

## **SPEEDA Privacy Policy**

Date of enactment: 1 June 2014

Date of final revision: 28 April 2022

Uzabase, Inc. (hereinafter referred to as the “Company”) provides information infrastructure supporting the decision-making processes of business professionals under its purpose of “Awaken a world of play in business, with our insights”. The Company handles a wide range of data, content, and knowledge as part of the insights it provides. It strives to not only accurately convey the objective facts contained in data, but also provide a variety of opinions and views derived from the analysis of such facts in the form of content and human knowledge, and aims to achieve its purpose by circulating these in society.

The Company recognises that personal information constitutes an integral part of the insights it provides and shall comply with all laws and regulations relating to personal information in order to protect the rights and interests of individuals.

In addition, in order to realise the principles noted below, the entire Company hereby commits to establishing a management system for protecting personal information and to improving it continuously, with a constant awareness of the latest trends in IT technology and changes in social requirements and the 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 comply with laws, regulations, national guidelines and other norms regarding the handling of personal information.

Principle 3. The Company shall establish internal regulations to address complaints and inquiries regarding the handling of personal information. The Company shall respond to such complaints and inquiries 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 establish internal regulations regarding the protection of personal information 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 of Japan (Act No. 57 of 30 May 2003; hereinafter referred to as the “Act”) and this SPEEDA Privacy Policy (hereinafter referred to as the “Policy”), provided, however, that the Policy shall not be applicable to the handling of Personal Information in the case where the Company is exempted from the application of Chapter IV of the Act in accordance with the Act.

The Company shall endeavour to manage and use Personal Information appropriately even in cases where the Act and/or the Policy are not applicable.

## **2. Definition of Personal Information**

The term “Personal Information” as used in the Policy shall mean the following information relating to a living individual: 1) any information that a specific individual can be identified with (including information which cannot be used on its own to identify a specific individual, but which can be readily collated with other information and thereby identify a specific individual), such as name, date of birth, or other descriptions, and 2) any information that contains an individual identification code, such as fingerprint data and passport number.

Notwithstanding the foregoing, in the event that the Act or any relevant laws and regulations are revised, the definition of Personal Information shall follow such revision(s).

## **3. Use of Personal Information**

The Company shall use Personal Information for the purposes listed below. In cases where changes in the purpose of utilisation are necessary, the Company shall promptly issue a notification or make a public announcement regarding such changes.

Personal Information to be Acquired	Purpose of Use and Retention Period
<p>(1) Personal Information acquired from customers</p> <p>Types of Personal Information</p> <ul style="list-style-type: none"> <li>▪ Name</li> <li>▪ Name and address of the company, department and position</li> <li>▪ Phone number</li> <li>▪ Email address</li> </ul>	<ul style="list-style-type: none"> <li>▪ Providing the Service and performing related tasks, such as issuing and managing IDs, billing for usage fees, and providing support desk services.</li> <li>▪ Providing information to partner companies and experts (provision of information to third parties) based on the consent/request of the principal.</li> <li>▪ Responding to customer inquiries.</li> <li>▪ Providing information on other services offered by the Company or the subsidiaries and affiliated companies of the Company (hereinafter referred to as the “Uzabase Group Companies”) and conducting other marketing activities.</li> <li>▪ Analysing usage and other data for the improvement and further development of the Service and other services.</li> <li>▪ Implementing promotional campaigns and surveys.</li> </ul> <p>Retention period: the shortest period required to achieve the purpose of use.</p>
<p>(2) Personal Information acquired from contractors, business partners (referring to those other than Company’s customers or contractors), etc.</p> <p>Types of Personal Information</p> <ul style="list-style-type: none"> <li>▪ Name</li> <li>▪ Address (for sole proprietor, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Examining outsourcing operations or transactions, managing and communicating within the scope necessary to achieve the purposes of such agreements.</li> <li>▪ Providing information on the services offered by the Company and the Uzabase Group Companies and conducting other marketing activities.</li> <li>▪ Publishing information on services offered by the Company and the Uzabase Group Companies (only with the consent of the principal).</li> </ul> <p>Retention period: the shortest period required to achieve the purpose of use.</p>

<ul style="list-style-type: none"> <li>▪ Name and address of the company, department and position</li> <li>▪ Phone number</li> <li>▪ Email address</li> <li>▪ Bank account information (if required for payment)</li> </ul>	
<p>(3) Personal Information acquired from participants at events, conferences, seminars, etc. (hereinafter referred to as the “Events”)</p> <p>Types of Personal Information</p> <ul style="list-style-type: none"> <li>▪ Name</li> <li>▪ Name and address of the company, department and position</li> <li>▪ Phone number</li> <li>▪ Email address</li> </ul>	<ul style="list-style-type: none"> <li>▪ Providing information on, organising, and operating the Events by the Company and the Uzabase Group Companies.</li> <li>▪ Providing information to third-party co-organisers, speakers, and other relevant parties of the Events (provision of information to third parties), based on the consent of the principal.</li> <li>▪ Analysing information on the Event participation for the planning and development of new Events or products and services.</li> <li>▪ Providing information on services offered by the Company and the Uzabase Group Companies and conducting other marketing activities.</li> </ul> <p>Retention period: the shortest period required to achieve the purpose of use.</p>

#### 4. Provision of Personal Data to Third Parties

The Company shall not provide the Personal Data (the definition of Personal Data is in accordance with the Act) acquired by the Company to third parties except in the following cases:

- (1) In cases where prior consent on providing the information to third parties has been obtained;

- (2) In cases where there is a need to protect a human life, body or fortune, and when it is difficult to obtain a principal's consent;
- (3) In cases where handling of Personal Information is outsourced partially or fully (including server storage) to an external company in accordance with an operation outsourcing contract. In these cases, the Company shall execute an agreement with that outsourcing company regarding the handling of Personal Information and shall appropriately supervise the outsourcing company to ensure that the Personal Information is securely managed by the outsourcing company;
- (4) In cases where business succession as a result of a merger or acquisition, company split, business transfer, or other reasons has taken place;
- (5) In cases where such action is conducted in accordance with the Act or other laws and regulations.

The provision of Personal Data to third parties located in foreign countries shall be handled in accordance with the stipulations of Article 7 of this Policy.

## **5. Acquisition and Use of Attribute Information and User Behaviour Data**

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

A list of the main third-party services that are used by the Company and Uzabase Group Companies' service is available via the link below.

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

## **6. Shared Use of Personal Data**

In order to provide better services, the Company will share and jointly use 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 Companies with which Data is Shared]**

Uzabase Group Companies.

### **[Purpose of Shared Use of Personal Data]**

The purpose of shared use of Personal Data is identical with the purpose stipulated in Article 3 of this Policy. (However, the “Service” in this article shall be interpreted as the “service provided by the Uzabase Group Companies”).

### **[Responsible Party for Managing Shared-Use Personal Data]**

The Company is the party responsible for managing the Personal Data (for representative and address, please refer to the [Company's website](#)). The shared use of Personal Data with Uzabase Group Companies located in foreign countries shall be handled in accordance with Article 7 of this Policy.

## **7. Provision, Shared Use, or Storage of Data by Third Parties Located in Foreign Countries**

The Company may, in the following cases, provide or entrust the storage (hereinafter collectively referred to as “provide”) of Personal Data to a third party located in foreign countries (i.e. countries or regions outside Japan) in the following cases. For a list of foreign countries to which the Company may provide Personal Data and information on the applicable legislative frameworks of such foreign countries, please refer to the [Annex](#).

Please note that the list excludes those prescribed by rules of the Personal Information Protection Commission as a foreign country establishing a personal information protection system recognized to have equivalent standards to that in Japan in regard to the protection of an individual's rights and interests.

### **[Provision of Personal Data to Third Parties Located in Foreign Countries (Including Entrustment of Handling of Personal Information)]**

The Company may provide Personal Data to third parties located in foreign countries to the extent necessary to achieve the purpose of use. In addition, the Company may entrust part or all of the handling of Personal Data to third parties located in foreign countries. When providing or entrusting the handling of Personal Data in accordance with this article, the Company shall impose contractually necessary obligations on the third party, such as the obligation to maintain confidentiality and the obligation to ensure the security of the information.

### **[Shared Use of Personal Data with Uzabase Group Companies Located in Foreign Countries]**

The Company will jointly utilise Personal Data with Uzabase Group Companies located in foreign countries in accordance with Article 6.

Please refer to the Company's [corporate website](#) for a list of foreign countries where the Uzabase Group Companies are located.

Each of the Uzabase Group Companies located in a foreign country has established the necessary systems to continuously take measures equivalent to those required to be taken by personal information handling business operators under the Act.

### **[Entrustment of Storage and Other Operations of Personal Data to Third Parties Located in Foreign Countries]**

The Company may entrust the storage and other operations of Personal Data via cloud-based computing or other methods to a third party located in a foreign country (where this does not constitute an entrustment of handling of Personal Data). In such cases, the Company shall exercise necessary and appropriate supervision over the third party.

## **8. Procedures for Inquiries Regarding the Handling of Personal Information and Requests (such as Disclosure)**

The Company shall respond to inquiries and requests from principals for disclosure, correction, addition or deletion, or termination of use of their Personal Information (hereinafter collectively referred to as the "Disclosure") according to the following items. If the Company is not legally obligated to make the Disclosure, the Company shall determine, at its own discretion, whether or not to make the Disclosure.

- (1) If a principal wishes to submit a request regarding the Disclosure, said principal can make such request by contacting the **Personal Information Inquiry Desk** via the email address provided below. In order to ensure an appropriate and prompt response, please state the name of the service in question (e.g. "SPEEDA") and the purpose and basis of the request when contacting the above desk.
- (2) The Company shall confirm the person's identity upon receipt of said person's request regarding the Disclosure pursuant to Item (1) above. In some cases, the Company may request the person to send copies of its official certificates;
- (3) After confirming the identity, the Company shall guide said principal through specific procedures for the Disclosure. The principal shall follow the guidance and fill out the necessary information in a form specified by the Company and submit it to the Company.

**[Personal Information Inquiry Desk]**

Email: [privacy@uzabase.com](mailto:privacy@uzabase.com)

**9. Major Changes and Notifications**

In case of major changes or announcements regarding the protection of Personal Information, the Company shall make a public announcement through its website and/or via other channels.

**10. Revisions of the Policy**

In order to constantly improve its handling of Personal Information, the Company may change and revise the Policy. In such cases, the Company shall release the revised Policy on the corporate website that it operates. In the case of changes to the content of this Policy for which the customer's consent is required by law, the customer's consent shall be obtained in the manner prescribed by the Company.

**11. Personal Information Protection Supervisor**

Uzabase, Inc. Executive Officer in Charge  
Email: [privacy@uzabase.com](mailto:privacy@uzabase.com)