

SPEEDA Privacy Policy

Date of enactment: 1 June 2014

Date of final revision: 1 September 2020

Uzabase, Inc. (hereinafter “the Company”) provides information infrastructure supporting decision-making in business activities. The Company recognises its social responsibility in protecting personal information that it handles, protects individual rights and interests, and observes rules and regulations concerning personal information.

In order to realise the principles noted below, the Company shall build a personal information protection management system. The Company also hereby declares that the entire company will endeavour to continuously improve the system with constant awareness of the latest IT trends and changes in social requirements and business environment.

Principle 1. The Company shall endeavour to specify the purpose for which personal information will be utilised. It will not handle personal information that is beyond the necessary scope to fulfil that purpose. The Company shall also take appropriate measures to achieve this.

Principle 2. The Company shall observe laws, ordinances, state policies, and other rules and regulations concerning personal information management.

Principle 3. The Company shall stipulate internal regulations concerning complaints and consultation requests regarding personal information management. The Company shall respond to such complaints and consultation requests swiftly and in good faith.

Principle 4. The Company shall endeavour to take necessary and appropriate measures to ensure the security of personal information, including the prevention and correction of instances of personal information leakage, loss, and damage.

Principle 5. The Company shall stipulate internal regulations concerning personal information protection and make appropriate revisions in a timely manner to promote constant improvements.

Uzabase, Inc.

1. Handling of Personal Information

The Company handles personal information related to SPEEDA (hereinafter referred to as “the Service” for all services related to SPEEDA) in accordance with the Act on the Protection of Personal Information (Act No. 57 of 30 May 2003; hereinafter referred to as “the Act”) and the SPEEDA Privacy Policy (hereinafter referred to as “the Policy”). However, the Policy shall not be applicable to the handling of personal information in the case where exemptions to Chapter IV of the Act as stipulated in Article 76 of the Act are applied. The Company shall endeavour to properly manage and use personal information even in the event of such an exemption.

2. Definition of Personal Information

The term “personal information” as used in the Policy shall mean the following information about a living individual: 1) any information that one can be identified with (including information which cannot be used on its own to identify an individual, but which can be used to identify an individual via simple comparison with other information), such as name, date of birth, address, family structure, e-mail address, etc., and 2) any information that includes a personal identification number or mark, such as fingerprint data and passports (passport number).

Nevertheless, in the event that the Act and any of its relevant laws and ordinances are revised, the definition shall follow such revision(s).

3. Purpose of Personal Information Utilisation

The Company shall use personal information for the purposes listed below. In cases where changes in the purpose of utilisation are necessary, the Company will issue a notification or make a public announcement regarding such changes in a timely manner.

Personal Information to be Acquired	Purpose of Use
(1) Personal information obtained from the customer	<ul style="list-style-type: none"> ● To provide the Service and any related after-sales services for it ● To improve or develop the Service and other related services ● To respond to inquiries ● To offer information on other services provided by the Company or subsidiaries and affiliated companies of the Company (hereinafter referred to as “Uzabase Group”) and conduct other marketing activities ● To provide personal information to business partners, experts, etc. based on the consent and application by the customer ● To implement promotional campaigns and surveys ● Other purposes of use agreed upon with the customer
(2) Personal information obtained from contractors, business partners (referring to those other than the Company’s customers or contractors), etc.	<ul style="list-style-type: none"> ● For analysis, implementation, and management of business transactions or outsourcing operations ● For information on services provided by the Company and the Uzabase Group ● For publication on services provided by the Company and the Uzabase Group (with consent from the relevant parties)

<p>(3) Personal information obtained from participants at events, conferences, seminars, etc.</p>	<ul style="list-style-type: none"> ● For information provision, organisation, and operation of events, etc. held by the Company and the Uzabase Group ● For providing information to co-organisers of events, speakers, etc. ● For planning and development of events or products/services ● For supplying information on services provided by the Company and the Uzabase Group
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4. Provision of Personal Data to a Third Party

The Company will not provide personal information that has been systematically aggregated to enable search via computer, or personal information that has been systematically aggregated according to set principles to enable a simplified search via organisation, categorisation, purpose, number, etc. (hereinafter referred to as “Personal Data”) to a third party except in the following circumstances:

- (1) In cases where prior consent on such action has already been obtained;
- (2) In cases where such action is necessary in order to protect individuals from life threats, physical injuries, and property damage, and where there is difficulty in obtaining the Subject’s consent;
- (3) In cases where personal information management is outsourced partially or fully (including server storage) to an external enterprise in accordance with a business outsourcing contract, the Company shall sign an agreement with the third party concerning personal information management and/or appropriately supervise the third party regarding security management of personal information;
- (4) In cases where business succession as a result of a merger or acquisition, company split, business transfer, etc. has taken place;
- (5) In cases where such action is conducted in accordance with the Act or other laws and ordinances.

5. Acquisition and Utilisation of Attribute Information and Action History

In order to render the content of the Service and advertisements provided by the Company more suitable for the User, the Company shall perform behavioural targeting and other activities using a system established by the Company or a service provided by a third party. Specifically, the Company shall acquire and analyse non-personally identifiable information such as searched keywords, pages viewed, browsers, server access logs including IP addresses, and device information. There may be cases where the above information is provided for the same purpose to the Uzabase Group and the advertisers of the Uzabase Group.

A list of the main third-party services that are used by the Uzabase Group's Service is available via the below URL.

<https://www.uzabase.com/thirdparty>

6. Joint Utilisation of Personal Data

In order to provide better services, the Company shall share and jointly utilise Personal Data as listed below under strict management and with appropriate security measures.

Shared-Use Personal Data

Personal Data listed in Article 3 of this Policy.

Group Affiliates of the Company

Companies under the Uzabase Group.

Purpose of Shared-Use

The purpose is unanimous with the purpose stipulated in Article 3 of this Policy. (However, in this article, “the Service” shall be deemed as “the service provided by the Uzabase Group”).

Responsible Party for Managing Shared-Use Personal Data

The Company is the party responsible for managing the Personal Data.

7. Procedures for Consultation and Disclosure Requests Concerning Personal Information Management

The Company shall respond to requests from individuals for disclosure, correction, addition or deletion, or termination of use of their personal information, etc. (hereinafter referred to as “the Disclosure”) according to the following items. If the Company is not legally obligated to make the Disclosure, etc., the Company shall determine, at its own discretion, whether or not to make the Disclosure.

(1) If an individual wishes to submit a request regarding the Disclosure, said individual shall contact [Personal Information Inquiries] via the email address listed below;

(2) The Company shall confirm an individual’s identity upon receipt of said individual’s request for the Disclosure according to Item (1). In some cases, the Company may request the person to send copies of identification documents;

(3) After confirming an individual’s identity, the Company shall guide said individual through specific procedures for the Disclosure. The individual shall follow the guidance and fill out the necessary information in the document specified by the Company and submit it to the Company.

[Personal Information Inquiries]

E-mail: privacy@uzabase.com

8. Major Changes and Notifications

In case of major changes and notifications regarding personal information protection, the Company shall make public announcements through its website and/or via other channels.

9. Revisions of the Policy

In order to constantly improve its personal information management, the Company may change and revise the Principles, under which circumstances the Company shall release the revised Policy on the company website that it operates.

When such revision requires Users' consent under relevant laws and ordinances, the Company shall obtain such consent in a manner designated by the Company.

10. Personal Information Protection Supervisor

Uzabase, Inc. CPO/CAO

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Tokyo, Japan

E-mail: privacy@uzabase.com