

NIKON AMERICAS INC. PRIVACY POLICY

Updated July 10, 2023

PLEASE READ THIS NIKON AMERICAS (AS DEFINED BELOW) PRIVACY POLICY (AS DEFINED BELOW) CAREFULLY BEFORE USING A COMMUNICATION POINT (AS DEFINED BELOW). WHEN YOU USE A COMMUNICATION POINT, YOU ARE SUBJECT TO THIS PRIVACY POLICY. DO NOT USE ANY COMMUNICATION POINT IF YOU DO NOT WANT TO BE SUBJECT TO THIS PRIVACY POLICY.

This Nikon Americas Privacy Policy (“Privacy Policy”) applies to all information received by Nikon Americas Inc. (“Nikon Americas,” “we,” “our” or “us”) through various points of communication (collectively, the “Communication Point(s)”), including but not limited to electronic, in-person, hard copy written or other means by which you may provide us with information, for example, such as making payments to and/or receiving payments from Nikon Americas.

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1. Our Commitment to Privacy

Nikon Americas recognizes that the protection of information that it receives from you is very important. Collecting information allows Nikon Americas to better understand and to be more responsive to you, as well as to develop and maintain websites relevant to your needs, and assists us in managing our business better. To better protect your privacy, we provide this notice explaining our information practices and the choices you can make about the way your information is collected and used.

2. NOTICE TO CALIFORNIA CONSUMERS

IF YOU ARE A CALIFORNIA CONSUMER, YOU MAY HAVE ADDITIONAL RIGHTS REGARDING YOUR PERSONAL INFORMATION COLLECTED BY

NIKON AMERICAS. PLEASE READ **THE CALIFORNIA SPECIFIC ADDENDUM** WHICH IS ATTACHED TO THIS PRIVACY POLICY AND WHICH SUPPLEMENTS SECTIONS 1 THROUGH 12 OF THIS PRIVACY POLICY (the “CALIFORNIA SPECIFIC ADDENDUM”).

3. The Information We Collect

We collect both Non-Personally Identifiable Information and Personally Identifiable Information, each defined below, that you provide to us through the Communication Points.

“Non-Personally Identifiable Information” is information that, by itself, cannot be used to identify you or to contact you and is information not associated with a specific personal identity. Non-Personally Identifiable Information may include information that you, at your option, voluntarily provide us through any of the Communication Points.

“Personally Identifiable Information” is information collected from the Communication Points that is associated with a person’s name or personal identity and can be used to identify or contact you. It includes, but is not limited to, such information as your name, postal address, e-mail address, telephone number (mobile and/or landline), fax number, and credit/debit card information. We do not knowingly collect Personally Identifiable Information from individuals under the age of sixteen.

4. How We Use Collected Information

Nikon Americas uses collected information (both Personally Identifiable Information and Non-Personally Identifiable Information) to provide you with the services and/or other information that you request.

For example, we may use Personally Identifiable Information to help you complete a transaction or order with us, or to respond to your inquiries and requests. Personally Identifiable Information in the form of credit/debit card information is used only for payment processing and fraud prevention.

We may use Non-Personally Identifiable Information to improve the experience of all of our Communication Points. In addition, we may take your Personally Identifiable Information and make it Non-Personally Identifiable Information, either by combining it with information about other individuals (aggregating your information with information about other individuals), or by removing characteristics, such as your name, that make the information personally identifiable to you, i.e., de-personalizing your information. Given the nature of this information, there are no restrictions under this Privacy Policy on Nikon Americas’ right to aggregate or de-personalize your Personally Identifiable Information, and use and/or share with third parties the resulting Non-Personally Identifiable Information in any way.

5. Who We Share Information With

Nikon Americas may disclose Personally Identifiable Information to companies affiliated with Nikon Americas, such as our parent company and/or unaffiliated third parties

performing services on our behalf or for us or with us, such as agents, professional advisors, service providers, consultants, shippers, processors, vendors, and suppliers, for the purposes of enabling them to respond to your requests to us or your purchase of products, services or information, or the other purposes discussed above in Section 4 of this Privacy Policy. All such affiliated and unaffiliated parties who have access to Personally Identifiable Information are required by Nikon Americas to keep confidential such information and may not use, retain, and/or disclose it for any purpose other than to carry out the services they are performing for Nikon Americas and/or as otherwise required or permitted by law. Except as otherwise stated in this Privacy Policy, Nikon Americas will not share Personally Identifiable Information with third parties without your permission, unless to (a) comply with any law, subpoena, regulation or court order; (b) respond to requests from governmental authorities; and/or (c) help prevent fraud or to protect the safety, rights, property or security of Nikon Americas as well as that of third parties.

6. Websites and Online Behavioral/Targeted Advertising.

Nikon Americas does not maintain a dedicated website and therefore does not collect cookie pixels from your browser and does not participate in online behavioral or targeted advertising.

7. Our Commitment To Information Security

Information security is important at Nikon Americas, and while no security measure is perfect or impenetrable and we cannot guarantee the security of the information that you provide to us, you can be assured that we maintain commercially reasonable physical, electronic, and administrative measures and safeguards and periodically review these security measures and safeguards to protect your Personally Identifiable Information from unauthorized or inappropriate access and use.

8. Our Commitment To Children's Privacy

Our Communication Points are not intended for or directed at individuals under the age of sixteen (16), and we do not knowingly solicit or collect personal information from or about individuals under the age of sixteen. If we learn that we have collected or received personal information from an individual under the age of sixteen (16) without parental consent and verification, we will delete that information. Should any parent or guardian discover that his/her child has provided personal information to Nikon Americas, please contact Nikon Americas at <https://www.nikonusa.com/en/about-nikon/contact-us.page> to have such information deleted from our records. If you are a California consumer, please see the California Specific Addendum for more information concerning personal information of individuals of a certain age.

9. How To Access, Edit, Delete or Update Your Information

You can access, edit, delete, and update any Personally Identifiable Information that you provided to us by visiting <https://www.nikonusa.com/en/about-nikon/contact-us.page> to contact us by telephone or email. If you are a California consumer, to exercise your rights under this Section 9, please follow the instructions set forth in the California Specific Addendum. To protect your privacy and security, we will also take steps to verify your

identity before granting you access to edit or update your Personally Identifiable Information.

10. Your Privacy Preferences -Opting In/Out

Nikon Americas does not currently sell personal information. However, for Nevada consumers, Nevada law gives Nevada consumers the right to request that a company not sell their personal information, even if their information is not currently being sold. If you are a Nevada consumer and wish to exercise this right, please submit your request by completing the [Rights Request Form available by clicking here](#).

11. CHANGES TO PRIVACY POLICY.

BY VISITING ANY OF THE COMMUNICATION POINTS, OR OTHERWISE PROVIDING NIKON AMERICAS WITH YOUR INFORMATION, YOU ARE SUBJECT TO THIS PRIVACY POLICY AND THUS CONSENT TO OUR COLLECTION AND USE OF YOUR INFORMATION AS SET FORTH IN THIS PRIVACY POLICY. WE RESERVE THE RIGHT TO AMEND THIS PRIVACY POLICY AT OUR DISCRETION AND AT ANY TIME. WHEN WE MAKE CHANGES TO THIS PRIVACY POLICY, WE WILL POST THE UPDATED NOTICE ON THE WEBSITE OF OUR SUBSIDIARY NIKON INC. AT WWW.NIKONUSA.COM AND UPDATE THE NOTICE'S EFFECTIVE DATE.

12. How To Contact Us.

If you have any questions, comments or concerns with respect to our privacy practices or this Privacy Policy, please feel free to contact us in writing at Nikon Americas Inc., 1300 Walt Whitman Road, Melville, New York 11747, Attention: Legal Department - Privacy.

NIKON AMERICAS INC. PRIVACY POLICY CALIFORNIA-SPECIFIC ADDENDUM

Effective Date: July 10, 2023

If you are a California consumer within the meaning of the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020, as may be amended from time to time (collectively, the "CCPA"), this California Specific Addendum applies to you. This California Specific Addendum supplements our Privacy Policy to which this California Specific Addendum is attached and prevails over any conflicting provisions in the Privacy Policy (this California Specific Addendum and the Privacy Policy, together, the "California Privacy Policy").

California Personal Information We Collect

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, which may include customers, employees, vendors, or other third parties ("California Personal Information"). In particular, we have collected the following categories of California Personal Information within the last twelve (12) months:

Category	Examples	Collected [Yes/No]
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. This category may overlap with other categories.	Yes
C. Protected classification characteristics under California or federal law.	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status, genetic information.	Yes
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
F. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Yes

Under the CCPA, “Sensitive Personal Information” means (1) personal information that reveals: (a) a consumer’s social security, drivers’ license, state identification card, or passport number; (b) a consumer’s account log-in, financial account, debit card, or credit card number in combination with any required security of access code, password, or credentials allowing access to an account; (c) a consumer’s precise geolocation; (d) a

consumer's racial or ethnic origin, religious or philosophical beliefs or union membership; (e) the contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; or (f) a consumer's genetic data; and (2) (a) the processing of biometric information for the purpose of uniquely identifying a consumer; (b) personal information collected and analyzed concerning a consumer's health; or (c) personal information collected and analyzed concerning a consumer's sex life or sexual orientation.

To the extent any Sensitive Personal Information is collected, Nikon Americas does not use or disclose your Sensitive Personal Information, as defined above, for any purpose other than those expressly permitted under the CCPA.

Please note California Personal Information does not include publicly available information from government records, de-identified or aggregate consumer information, and personal information protected by certain other sector-specific federal or California statutes. We maintain and use de-identified data without attempting to re-identify such data.

Sources of Collection

For the above categories (A) - (F), we obtain California Personal Information from a variety of sources.

These sources include:

- yourself, with respect to both online and offline interactions you may have with us or our service providers including but not limited to paper forms and electronic or digital forms;
- other entities with whom you transact or with whom you maintain relationships who may deal with us on your behalf;
- the devices you use to access our online services, if any;
- identity verification and fraud prevention services; and
- other sources consistent with this California Privacy Policy.

Our Use of California Personal Information

For the above categories (A) – (F), we use the California Personal Information we collect for the business purposes disclosed within this California Privacy Policy.

These business purposes include:

1. Audits and reporting relating to particular transactions and interactions, including online interactions, you may have with us or others on our behalf;
2. Detecting and protecting against security incidents, and malicious, deceptive, fraudulent or illegal activity, and prosecuting the same;
3. Debugging to identify and repair errors in our systems;
4. Providing services on our behalf or on behalf of another, including creating, maintaining or servicing accounts; providing customer service and support;

- fulfilling transactions; verifying identity information; processing payments; and other services;
5. To complete a transaction requested by you;
 6. Conducting activity to verify, enhance, and maintain the quality or safety of services or devices which we may own, control, or provide;
 7. To respond to your questions and requests;
 8. To enable us to communicate with you regarding our business relationship, such as for example, by email or by online virtual meeting platforms;
 9. As part of our recruitment and employment activities including but not limited to conducting interviews and background checks, providing benefits and other employment-related matters during the course of employment;
 10. To comply with applicable laws and regulations.

Retention of California Personal Information

Nikon Americas keeps your California Personal Information as long as reasonably necessary to fulfill the business purpose(s) set forth above, subject to your right to delete California Personal Information as further described below in this California Privacy Policy. We may keep some of your California Personal Information longer to the extent necessary to comply with any applicable legal or regulatory obligations.

Sharing of California Personal Information

A. Disclosure of California Personal Information for Business Purposes:

Categories of Third Parties

Within the last twelve (12) months, we have disclosed California Personal Information identified in the above Categories (A)-(F) for our business purposes, to our service providers, to our affiliates, and/or to any other third party to whom you or your agents have authorized us to disclose your personal information in connection with the services provided to you. To learn more about the categories of third parties with whom we share such information, please see Section 5 of the Privacy Policy.

B. Sale of California Personal Information

Within the last twelve (12) months, we have not sold any California Personal Information identified in categories (A)-(F) above. We do not disclose California Personal Information of individuals we know to be under the age of sixteen (16) to third parties for monetary or other valuable consideration as a “sale” under the CCPA without affirmative authorization. If you are an individual under the age of sixteen (16), please do not submit any California Personal Information to us unless we have received the affirmative authorization described below in this California Specific Addendum.

C. Cross-Contextual Behavioral and/or Targeted Advertising. Nikon Americas does not maintain a dedicated website and therefore does not collect cookie pixels

from your browser and does not participate in online behavioral or targeted advertising.

California Rights and Choices

You have certain rights related to your California Personal Information. You may exercise these rights free of charge except as otherwise provided by applicable law. We endeavor to respond to your request promptly upon verification and as required by applicable law.

- A. Right to Know/Portability.** You have the right to request that we disclose to you:
- the categories of California Personal Information we have collected about you;
 - the categories of sources from which the California Personal Information is collected;
 - our business or commercial purpose for collecting, selling or sharing California Personal Information;
 - the categories of third parties with whom we disclose California Personal Information; and
 - the specific pieces of information we have collected about you. To protect your privacy and security, we may redact this information to the extent it is Sensitive Personal Information.

To the extent that we sell or share your California Personal Information or disclose such information for a business purpose, you may request that we disclose to you:

- the categories of California Personal Information that we have collected about you;
- the categories of California Personal Information about you that we have sold or share within the meaning of the CCPA and the categories of third parties to whom the California Personal Information was sold or shared, by category or categories of personal information for each third party to whom the California personal information was sold or shared; and
- the categories of California Personal Information about you that we disclosed for a business purpose.

- B. Right to Delete.** You have the right to request that we delete California Personal Information about you which we have collected from you. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- debug products to identify and repair errors that impair existing intended

functionality.

- exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- comply with a legal obligation.
- make other internal and lawful uses of that information that are compatible with the context in which you provided it.

C. Right to Correct. You have the right to correct your inaccurate California Personal Information that we maintain about you.

D. Right to Opt-Out. You have the right to opt-out of the sale or sharing of your California Personal Information by Nikon Americas.

E. Right to Limit Use/Disclosure of Sensitive Personal Information. You have the right to limit the use or disclosure of your Sensitive Personal Information by Nikon Americas. To the extent any Sensitive Personal Information is collected, Nikon Americas does not use or disclose your Sensitive Personal Information for any purpose other than those expressly permitted under the CCPA.

F. Right to Non-Discrimination. You have the right not to receive discriminatory treatment by Nikon Americas for the exercise of your privacy rights conferred by the CCPA, including an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of their CCPA rights.

G. How to Submit a Request. You may request to exercise these rights by:

- Completing **[Rights Request Form available by clicking here.](#)**
- Calling us toll-free at **[877-589-0493](tel:877-589-0493)**.

H. Verifiable Request. As required under applicable law, we take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We may require you to provide information sufficient to allow us to reasonably verify you are the person about whom we collected personal information and to describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. For example, we may request that you provide us with at least two data points that match those that we maintain about you; or, for Sensitive Personal Information, we may require that we match three pieces of personal information you provide to us with personal information we maintain about you, together with obtaining a signed declaration from you confirming that you are the consumer whose personal information is the subject of the request. We may deny a request or limit our response to your exercise of the above rights as permitted under applicable law. We will respond to your request no later than forty-five (45) calendar days after we receive your request, provided that any delays in providing verification information may delay our processing of your request.

I. Agent Authorization and Disability Access. You may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf. As permitted by law, we may require additional verification in response to a request even if you choose to use an agent. Unless the agent provides us with a valid Power of Attorney, we may require a consumer to verify their identity with us separately. You may also make a verifiable consumer request on behalf of your minor child.

Consumers with disabilities may access this California Privacy Policy in an alternative format by contacting us in writing at Nikon Americas Inc., 1300 Walt Whitman Road, Melville, New York 11747, Attention: Legal Department - Privacy, and requesting that we mail a copy of this California Privacy Policy.

J. Children’s Right to Opt Out and Right to Opt In. Although we are not currently selling California Personal Information, if you are sixteen (16) years of age or older, you have the right to direct us to not sell your California Personal Information at any time should our practices change in the future (the “right to opt out”) and this election shall be effective for a period of twelve (12) months. We do not sell the California Personal Information of consumers we actually know are younger than sixteen (16) years of age, unless we receive affirmative authorization (the “right to opt in”) from either the consumer who is between thirteen (13) and sixteen (16) years of age, or the parent or guardian of a consumer younger than thirteen (13) years of age. Consumers who opt-in to California Personal Information sales may opt-out of future sales at any time.

- To submit an opt-out request, please complete **[Rights Request Form available by clicking here.](#)**

Or

- By calling us toll-free at **877-589-0493**

Nondiscrimination and Financial Incentives

We will not discriminate against you because of your exercise of any of the above rights, or any other rights under the CCPA, including by:

- denying you goods or services;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing you a different level or quality of goods or services; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Nikon Americas does not currently offer any “financial incentives” under the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information’s value and contain written terms that describe the program’s material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Other California Privacy Rights

Under California’s “Shine the Light” law (Civil Code Section § 1798.83), if you are a California resident, you may, one time per calendar year, request a notice regarding the categories of personally identifiable information disclosed by Nikon Americas (if any) during the immediately preceding twelve (12)-month period to third parties for their own direct marketing purposes, and the name and address of any such third parties. To obtain such a notice, please send a written request by postal mail to Nikon Americas Inc., 1300 Walt Whitman Road, Melville, New York 11747, Attention: Legal Department - Privacy.

CHANGES TO THIS CALIFORNIA-SPECIFIC ADDENDUM

WE RESERVE THE RIGHT TO AMEND THIS CALIFORNIA-SPECIFIC ADDENDUM AT OUR DISCRETION AND AT ANY TIME. WHEN WE MAKE CHANGES TO THIS CALIFORNIA-SPECIFIC ADDENDUM, WE WILL POST THE UPDATED NOTICE ON THE WEBSITE OF OUR SUBSIDIARY NIKON INC. AT WWW.NIKONUSA.COM AND UPDATE THE NOTICE’S EFFECTIVE DATE.

Contact Information

You may contact us with questions or concerns about our privacy policies or practices and your choices and rights under California law by visiting <https://www.nikonusa.com/en/about-nikon/contact-us.page> and then completing the

form to contact us by email; or by contacting us in writing at Nikon Americas Inc., 1300 Walt Whitman Road, Melville, New York 11747, Attention: Legal Department - Privacy.