

Privacy Policy

The following Privacy Policy (hereinafter referred to as the "Policy") regarding the handling of personal information of users in the services provided by "Shareroo" software (hereinafter referred to as the "Service") is hereby established.

Article 1 (Personal Information)

"Personal information" refers to "personal information" as defined in the Act on the Protection of Personal Information; i.e., information regarding a living individual that allows a specific individual to be identified by name, date of birth, address, telephone number, contact information, e-mail address, etc., contained in such information and information that by itself allows a specific individual to be identified such as appearance, fingerprint, and voiceprint, an insurer's number on a health insurance card, etc. (personally identifying information).

Article 2 (How Personal Information is Collected)

When users register for the Service, they may be requested to provide personal information such as their e-mail address and date of birth. In addition, information including personal information of users, such as personal identification codes, business information, Internet and electronic network activity information, and geographic information, which users voluntarily enter in the course of using the Service or which is created as a result of the use of the Service itself, may be collected and used for the Service or provided to third parties. The Service may also collect information related to users from partners of the Service (including information providers, advertisers, and advertising distribution partners; hereinafter referred to as "Partners").

We collect the following categories of your personal information and may sell it to third parties: identifiers, commercial information, internet or other electronic network activity information, geolocation data, and inferences drawn from these categories.

Article 3 (Purposes of the Collection and Use of Personal Information)

Personal information is collected and used by the Service for the following purposes.

- Provision and operation of the Service
- Development and improvement of the Service or related services
- Responding to inquiries from users (including identification of the principal)
- Sending information on new features, updates, campaigns, etc. of the

Service that users are currently using, as well as information on other services related to the Service and advertisements of the Partners of the Service

- Maintenance, important notices, and other communications as necessary
- Identifying users who have violated the Terms of Use or who are attempting to use the Service for fraudulent or improper purposes so that we may refuse their use of the Service
- Allowing users to view, change, or delete their registration information, or to view their usage status
- Charging users usage fees for paid services
- Purposes incidental to the above purposes of use

Article 4 (Changes to Use Objectives)

The Service will change the purposes of use of personal information only when it is deemed that the new objectives are reasonably relevant to those before the change(s).

In the event of a change in the purposes of use, we will notify users of the new objectives by the prescribed method or publicly announce them on this website.

Article 5 (Provision of Personal Information to Third Parties)

The Service will not provide personal information to third parties without the prior consent of users, except in the following cases. However, this excludes cases where permitted under the Act on the Protection of Personal Information and other laws and ordinances.

- It is necessary for the protection of the life, body, or property of an individual and it is difficult to obtain the consent of the principal
- It is especially necessary to improve public health or to promote the sound development of children, and it is difficult to obtain the consent of the principal
- It is necessary in cooperating with a national agency, a local government, or a party entrusted by either a national agency or local government as they carry out affairs specified by laws and ordinances, and obtaining the consent of the principal may impede the performance of said affairs
- The following items are disclosed or announced in advance and reported to the Personal Information Protection Committee by the Service:
 - Inclusion of provision of information to third parties in the objectives of use
 - Data items provided to third parties
 - Means or methods of provision to third parties
 - Suspension of the provision of personal information to third parties at the request of the principal
 - Method by which the request of the principal was received

• Notwithstanding the preceding provisions, the recipient of the relevant information shall not constitute a "third party" in the following cases:

- The handling of personal information in whole or in part within the scope necessary for the achievement of the objectives of use is outsourced by the Service

- Personal information is provided in association with the succession of a business due to a merger or other reason(s)

- In cases where personal information is used jointly with a specific party, the principal is notified in advance to that effect and of the items of personal information jointly used, the scope of the party or parties with whom the personal information is jointly used, the objectives of the use by the party or parties so using the personal information, and the name(s) of the party or parties responsible for the management of the said personal information, or the principal was in a position to easily learn of such.

Article 6 (Disclosure of Personal Information)

If the principal requests disclosure of his/her personal information, the Service will disclose such information to the principal without delay. However, if disclosure would result in any of the following, we may decide not to disclose some or all of the information. If we decide not to disclose the information, we will notify the principal to that effect without delay. A fee of ¥1,000 will be charged for each instance of disclosure of personal information.

- Risk of harm to the life, body, property, or other rights or interests of the principal or a third party
- Risk of significant impediment to the proper operation of this service
- Other violations of laws and ordinances
- Notwithstanding the preceding provisions, in principle, we will not disclose information that is not personal information, such as historical information and characteristic information.

Article 7 (Correction and Deletion of Personal Information)

Users may request the Service to correct, add, or delete (hereinafter referred to as "Correction, etc.") their own personal information held by the Service in accordance with the specified procedures, if such information is incorrect. When the Service receives a request from a user as set forth in the preceding paragraph and deems it necessary to respond to such request, the Service will perform Correction, etc. of the relevant personal information without delay. If Correction, etc. is performed pursuant to the provisions of the preceding paragraph, or if a decision is made not to perform Correction, etc., the user will be notified of such without delay.

Article 8 (Suspension of the Use of Personal Information, etc.)

If the principal requests that the Service suspend the use of or delete his/her personal information (hereinafter referred to as "Suspension of Use, etc.") on the grounds that it is being handled for purposes beyond the scope of the stated purposes of use or that it has been obtained by wrongful means, the Service will conduct the necessary investigation without delay. If, based on the results of such investigation, we determine that it is necessary to comply with the request, we will carry out the Suspension of Use, etc. of the relevant personal information without delay. If the Service carries out Suspension of Use, etc. pursuant to the preceding provisions, or if the Service decides not to carry out Suspension of Use, etc., the Service will notify the user to that effect without delay. Notwithstanding the preceding two provisions, in cases where Suspension of Use, etc. involves substantial costs or where such Suspension of Use, etc. is difficult to implement and alternative measures can be taken as necessary to protect the rights and interests of the user, such alternative measures will be carried out.

Article 9 (Changes to the Privacy Policy)

The details of this policy are subject to change without notice to users, except as otherwise provided by law or in this Policy. The amended Privacy Policy shall take effect from the time it is posted on the Service, unless otherwise specified by the Service.

Article 10 (Inquiries Desk)

Inquiries regarding this policy may be made using the Inquiry Form provided in the Service.

Effective August 1, 2019