

India Addendum – Handling of Personal Information in the JCB Cashback Campaign

1. Applicability

This India Addendum – Handling of Personal Information in the JCB Cashback Campaign (“**India Addendum**”) supplements the Policy, with respect to processing of a customer’s personal information for the Campaign if his/her RuPay JCB Global card has been issued in India. Capitalized terms not defined herein shall have the same meaning as ascribed to them in the Policy. In the event of any conflict between this India Addendum and the Policy, the provisions of this Addendum shall prevail. “Personal information” for the purposes of this India Addendum shall mean and include “personal data” under the Digital Personal Data Protection Act, 2023.

2. Legal Grounds for Data Processing

The Company relies on a customer’s consent as the primary legal ground to process his/her personal information, unless otherwise permitted under applicable law.

3. Contact Us

If a customer has any questions, concerns, complaints or grievances regarding the Policy or the Company’s processing of personal information, the customer may contact the Company’s Grievance Officer, whose details are provided below. The Company will respond to complaints or grievances within 30 days.

Grievance Officer: Information Governance Team, Internal Control Department

Address: Aoyama Rise Square 5-1-22 Minami Aoyama, Minato-ku, Tokyo 107-8686, Japan

Email: jcbinter-eudataprotection@info.jcb.co.jp

4. Complaint to the Data Protection Board of India

In the event the Company does not address a customer’s grievances, he/she may approach the Data Protection Board of India to make a complaint.

5. Data Transfer Outside of Country

The Company will comply with applicable laws and conditions relating to the transfer of personal information outside India. The Company will not transfer

personal information to any country or territory outside India, where such transfer is restricted as per applicable law.

6. Company's Responsibility for Data Processors

The Company will remain responsible for compliance with applicable data protection laws by its data processors/subcontractors, for the processing activities specified in Section 5 of the Policy.

7. Customer Responsibility to Ensure Completeness, Accuracy and Consistency

By participating in the Campaign and consenting the Company processing personal information in accordance with the Policy, the customer represents, warrants and undertakes to ensure that the personal information provided to the Company is complete, accurate and consistent.

8. Customer Rights

If a customer intends to exercise any of his/her rights under applicable law with respect to the Company's data processing activities, he/she is requested to contact the Company using the details provided in Section 8 of the Policy.

- (1) **Right to Withdraw Consent:** Where consent is the basis of the Company processing a customer's personal information, the customer shall have the right to withdraw his/her consent and the Company will, within reasonable time and subject to applicable law, cease to process such personal information. However, in such case, the customer may no longer be permitted to participate in the Campaign. Upon withdrawal of consent to the Company processing such personal information, the Company will also, unless it is required to retain the personal information for compliance with applicable law, erase the personal information, but may retain aggregated data/de-identified data/anonymized data derived from or incorporating the personal information, provided it no longer identifies the customer.
- (2) **Access:** Where consent is the basis of the Company processing a customer's personal information, the customer shall have the right to access:
 - A summary of the customer's personal information being processed by the Company along with information on the processing activities undertaken by the Company with respect to such personal information.

- Subject to applicable law, the identities of the third-parties with whom the Company has shared the customer's personal information along with a description of such personal information.
 - Any other information relating to the customer's personal information as the Company may be required to share in accordance with applicable law.
- (3) **Correct, complete or update:** Where consent is the basis of the Company processing a customer's personal information, the customer shall have the right to correct inaccurate or misleading personal information, complete incomplete personal information, and/or update his/her personal information being processed by the Company.
- (4) **Erase:** Where consent is the basis of the Company processing a customer's personal information, the customer shall have the right to erase his/her personal information in our possession. However, in such case, the customer may no longer be permitted to participate in the Campaign. Upon receipt of such request, unless the Company is required to retain such personal information for compliance with applicable law, the Company will erase the personal information, but may retain aggregated data/de-identified data/anonymized data derived from or incorporating the personal information, provided it no longer identifies the customer.
- (5) **Right to nominate:** The customer may submit a request to nominate individuals who shall, in the event of the customer's death or incapacity, exercise the customer's rights with respect to the Company processing the customer's personal information.

9. Personal Information of Children

If a customer is under the age of 18 or otherwise incompetent to contract, the customer shall not attempt to register to participate in the Campaign or send any personal information about himself/herself to the Company, unless the Company has obtained the customer's parent's or guardian's (as applicable) verifiable consent. If the Company learns that it has collected personal information from an unauthorized individual without appropriate consent, the Company will promptly delete that information. The Company will not conduct tracking, behavioral monitoring or targeted advertising directed at children, unless permitted under applicable law.