

PRIVACY POLICY

Cruivel Communication Japan Inc. (hereinafter referred to as the "Company") will comply with laws and regulations regarding the protection of the rights of individuals and personal information regarding the protection of all personal information handled by the Company.

In all our businesses, including all services provided by our company (hereinafter referred to as "our services"), we will comply with the Act on the Protection of Personal Information (hereinafter referred to as the "Personal Information Protection Act") and other related laws and regulations, and we will establish and implement the following personal information protection policy.

Business information

Company name: Cruivel Communication Japan Inc.

Address: Shinmakicho Building Annex Daiichi 1F, 3-2-14 Nihonbashi, Chuo-ku, Tokyo 103-0027

CEO: Yuki Matsuura

Section 1: Definition

For the purposes of this Privacy Policy, personal information refers to information about a living individual that falls under any of the following:

- Name, date of birth, nationality, address, contact information, gender, place of employment, social media account information, bank account number, credit card information, photograph that can identify the person, other descriptions, etc. Records made by magnetic methods or other methods that cannot be recognized by human perception) or recorded or expressed using voice, movement, or other methods that can identify a specific individual by means that can be easily collated with other information to identify a specific individual.
- Information that includes an individual identification code.

Section 2: Purpose of Use of Personal Information

We will use personal information only within the scope of the following purposes. In addition, we will not use personal information beyond the mentioned scope except with the consent of the person in question or as permitted by the Personal Information Protection Law and other laws and regulations related to personal information.

The purpose of use of personal information handled by the Company is as follows;

- a. Written documents from the person in question (including those by website, e-mail, etc.) Hereinafter referred to as "documents")
 - i. Information of persons who use the various service businesses conducted by the Company
 - To provide services appropriately
 - To make necessary communications and notifications regarding the service
 - To make plans and proposals regarding the implementation of the service

- To report the details of the service to the relevant business operators
- To request cooperation in marketing activities, surveys, signatures, etc. related to the Company's business activities
- For member management
- To provide information on our services
- ii. Information about business partners
 - For business partner management, sales activities, and business communication
 - To send invoices
 - To send products and documents necessary for the content of the transaction
 - To provide services appropriately
 - To provide information on our services
- iii. Information about those who have made inquiries to the Company
 - To respond to inquiries received
 - To provide information on our services
- iv. Information on participants in events such as trainings, gatherings, tours, etc. sponsored by the Company
 - To make necessary communications and notifications regarding the event
 - To record and stream the event
 - To report the details of the event to the relevant business operators
 - To request cooperation in investigating the event and signing the petition
 - To provide information on our services, information on similar events, and introduction of work entrusted by business partners, etc.
- v. Information on persons interviewed in public relations activities and persons obtained in such activities
 - To publish in public relations magazines, pamphlets, and websites
 - To publish articles in the media
 - To provide information on our services, information on similar events, and introduction of work entrusted by business partners, etc.
- vi. Information on subcontractors
 - For business communication
 - To send products and documents necessary for the content of the transaction
 - To send or settle invoices
 - To provide information on our services, information on similar events, and introduction of work entrusted by business partners, etc.
- vii. Information of subcontractors
 - For business communication
 - To send products and documents necessary for the content of the transaction
 - To send or settle invoices
- viii. Information on subcontractors
 - For business communication, shipping of items necessary for business, and payment of consignment fees

- ix. Information on applicants for employment
 - To contact you for employment selection and interviews, etc.
 - x. Information on current employees
 - For personnel management and business communication
 - b. When obtaining personal information from the person other than in writing
 - i. Recording of the online conference system
 - To confirm the contents of the meeting
 - ii. Recording of online events
 - To confirm the contents
 - For archive distribution such as missed delivery
 - To provide information on our services
 - iii. Credit card information
 - For settlement
 - iv. Taking photos and videos
 - To give gifts to participants of events and tours, and to report
 - To report business to suppliers regarding business implementation
 - To provide information on our services
 - c. Purpose of use when indirectly acquiring personal information from business partners, etc.
 - i. Information entrusted to the Company for the purpose of conducting entrusted business
 - For data entry and processing operations
 - For operations such as document preparation, issuance, and procedures related to various affairs
 - To provide information on our services
 - To carry out other business requested by the contractor
- * Information entrusted to us for the purpose of conducting commissioned business will not be disclosed.

Section 3: Acquisition of Personal Information

In consideration of the business content and scale of our services, we will acquire personal information appropriately, such as by specifying the purpose of use in advance and disclosing it, collect it to the extent necessary to achieve the purpose of use, and will not use personal information beyond the purpose of use at the time of acquisition. In addition, the "Act on the Protection of Personal Information" (Act No. 57 of 15. Hereinafter referred to as the "Personal Information Protection Law") and the terms of use of our services, etc., we will not use personal information collected without the prior consent of the person for any purpose other than the purpose of use, and we will endeavor to delete the personal information without delay after the purpose of use is achieved.

Section 4: Provision of Personal Information to Third Parties

The Company will not provide personal information to third parties except in cases where the person has given consent in advance or when otherwise permitted by law. In the event that

we transfer a significant part or all of our business to a third party, such as a merger, acquisition, or other transfer of material part or all of our business, we may transfer personal information necessary for the operation of the business to that third party, but we will endeavor to maintain confidentiality in accordance with this Privacy Policy.

The "third party" in this article shall be in accordance with Article 23, Paragraph 4 of the Act on the Protection of Personal Information, which was last revised on 16 July 2015, and Item 1 of the same paragraph "When the business operator handling personal information entrusts all or part of the handling of personal data to the extent necessary to achieve the purpose of use" does not fall under the above third parties.

If it is necessary for the appropriate and smooth provision of services in our services, we may provide personal information to a third party to the extent stipulated in the personal information protection policy in the terms of use of the service after obtaining the consent of the individual.

Section 5: Security Management of Personal Information

In addition to taking measures to prevent leakage, loss, or damage of personal information and other safety management, we will educate our employees and thoroughly protect personal information.

Section 6: Use of Statistical Information

We may collect data in a form that does not identify individuals and use it as statistical information to help us provide more useful information and services, and to understand which parts of our website and services are of most interest. Statistical data is not considered personal information for the purposes of this Privacy Policy.

Section 7: Cookies and Other Technologies

This service may use cookies and other technologies such as pixel tags and web beacons. These technologies help us better understand the behavior of people who use our website, to see which parts of our website people visit, and to facilitate and evaluate the effectiveness of advertising and web searches. If you wish to disable cookies, please disable cookies by changing the settings of your web browser. However, if you disable cookies, you may not be able to use some of the features of our services.

Section 8: Request for Notification of Purpose of Use, Disclosure, Correction, Suspension of Use, etc. of Personal Information

The Company accepts requests for notification of the purpose of use, disclosure of personal information, correction, addition or deletion of content, suspension of use or elimination, and suspension of provision to third parties at the following contact point. If we receive a request from the person in question, we will confirm that the person making the request is the person in question or his or her agent, respond in accordance with the provisions of laws and regulations, and respond in writing or by e-mail. In addition, if the request does not meet the requirements stipulated by laws and regulations, or if there are grounds for refusing disclosure,

etc. under the Personal Information Protection Law or other laws and regulations, we may not be able to respond to the request.

Section 9: Inquiries

Requests for disclosure, opinions, questions, complaints, and other inquiries regarding the handling of personal information are accepted by e-mail to the following contact point.

Contact for Handling of Personal Information

Cruivel Communication Japan Inc.

Email: contact@cruivel.com

Section 10: Governing Law and Exclusive Jurisdiction

This Privacy Policy shall be governed by and construed in accordance with the laws of Japan, and any dispute arising out of or in connection with this Privacy Policy shall be subject to the exclusive jurisdiction of the Tokyo District Court as the court of first instance.

Section 11: Continuous Improvement

In response to changes in social conditions and advances in information technology, and in light of the Company's business environment, we will strive for continuous improvement, and may change this privacy policy as necessary. In addition, any changes to this privacy policy will be posted on this page.

Applicable date from 1 Sep 2024