

# Privacy Policy

The General Incorporated Association steAm BAND (hereinafter referred to as “the Association”) establishes this Privacy Policy (hereinafter referred to as “this Policy”) regarding the handling of personal information of individuals participating in the activities of the Association (hereinafter referred to as “users”), and establishes a system to protect users’ personal information. The Association acknowledges the importance of protecting personal information and, by implementing measures thoroughly, aims to promote the protection of personal information.

## **Article 1 (Personal Information)**

Personal Information refers to the term as defined in the Act on the Protection of Personal Information (Act No. 57 of 2003, hereinafter referred to as the "Personal Information Protection Act"). It pertains to information about a living individual, whereby the information contains a name, date of birth, or other descriptions that could identify a specific individual, or includes a personal identification code.

## **Article 2 (Purpose of Use of Personal Information)**

The Association collects and utilizes users' personal information to the extent necessary for the following purposes. In cases where the use of personal information exceeds the scope of the following purposes, the consent of users shall be obtained in advance through appropriate means:

- (1) To implement the activities of the Association (hereinafter referred to as "the Activities").
- (2) To enhance, improve, or develop the content of the Activities or to introduce new initiatives.
- (3) For notifications of new Activities of the Association, updates, and other activity-related information provided by the Association, including but not limited to, notifications through electronic mail, brochures, and other forms of direct mail.
- (4) For essential notifications, as deemed necessary, such as important information regarding the Association.
- (5) To respond to users' opinions, inquiries, etc., regarding the Association’s activities and initiatives (including identity verification).
- (6) To provide reports to users about the utilization status of the Association.
- (7) To request cooperation in surveys, interviews related to the Activities, and participation in various events, and to provide reports.
- (8) To investigate and analyze the users’ access and participation related information, etc. of the Association and the Activities for the purpose of improving, developing, and advertising about the Association and the Activities.
- (9) To provide personal information to companies and other types of organizations participating in events organized by the Association, based on prior consent from the users or on application of the event.

### **Article 3 (Management and Protection of Personal Information)**

The Association strictly manages personal information and does not disclose or provide data to third parties without the users' consent, except in the following cases. In consideration of the protection of personal information, the Association takes measures to prevent risks such as unauthorized access, loss, destruction, falsification, leakage and other threats to the safety of personal information, and to correct measures against such risks.

- (1) Cases in which the handling of personal information is necessary for the protection of life, body, or property of a person, it is difficult to obtain the users' consent.
- (2) Cases in which the handling of personal information is specially necessary for improving public health or promoting the sound growth of children, and in which it is difficult to obtain the consent of the person.
- (3) Cases in which the handling of personal information is necessary for cooperating with a state organ, a local government, or an individual or a business operator entrusted by either of the former two in executing the affairs prescribed by laws and regulations and in which obtaining the consent of the person is likely to impede the execution of the affairs concerned.
- (4) Cases in which the handling of personal information is based on laws and regulations.

### **Article 4 (Outsourcing of Personal Information Handling )**

The Association may outsource the entire or partial handling of personal data, to the extent necessary to achieve the purpose of use. In this case, the Association reviews the outsource's eligibility, incorporates confidentiality obligations in the contract, and supervises its handling of personal data as is necessary and appropriate.

### **Article 5 (Disclosure of Personal Information)**

When a user (limited to the individual for the purposes of this Article) requests disclosure of his/her personal information held by the Association, the Association promptly discloses this information to the user. However, there might be instances where the Association may choose not to disclose all or part of the information, and if such a decision not to disclose is made, the user shall be promptly notified. These situations where disclosure may be withheld include:

- (1) Cases where there is a risk of harm to the life, body, or property of, or any other rights or interests of the user or a third party.
- (2) Cases where there is a significant risk of substantially impeding the proper implementation of the Association's operations.
- (3) Cases where such disclosure violates any applicable laws or regulations.

### **Article 6 (Correction, etc. of Stored Personal Data )**

1. Users have the right to request the correction, addition, or deletion (hereinafter referred to as "correction, etc.") of their personal data held by the Association if it is found to be incorrect.
2. Upon receipt of a request as mentioned in the preceding clause, the Association promptly conducts the necessary investigation. If it is determined that there are valid reasons for the

request, the Association promptly makes the necessary corrections, etc., to the personal data held by the Association.

3. Upon making a determination regarding the implementation or non-implementation of corrections, etc., based on the preceding clause, the Association promptly contacts the user in question.

#### **Article 7 (Suspension of Use of Personal Information, etc.)**

1. Users have the right to request the suspension of use, deletion, or suspension of third-party provision (hereinafter referred to as "suspension of use, etc.") of their personal information held by the Association.
2. Upon receipt of such a request as mentioned in the preceding clause, the Association promptly conducts the necessary investigation. If it is determined that there are valid reasons for the request, the Association suspends the use, etc., of the personal data. However, in cases where the suspension of the use of personal information incurs substantial costs, or in other situations where it is difficult to suspend the use, and if alternative measures that are necessary to protect the user's rights and interests can be taken, the Association implements such alternative measures.
3. Upon making a determination to implement or not to implement the suspension of use, etc., based on the preceding clause, the Association promptly contacts the users.

#### **Article 8 (Procedure for Changes to the Privacy Policy)**

The Association periodically reviews the content of this Policy and strives for its improvement. The content of this Policy may be modified, except for matters stipulated separately in laws or within this Policy. The revised Privacy Policy is effective from the time it is notified to the users in the manner determined by the Association or when it is posted on the Association's website.

#### **Article 9 (Compliance with Laws and Regulations )**

The Association complies with the laws and other regulations in Japan applicable for the handling of personal information.

#### **Article 10 (Handling of Complaints and Consultations )**

The Association accepts and responds appropriately and promptly to complaints and consultations from users concerning the handling of personal information. Additionally, the Association promptly and properly addresses requests from users regarding the disclosure, correction, addition, deletion, use, or refusal of provision of personal information.

#### **Article 11 (Security Measures)**

The Association prevents unauthorized access to personal information with which it is entrusted, as well as its loss, destruction, falsification, and leakage through the appropriate implementation of organizational, physical, personnel, and technical security measures such as restrictions on access, recording the access log and measures to prevent unauthorized access. In the event of an incident such as the leakage of personal information of users, the Association promptly reports to the supervisory authorities in accordance with the Personal

Information Protection Act and related guidelines. Additionally, the Association takes necessary measures in compliance with the instructions of the supervisory authorities to prevent similar incidents and to prevent their recurrence.

**Article 12 (Address of the Association, Name of the Representative, Personal Information Protection Manager )**

The address, the name of the representative, and the name of the personal information protection manager of the Association are as follows

Address: 18F W building, 1-8-15 Konan, Minato-ku, Tokyo 108-0075

Representative: General Incorporated Association steAm BAND Representative Director: Sachiko Nakajima

Personal Information Protection Manager: Director Shinichi Hamasaki

**Article 13 (Contact for Inquiries)**

Please contact the following for any inquiries regarding the handling of personal information by the Association.

General Incorporated Association steAm BAND Customer Service Center

18F W building, 1-8-15 Konan, Minato-ku, Tokyo 108-0075

TEL: +81-50-9000-9962

Mail: info@steamband.jp

**Article 14 (Language)**

This Policy is made in Japanese and translated into English. The Japanese text is the original and the English text is for reference purposes. If there is any conflict or inconsistency between these two texts, the Japanese text shall prevail.

Enacted and enforced on November 25, 2022.