

Privacy Policy

PADECO Co., Ltd. (hereinafter referred to as "**the Company**") respects the privacy of the Company's customers (including individuals who are members of the organization if the customer is a corporation, group, or other organization), users of the website managed by the Company (hereinafter referred to as "**the Company website**"), and other individuals related to the Company (hereinafter referred to as "**customers**") and considers the protection of personal information to be an important responsibility. The necessary matters for this purpose are outlined in this Privacy Policy (hereinafter referred to as "**this Policy**").

Article 1 (Personal Information)

"Personal information" refers to "personal information" as defined in the law related to the protection of personal information (hereinafter referred to as the "**Protection of Personal Information Act**"), and refers to information about a living individual that can identify a specific individual by name, date of birth, or other description, or that contains a personal identification code.

Article 2 (About the Collection and Use of Personal Information)

- 1 When the Company collects personal information, the Company will clearly state the purpose for which the information is to be collected and will collect the information in a lawful and fair manner to the extent necessary to achieve that purpose.
- 2 When the Company asks customers to provide personal information, the Company will clearly state in advance the purpose for which the information will be used, and will collect the information within an appropriate scope. The Company will use the collected personal information for the following purposes. The Company will not use the customers' personal information for any purpose other than the following and closely related purposes without the customers' permission.
 - (1) To provide, improve, and develop services provided by the Company
 - (2) To confirm the identity of customers
 - (3) To respond or communicate to customers from the Company
 - (4) To provide information or contact you regarding services or products other than those described above in clause (1)
 - (5) To plan, develop, or implement new services or products
 - (6) To statistically analyze personal information and provide information that is processed so that it does not fall under the category of personal information (hereinafter referred to as "**statistical information**") for any purpose or use, or to provide such information to a third party
 - (7) For other purposes announced, indicated, or for which consent is obtained to customers at the time of collection
 - (8) For purposes related or incidental to the above purposes of use
- 3 The Company may change the purpose of use of personal information only when the purpose of use is reasonably considered to be relevant to the purpose of use before the change. In the event of a change in the purpose of use, the Company will notify customers of the changed purpose by appropriate means or publicly announce it on the Company website.

Article 3 (Appropriate Management of Personal Information)

- 1 The Company will comply with the Protection of Personal Information Act and related laws, regulations, and guidelines, handle the personal information of customers and other parties in an appropriate manner, and take appropriate management measures, including security measures, to prevent loss, destruction, alteration, leakage, and unauthorized access.
- 2 The Company will establish a management system for the protection of personal information that is appropriate to the actual conditions of our business, handle such information appropriately and carefully per internal rules, and provide training to our employees.
- 3 The Company will check, review, and improve the management of personal information as appropriate.

Article 4 (About the Provision of Personal Information to Third Parties)

- 1 Collected personal information will not be provided or disclosed to third parties without consent. However, this will not apply for the following cases.
 - (1)When permitted or required by Article 27 of the Protection of Personal Information Act or other laws and regulations
 - (2)When all or part of the handling of personal information is outsourced within the scope necessary to achieve the purpose of use to facilitate the smooth performance of business operations. In this case, we will select an appropriate contractor, conclude a contract to ensure proper handling, and supervise the implementation.
 - (3)When personal information is provided to a successor company in the event of a merger, business transfer, or other business successions.
 - (4)In cases where personal information is used jointly with a specific party, and the items of personal information to be jointly used, the scope of the parties jointly using the personal information, the purpose of use by the parties using the information, and the name or title of the party responsible for the management of the personal information is notified in advance or the name of the party responsible for the management of the personal information is made readily accessible to the customers
- 2 When providing personal information of customers to a third party in a foreign country, the Company will obtain the prior consent of the customers. However, this shall not apply if the foreign country has a system for the protection of personal information that is deemed equivalent to that in Japan by the Rules of the Personal Information Protection Commission, or if the third party has established a system for the handling of personal data that conforms to the standards set forth by the Rules of the Personal Information Protection Commission.

Article 5 (Disclosure of Personal Information)

- 1 When the Company receives a request from customers for disclosure of personal information managed by the Company or records of provision of personal information to a third party, the Company will disclose such information by providing electromagnetic records or delivering written documents within a reasonable period per the law after confirming the identity of the requesting person. However,

the Company may not disclose all or part of the information if disclosure would result in any of the following cases.

- (1) If there is a risk of harm to the life, body, property, or other rights or interests of the customer or a third party
 - (2) If there is a risk of significant hindrance to the proper conduct of the Company business
 - (3) If the disclosure leads to violation of any laws or regulations
- 2 If the Company decides not to disclose all or part of the personal information requested above, if such personal information does not exist, or if it is difficult to disclose the personal information in the manner requested by the customer, the Company will notify the customer to that effect without delay.

Article 6 (Suspension of Use, etc. of Personal Information)

In the event that the Company receives a request from customers to suspend use of or delete personal information (hereinafter referred to as "suspension of use, etc.") for any of the reasons set forth below, the Company will, after following the procedures set forth in this Policy Article 9, if the reasons for the request are recognized, conduct suspension of use, etc. in accordance with the law and notify the customers to that effect. However, in cases where the suspension of use, etc. is difficult due to involvement of large costs or other reasons, and alternative measures can be taken as necessary to protect the rights and interests of customers, such alternative measures will be taken.

- (1) Cases in which there are no grounds under Article 18, Paragraph 3 of the Personal Information Protection Act, yet personal information is handled beyond the scope of the purpose of use without the consent of the individual concerned
- (2) Cases in which Article 18, Paragraph 2 of the Personal Information Protection Act is violated, and personal information is used in a manner that is likely to encourage or induce illegal or unjust acts
- (3) Cases in which personal information has been obtained by wrongful means
- (4) If the personal information falls under the category of information requiring special consideration as defined in Article 2, Paragraph 3 of the Protection of Personal Information Act, which was obtained without the consent of the individual concerned without grounds under Article 20, Paragraph 2 of the Protection of Personal Information Act.
- (5) When the Company no longer needs to use the personal information of the customers
- (6) Other reasons stipulated in the Personal Information Protection Act for requesting the suspension of use, etc.

Article 7 (Suspension, etc. of Provision of Personal Information to Third Parties)

If the Company receives a request from customers to suspend the provision of personal information to a third party (hereinafter referred to as "**suspension of provision to a third party**") on the grounds that such information has been provided to a third party without the consent of the person in violation of Article 27, Paragraph 1 or Article 28 of the Personal Information Protection Act, the Company will, after the procedures prescribed in this Policy Article 9 and based on the results, if such a request is deemed reasonable, suspend provision to a third party per the law, and notify the customers to that effect. Note that the proviso of the preceding Article shall apply mutatis mutandis to the suspension of provision to a third

party.

Article 8 (Correction and Deletion of Personal Information)

When the Company receives a request from customers to correct, add, or delete (hereinafter referred to as "**corrections**") his/her personal information managed by the Company because the content of such personal information is not true, the Company will, after confirming that there is a reason for such a request based on the results of the procedures set forth in this Policy Article 9, respond to such requests appropriately and promptly within a reasonable period and scope and notify such customers whether such corrections were made and the details thereof.

Article 9 (Procedures for Confirming Requests from Customers)

When the Company receives a request from customers for any of the three preceding articles, the Company will respond to the request after confirming the identity of the person making the request and after investigating and confirming that there is a reason for the request.

Article 10 (About the Acquisition of Cookies)

- 1 The Company website may use general technologies such as cookies. A "cookie" is a small text file that is sent from a web server to the browser of a customer's device and stored on the device when the customers access the Company website. Cookies are generally divided into two categories of "1st Party Cookies" and "3rd Party Cookies". The former is usually set up by the Company for the purpose of using the functions provided on the Company website. The latter are set not by the Company, but by third parties with whom the Company works. Cookies do not contain personally identifiable information such as names or email addresses.
- 2 The Company may acquire information on the device used by the customer (OS, advertising ID, computer name, language settings, etc.) or may link the acquired information to an internal identifier given to the customers by the Company. This information is used to provide better service, to verify customer's identity, and to prevent fraudulent activities that may interfere with the normal provision of service.
- 3 The Company may use the personal information collected by the Company or received from access analysis tools such as Google Analytics or the Company's other partners, including browsing and search history, location information, access analysis data, and cookies. After linking it with personal information of the customers possessed by the Company, this may be used for marketing purposes such as displaying behaviorally targeted advertisements and for other business purposes. However, in cases where the consent of customers is required under the Personal Information Protection Act for such linking, consent will be obtained in accordance with the law and related guidelines.
- 4 Customers may refuse the use of cookies through their browser settings. Customers may refuse the use of cookies through their browser settings.
However, customers may not be able to use some of the functions of the Company website, or may be restricted from using some of the functions of the Company website.

Article 11 (Revision of this Policy)

The Company may revise this Policy from time to time in response to changes in laws and regulations or business needs. In such cases, the revised policy will be posted on the Company website, and the revised policy will become effective at the time of such posting.

Article 12 (Contact for Inquiries Regarding the Protection of Personal Information)

Please contact the following for inquiries regarding the Company's handling of personal information.

PADECO Co., Ltd. Personal Information Consultation Service

6-17-19 Shimbashi, Minato-ku, Tokyo 105-0004

Shin Onarimon Building

Phone: 03-5733-0855 (Monday through Friday)

Email: padeco.privacy@padeco.co.jp