

Privacy Policy

Established on March 20, 2015

Latest Updated on February 3, 2018

Phone Appli, Inc.

Yosuke Ishihara, Chief Executive Officer

Phone Appli, Inc. (hereinafter referred to as the “Company”) fully understands its social mission concerning the protection of all personal information handled by the Company and complies with laws and regulations related to personal information. Moreover, the Company hereby declares that it builds a personal information protection management system to realize this Policy and strives for continuing improvement thereof across the Company, looking at the latest trends of IT technology and changing social demands, and business environment, etc.

1. The Company shall acquire, use and provide personal information to the extent necessary for the Company to perform its due business services, hire new employees and manage personnel affairs as provided in the

following items, and shall not handle the personal information beyond the scope necessary for the Company to achieve the specified purpose of use. The Company shall take the measures necessary to prevent the personal information from being used other than for the intended purposes .

- (1) Application development, sales and maintenance
- (2) Network equipment design, building, sales and maintenance
- (3) Provision of cloud services
- (4) Communication facilities construction
- (5) Worker dispatch business, etc.

2. The Company shall comply with laws and regulations, guidelines provided by the government and other codes concerning the protection of personal information.
3. For the risks of leakage, destruction or loss, or damage to personal information, the Company shall input its management resources in accordance with the actual situation of business so as to avoid potential risks by

taking reasonable safety measures, and continuously improve the personal information security system. In addition, the Company shall immediately take corrective actions if any risk incidents occur.

4. The Company shall swiftly, sincerely and properly handle any complaints and inquiries concerning handling of personal information from our customers.
5. The Company shall regularly review the personal information protection management system, looking at the changes in the environment surrounding the Company, and continuously improve thereof.

The Company shall distribute and make this Policy well-known to all employees, and post it on its website and in leaflets, so that anyone can access our policy at any time.

For inquiries

For inquiries about this Privacy Policy, you can contact:

Personal Information Inquiries Counter, Phone Appli Inc.

Hulic Kamiyacho Bldg. 8F

4-3-13, Toranomom, Minato-ku, Tokyo 105-0001

TEL : 03-5488-7085 9:30 am - 5:30 pm weekdays

Mail : support@phoneappli.net

(Official Announcement on Personal Information) Revised: June 10, 2019

■ On handling of personal information

1. Purpose of use of personal information handled by the Company

- (1) The Company shall expressly state the purpose of use of personal information to the subject person in writing, before obtaining his/her personal information directly from himself/herself in writing (including information obtained via website or email, etc.).

- (2) Purpose of use of personal information obtained by the way other than that in the preceding paragraph.

Category

Purpose of use

Individual customer information

To support a user
 To manage the history of use
 To respond to inquiries
 To inform the Company's products, services or events
 (including advertising and sales promotion)

Information on coordinators of business partners or customers

To confirm the details of an order placement or acceptance, to claim payment, and to provide maintenance or other related services (communication record, bank account No., etc.)

Personal information received from a customer as a result of accepting the business contract to provide the Company's services (including location data (measurement from beacon or wireless access point, places entered by the customer),

To inform the company's products, services or events
 (including advertising and promotion)
 To properly execute the relevant service contracted
 To analyze user environment and the status of use in order to

history of receiving and sending data , data on communications and operating a device and applications (including accessing the applications via browser), connection devices (including types of OS, browser and application), the language in a browser, the customer's communications state (including IP address, IP address connected to, and communications port) and other information such as vital data transmitted from other various equipment)

improve services

To prevent and investigate a wrongful act

Information on the persons seeking jobs at the Company

To contact the applicants and manage employment service of the Company

■ Familiarization with matters regarding personal information subject to disclosure

Concerning personal information subject to disclosure owned by the Company, the Company shall handle the requests from the subject person or his/her agent for notification or disclosure of the purpose of use, correction,

addition or deletion of contents, suspension of use, and suspension of the provision to a third party (hereinafter referred to as “request for disclosure”) in accordance with the following guidelines:

- a) Name of business operator
Phone Appli, Inc.
- b) Personal information protection manager
Name of manager: Yoshihisa Tsuchiya
Name of his department: Business Operations Division
Contact: 03-5488-7085
- c) Purpose of use of all personal information subject to disclosure

Category	Purpose of use
Individual customer information	To support a user To manage the history of use To inform the Company’s products, services or events (including advertising and sales promotion) To respond to inquiries
Information on coordinators of business partners or customers	To confirm the details of an order placement or acceptance, to claim payment, and to provide maintenance or other related

services (communication record, bank account No., etc.)

To inform the company's products, services or events
(including advertising and promotion)

Personal information received from a customer as a result of
accepting the business contract to provide the Company's
services

To properly execute the relevant service contracted

To analyze user environment and the status of use in order to
improve services

Information on employees of the Company

To prevent and investigate a wrongful act

To manage personnel and labor affairs, operation, health care
and security for the Company's employees

Information on the persons seeking jobs at the Company

To contact the applicants and manage employment service of
the Company

Specified personal information

To use as specified in the Act on the Use of Numbers

- d) For complaints on handling of personal information subject to disclosure

Phone Appli, Inc. Personal Information Counter

- Hurik Kamiyacho Bldg. 4—3-13, Toranomom, minto-ku Tokyo 105-0001

- Email : support@phoneappli.net
TEL : 03-5488-7085
- e) Authorized personal information protection organization
- The Company does not belong to any authorized personal information protection organizations at present.
- f) How to request for disclosure of personal information subject to disclosure.
 - 1) Contact request
Contact the personal information inquiry counter stated above to request for disclosure.
 - 2) Procedures for disclosure request
 - i) After receiving the request for disclosure, the Company will send you a prescribed request form, *Request for Disclosure, etc. of Personal Information subject to Disclosure* by postal mail.
 - ii) After filling out the request form, send the above personal information inquiry counter your Request Form, an evidence displaying who you represent for, if you are an agent, and a postal money order for service fee. (only for the requests for notice and disclosure of the purpose of use)
 - iii) After receiving the Request Form, the Company will contact and ask you around two questions on your personal information which is registered in the Company (ex. Your phone number and birth date) for identity verification.
 - iv) In principle, our answer will be given to the subject person in writing (by postal mail).

- 3) Evidence displaying who you represent for, if you are an agent

If a request for disclosure is made by an agent, you are asked to enclose an evidence displaying who you represent for and any documents that verify the agent's identification. The document requires only the information on which prefecture the agent is from. For other parts of the address, you can blot out in black ink, etc. You can send us the documents which do not include any identifications numbers or blot out them in black.

- i) Evidence displaying who you represent for
<For an agent who is commissioned to make a request for disclosure>

- A letter of proxy by the subject person (original)

<For a statutory agent for a minor> a copy of any of the following:

- Family register

- Resident card (statement of kinship relationship is required)

- Other official documents proving that the agent is qualified

<For a statutory agent for an adult ward> a copy of any of the following:

- • Certificate of registered items on guardian registration

- Other official documents proving that the agent is qualified

ii) Any documents that verify the agent's identification

- Driver's license
- Passport
- Health Insurance Insured Card
- Resident card
- Basic resident ledger card

- 4) Service fee for a request for notice or disclosure of the purpose of use
1000 yen per request
(Enclose a postal money order with your request form)