

# Personal Information Protection Code

ROKI GROUP International Pte. Ltd. (hereinafter referred to as "the Company") has established a personal information protection system based on relevant laws, regulations, and guidelines (hereinafter referred to as "Applicable Laws") and is working to prevent unauthorized access, leakage, loss, and misuse of personal information by making officers and employees fully aware of the importance of protecting personal information and implementing protective measures.

The Company will act in accordance with this Personal Information Protection Code (hereinafter referred to as the "Code") with respect to the handling of personal information of customers, business partners, shareholders, and recruitment applicants (hereinafter collectively referred to as the "Customers") who have been provided with personal information to us.

Among the personal information that the Company acquire, the handling of the Individual Numbers (so-called "My Number") notified pursuant to Article 7, Paragraph 1 or 2 of the "Act on the Use of Numbers to Identify Specific Individuals in Administrative Procedures" will be handled in accordance with the separately provided "My Number Protection Agreement" (hereinafter "My Number Agreement"). Please refer to that section.

## 1. Definitions

- (1) The term "Personal Information" as used in this Code shall mean information concerning an individual that can identify a specific individual by name, date of birth or any other description contained in such information, or a number, symbol, or other code, image, or voice affixed to an individual (including information that cannot be identified by such information but can be easily collated with other information and thereby identify a specific individual).
- (2) The term "Information related to personal information" as used in this Code shall mean information concerning an individual that does not fall under any of the Personal Information, pseudonymous processing information (Article 2-5 of the Act on the Protection of Personal Information) or anonymized processing information (Article 2-6 of the Act on the Protection of Personal Information). Specifically, it is assumed to include an individual's attribute information (gender, age/occupation, etc.), a history of access to a website of an individual, and the location information of an individual.
- (3) The term "Users" as used in this Code shall mean individuals (including customers) who browse the website operated by the Company.

## 2. Acquisition of Personal Information

The Company shall obtain the Personal Information of the Customers in a lawful and fair manner.

## 3. Use of Personal Information

- (1) The Company shall use the Personal Information provided by the Customers only for the purpose of each of the following items.

- ①Responses to the Customers' inquiries or requests or inquiries from the Company to the Customers
- ②Contact and Inquiry with the Customers
- ③Exercise of rights or performance of obligations under laws and regulations or contracts with the Customers
- ④Provision of the Company's products or services or information about them
- ⑤Operations with respect to shares
- ⑥Provision of information on recruitment activities, communication, and recruitment selection
- ⑦Research and analysis on the planning, development, and use of the Company's products and services
- ⑧Information on events held by the Company

(2) Where necessary, the Company may share the Personal Information provided by the Customers as follows.

Items to be shared: Name of company/department or school/faculty to which the Customers belong, address, telephone number, e-mail address of the Customers

Shared Users: The Company, its parent company and other companies whom the parent company have direct or indirect control.

Purpose of Utilization of Shared Users: Scope of the purposes of utilization listed in each item of the preceding paragraph

Person responsible for managing personal data: ROKI GROUP Co., Ltd.

#### 4.Prohibition of Disclosure or Provision of Personal Information to Third Parties

The Company will properly manage the Personal Information provided by the Customers and will not disclose it to any third party without obtaining the consent of such Customers unless it falls under any of the following conditions.

- ①Cases of disclosure based on the Applicable laws
- ②In the event that the handling of the Personal Information is entrusted, in whole or in part, to a third party to the extent necessary for the achievement of the purpose of utilization set forth in the preceding Article, such information is disclosed to such third party.  
In the event the handling of the Personal Information is entrusted in whole or in part to a subcontractor, the Company shall select appropriate subcontractor to whom personal information can be appropriately managed as a subcontractor, agree on matters necessary for the protection of the Personal Information with the subcontractor, and properly supervise and manage the handling of personal information in order to fully protect Personal Information.
- ③In the event such information is disclosed to the Company's group companies that are Shared Users pursuant to Paragraph 2 of the preceding article
- ④Other cases where disclosure is permitted by the Applicable Laws

#### 5.Personal Information safety measures

The Company takes necessary and appropriate measures to prevent unauthorized access, leakage, loss, and misuse of the Personal Information handled by the Company and to ensure the safe management of such information.

Please contact the Company's inquiry desk described in "10. Inquiries" about safety control measures taken by the Company.

#### 6.Request for Disclosure of Personal Information

In the event that the Customers wish to disclose, correct, delete, discontinue using, or discontinue providing to third parties (hereinafter collectively referred to as "Disclosure, etc") personal data held by the Company (hereinafter referred to as "Personal data the business holds"), please contact the Company's inquiry desk described in "10. Inquiries."

The Company will promptly respond to the Customers within a reasonable scope after confirming their identity.

Provided, however, that this provision shall not apply in the event of infringement of the rights of a third party, in the event that the Company determines that such infringement significantly interferes with the proper performance of the business of the Company, or in the event of violation of the Applicable Laws.

#### 7.Compliance and review of laws and regulations

The Company will comply with the Applicable Laws relating to the Personal Information handled by the Company and will review and improve the contents of the Code from time to time.

#### 8.Use of cookies as Information related to personal information

- (1) In order to analyze the access of websites operated by the Company, the Company may acquire access information and browsing information of users among Information related to personal information using the technique of Cookie and other information collection modules (hereinafter referred to as "Cookies, etc.").

Information obtained through the Cookies, etc (hereinafter referred to as "Cookie Information") does not include information that alone can identify or specify individual users.

- (2) Users can restrict the use of the Cookies, etc on website.

If users do not permit the use of the Cookies, etc, users can disable the Cookies, etc, in the user's browser settings.

However, if the Cookies, etc are disabled, the usability of website may be compromised, or the scope of the services provided on website may be limited.

- (3) The Company will use Cookie Information to operate, maintain and improve websites, develop and improve the Company's products and services, and distribute advertisements according to users' website usage.

#### 9.Using Web Analysis Tool

- (1) The Company uses "Microsoft Clarity" provided by Microsoft Corporation (hereinafter referred to as "Microsoft").

The Company may receive the results of Microsoft's collection and analysis of the user's browsing history based on the Cookies, etc. set by the Company or Microsoft, and the Company may use the

results to ascertain the status of website usage and to provide the Company's services.

For details on how Microsoft handles Microsoft Clarity, please visit its website.

About Microsoft Clarity: <https://clarity.microsoft.com/>

Microsoft Clarity –Terms of Use: <https://clarity.microsoft.com/terms>

Microsoft Privacy-Statement: <https://privacy.microsoft.com/ja-jp/privacystatement>

(2) The Company uses Google Analytics provided by Google LLC (hereinafter referred to as "Google").

The Company may receive the results of Google's collection and analysis of the user's browsing history based on the Cookies, etc. set by the Company or Google, and the Company may use the results to ascertain the status of website usage and to provide the Company's services.

For information on Google's use of Google Analytics, please visit its website.

About Google Analytics: <https://marketingplatform.google.com/about/analytics/>

Google Analytics Terms of Use: <http://www.google.com/analytics/terms/jp.html>

Google Privacy Policy: <http://www.google.com/intl/ja/policies/privacy/partners/>

Google Analytics opt-out add-on: <https://tools.google.com/dlpage/gaoptout?hl=ja>

## 10.Inquiries

Please contact the Company's inquiry desk as follows for requests for disclosure of the Personal Information, opinions, questions, and complaints regarding the handling of personal information.

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