

# **“PRIMO” Privacy Policy**

Primo Co., Ltd. (hereinafter referred to as “the Company”) establishes a personal information protection policy (hereinafter referred to as “the Policy”) with respect to information (hereinafter referred to as “(the) User Information”) on those who use (hereinafter referred to as “a (the) User”) the application “PRIMO” and the WEB service (hereinafter referred to as “the Services”. This website and the Services are collectively referred to as “the Services and the like”) administered by the Company.

## **Article 1 (General Rule)**

1. The Company abides by the Personal Information Protection Law and other relevant laws and regulations, and devotes the utmost care to properly handling and protecting User Information including personal information.
2. The Policy is applied in the use of the Services and the like. When the Company decides, separately from the Policy, on a privacy policy specific to a service or other policies to protect personal information, or when the Company decides on the handling and the like of User Information in Terms and Conditions of the Services and the like, and in a case where these decisions conflict with the Policy, these decisions are applied prior to the Policy.
3. The Policy may not be applied with respect to affiliated services offered by providers (hereinafter referred to as “the Affiliated Providers”) providing services (hereinafter referred to as “Affiliated Services”) affiliating with the Services and the like, and other services (hereinafter referred to as “Outside Services”) offered by providers other than the Company. In regard to the handling of User Information in the Affiliated Services, please refer to privacy policies and the like separately established by the providers providing the Affiliated Services.

## **Article 2 (Information Acquired by the Company and How to Acquire the Information)**

1. In the Services and the like, the Company acquires User Information including personal information (indicating "Personal Information" as defined by Article 2, Paragraph 1 of the Personal Information Protection Law, and the same shall apply hereinafter) as defined below.

(a) Information to be Offered by a User

The Company obtains the name, e-mail address, and telephone number of a User, and other information relative to the User designated by the Company.

(b) Information Gathered by the Company when Using the Services and the like

(i) Terminal Information

When a User uses the Services and the like on a terminal or a mobile terminal, the Company may gather terminal information (such as ID information from which the terminal can be identified) used by the User in order to maintain and improve the Services and the like or to prevent fraudulent activities.

(ii) Log Data, Information on Action Histories and Service Usage Situations

In order to maintain and improve the Services and the like or to prevent fraudulent activities, the Company may gather information on an IP address automatically generated and stored when a User uses the Services and the like, the time and date of request from the User, information on operation histories in the Services and the like, and information on the service usage situations of the User.

(iii) Cookies and Anonymous ID

In the Services and the like, the Company may use techniques called “Cookies” and other techniques similar to Cookies. Cookies are industry standard techniques used for a web server to identify a User’s computer. Cookies are capable of identifying the computer of

the User, but not capable of identifying the individual User. It should be noted that changes in settings of an electronic terminal may nullify effects of Cookies, but may lead to inaccessibility to a part or the whole of the Services and the like.

2. In acquisition of User Information, the Company acquires the User Information in an appropriate manner, not in fictitious or other fraudulent manners. In a case where the Company acquires the User Information by means other than acquiring when a User uses the Services and the like, the Company shall notify or disclose purposes of use in advance.

**Article 3 (Purposes of Use)**

1. The Company properly handle User Information, acquired when a User uses the Services and the like, within the scope of the following purposes. The Company shall not use the User Information beyond the scope of the purposes of use without a consent of the party concerned.

(ア) Purposes of Use	Details on Purposes of Use	Information to be used
To Offer, Maintain, and Improve the Services and the like	<ul style="list-style-type: none"> <li>● To identify the party concerned, and to prevent fraudulent activities in the Services and the like</li> <li>● To smoothly offer, maintain and improve the Services and the like</li> <li>● To offer and apply the Services and the like</li> </ul>	<ul style="list-style-type: none"> <li>● The name, e-mail address, and telephone number of a User, and other information relative to the User designated by the Company</li> <li>● Terminal information</li> <li>● Log Data, information on action histories and service usage situation</li> <li>● Cookies and anonymous ID</li> </ul>
To Notify and Cope with the User	<ul style="list-style-type: none"> <li>● To guide the Services and the like, and to cope with inquiries</li> <li>● To notify Terms and Conditions of the Services and the like; amendments to the Policy; suspension, cancellation, and termination of the Services and the like; and other important announcements relating to the Services and the like</li> </ul>	<ul style="list-style-type: none"> <li>● The name, e-mail address, and telephone number of a User, and other information relative to the User designated by the Company</li> </ul>

Provision to a Third Party	<ul style="list-style-type: none"> <li>● A third party who receives the information mentioned in the right from the Company uses the information for the following purposes: To provide affiliated Services; To provide advertisements in accordance with needs, interest, and concerns of the User; To analyze advertising effectiveness; To analyze a market or to make a marketing strategy</li> </ul>	<ul style="list-style-type: none"> <li>● The name, e-mail address, and telephone number of a User, and other information relative to the User designated by the Company</li> <li>● Terminal information</li> <li>● Cookies and anonymous ID</li> </ul>
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2. The Company may change the purposes of use in the preceding Paragraph within the scope where the changed purposes of use is rationally recognized as having relevance to the purposes of use before change. When changed, the purposes of use are disclosed to a User by notification or posting on the Services or this website, or by other prominent means.

#### Article 4 (Provision to a Third Party)

1. As a matter of principle, the Company shall not provide personal information to any third parties without a consent of the party concerned. However, in any of the following cases, the Company may provide the personal information without the consent of the party concerned within the scope of the applicable laws and regulations:

- (a) According to laws and regulations;
- (b) According to needs of protecting human lives, bodies, or properties, and when it is difficult to obtain the consent of the party concerned;
- (c) According to extreme needs of improving public hygiene, or promoting sound growth of children, and when it is difficult to obtain the consent of the party concerned;
- (d) According to needs for cooperation with respect to national institutions or local public entities or those who have received a commission thereof so that they can prosecute administrative affairs prescribed by laws and regulations, and when there is a possibility that the consent of the party concerned may cause an obstacle on the prosecution of the administrative affairs;
- (e) According to a case where business including personal information of a User is succeeded due to merger, demerger, assignment of business, or other reasons.

2. Based on a consent of a User or by means described in Paragraph 4, the Company may provide the information predetermined in Article 2 with respect to a third party for the purposes predetermined in Article 3.

3. In a case where the Company provides a third party with personal information based on a consent of a User, the Company prepares and stores a record regarding the following items:

- (i) The fact that the Company has obtained the consent from the User
- (ii) The name of the third party, and matters specific enough to identify the third party
- (iii) The name of a person identified by the personal information, and data specific enough to identify the party concerned
- (iv) Items about the personal information

4. Regardless of the rules and regulations in Paragraph 1, in a case where the Company reports to the Personal Information Protection Committee, the Company is able to provide a third party with personal information included in the item regarding User Information according to “Provision to a Third Party” in the table in Article 3, Paragraph 1 by means of e-mail. However, when the User does not wish to provide his/her personal information to the third party, the User shall inform the Company based on Article 10 so that the Company stops the provision to the third party.

5. Based on the rules and regulations in the preceding Paragraph, in a case where the Company provides personal information to a third party, the Company prepares and stores a record regarding the following items.

- (i) DD, MM, YY when the personal information is provided
- (ii) The name of the third party, and matters specific enough to identify the third party
- (iii) The name of a person identified by the personal information, and data specific enough to identify the party concerned
- (iv) Items about the personal information

6. The Company may perform statistic processing on the personal information received from a User based on distribution of ages, likes and tastes, usage histories, and the like, and may provide the statistical data to a third party or put the statistical data on view of the public. However, please note that these pieces of information shall not lead to specification of individuals and are not anonymous processing information established in the Personal Information Protection Law.

#### **Article 5 (Entrustment of the Handling of Personal Information)**

The Company may entrust a third party with the handling of a part or the whole of personal information acquired from a User, within the scope necessary for the purposes of use to be implemented. In such a case, the Company shall previously conclude confidentiality agreement and the like conforming to the Policy with the outsourcing contractor, and shall perform necessary and appropriate supervision over the outsourcing contractor so that the information will be appropriately and safely managed by the outsourcing contractor.

#### **Article 6 (Sharing)**

The Company may share personal information, acquired from a User, between the Affiliated providers or other third parties within the scope necessary for provision of the Affiliated Services. In such a case, the Company shall previously disclose items of information to be shared, the scope of persons to be shared, purposes of use of persons to be shares, and the name of the person in charge of managing the information.

#### **Article 7 (Information-Gathering Modules)**

The Services and the like may be incorporated with information-gathering modules selected by the Company in order to analyze information such as usage situations, and advertising effectiveness relating to services including the Services and the like. With this incorporation, the Company may provide User Information to providers of the information-gathering modules. These information-gathering modules gathers the User Information without involving information specifying individuals, and the gathered information is managed based on privacy policies established by each provider of the information-gathering modules and other laws and regulations.

#### **Article 8 (Behavioral Targeting Advertisements)**

1. The Company may gather the following information and may store or use the information using the information-gathering modules predetermined in the preceding Paragraph when providing

the Services and the like or Affiliated Services so the Company or a third party such as an advertisement delivery provider can place targeting advertisements (representing an advertising technique to deliver advertisements in accordance with needs, interests, and concerns of a User)

(a) Information on action histories and service usage situations (information such as usage histories of the Services and the like from which needs, interest, and concerns of the User can be analyzed by storing the usage histories, which does not lead to identification of specific individuals.)

(b) Terminal Information

2. The Company may deliver the information gathered based on the preceding Paragraph to providers (hereinafter referred to “the Advertisement Delivery Providers”) who deliver behavioral advertisements by delivering optimal advertisements customized in accordance with needs, interest, and concerns of a User for the purpose of delivering valuable information to the User.

3. In regard to the handling of various information carried out by the Advertisement Delivery Providers, we shall comply with privacy policies or other conditions prescribed by the Advertisement Delivery Providers.

**Article 9 (Safety Management System)**

1. In order to prevent leakage, loss, or defamation of User Information and to protect the User Information, the Company takes necessary and appropriate measures so as to safely manage the User Information, for example, limitation of access to the personal information file, minimization of the number of persons with access authority, and introduction of security software to prevent fraudulent access from the outside.

2. The Company assigns the representative director as the chief administrator of User Information and implements appropriate management and continuous improvement of the User Information.

**Article 10 (User’s Right to Disclose, and Amend Personal Information)**

In regard to a measure for disclosure, amendment, deletion, or suspension (hereinafter referred to as “disclosure and the like”) in the Services and the like, please refer to “Guidance for Application to Disclosure of Personal Information” (PDF). However, the Company may not be able to perform such procedures in a case where the Company does not undertake these obligations due to the Personal Information Protection Law and other laws and regulations, or in a case where requests for the similar contents are repeated without reasonable excuse, or in a case where the Company is subjected to extremely technical operation.

**Article 11 (Amendments to the Policy)**

1. Appropriately reviewing operational situations in regard to the handling of User Information and devoting to continuous improvement, the Company may modify the Policy as needed.

2. The modified Policy shall be informed by notification or posting on the Service or this website, or by other prominent means. However, when the Company amends contents which requires a consent from a User under the laws and regulations, the Company shall acquire the consent from the User by means to be separately prescribed by the Company.

**Article 12 (Contact Us)**

If you have any comments, questions, or complaints on the handling of User Information of the Company, or any inquiries on the User Information, please don’t hesitate to ask us, using the following form.

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Created on 12/13/2015

Revised on 7/1/2017