



## **PRIVACY NOTICE (A)**

\* If you register from within the European Economic Area (EEA), see PRIVACY NOTICE (B) below.

\* The EEA includes the following 30 countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Liechtenstein, Iceland, and Norway

This Privacy Notice (A) explains how Nikon Corporation (hereinafter referred to as "Nikon") collects and processes the personal data of Nikon Film and Photo Contest entrants.

The Nikon Group respects the privacy of individuals and acknowledges that handling personal data in a lawful and proper manner is an important social responsibility, and commits to protecting personal data as follows. This privacy notice is based on Nikon Group's Privacy Protection Policy (<https://www.nikon.com/privacy/group/>) and applies to the personal data of entrants processed by Nikon in relation to the Nikon Film and Photo Contest run by Nikon. This privacy notice describes which personal data Nikon collects and processes and its purpose of use, so entrants are encouraged to read this notice carefully.

### **1. What personal data are collected**

The Nikon Film and Photo Contest is open to all eligible persons. Entries can be submitted via the procedure explained in the Nikon Film and Photo Contest Entry Guidelines (Short Film entries: <https://www.nikon-photocontest.com/en/film/entryguideline> ; Photo entries: <https://www.nikon-photocontest.com/en/photo/entryguideline> ). Personal data collected by Nikon are: the entrant's name, email address, phone number and FAX number, area of residence, nationality, date of birth, gender (optional), occupation (optional), and the entrant's uploaded work and its title (including an identifier to ensure that the file name of the entrant's work is unique). Nikon will later request only the winners to register their mailing address and postal code as additional personal data.

### **2. Purposes of use**

As detailed in the Nikon Film and Photo Contest Entry Guidelines (Short Film entries: <https://www.nikon-photocontest.com/en/film/entryguideline> ; Photo entries: <https://www.nikon-photocontest.com/en/photo/entryguideline> ), Nikon uses the personal data of entrants for the following



purposes with regard to holding the Photo Contest:

- PR activities using entered works during the Contest period
- Notification of results to the winners
- Providing information related to the Contest
- Contacting entrants regarding their entry
- Announcement of winning works
- Making archival records and publication of the winning works
- Contest statistics
- Sending questionnaires related to the Contest
- Sending prizes
- Creating statistical data
- Sending newsletter notifications for the next Contest

Additional purposes of use applying only to winners are as follows:

- Notifying winners that they have won and sending information about the award ceremony
- Publication in announcement of winning works
- Sending prizes
- Communication with winners regarding requests to create content
- Making archive records and publishing winning works

Aside from the above, Nikon may use entrants' works, work titles and entrants' names for advertisement purposes and social action programs for enriching the creator culture as a whole as stated in "Organizer Rights" of the Nikon Film and Photo Contest Entry Guidelines.

Nikon may also use entrants' works, work titles and entrants' names in any media for Nikon's business purposes. This includes e.g. presentation material, intranet websites, training materials, calendars, newsletters, posters, on-site galleries, recruitment materials, and company brochures or other company publications.

In addition, Nikon may use voluntarily provided responses to questionnaires as reference for product development.

The names of winners will also be published on websites, printed materials, or other materials related to this Contest when introducing winning works. In addition, personal data may be used for identity verification should entrants wish to change their address or otherwise update their personal data. The above-mentioned notifications and inquiries will be handled by the Nikon Film and Photo Contest Office.

### **3. Data storage**



Please note that, regardless of the entrant's country of residence, the data provided upon entry (image data of works and personal data) maybe stored in Japan or another country at the discretion of the organizer.

#### **4. Disclosure to third parties**

The organizer will provide personal data to judges and third parties involved in running the Contest to the extent necessary to run the Contest.

When providing personal data in accordance with the preceding paragraph, the organizer will execute contracts with such third parties that contain provisions of confidentiality, or otherwise ensure that they manage the personal data appropriately.

#### **5. Management of personal data**

Nikon strives to ensure the security of personal data provided via the internet by using the Secure Sockets Layer (SSL) or an equivalent protocol to prevent unauthorized access.

#### **6. Disposal and deletion of personal data**

The organizer will dispose of or delete the provided personal data (entry forms, data of submitted works, and other digital personal data related to the Contest) on December 31, 2025 (hereinafter referred to as "disposal date") except for the personal data of winners of the Contest or entrants whose works are used for purposes other than Contest promotion (hereinafter referred to as "winners, etc.") and the personal data of entrants who wish to receive email notifications for the next Contest. Please note that for this reason, except for winners, etc., it will no longer be possible to update or view the personal data of entrants after the disposal date.

#### **7. Inquiries Desk for inquiries related to personal data (including entry-related inquiries)**

October 30, 2024 to December 31, 2025

Nikon Film and Photo Contest Office Inquiries Desk

[info@nikon-photocontest.com](mailto:info@nikon-photocontest.com)

Update of personal data, etc.

If you need to update yor provided personal data, please see the instructions on the entry form. If this is not enough to resolve the issue, please contact the Inquiries Desk above.

#### **8. Other**



If you are a California resident, you may have additional rights regarding your personal information collected by the Company. Please read the California-Specific Addendum

> [NIKON PRIVACY MANAGEMENT CALIFORNIA-SPECIFIC ADDENDUM](#)

\* Personal information refers to information with which a particular individual can be identified, including any information that can be matched with other information to identify a particular individual.

## **PRIVACY NOTICE (B)**

This Privacy Notice (B) explains how Nikon Corporation (hereinafter referred to as "Nikon") collects and processes the personal data of Nikon Film and Photo Contest entrants.

The Nikon Group respects the privacy of individuals and acknowledges that handling personal data in a lawful and proper manner is an important social responsibility, and commits to protecting personal data as follows. This privacy notice is based on Nikon Group's Privacy Protection Policy (<https://www.nikon.com/privacy/group/>) and applies to the personal data of entrants processed by Nikon in relation to the Nikon Film and Photo Contest run by Nikon. This privacy notice describes which personal data Nikon collects and processes and its purpose of use, so entrants are encouraged to read this notice carefully.

### **1. About the company collecting your personal data**

Nikon Corporation (address: 1-5-20, Nishioi, Shinagawa, Tokyo, 140-8601) is responsible for the collection and use of your personal data described in this privacy notice.

The Nikon Group has established a system for coordinating the responsibilities of each group company with respect to the global processing of personal data in order to comply with the legal obligations of each country that are applicable to the processing of your personal information. In summary, we have arranged that if you want to exercise your rights, such as your right to access, correct, erase, restrict, object or port personal data or to withdraw your consent, you can contact us through the contact details in the Section '9. Inquiries related to personal data' below. Nikon Group companies and Nikon Corporation will assist each other where necessary to ensure that you can exercise your rights and your questions will be handled.

### **2. What personal data are collected and what they are used for**



The Nikon Film and Photo Contest is open to all eligible persons. Entries can be submitted via the procedure explained in the Nikon Film and Photo Contest Entry Guidelines (Short Film entries: <https://www.nikon-photocontest.com/en/film/entryguideline> ; Photo entries: <https://www.nikon-photocontest.com/en/photo/entryguideline> ). Personal data collected by Nikon are: the entrant's name, email address, phone number and FAX number, area of residence, nationality, date of birth, gender (optional), occupation (optional), and your uploaded work and its title (including an identifier to ensure that the file name of your work is unique). Nikon will later request only the winners to register their mailing address and postal code as additional personal data.

You are solely responsible for the content you share with us and we ask you to inform any person whose picture you use in the context of the Nikon Film & Photo Contest about how personal data is handled as described in this Privacy Notice.

### **Sensitive data**

When works are uploaded for the Nikon Film and Photo Contest, Nikon may receive sensitive data from you in the form of work including an identifiable person's picture. You are solely responsible for the content you share with us and you have to inform and obtain the prior consent of a person whose sensitive data are concerned for using their picture in a work in the context of the Nikon Film and Photo Contest as described in this Privacy Notice. In certain cases, a submitted work could be considered "special category personal data" under applicable data protection laws. For example, pictures revealing a person's racial or ethnic origin, political opinions, religious or philosophical beliefs or concerning their health, sex life or sexual orientation may qualify as special personal data. In such cases, you will have to formally obtain the person's consent in writing, if the special category personal data is not manifestly made public by the person themselves. At the time of your entry, Nikon will deem that the person's consent in writing was formally obtained by you and Nikon shall not be responsible in case you failed to obtain consent.

### **Purposes of use**

As detailed in the Nikon Film and Photo Contest Entry Guidelines (Short Film entries: <https://www.nikon-photocontest.com/en/film/entryguideline> ; Photo entries: <https://www.nikon-photocontest.com/en/photo/entryguideline> ), Nikon will use your personal data for the following purposes with regard to holding the Photo Contest:

- PR activities using entered works during the Contest period
- Notification of results to the winners
- Providing information related to the Contest
- Contacting you regarding your entry
- Announcement of winning works
- Making archival records and publication of the winning works



- Contest statistics
- Sending questionnaires related to the Contest
- Sending prizes
- Creating statistical data
- Sending newsletter notifications for the next Contest

Additional purposes of use applying only to winners are as follows:

- Notifying winners that they have won and sending information about the award ceremony
- Publication in announcement of winning works
- Sending prizes
- Communication with winners regarding requests to create content
- Making archive records and publishing winning works

Aside from the above, Nikon may use your works, work titles and your name for advertisement purposes and social action programs for enriching the creator culture as a whole as stated in “Organizer Rights” of the Nikon Film and Photo Contest Entry Guidelines.

In addition, we sometimes refer to voluntarily provided questionnaire responses when developing products. The names of winners will also be published on websites, printed materials, or other materials related to this Contest when introducing winning works. In addition, personal data may be used to verify your identity should you wish to change your address or otherwise update your personal data.

The above-mentioned notifications and inquiries will be handled by the Nikon Film and Photo Contest Office.

### **Legal basis for processing of personal data**

Nikon processes your personal data and person(s) appearing in your work in order to have you participate in the Nikon Film and Photo Contest as necessary for our legitimate interests or the interests of a third party or on the basis of consent.

When we process your personal data for our legitimate interests or the interests of a third party, we will take reasonable measures to prevent unwarranted harm to you. Nikon's legitimate interests are, for example, to provide information on works entered to the Nikon Film and Photo Contest and promote the contest. More information on our considerations when weighing Nikon's legitimate interests against consequences for our customers is available upon request. Where we process your personal data for our or a third party's legitimate interests, you have the right to object at any time to your personal data being processed if you have an acceptable reason based on your individual circumstances (please see ‘Article 7. Your rights’ below).

You can withdraw your consent at any time by changing your settings or by contacting us through the Inquiries Desk in Section ‘9 Inquiries related to personal data’ below.



Where we process your personal data for a purpose other than that for which we collected it initially and are relying on a legal basis other than consent or complying with legal obligations for this new purpose, we will ascertain whether processing for this new purpose is compatible with the purpose for which the personal data were initially collected. More information on this assessment is available upon request (please see Section '7. Your rights' below).

### **3. How personal data is collected**

The personal data we process is information that you knowingly provide to us directly. If you refuse to provide personal data that we require for the Nikon Film and Photo Contest, you may not be able participate in the contest.

### **4. Shared use of personal data**

Nikon will process some of your personal data in Japan. However, as a global organization and in the context of the contest, personal data may be processed or consolidated in specific or centralized, secure databases or systems located outside of Japan or in specific secure facilities around the world. As a result, your personal data may be shared with other entities within the Nikon Group. However, each Nikon Group company and those other systems and databases will only collect, receive, use, share or otherwise process such personal data provided for shared use in accordance with applicable laws, this Privacy Notice and our Nikon Group Privacy Protection Policy (<https://www.nikon.com/privacy/group/>). Moreover, internally we maintain a strict access policy with regard to the processing of personal data. Only a limited group of authorized Nikon staff on a need to know basis will have access to your personal data.

As a rule, we will not share your personal data with anyone other than Nikon Group staff, the contest judges and third parties overseeing the contest, besides your entered work, the work's title and the creator name. Your work may be used in any media for Nikon's internal use and business purposes and may be accessed on a global level. In order to achieve the purposes of use, Nikon may share your personal data in the same manner as your work with trusted third parties that provide services to us. All such third parties will be required to adequately safeguard your personal data, subject to agreements that cover the requirements of applicable laws. Your personal data may also be shared for investigations (e.g. disclosure to prevent crime or fraud, or to comply with a court order or legislation).

### **5. Secure management measures and personal data retention period**

Nikon will securely manage your personal data in accordance with our information security policy so that obtained personal data are protected against unauthorized access, unauthorized use, wrongful modifications,



loss, or destruction. Your personal data will be stored no longer than is necessary for the purpose of your participation in the Nikon Film and Photo Contest, compliance with legal and fiscal obligations and for solving any disputes. The specific data retention period for processing activities is in principle until the end of the year in which the Nikon Film and Photo Contest takes place, except in cases when we keep your email address until the end of the year after the Nikon Film and Photo Contest if you requested to receive a notification email for the next Nikon Film and Photo Contest, when we keep some entrants' personal data until the end of the second year after the Nikon Film and Photo Contest to be used for Nikon's business purposes other than PR activities (for example calendars), when it is necessary to execute agreements with you or necessary for legal obligations, or when as a result of winning an award in the Contest, your personal data and works are stored for an undetermined period of time for the purpose of keeping records of the winning works.

Please also note that when we delete personal data collected from you upon your request to erase the data, we retain the request email and the personal data of your name and your email address as proof of the erasure until we delete it together with other entrants' personal data at the end of the year in which the Nikon Film and Photo Contest takes place.

## **6. International transfer of personal data**

Given the global nature of our company, your personal data may be transferred to Nikon entities and entrusted third parties in countries outside the European Economic Area whose laws may not afford the same level of protection of your personal data. Where necessary, Nikon will ensure that appropriate and adequate safeguards are in place to comply with the requirements for the international transfer of personal data under applicable privacy laws. For transfers of personal data outside the European Economic Area, Nikon will use European Commission approved mechanisms, such as the Privacy Shield certification, and standard contractual clauses as safeguards, such as the "(EU-)controller to (Non EU/EEA-)controller" Decision 2004/915//EC (see Article 46 of the General Data Protection Regulation (GDPR)). If you have provided your personal data from within the EEA and wish to receive a copy of these safeguards, please contact us through the Inquiries Desk described in Section '9. Inquiries related to personal data' below.

## **7. Your rights**

You can contact us (please see Section '9. Inquiries related to personal data' below) to exercise any of the rights you are granted under applicable data protection laws, which include (1) the right to access your data, (2) to rectify them, (3) to erase them, (4) to restrict the processing of your data, (5) the right to receiving a file of your personal data and (6) the right to object to the processing of your personal data, and where we have asked for your consent for processing of your personal data, to withdraw this consent. These rights will be limited in some situations, such as when Nikon processes your personal data in response to a legal obligation.





We will, for example, deny your request for access when necessary to protect the rights and freedoms of other individuals or refuse to delete your personal data in case the continued retention of such data is necessary for compliance with legal obligations. The right to data transfer, for example, does not apply in case the personal data was not provided by you, if we did not obtain the personal data on the basis of your consent, or if processing of your personal data is necessary for execution of a contract. If you would like to exercise your rights, please contact our Inquiries Desk via the contact methods given in Section '9 Inquiries related to personal data' below. Please note that we may need you to provide additional information to confirm your identity in such a case. You also have the right to lodge a complaint with your local Supervisory Authority with regard to the personal data protection in the EEA.

You can also contact our Inquiries Desk via the contact methods given in Section '9 Inquiries related to personal data' if you have any questions or concerns in relation to this Privacy Notice.

#### 7.1 Right to access

You may ask us whether or not we are in possession of any of your personal data and, if so, receive access to that data in the form of a copy. When complying with an access request, we will also provide you with additional information, such as the purpose of processing the personal data, the categories of personal data concerned as well as any other information necessary for you to exercise the essence of this right.

#### 7.2 Right to rectification

You have the right to request Nikon to rectify your data in case the personal data that Nikon is in possession of are inaccurate or incomplete. Upon request, we will correct inaccurate personal data about you and, taking into account the purpose of the processing, complete incomplete personal data, which may include you providing supplementary personal data.

#### 7.3 Right to erasure

You also have the right to request Nikon to erase your personal data, which means the deletion of your data by us and, where possible, any other controller to whom your data has previously been disclosed by us. Erasure of your personal data only finds place in certain cases as stipulated in Article 17 of the General Data Protection Regulation (GDPR). This includes situations where your personal data are no longer necessary in relation to the initial purposes for which they were collected as well as situations where they were processed unlawfully. Due to the way we maintain certain services, it may take some time before backup copies are erased.

#### 7.4 Right to restriction of processing

You have the right to obtain the restriction of the processing of your personal data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data was contested but some time is needed for



us to verify their (in)accuracy. This restriction of processing does not prevent us from continuing to store your personal data. We will inform you before the restriction is lifted.

#### 7.5 Right to receive your file (data portability)

You have the right to request Nikon to provide you with the personal data stored by Nikon in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible, Nikon will transmit your personal data directly to the other controller.

#### 7.6 Right to object

You have the right to raise an objection to the effect that Nikon no longer process your personal data. This only applies in case the when Nikon's 'legitimate interests' (including processing for profiling purposes) constitutes the legal basis for the processing of the personal data by us (see the Section 'Legal basis for personal data processing' above).

At any time and free of charge you can object to processing of your personal data for direct marketing purposes (including profiling purposes to the extent that it is related to such direct marketing). In case you exercise this right, we will no longer use your personal data for direct marketing purposes.

### 8. Amendments to this privacy notice

This privacy notice was updated on September 24, 2020 and is the most recent version. We will review and, if necessary, update this privacy notice from time to time and notify you of any substantive changes.

### 9. Inquiries related to personal data

October 30, 2024 to December 31, 2025

Nikon Film and Photo Contest Office Inquiries Desk

[info@nikon-photocontest.com](mailto:info@nikon-photocontest.com)

Update of personal data, etc.

If you need to update your provided personal data, please see the instructions on the entry form. If this is not enough to resolve the issue, please contact the Inquiries Desk above.