

# Privacy policy

Pretia Technologies, Inc. (hereinafter referred to as “we”) will act in accordance with this Privacy Policy in our handling of personal information (“personal information” having the meaning set forth in Article 2, Paragraph 1 of the Act on the Protection of Personal Information (hereinafter referred to as “APPI”), with this definition applying to all subsequent uses of this term).

## 1. Basic policy

We will endeavor to properly protect personal information by complying with the APPI and putting in place the proper organizational structure.

## 2. Proper obtainment of personal information

Any personal information obtained by us will be obtained in a proper and fair manner. We will not obtain any personal information classified as “Special Care-Required Personal Information” without prior consent or unless permitted by law.

## 3. Proper Use of Personal Information

We will not use the personal information we have obtained in ways that may encourage or induce illegal or unjust acts or in other inappropriate ways, and will observe the proper use of such information in accordance with the purpose of its use.

## 4. Implementation of appropriate security control measures

In order to prevent unauthorized access, falsification, leakage, loss, or damage of personal information in our possession, we will take necessary and appropriate security control measures, including the appointment of a personal information manager, establishment of internal rules, training of employees, access control, restriction of equipment brought in, restriction of access to information, and measures to prevent unauthorized access. If you have any questions regarding security control measures, please contact the contact point in Section 11.

## 5. Purpose of use

We will use personal information for the purposes listed below. This information will not be used for any other purposes, unless: i) there are grounds to do so under the APPI or any other law, ii) we have obtained consent from the person to whom the personal information applies (“person” having the meaning set forth in Article 2, Paragraph 8 of the APPI, with this definition applying to all subsequent uses of this word), or iii)

we have made a notification or announcement to the effect that such information will be used for a separate purpose. If the terms of use for a service that we offer provides that the personal information may be used for another purpose, then such purpose shall also be included here.

Information type	Purposes of use
Customer information and user information (including log information, device information, positional information, purchase information, etc.)	<ul style="list-style-type: none"> <li>-To verify a person’s identity in relation to our services, products, and other offerings (hereinafter referred to collectively as “Our Services”)</li> <li>-To provide Our Services</li> <li>-To allow a person to efficiently access their own information</li> <li>-To maintain information that a person has entered, so that the person is not required to enter it again when needed</li> <li>-To provide information related to Our Services</li> <li>-To marketing and advertisement of Our Services</li> <li>-To generate data, such as statistical data, that does not identify the individual person</li> <li>-To improve Our Services (including the monitoring of unauthorized activities, taking measures against such activities, etc.)</li> <li>-To research and develop new services and other offerings</li> <li>-To investigate and deal with acts that are prohibited by a contract, terms of use, etc., or are problematic in other ways</li> <li>-To respond to inquiries</li> <li>-To verify the purchase of, deliver, and provide after-sales care for Our Services</li> <li>-To verify a person’s identity</li> <li>-For purposes related to the above</li> </ul>

6. Furnishing to third parties.

We will not furnish any personal information to a third party unless permitted by the APPI or other laws.

Individual Numbers and Specific Personal Information (personal information that contains an Individual Number) will only be used for administrative purposes as permitted by law, and will not be furnished to a third party unless the law allows us to do so.

#### 7. Provision of personal information to third parties located in foreign countries

We will take necessary measures when providing personal information to third parties located in foreign countries in accordance with laws and regulations.

#### 8. Outsourcing of personal information

We may outsource the handling of personal information to outside parties to the extent necessary to achieve the purpose of use. In such cases, we will exercise necessary and appropriate supervision by such means as contractually obligating them to ensure appropriate security management.

#### 9. Anonymously processed information / Pseudonymized Processed Information

We will handle anonymized processed information and pseudonymized processed information (as defined under the APPI) in accordance with law.

#### 10. Requests for disclosure, correction, etc. of personal information

In the event that anyone files a request as per the APPI for disclosure (including disclosure of records of personal data provided to or received from third parties), correction, addition, deletion, suspension of use, elimination, or suspension of provision to third parties of personal information in our possession in accordance with the APPI after confirming that the request has been filed by the person to whom the personal information applies. Anyone who wishes to file such requests should use the contact details provided in Section 9.

#### 11. Contact details for inquiries

If you have any questions regarding this Privacy Policy or the request described in the preceding paragraph, please contact to the following address:

Pretia Technologies, Inc.

Name of contact person in charge: Administration Division

TUNNEL TOKYO 9F Sumitomo Fudosan Osaki Garden Tower, 1-1-1 Nishi Shinagawa, Shinagawa-ku, Tokyo 141-0033

E-mail: [info@pretia.co.jp](mailto:info@pretia.co.jp)

#### 12. Use of cookie data and Google Analytics

We use cookies for: i) improving ease of use for users, including features such as saving of settings, ii) session security purposes, including the maintenance and protection of sessions, and iii) improving the quality of service by learning how many visits users make and how they use this service, the size of the user base, etc. Users may choose to allow or disallow our use of cookies, but prohibiting us from saving cookies may result in the unavailability of some parts of this service. This service may also make use of Google Analytics from time to time. Please see the following links for details on the collection and processing of data and other aspects of Google Analytics:

<https://marketingplatform.google.com/about/analytics/terms/jp/>

<https://policies.google.com/privacy>

<https://policies.google.com/technologies/partner-sites>

### 13. Outside links

We are not responsible in any way for personal information on third party websites whose links are provided on a website that we operate.

### 14. Personal information provided by minors

We may require the consent of the minor's parent or guardian if needed in the event that a minor provides their personal information to us.

### 15. Requests

Our Services may place a user's information under password protection. We ask that users assume responsibility for managing their own ID and password. Please do not disclose any personal information, be it another user's or your own, so that Our Services may be used in a safe manner.

### 16. Amendments to this privacy policy

This privacy policy may be amended as needed.

### 17. Name, address and name of representative of the business operator handling personal information

Pretia Technologies, Inc.

TUNNEL TOKYO 9F Sumitomo Fudosan Osaki Garden Tower, 1-1-1 Nishi Shinagawa, Shinagawa-ku, Tokyo  
141-0033

CEO Yu Ushio

Amended on 25/04/2022