

## Privacy Policy

### I. Personal Information

Idein Inc. (the “Company”, “we”) has established the following Personal Information Protection Policy, and endeavors to properly handle, manage, and maintain personal information by ensuring our officers and employees are aware of the importance of protecting personal information and undertaking initiatives in line with this policy.

Please refer to the separate Actcast [Privacy Policy](#) regarding the handling of personal information by Actcast, a platform we operate.

1. When handling personal information, the Company complies with the laws, ordinances and other regulations applicable to the protection of personal information. Therefore, we establish policies and internal rules regarding the protection of personal information in accordance with the laws, ordinances and other regulations.
2. The Company endeavors to keep personal information retained accurate and up-to-date, and implements security measures and the necessary and appropriate management of personal information by taking necessary measures such as maintaining security systems, developing management systems, and training employees to prevent unauthorized access, loss, damage, falsification and leakages, etc. of personal information. The details of the safety and security measures implemented by the Company for the handling of personal information are as follows:

Items	Details of Safety and Security Measures
Establishment of basic policy	In addition to this Policy, the Company establishes a personal information protection policy and policy regarding internal security, and ensures the proper handling of personal information in accordance with the relevant policies.
Placement of rules on handling of personal Information	With respect to the handling of personal information, the Company determines the handling method and the responsible officer for acquisition, use, storage, sharing, deletion/disposal and other steps, and establishes and complies with the relevant handling rules.
Organizational safety and	The Company appoints a responsible officer

security measures	regarding the handling of personal information, investigates the handling of personal data, and reports its results to the department in charge.
Personnel safety and security measures	The Company enters into confidentiality agreements with its employees, promotes awareness of matters that require attention concerning the handling of personal information, and educates and trains employees regarding the relevant matters.
Physical safety and security measures	The Company implements physical access control including control of entry to and exit from areas handling personal information, and implements measures to prevent theft and other similar incidents.
Technical safety and security measures	With respect to the handling of personal information, the Company only allows access to those who need to gain access, and regularly keeps a record of those had access to personal information and analyzes and stores the records of access to check for any suspicious, unauthorized access or use of personal data. The Company also considers and implements the optimization of information security measures from time to time. Any personal information which does not need to be stored continuously will be disposed or deleted in an appropriate manner.
Understanding of external environment	When handling personal information in a foreign country, the Company takes necessary and appropriate measures for the safety of personal information after understanding the system, etc. concerning the protection of personal information in the relevant foreign country.

3. The Company handles the acquisition, use, and provision, etc. of personal information in accordance with the Act on the Protection of Personal Information and other standards, and limits handling to the scope necessary to achieve the following purposes of use (including incidental provision to third parties). When collecting personal information we notify or announce the purpose of use, and we do not use personal information, except when necessary to achieve the purpose notified or announced, without the consent of

Entrusted Person. We do not use personal information for purposes not stipulated and we take measures to prevent use for other purposes.

Type of Personal Information	Purpose of Use
Customer information	Service provision, billing, surveys, etc.
Personal information on business partners	Performance of contracts, communication, etc.
Personal information on employees	Employment management, etc.
Information on applicants	Employee screening, communication, etc.
Information on website visitors	Website optimization, etc.

4. The Company will not disclose or provide personal information to any third party unless any of the following apply. When outsourcing part of the handling of the personal information, the Company shall enter into an agreement regarding the protection of personal information with the outsourcer and shall exercise necessary and appropriate supervision to ensure the safe management of the personal information.
  1. With the consent of Entrusted Person
  2. Cases required by laws and regulations
  3. In the event it is necessary to protect the life, body, or property of an individual and it is difficult to obtain the consent of Entrusted Person
  4. In the event the handling of personal information is entrusted to the extent necessary for the achievement of the purpose of use
  5. In the event of succession of business due to merger, company split, transfer of business, or any other reason
  6. When based on specific shared use under laws and regulations
5. With respect to the personal information held by the Company, the Company handles any inquiry and request for disclosure (including disclosure of records showing provision of personal information to third parties), correction, addition, deletion, suspension of use, deletion and suspension of provision to third party from him/herself or its agent to a reasonable extent and in accordance with the laws and regulations and rules that the Company provided. The Company provides contact details for complaints and consultation regarding the handling of personal information and responds to such cases appropriately.
6. The Company shall comply with the laws and regulations of Japan and other applicable

regulations related to the personal information held by the Company. The Company shall make necessary action to ensure the status, revision, or abolishment of such laws and regulations, and shall endeavor to improve this Policy by reviewing the contents from time to time.

### **Contact details about personal information**

For Disclosures etc. or other inquiries to us, please contact the following office via mail.

Idein Inc.

Backoffice (Representative Office for Personal Information Protection)

101-0051

1-4-13 Kanda Jinbbocho Chiyoda-ku, Tokyo Japan

## **II. Use of Cookies and Similar Technologies**

Our website uses cookies and other similar tracking and analysis technologies (collectively “Cookies”) in order to provide customers with more appropriate services.

### **1. Overview of Cookies**

Cookies are small text files containing arbitrary strings of characters which are exchanged between our web server and a customer’s internet browsing software (browser) when visiting our website, and are stored on the customer’s device. By using Cookies, we may obtain non-personally identifiable attribute information such as a customer’s browsing history, service usage history, and location information.

There are two types of Cookies, Cookies set by our website domain and Cookies set by affiliated third parties.

Depending on the customer’s browser settings, it may be possible to indicate in advance that our site uses Cookies, or it may be possible for customers to disable Cookies or deleted saved Cookies. Please note that the functions available on our website may be limited if a customer refuses to accept Cookies or deletes Cookies.

### **2. Purpose of Using Cookies**

We use Cookies to improve customer convenience, to improve the performance of our website by analyzing how our website is used, and to improve and enhance the services we provide to our customers.

In addition to the above, Cookies may be used to distribute behavioral targeting advertisements by our affiliated advertising distribution service providers.

3. We use the tools listed in the table below to measure and analyze the use of our website. Please refer to the websites of each tool provider to find out how information obtained by each tool is handled and how to stop information from being sent to the tool.

Tools (provider)	Website	How to stop sending information to the tool
Google Analytics (Google LLC)	<ul style="list-style-type: none"> <li>- <a href="#">Google privacy policy</a></li> <li>- <a href="#">Use by Google of data when users use Google partner sites and apps</a></li> </ul>	<ul style="list-style-type: none"> <li>- <a href="#">Google Analytics Opt-out Browser Add-on</a></li> </ul>

4. We use advertising distribution services provided by third parties. The third parties listed in the table below may use Cookies, web beacons and other storage technologies to obtain or receive information from our website and elsewhere on the internet, and may use that information to provide effectiveness measurement services and to target advertising. Please refer to each company's website for information on how information is handled and opt-out procedures.

Advertisements (advertising distribution service providers)	Website
Facebook advertisements (Meta Platforms, Inc.)	<ul style="list-style-type: none"> <li>- <a href="#">Privacy Policy</a></li> <li>- <a href="#">Cookies Policy (facebook.com)</a></li> </ul>

\*Please note that if you opt-out, the use of Cookies for advertisements will be stopped, but this does not mean that advertisements will no longer be displayed.

### **Inquiries**

Please contact us from [here](#) if you have any questions about our website.

Revised: August 1, 2022