services to our clients, and continuously improving those services.
To address the exercise of rights by shareholders	· necessary to perform a contract with you or to take steps at your request prior to entering into a contract with you.
To perform obligations and exercise rights under applicable laws (including the Companies Act)	· necessary for compliance with a legal obligation in respect of compliance with EU law, member state law, and UK law · our legitimate interest in respect of

	compliance with other laws · if a legal obligation does not apply, we rely on our legitimate interest in ensuring the security and integrity of our organisation.
To provide shareholders with (i) the information of timely disclosure and (ii) the URLs about our press release article or our annual reports	· necessary to perform a contract with you or to take steps at your request prior to entering into a contract with you. · where contractual necessity doesn't apply, we rely on our legitimate interest in managing our business, providing services to our clients, and continuously improving those services.
To conduct communication as necessary and to plan, perform and manage the relationship such as IR events including large or small meeting;	· Necessary to perform a contract with you or to take steps at your request prior to entering into a contract with you.
To check whether shareholders and we are in compliance with any legal obligations (including legal obligations arising from data protection legislation)	· Necessary for compliance with a legal obligation in respect of compliance with EU law, member state law, and UK law. · our legitimate interest in respect of compliance with other laws. · if a legal obligation does not apply, we rely on our legitimate interest in ensuring the security and integrity of our organisation. In the UK, this is a recognised legitimate interest when we do this to prevent, detect, or investigate a crime.
To gather evidence for the establishment, exercise or defense of legal claims	
To prevent fraud	
To prevent any criminal conduct or any conduct that may result in criminal offence or convictions	
To prevent unlawful use of our place of business and our office equipment (including our information and communication systems)	

(3) Personal information of job applicants for Tokyo Gas

Purpose	Legal Basis
For recruitment and screening of applicants for Tokyo Gas	· our legitimate interest to identify and evaluate suitable candidates to work at our organisation.
To perform obligations and exercise rights under applicable laws	· necessary for compliance with a legal obligation in respect of compliance with EU law, member state law, and UK law · our legitimate interest in respect of compliance with other laws.

	· if a legal obligation does not apply, we rely on our legitimate interest in ensuring the security and integrity of our organisation.
To conclude employment contracts when job applicants are hired	· necessary to perform a contract with you or to take steps at your request prior to entering into a contract with you. · where contractual necessity doesn't apply, we rely on our legitimate interest to identify and evaluate suitable candidates to work at our organisation.
To conduct communication as necessary	

(4) Personal information of website visitors for Tokyo Gas

Purpose	Legal Basis
To engage in analysis, auditing, research and reporting	· consent where required under EEA and UK data protection law. · where consent is not required, we rely on our legitimate interest in managing our business, providing services to our clients, and continuously improving those services.
To provide interest-based advertising use cookies, web beacons, and device identifiers, and similar technologies (including clear GIFs, tracking pixels, JavaScript, and tags) and combine personal information of website visitors with information about website visitors' activities on other unaffiliated websites	· consent where required under EEA and UK data protection law. · where consent is not required, we rely on our legitimate interest in tailoring our products, services, and communications to align with the preferences of website visitors and to keep them informed about our offerings.
To use information about website visitors' visits to our website to help target advertisements that are unrelated to Tokyo Gas, based on their online behaviors in general.	· consent where required under EEA and UK data protection law. · where consent is not required, we rely on our legitimate interest in managing our business, providing services to our clients, and continuously improving our services.
To establish connections among related web browsers and match website visitors' browsers or devices if they log into the same online service on multiple devices, or if their devices share similar attributes that support an inference that they are used by the same person or household	· consent where required under EEA and UK data protection law. · where consent is not required, we rely on our legitimate interest in tailoring our products, services, and communications to align with the preferences of website visitors and to

To help measure the impact of the targeted online advertisements that we have launched for our products and services	keep them informed about our offerings.
To market surveys. This includes studies and/or surveys conducted to improve our existing products and services, as well as to create new ones. and help us understand how visitors use our website, and their potential needs.	
To prevent cyberattacks against our website. This will further improve the user experience on our website, as well as prevent possible data breaches that may arise from our website or servers.	· consent where required under EEA and UK data protection law. · where consent is not required, we rely on our legitimate interest in ensuring the security and integrity of our organisation.

There are instances where we rely on our legitimate interests to process your personal information. The specific legitimate interest will vary depending on the purpose of the processing, and we have outlined above what those interests are and how they relate to the relevant processing activities.

Where we process personal information on the basis of a legitimate interest, then - where required by EEA and UK data protection law - we have carried out a balancing test to document our interests, to consider what the impact of the processing will be on individuals and to determine whether individuals interests outweigh our interests in the processing taking place. You can request further information about this balancing test by contacting us using the details listed above.

In the UK, we are not required to conduct a balancing test where the processing is based on a "recognised legitimate interest." When we rely on our legitimate interest in ensuring the security and integrity of our organisation, and the processing is carried out to prevent, detect, or investigate crime, this constitutes a such recognised legitimate interest.

8. Is personal information transferred across international borders?

As described in **"8. Is personal information transferred across international borders?"** of Global Privacy Policy, we may transfer personal information to business partners and service providers located in jurisdictions that have been deemed adequate by the European Commission and/or the UK Secretary of State, as applicable; business partners and service providers in the US who participate in the US Data Privacy Framework; business partners and service providers who rely on approved standard contractual clauses (module 1 or 2 depending on nature of relationship); and business partners and service providers who rely on processor BCRs. This includes business partners and service providers who are in the countries listed in the Global Privacy Policy above. A copy of the relevant mechanism can be obtained for your review on request by using the contact details also provided above.

11. What rights do Data Subjects have with regard to personal information?

If you have unresolved concerns, you have the right to complain to us or a data protection authority in the country that you reside in or, the country of your place of work or the country where the alleged infringement took place.

12. Contact details

You may exercise your rights, make an inquiry, or request for information regarding any matter relating to the processing of your personal information by using the contact details set forth in "**12. Contact details**" of the Global Privacy Policy.

We have appointed a representative in EEA and the UK. Our representative can be contacted at:

- Contact information of our representative in the EEA:

DP-Dock GmbH, Attn: Tokyo Gas

- E-mail: tokyogas@gdpr-rep.com
- Address: Ballindamm 39, 20095 Hamburg, Germany

- Contact information of our representative in the United Kingdom:

DP Data Protection Services UK Ltd., Attn: Tokyo Gas

- Email: tokyogas@gdpr-rep.com
- Address: 16 Great Queen Street, Covent Garden, London, WC2B 5AH, United Kingdom
- Website: www.dp-dock.com

Annex for residents of Thailand

This Annex applies to Data Subjects who are in Thailand (or if Thai data protection law applies).

The provisions of each section described below are supplementary to the provisions of the respective sections with the same numbers and same titles of the Global Privacy Policy unless otherwise specifically stipulated in such section below.
This Annex applies to Data Subjects who are in the EEA or UK.

Tokyo Gas is the data controller of personal information processed in line with the purposes as stated in the Global Privacy Policy and this Annex.

4. What is the legal basis for processing personal information?

Notwithstanding those as described in **"2. What categories of personal information are subject to processing"** of the Global Privacy Policy, we use your personal information for the purposes described as below, based on the legal basis set out for each purpose. In many instances, we need to process your personal information in order to fulfil our obligations under the contracts with you or comply with any laws and regulations. If you do not provide the personal information requested, we may not be able to provide our services to you.

(1) Personal information of business partners

Purposes	Legal basis
To communicate with our business partners about their products and services, or about our products and services	· contractual obligation · legitimate interest
To plan, perform and manage the business relationship with our business partners, such as placing or receiving orders, making payments, delivery of products or services, receiving invoices, billing and collection, etc.	· contractual obligation · legitimate interest
To administer and perform surveys, marketing activities, market analysis, etc.	· legitimate interest
To make decisions about continuing the business relationship with our business partners	· legitimate interest
To make arrangements for the termination of the contract with our business partners	· contractual obligation
To check whether our business partners are in compliance with any legal obligations (including legal obligations arising from data protection legislation)	· legal obligation · legitimate interest
To gather evidence for the establishment, exercise or defense of legal claims	· legitimate interest · legal obligation

Purposes	Legal basis
To prevent fraud	· legitimate interest · legal obligation
To prevent any criminal conduct or any conduct that may result in criminal offence or convictions	· legitimate interest · legal obligation
To prevent unlawful use of our place of business and our office equipment (including our information and communication systems)	· legitimate interest · legal obligation
For any other purposes necessary in the course of business operations at Tokyo Gas	· contractual obligation · legitimate interest · legal obligation · your consent

(2) Personal information of shareholders of Tokyo Gas

Purposes	Legal basis
To conduct administrative work regarding shares	· legal obligation · contractual obligation
To address the exercise of rights by shareholders	· contractual obligation · legal obligation · legitimate interest
To perform obligations and exercise rights under applicable laws (including the Companies Act)	· legal obligation · contractual obligation · legitimate interest
To provide shareholders with (i) the information of timely disclosure and (ii) the URLs about our press release article or our annual reports	· legal obligation · contractual obligation · legitimate interest
To conduct communication as necessary and to plan, perform and manage the relationship such as IR events including large or small meeting	· legitimate interest · contractual obligation
To check whether shareholders and we are in compliance with any legal obligations (including legal obligations arising from data protection legislation)	· legitimate interest · legal obligation
To gather evidence for the establishment, exercise or defense of legal claims	· legitimate interest · legal obligation
To prevent fraud	· legitimate interest · legal obligation
To prevent any criminal conduct or any conduct that may result in criminal offence or convictions	· legitimate interest · legal obligation
To prevent unlawful use of our place of business and our office equipment	· legitimate interest · legal obligation

Purposes	Legal basis
(including our information and communication systems)	
For any other purposes necessary in the course of business operations at Tokyo Gas	· contractual obligation · legitimate interest · legal obligation · your consent

(3) Personal information of job applicants for Tokyo Gas

Purposes	Legal basis
For recruitment and screening of applicants for Tokyo Gas	· our legitimate interest to identify and evaluate suitable candidates to work at our organisation. · contractual obligation
To perform obligations and exercise rights under applicable laws	· legal obligation · legitimate interest
To conclude employment contracts when job applicants are hired	· to perform a contract with you or to take steps at your request prior to entering into a contract with you. · legitimate interest
To conduct communication as necessary	· to perform a contract with you or to take steps at your request prior to entering into a contract with you. · legitimate interest
For any other purposes necessary in the course of business operations at Tokyo Gas	· contractual obligation · legitimate interest · legal obligation · your consent

(4) Personal information of website visitors for Tokyo Gas

Purposes	Legal basis
To engage in analysis, auditing, research and reporting	· legitimate interest · Consent where required under Thai data protection law
To provide interest-based advertising use cookies, web beacons, and device identifiers, and similar technologies (including clear GIFs, tracking pixels, JavaScript, and tags) and combine personal information of website visitors with information about website visitors' activities on other unaffiliated websites	· legitimate interest · your consent where required under Thai data protection law.
To use information about website visitors' visits to our website to help target advertisements that are unrelated to Tokyo	· legitimate interest · your consent where required under Thai data protection law.

Purposes	Legal basis
Gas, based on their online behaviors in general.	
To establish connections among related web browsers and match website visitors' browsers or devices if they log into the same online service on multiple devices, or if their devices share similar attributes that support an inference that they are used by the same person or household	· legitimate interest · your consent where required under Thai data protection law.
To help measure the impact of the targeted online advertisements that we have launched for our products and services	· your consent where required under Thai data protection law. · legitimate interest
To market surveys. This includes studies and/or surveys conducted to improve our existing products and services, as well as to create new ones and help us understand how visitors use our website, and their potential needs.	· legitimate interest · your consent where required under Thai data protection law.
To prevent cyberattacks against our website. This will further improve the user experience on our website, as well as prevent possible data breaches that may arise from our website or servers.	· legitimate interest · your consent where required under Thai data protection law.
For any other purposes necessary in the course of business operations at Tokyo Gas	· contractual obligation · legitimate interest · legal obligation · your consent

As for the processing based on your consent, we will request you for your consent to process your personal information as above in separate form from time to time. Please read the Global Privacy Policy and this Annex carefully before giving your consent to our processing of your personal information in accordance with the separated format.

5. How long is personal information retained for?

Further to the Global Privacy Policy, we will basically retain your personal information for as long as it is necessary but not exceeding ten years after the termination of the contractual relationship with you or after our last contact with you. We may, however, store your personal information longer than that if required by law or our internal policy.

8. Is personal information transferred across international borders?

As described in **"8. Is personal information transferred across international borders?"** of Global Privacy Policy, we transfer your personal information to those specified countries other than your country of residence.

For future transfers from Thailand to countries not considered adequate by Thailand's supervisory authority, we have put in place adequate measures, such as standard contractual clauses, to protect your personal information.

11. What rights do Data Subjects have with regard to personal information?

You have the following rights regarding your personal information:

(1) Right to access and request copies
(2) Right of portability of data
(3) Right to rectify
(4) Right to erasure
(5) Right to restrict
(6) Right to object the processing of personal information
(7) Right to withdraw consent

12. Contact details

You may exercise your rights, make an inquiry, or request for information regarding any matter relating to the processing of your personal information by using the contact details set forth in "**12. Contact details**" of the Global Privacy Policy. In addition, you also have the right to complain to a supervisory authority. However, we would appreciate the opportunity to address your concerns first before you file a complaint with the supervisory authority.

Annex for residents of Singapore

This Annex applies to Data Subjects who are in Singapore (or if Singapore data protection law applies).

The provisions of each section described below are supplementary to the provisions of the respective sections with the same numbers and same titles of the Global Privacy Policy unless otherwise specifically stipulated in such section below.

Tokyo Gas is the data controller of personal information processed in line with the purposes as stated in the Global Privacy Policy and this Annex.

4. What is the legal basis for processing personal information? Is provision of some types of personal information obligatory?

Notwithstanding the legal bases described in "**4. What is the legal basis for processing personal information? Is provision of some types of personal information obligatory?**" in the Global Privacy Policy, we will process your personal information under the following grounds in Singapore:

- Consent: When the Data Subjects have given consent or have been deemed to give consent to the processing of their personal information for one or more specific purposes.
- Exceptions to Consent: Where there is an applicable exception to consent under the law (for example, where the processing is in our legitimate interests, necessary to manage an employment relationship with you, necessary to comply with law, or where the processing is in your vital interests, etc.).

5. Contact details

You may exercise your rights, make an inquiry, or request for information regarding any matter relating to the processing of your personal information by using the contact details set forth in "**12. Contact details**" of the Global Privacy Policy.

We have appointed a data protection officer. Our data protection officer can be contacted at:

- Group Manager
  Legal Sect. II, Legal Department of Tokyo Gas
- E-mail: TGlegal-kaigaidp@tokyo-gas.co.jp
- Address: 1-5-20 Kaigan, Minato-ku, Tokyo 105-8527, Japan

Annex for residents of Australia

This Annex applies to Data Subjects who are in Australia (or if Australian data protection law applies).

The provisions of each section described below are supplementary to the provisions of the respective sections with the same numbers and same titles of the Global Privacy Policy unless otherwise specifically stipulated in such section below.

Tokyo Gas is the data controller of personal information processed in line with the purposes as stated in the Global Privacy Policy and this Annex.

4. What is the legal basis for processing personal information? Is provision of some types of personal information obligatory?

In relation to "**4. What is the legal basis for processing personal information? Is provision of some types of personal information obligatory?**" in the Global Privacy Policy, we will only collect your personal information where that personal information is reasonably necessary for one or more of our functions or activities. Unless an exception applies under the Privacy Act 1988 (Cth), we will only collect your sensitive information (such as your visa information) where you consent to the collection of that sensitive information and where that sensitive information is reasonably necessary for one or more of our functions or activities.

We will only collect your personal information by lawful and fair means, and will only collect your personal information directly from you unless it is unreasonable or impracticable to do so.

As set out in "**3. Why is personal information processed?**", we collect, hold, use and disclose personal information for particular purposes, and will only use or disclose your personal information for another purpose where we obtain your consent to the use or disclosure or otherwise in accordance with applicable laws (such as, for personal information, where you would reasonably expect us to do so and the secondary purpose is related to the primary purpose).

11. What rights do Data Subjects have with regard to personal information?

You have the following rights regarding your personal information:

(1) Right to access; and
(2) Right to correct

12. Contact details

You may exercise your rights, make an inquiry, or request for information regarding any matter relating to the processing of your personal information by using the contact details set forth in "**12. Contact details**" of the Global Privacy Policy.

In addition, please contact us if you have any concerns or complaints about the manner in which we have handled your personal information. We may ask you to put your

complaint in writing and provide details about it. We will inquire into your complaint and aim to respond to you in writing within 30 days.

If you are not satisfied with our response, you can contact us to discuss your concerns or lodge a complaint with the Office of the Australian Information Commissioner ("**OAIC**").

The OAIC's contact details are:

- Website: https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us
- Phone: 1300 363 992
- Fax: +61 2 6123 5145
- Post: GPO Box 5288, Sydney NSW 2001, Australia

Annex for residents of Vietnam

This Annex applies to Data Subjects who are in Vietnam (or if Vietnam data protection law applies).

The provisions of each section described below are supplementary to the provisions of the respective sections with the same numbers and same titles of the Global Privacy Policy unless otherwise specifically stipulated in such section below.

Tokyo Gas Co., Ltd. is the data controller of personal information processed in line with the purposes as stated in the Global Privacy Policy and this Annex.

3. Why is personal information processed?

Without prejudice to those as described in **"3. Why is personal information processed?"** of the Global Privacy Policy, any data analysis activities conducted by Tokyo Gas, Tokyo Gas Group companies and/or an authorized third party in accordance with this Global Privacy Policy is for internal use purposes of Tokyo Gas, and Tokyo Gas has not provided any data analysis services using the data relating to the Vietnamese citizens.

4. What is the legal basis for processing personal information?

In relation to "**4. What is the legal basis for processing personal information? Is provision of some types of personal information obligatory?**" in the Global Privacy Policy, to clarify the legal basis for processing personal information, we will process the personal information under the permissible grounds which include the following:

- Consent: When the Data Subjects have given consent to the processing of their personal information for one or more specific purposes. Unless an exception applies under the PDPD, we will only collect your sensitive information where you consent to the collection of that sensitive information and where that sensitive information is reasonably necessary for one or more of our functions or activities.
- Legitimate interest: When processing is necessary to protect the life, health, honor, dignity, rights and lawful interests of the Data Subject or other people in urgent cases, or to protect our legitimate rights or interests of oneself, of others or the interests of the State, of agencies and organizations in a necessary manner against acts of infringement of the above-mentioned interests. We will work with relevant data processors and third parties to prove this case.
- Contractual obligation: When processing is necessary for the performance of an obligation in accordance with a contract to which the Data Subject is a party with relevant authorities, organizations, individuals in accordance with laws.
- Legal requirements: The processing is required for the activities of state agencies and state management activities according to the provisions of law, or in the cases of threat to national security, or for purpose of prevention of riots, terrorism, crimes and law violations.
- Any other cases without being subject to the Data Subject's consent as permitted by law.
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11. What rights do Data Subjects have with regard to personal information?

(1) Rights of Data Subjects

In relation to "**11. What rights do Data Subjects have with regard to personal information?**" of the Global Privacy Policy, the Data Subjects may exercise, among other rights as provided by law, the following rights in relation to their personal information pursuant to the manual, policies and internal rules as we may designate from time to time in accordance with the laws:

(a) Right to know of the information processing

The Data Subjects have the right to know about our processing of their personal information unless otherwise provided by law.

(b) Right to consent to information processing

The Data Subjects have the right to give or not to give consent to the processing of their personal information, except in certain circumstances provided by law.

(c) Right to withdraw consent

The Data Subjects have the right to withdraw their consent to the processing of their personal information when there is doubt about the processing scope or purposes or the accuracy of the personal information, unless otherwise provided by law.

If the Data Subjects withdraw their consent to the processing of the personal information, we may not be able to carry out in full the required performance of the contract, work and tasks concerning our relationship with the Data Subjects if the information to which their consent is withdrawn has a direct impact on the performance of the relevant contract or work.

The execution of a request to withdraw consent does not apply to processing activities before the time the request is made.

(d) Right to rectify information

The Data Subjects have the right to rectify by themselves certain types of their personal information in accordance with their agreement with us, or request us to rectify their personal information.

In case it is not possible to correct personal information for legitimate reasons, we will notify the Data Subjects.

(e) Right to request the provision of information

The Data Subjects have the right to request us to provide them with their personal information in accordance with law and our agreement with the Data Subjects, if any.

(f) Right to erasure

The Data Subjects have the right to request erasure of their personal information, except in certain circumstances provided by law.

In certain events of erasure of personal information, we may not be able to carry out in full the required performance of the contract, work and tasks concerning our relationship with the Data Subjects if the information required to be deleted has a direct impact on the performance of the relevant contract or work.

In case it is not possible to erase personal information for legitimate reasons after receiving the Data Subject's request, we will notify the Data Subject.

(g) Right to restrict information processing

The Data Subjects have the right to request restriction of the processing of their personal information when there is doubt about the processing scope or purposes or the accuracy of the personal information, unless otherwise provided by law.

In certain events of restriction of information processing, we may not be able to carry out in full the required performance of the contract, work and tasks concerning our relationship with the Data Subjects if the restricted information has a direct impact on the performance of the relevant contract or work.

The execution of a request to restrict information processing does not apply to processing activities before the time the request is made.

(h) Right to object to information processing.

The Data Subjects have the right to object to our processing of their personal information, unless otherwise provided by law.

(i) Right to complain, denounce, initiate lawsuits, and claim compensation

In the event that we violate applicable personal data protection regulations, the Data Subjects have the right to file complaints, denunciations, lawsuits and claim compensation as prescribed by law.

(j) Right to self-protection

The Data Subjects have the right to request competent authorities or agencies, organizations and individuals related to the processing of personal information to implement measures and solutions to protect their personal information in accordance with the provisions of law.

(2) Obligations of Data Subjects

Besides the rights listed above, the Data Subjects have the following obligations in relation to their personal information, among other obligations as provided by law:

(a) to protect their own personal information;

(b) to respect and protect others' personal information;

(c) to fully and accurately provide their personal information as required by law, in accordance with contract or when consenting to the processing of personal information; and

(d) to comply with regulations on personal data protection and prevent violations against regulations on personal data protection.

(3) General principles when exercising rights and obligations

The Data Subjects must fully comply with the following principles when exercising their rights and obligations:

(a) to exercise their rights and obligations as prescribed by law; and to comply with the obligations of Data Subjects under the relevant contract. The exercise of the rights and obligations of Data Subjects must aim to protect the rights and legitimate interests of the Data Subjects themselves;

(b) not to cause difficulties or hinder the exercise of the rights and legal obligations of the data controller, the data controller-cum-processor, and the data processor; and

(c) not to infringe upon the rights and legitimate interests of the State, other agencies, organizations, and individuals.

12. Contact details

You may exercise your rights, make an inquiry, or request for information regarding any matter relating to the processing of your personal information by using the contact details set forth in "**12. Contact details**" of the Global Privacy Policy.

We have appointed a data protection officer. Our data protection officer can be contacted at:

- Aki Kuboyama
  Group Manager
  Legal Sect. II, Legal Department of Tokyo Gas
- E-mail: TGlegal-kaigaidp@tokyo-gas.co.jp
- Address: 1-5-20 Kaigan, Minato-ku, Tokyo 105-8527, Japan

Annex for residents of Indonesia

This Annex applies to Data Subjects who are in Indonesia (or if Indonesian data protection law applies).

The provisions of each section described below are supplementary to the provisions of the respective sections with the same numbers and same titles of the Global Privacy Policy unless otherwise specifically stipulated in such section below.

Tokyo Gas is the data controller of personal information processed in line with the purposes as stated in the Global Privacy Policy and this Annex.

1. What does this Global Privacy Policy cover?

Tokyo Gas is the data controller of personal information processed in line with the purposes as stated in the Global Privacy Policy and this Annex below.

4. What is the legal basis for processing personal information? Is provision of some types of personal information obligatory?

In relation to "**4. What is the legal basis for processing personal information? Is provision of some types of personal information obligatory?**" in the Global Privacy Policy, we will process your personal information for the below purposes based on one or more of the provided lawful grounds (as applicable) in accordance with Indonesian personal data protection regulatory framework:

(1) Personal information for customers

Purposes	Legal basis
To provide the products and services (including websites) of Tokyo Gas and perform executive agreements with regard to such provision	· to perform a contract with you or to take steps at your request prior to entering into a contract with you; or · your consent.
To carry out necessary communication, including negotiations, meetings, and correspondences	· to perform a contract with you or to take steps at your request prior to entering into a contract with you; · our legitimate interest for carrying out necessary communication; or · your consent.
To respond to inquiries	· to perform a contract with you or to take steps at your request prior to entering into a contract with you; or · your consent.
To develop and improve the products and services (including websites) of Tokyo Gas	· our legitimate interest for product and services development and improvement.

Purposes	Legal basis
To customize products and services, including the provision of products and services (including websites) that are personalized based on customer preferences	· to perform a contract with you or to take steps at your request prior to entering into a contract with you.
To provide information regarding the products and services of Tokyo Gas	· our legitimate interest for marketing and business development purposes; or · your consent.
To conduct direct marketing activities, including the distribution of e-mail newsletters and advertisements	· our legitimate interest for marketing and business development purposes; or · your consent.
To manage and operate promotions and events	· our legitimate interest for marketing and business development purposes; or · your consent.
To conduct research and questionnaires	· our legitimate interest for marketing and business development purposes; or · your consent.
To make reports to, make filings with, cooperate with, and carry out procedures for government agencies, various industry associations, etc.	· legal obligation; or · our legitimate interest for legal compliance.
To carry out audits, operate the internal reporting system, and to otherwise prevent and address unjust acts	· legal obligation; or · our legitimate interest for audit and internal reporting system.
To generate statistical and other non-personal information	· our legitimate interest to generate statistical data.
To respond to urgent needs to process personal information to protect important rights and interests, such as human life and human rights, within the scope of applicable laws and regulations	· vital interest.
To perform duties and exercise rights based on applicable laws and regulations	· legal obligation.
To check whether customers and we are in compliance with any legal obligations (including legal obligations arising from data protection legislation)	· legal obligation; · to perform a contract with you or to take steps at your request prior to entering into a contract with you; or · our legitimate interest to ensure compliance.
To gather evidence for the establishment, exercise or defense of legal claims	· our legitimate interest for legal claims.
To prevent fraud	· legal obligation; or · our legitimate interest to prevent fraud.

Purposes	Legal basis
To prevent any criminal conduct or any conduct that may result in criminal offence or convictions	· legal obligation; or · our legitimate interest to prevent criminal conduct.
To prevent unlawful use of our place of business and our office equipment (including our information and communication systems)	· legal obligation; or · our legitimate interest to prevent unlawful acts.
For any other purposes necessary in the course of business operations at Tokyo Gas	· to perform a contract with you or to take steps at your request prior to entering into a contract with you; · legal obligation; · our legitimate interest for business operations; or · your consent;

(2) Personal information of business partners

Purposes	Legal basis
To communicate with our business partners about their products and services, or about our products and services	· to perform a contract with you or to take steps at your request prior to entering into a contract with you; or · our legitimate interest for business development and marketing purposes.
To plan, perform and manage the business relationship with our business partners, such as placing or receiving orders, making payments, delivery of products or services, receiving invoices, billing and collection, etc.	· to perform a contract with you or to take steps at your request prior to entering into a contract with you; or · our legitimate interest to carry out business operations.
To administer and perform surveys, marketing activities, market analysis, etc.	· our legitimate interest for business development and marketing purposes.
To make decisions about continuing the business relationship with our business partners	· our legitimate interest for business development.
To make arrangements for the termination of the contract with our business partners	· to perform a contract with you or to take steps at your request prior to entering into a contract with you.
To check whether our business partners are in compliance with any legal obligations (including legal obligations arising from data protection legislation)	· legal obligation; · to perform a contract with you or to take steps at your request prior to entering into a contract with you; or · our legitimate interest to ensure compliance.
To gather evidence for the establishment, exercise or defense of legal claims	· our legitimate interest for legal claims.
To prevent fraud	· legal obligation; or

Purposes	Legal basis
	· our legitimate interest to prevent fraud.
To prevent any criminal conduct or any conduct that may result in criminal offence or convictions	· legal obligation; or · our legitimate interest to prevent criminal conduct.
To prevent unlawful use of our place of business and our office equipment (including our information and communication systems)	· legal obligation; or · our legitimate interest to prevent unlawful acts.
For any other purposes necessary in the course of business operations at Tokyo Gas	· to perform a contract with you or to take steps at your request prior to entering into a contract with you; · legal obligation; · our legitimate interest for business operations; or · your consent.

(3) Personal information of shareholders of Tokyo Gas

Purposes	Legal basis
To conduct administrative work regarding shares	· to perform a contract with you or to take steps at your request prior to entering into a contract with you; · legal obligation; or · our legitimate interest to carry out corporate matters.
To address the exercise of rights by shareholders	· to perform a contract with you or to take steps at your request prior to entering into a contract with you; · legal obligation; or · our legitimate interest to carry out corporate matters.
To perform obligations and exercise rights under applicable laws (including the Companies Act)	· legal obligations; or · to perform a contract with you or to take steps at your request prior to entering into a contract with you.
To provide shareholders with (i) the information of timely disclosure and (ii) the URLs about our press release article or our annual reports	· legal obligation; · to perform a contract with you or to take steps at your request prior to entering into a contract with you; or · out legitimate interest to carry out corporate matters.
To conduct communication as necessary and to plan, perform and manage the relationship such as IR events including large or small meeting	· to perform a contract with you or to take steps at your request prior to entering into a contract with you; or · our legitimate interest for business relationship.

Purposes	Legal basis
To check whether shareholders and we are in compliance with any legal obligations (including legal obligations arising from data protection legislation)	· legal obligation; or · our legitimate interest to ensure compliance.
To gather evidence for the establishment, exercise or defense of legal claims	· our legitimate interest for legal claims.
To prevent fraud	· legal obligation; or · our legitimate interest to prevent fraud
To prevent any criminal conduct or any conduct that may result in criminal offence or convictions	· legal obligation; or · our legitimate interest to prevent criminal conduct
To prevent unlawful use of our place of business and our office equipment (including our information and communication systems)	· legal obligation; or · our legitimate interest to prevent unlawful act
For any other purposes necessary in the course of business operations at Tokyo Gas	· our legitimate interest for business operations; or · to perform a contract with you or to take steps at your request prior to entering into a contract with you. · legal obligation

(4) Personal information of job applicants for Tokyo Gas

Purposes	Legal basis
For recruitment and screening of applicants for Tokyo Gas	· our legitimate interest to identify and evaluate suitable candidates.
To perform obligations and exercise rights under applicable laws	· legal obligation; or · our legitimate interest.
To conclude employment contracts when job applicants are hired	· performance of a contract; or · our legitimate interest. ·
To conduct communication as necessary	· our legitimate interest.
For any other purposes necessary in the course of business operations at Tokyo Gas	· contractual obligation; · our legitimate interest; or · legal obligation.

(5) Personal information of website visitors for Tokyo Gas

Purposes	Legal basis
To engage in analysis, auditing, research and reporting	· our legitimate interest.
To provide interest-based advertising use cookies, web beacons, and device identifiers, and similar technologies	· our legitimate interest; or · your consent where required under Indonesian PDP regulatory framework.

Purposes	Legal basis
(including clear GIFs, tracking pixels, JavaScript, and tags) and combine personal information of website visitors with information about website visitors' activities on other unaffiliated websites	
To use information about website visitors' visits to our website to help target advertisements that are unrelated to Tokyo Gas, based on their online behaviors in general.	· your consent where required under Indonesian PDP regulatory framework.
To establish connections among related web browsers and match website visitors' browsers or devices if they log into the same online service on multiple devices, or if their devices share similar attributes that support an inference that they are used by the same person or household	· our legitimate interest; or · your consent where required under Indonesian PDP regulatory framework.
To help measure the impact of the targeted online advertisements that we have launched for our products and services	· your consent where required under Indonesian PDP regulatory framework.
To market surveys. This includes studies and/or surveys conducted to improve our existing products and services, as well as to create new ones and help us understand how visitors use our website, and their potential needs.	· our legitimate interest; or · your consent where required under Indonesian PDP regulatory framework.
To prevent cyberattacks against our website. This will further improve the user experience on our website, as well as prevent possible data breaches that may arise from our website or servers.	· your consent where required under Indonesian PDP regulatory framework.
For any other purposes necessary in the course of business operations at Tokyo Gas	· contractual obligation; · our legitimate interest; · legal obligation; or · your consent.

8. When a cross-border data transfer occurs

Due to being headquartered in Japan and the global nature of our business, your personal information may be disclosed to other third parties including processors which are located in the jurisdictions as stated in **"8. Is personal information transferred across international borders?"** section of the Global Privacy Policy.

When processing your personal information in locations outside of Indonesia where privacy or data protection laws have a different level of protection, we will ensure that

adequate safeguards are in place to protect your personal information as required by Indonesian PDP Regulatory Framework.

Where these locations do not provide an adequate level of data protection, we ensure appropriate safeguards in accordance with the applicable rules and the principles in the Indonesian PDP Regulatory Framework to protect the transfer of your personal information to these countries.

In several specific instances of cross-border data transfer that are non-recurring, we may request your consent to conduct such cross-border data transfer on a case-by-case basis.

11. What rights do Data Subjects have with regard to personal information?

In relation to section "**11. What rights do Data Subjects have with regard to personal information?**" of the Global Privacy Policy, based on the Indonesian PDP Regulatory Framework, you have the following rights as a Data Subject:

Rights	Summary
Right to obtain information	You are entitled to obtain information on the identity, lawful ground, purpose of request and use of personal information, and accountability of the party requesting the personal information.
Right of access to data or copies of data	You are entitled to access and obtain a copy of your personal information.
Right to complete, update, and/or rectification of errors or inaccuracies	You are entitled to complete, update and/or rectify errors or inaccuracies of your personal information in accordance with the purpose of data processing.
Right to terminate processing, deletion, and/or disposal of data	You have the right to terminate, delete and/ or dispose of your personal information, in accordance with applicable laws and regulations.
Right to restrict processing	You may suspend or restrict data processing proportional to the purpose of data processing.
Right to data portability	You may obtain, utilize, and transfer your personal information to another controller, insofar as the system may communicate safely in accordance with the principles provided under the Indonesian PDP Regulatory Framework.
Right to withdraw consent	You are entitled to withdraw your submitted consent for the data processing.
Right to object against automated decision-making	You are entitled to object to automated decision making and profiling that has legal or significant effects on you.
Right to file a lawsuit	You have the right to file a lawsuit and receive compensation over the violation of your processed personal information.

Please note that the exercise of these rights may be limited in accordance with the background and context of the processing activity, for example if the exercise of such rights would be a danger to national defense/security, would impede law enforcement process, or for the supervision of financial services supervision.

12. Contact details

If you wish to exercise your rights (e.g., right to obtain information regarding data processing, access your personal information, rectify or complete inaccurate data, erase or destroy your personal information, withdraw consent), or submit inquiries or complaints concerning the processing of your personal information, please contact by using the contact details set forth in "**12. Contact details**" of the Global Privacy Policy .

We will respond to your request or inquiry in accordance with the timelines and procedures set out under applicable Indonesian personal data protection laws and regulations.

Annex for residents of the Philippines

This Annex applies to Data Subjects who are in Philippines (or if Philippines data protection law applies).

The provisions of each section described below are supplementary to the provisions of the respective sections with the same numbers and same titles of the Global Privacy Policy unless otherwise specifically stipulated in such section below.

Tokyo Gas is the data controller of personal information processed in line with the purposes as stated in the Global Privacy Policy and this Annex.

4. What is the legal basis for processing personal information?

Tokyo Gas will process personal information on the basis of the lawful criteria as provided under the Data Privacy Act of 2012 (DPA) and other relevant laws.

Generally, we shall rely on legitimate interests, fulfilment of a legal obligation, and/or fulfilment of our contract with you, depending on the nature of our relationship, as our primary legal basis for the collection, use, storage, disclosure, or other processing of your personal information, more particularly set out as follows:

(1) Personal information of customers

Purposes	Legal basis
To communicate with our business partners about their products and services, or about our products and services	· contractual obligation · legitimate interest
To plan, perform and manage the business relationship with our business partners, such as placing or receiving orders, making payments, delivery of products or services, receiving invoices, billing and collection, etc.	· contractual obligation · legitimate interest
To administer and perform surveys, marketing activities, market analysis, etc.	· legitimate interest
To make decisions about continuing the business relationship with our business partners	· legitimate interest
To make arrangements for the termination of the contract with our business partners	· contractual obligation
To check whether our business partners are in compliance with any legal obligations (including legal obligations arising from data protection legislation)	· legal obligation
To gather evidence for the establishment, exercise or defense of legal claims	· legitimate interest · legal obligation
To prevent fraud	· legitimate interest

Purposes	Legal basis
	· legal obligation
To prevent any criminal conduct or any conduct that may result in criminal offence or convictions	· legitimate interest · legal obligation
To prevent unlawful use of our place of business and our office equipment (including our information and communication systems)	· legitimate interest · legal obligation
For any other purposes necessary in the course of business operations at Tokyo Gas	· contractual obligation · legitimate interest · legal obligation · your consent

(2) Personal information of business partners

Purposes	Legal basis
To communicate with our business partners about their products and services, or about our products and services	· contractual obligation · legitimate interest
To plan, perform and manage the business relationship with our business partners, such as placing or receiving orders, making payments, delivery of products or services, receiving invoices, billing and collection, etc.	· contractual obligation · legitimate interest
To administer and perform surveys, marketing activities, market analysis, etc.	· legitimate interest
To make decisions about continuing the business relationship with our business partners	· legitimate interest
To make arrangements for the termination of the contract with our business partners	· contractual obligation
To check whether our business partners are in compliance with any legal obligations (including legal obligations arising from data protection legislation)	· legal obligation
To gather evidence for the establishment, exercise or defense of legal claims	· legitimate interest · legal obligation
To prevent fraud	· legitimate interest · legal obligation
To prevent any criminal conduct or any conduct that may result in criminal offence or convictions	· legitimate interest · legal obligation
To prevent unlawful use of our place of business and our office equipment	· legitimate interest · legal obligation

Purposes	Legal basis
(including our information and communication systems)	
For any other purposes necessary in the course of business operations at Tokyo Gas	· contractual obligation · legitimate interest · legal obligation · your consent

(3) Personal information of shareholders of Tokyo Gas

Purposes	Legal basis
To conduct administrative work regarding shares	· legal obligation · contractual obligation
To address the exercise of rights by shareholders	· contractual obligation
To perform obligations and exercise rights under applicable laws (including the Companies Act)	· legal obligation · contractual obligation
To provide shareholders with (i) the information of timely disclosure and (ii) the URLs about our press release article or our annual reports	· legal obligation · contractual obligation
To conduct communication as necessary and to plan, perform and manage the relationship such as IR events including large or small meeting	· legitimate interest · contractual obligation
To check whether shareholders and we are in compliance with any legal obligations (including legal obligations arising from data protection legislation)	· legitimate interest · legal obligation
To gather evidence for the establishment, exercise or defense of legal claims	· legitimate interest · legal obligation
To prevent fraud	· legitimate interest · legal obligation
To prevent any criminal conduct or any conduct that may result in criminal offence or convictions	· legitimate interest · legal obligation
To prevent unlawful use of our place of business and our office equipment (including our information and communication systems)	· legitimate interest · legal obligation
For any other purposes necessary in the course of business operations at Tokyo Gas	· legitimate interest · legal obligation

(4) Personal information of job applicants for Tokyo Gas

Purposes	Legal basis
For recruitment and screening of applicants for Tokyo Gas	· legitimate interest · to take steps, at your request, prior to entering into a contract with you
To perform obligations and exercise rights under applicable laws	· legal obligation · legitimate interest
To conclude employment contracts when job applicants are hired	· legitimate interest · to take steps, at your request, prior to entering into a contract with you
To conduct communication as necessary	· legitimate interest · to take steps, at your request, prior to entering into a contract with you
For any other purposes necessary in the course of business operations at Tokyo Gas	· contractual obligation · legitimate interest · legal obligation

(5) Personal information of website visitors for Tokyo Gas

Purposes	Legal basis
To engage in analysis, auditing, research and reporting	· legitimate interest
To provide interest-based advertising use cookies, web beacons, and device identifiers, and similar technologies (including clear GIFs, tracking pixels, JavaScript, and tags) and combine personal information of website visitors with information about website visitors' activities on other unaffiliated websites	· legitimate interest
To use information about website visitors' visits to our website to help target advertisements that are unrelated to Tokyo Gas, based on their online behaviors in general.	· legitimate interest
To establish connections among related web browsers and match website visitors' browsers or devices if they log into the same online service on multiple devices, or if their devices share similar attributes that support an inference that they are used by the same person or household	· legitimate interest
To help measure the impact of the targeted online advertisements that we have launched for our products and services	· legitimate interest
To market surveys. This includes studies and/or surveys conducted to improve our	· legitimate interest

Purposes	Legal basis
existing products and services, as well as to create new ones and help us understand how visitors use our website, and their potential needs.	
To prevent cyberattacks against our website. This will further improve the user experience on our website, as well as prevent possible data breaches that may arise from our website or servers.	· legitimate interest
For any other purposes necessary in the course of business operations at Tokyo Gas	· contractual obligation · legitimate interest · legal obligation

In addition to the foregoing lawful criteria, or where the law specifically requires it, Tokyo Gas may, in some cases, obtain your consent in a manner consistent with the standards set by applicable laws.

- **Notice and consent**

In the event that your personal information will be used for purposes other than those disclosed in the policy, you will be notified of such additional use in accordance with requirements under relevant laws and regulations.

Where applicable, your consent will be obtained and shall be evidenced by written, electronic, or recorded means. Consent may also be given on your behalf by a lawful representative or an agent you authorized.

- **Access**

Due to the sensitive and confidential nature of the personal information under our custody, only authorized personnel shall be allowed to access such personal information, for any purpose, except as otherwise provided by law.

- **Legal basis for disclosure and sharing of personal information to third parties**

Disclosure and sharing of personal information to third parties shall, in each case, be pursuant to a legal justification provided under relevant law, which may include consent, legitimate purpose, or legal obligation. You will be notified of the disclosure, prior to such sharing or at the next practical opportunity, which should include the following information:

- Categories of recipients of the personal information, provided that the identity of the recipients may also be given upon request;
- Purpose of data sharing and the objective/s it is meant to achieve;
- Categories of personal information that will be shared;
- Existence of your rights; and
- Other information that would sufficiently inform you of the nature and extent of data sharing and the manner of processing involved.

12. Contact details

You may exercise your rights, make an inquiry, or request for information regarding any matter relating to the processing of your personal information under our custody by using the contact details set forth in "**12. Contact details**" of the Global Privacy Policy.