

Privacy Policy

Jorte Inc. (the "Company") understands the importance of protecting customer's personal information, and will observe the Act on the Protection of Personal Information (the "Act") and endeavor to treat and protect personal information in an appropriate manner in accordance with this Privacy Policy (the "Privacy Policy"). With respect to treatment and protection of personal information in each application service provided by the Company, the supplemental explanation shall be set forth in the relevant terms of use, etc. of each application service.

1. DEFINITION

In the Privacy Policy, personal information shall mean "personal information" defined in paragraph 1 of Article 2 of the Act, i.e. the information regarding a living individual which can identify a specific individual by name, date of birth or other description contained in such information (including information which may be easily referred to other information and will thereby enable identification of a specific individual).

2. PURPOSE OF USE

The Company shall use customers' personal information for the following purposes:

- (1) provision and announcement with respect to the Company's services;
- (2) responses to customer inquiries;
- (3) investigation and analysis with respect to the utilization status of the services, etc.;
- (4) improvement of the services and development of new functions and services, etc.;
- (5) operation and management of seminars and events, etc.;
- (6) recruitment for persons who apply to the Company's recruitment process; or
- (7) other purposes related to the above purposes.

3. CHANGE OF PURPOSE OF USE

The Company may change the purpose of use of personal information to the extent that the purpose of use after the change is reasonably deemed duly related to the original purpose of use. When the purpose of use has been changed, the Company shall notify the customer of, or publicly announce the purpose of use after the change.

4. RESTRICTION ON USE

The Company shall not use personal information, without the consent of the relevant customers, beyond the scope necessary for the achievement of the purpose of use, unless permitted by the Act or other laws or regulations; provided, however, that this provision shall not apply if:

- (1) the use of personal information is based on laws and regulations;
- (2) the use of personal information is necessary for the protection of the life, body or property of an individual and it is difficult to obtain the consent of the relevant customers;
- (3) the use of personal information is specially necessary for improving public health or promoting the sound growth of children and it is difficult to obtain the consent of the relevant customers; or
- (4) the use of personal information is necessary for cooperating with a national government, a local government, or a person or entity entrusted thereby in executing the affairs prescribed by laws and regulations and acquisition of the consent of the relevant customers may impede the execution of the affairs concerned.

5.PROPER ACQUISITION

The Company shall acquire personal information by a proper means, and shall not acquire it by a deception or other wrongful means.

6.SECURITY CONTROL

The Company shall sufficiently and appropriately supervise the Company's employee to ensure the security control of personal information against the risk of loss, destruction, alteration or leakage. When the Company entrusts a third party with the handling of personal information in whole or in part, the Company shall sufficiently and appropriately supervise the third party to ensure the security control of personal information.

7.PROVISION TO A THIRD PARTY

The Company shall not provide personal information to a third party without the prior consent of the relevant customers, unless the disclosure is permitted by the Act or other laws or regulations; provided, however, that the following cases shall not be regarded as the provision to a third party:

- (1)Cases where the Company entrusts a third party with the handling of personal information within the scope necessary for the achievement of the purpose of use;
- (2)Cases where personal information is provided as a result of the succession of business in a merger or otherwise; or
- (3)Cases where personal information is used jointly with others in accordance with the provisions of the Act.

8.DISCLOSURE

In cases where the Company is requested by a customer to disclose the personal information under the Act, the Company shall, after confirming that the request is made by the principal, disclose the personal information to the customer without delay (in cases where the Company does not have such personal information, the Company shall notify the customer to that effect); provided, however, that this provision shall not apply to cases where the Company is not obliged to disclose such personal information under the Act or other laws or regulations.

9.CORRECTION, ETC.

In cases where the Company is requested by a customer to correct, add or delete the personal information under the Act on the ground that such personal information is contrary to the fact, the Company shall, after confirming that the request is made by the principal, make a necessary investigation without delay within the scope necessary for the achievement of the purpose of use, and on the basis of the result, correct, add or delete the personal information and notify the customer to that effect (in cases where the Company decides not to make such correction, addition or deletion, the Company shall notify the customer to that effect); provided, however, that this provision shall not apply to cases in which the Company is not obliged to make such correction, addition or deletion under the Act or other laws or regulations.

10.DISCONTINUANCE OF THE USE, ETC.

In cases where the Company is (i) requested by a customer to discontinue using or to erase the personal information under the Act on the ground that such personal information is being handled beyond the purpose of use publicly announced in advance or has been acquired by

a deception or other wrongful means, or (ii) requested by a customer to discontinue providing the personal information under the Act on the ground that such personal information is provided to a third party without the customer's consent, and where it is found that the request has a reason, the Company shall, after confirming that the request is made by the principal, discontinue the use of or erase the personal information, or discontinue the provision of the personal information, without delay and shall notify the customer to that effect; provided, however, that this provision shall not apply to cases in which the Company is not obliged to make such discontinuance of use or erasure, or discontinuance of provision, under the Act or other laws or regulations.

11.USE OF COOKIES AND OTHER TECHNOLOGIES

Cookies or similar technologies may be used in the Company's service. Such technologies help the Company to recognize the status of use of the Company's service, etc. and contribute improvement of the service. When a user intends to disable cookies, the user may disable cookies by changing the web browser's settings. Please note that when cookies are disabled, a part of the service may be unavailable.

12.CONTACT

With respect to requests for disclosure, etc., comments, questions, complaints and other inquiries regarding the handling of personal information, please contact the following.

Sogetsu Kaikan 10F, 7-2-21 Akasaka, Minato-ku, Tokyo, 107-0052, Japan
Legal Affairs Section of the Administration Department
Jorte Inc.

email: privacy@jorte.com

Please note that the Company shall receive the contacts from 10:00 to 18:00 on weekdays.

13.CONTINUOUS IMPROVEMENT

The Company shall endeavor to review timely the status of the operation regarding handling of personal information and to improve such operation continuously. The Company may amend this Privacy Policy as necessary.

Effective as of July 1st, 2006

Revised as of July 23, 2014

Revised as of June 29th, 2016