

Privacy Policy

The Company recognizes the importance of personal information security, and shall endeavor to safeguard personal information in accordance with the policy described below. Before providing personal information to the Company, please agree to the following terms.

Article 1 (Acquisition of Personal Information)

Personal information refers to any information which may be used to identify an individual, including such information as one's name, date of birth, description, etc.

- 2 The Company shall acquire information by legal and legitimate means, and shall devote the utmost care to protecting personal information.
- 3 In the event the personal information acquired by the Company is incomplete, the Company may be incapable of providing services in whole or in part.

Article 2 (Use of Personal Information)

The Company shall use personal information within the scope of the purpose of use indicated at such time that said personal information is acquired, and within the limits necessary to carry out business operations.

- 2 In the event the Company shares personal information with a third party or entrusts the handling of personal information to a third party, said third party shall be thoroughly vetted and properly supervised to ensure confidentiality is maintained.
- 3 The Company may use personal information in order to solicit opinions, requests, or information for the purpose of improving service.

Article 3 (Provision of Personal Information to Third Parties)

The Company shall not provide identifying information (name, address, telephone, email address, etc.) to any third party without the prior consent of the individual in question except as stipulated in the following section.

- 2 When any of the following items is applicable, the Company may provide personal information beyond the scope of the expressed purpose of use without the consent of the individual in question.
 - ① When disclosure of personal information has been requested by a court of law, public prosecutor's office, police department, tax office, bar association, or any other agency empowered by same
 - ② When forwarding a member's order or application information to an outsourcer in order to provide application or web services operated by the Company, or to provide associated services
 - ③ When disclosing to outsourcers entrusted with settling payments
 - ④ When outsourcing the Company's business operations in whole or in part
 - ⑤ When disclosing to a party subject to an obligation of confidentiality to the Company
 - ⑥ If necessary to exercise the Company's rights
 - ⑦ If operations are assumed by a third party due to merger, transference of operations, or other such grounds; disclosure to said party assuming operations
 - ⑧ If permitted by laws and ordinances such as the Personal Information Protection Act

Article 4 (Outsourcing)

When outsourcing data processing duties, etc., the Company may provide personal information. In the event personal information is provided, it shall be on the condition that the outsourcer maintains a personal information security system.

Article 5 (Management of Personal Information)

- The company shall maintain the accuracy of personal information and manage it securely.
- 2 In order to prevent the loss, destruction, falsification, leaking, etc., of personal information, the Company shall institute appropriate IT security countermeasures against unauthorized access, computer viruses, etc.
 - 3 The Company shall not allow personal information to be leaked via removal of property or external transmission.

Article 6 (Disclosure, Revision, Suspension of Use, or Deletion of Personal Information)

The Company affirms that an individual possesses the right to request the disclosure, revision, suspension of use, or deletion of one's own personal information, and in the event of such a request, shall comply promptly in accordance with the procedures stipulated by the Company. However, in the event this would hinder the Company's business operations, or in regards to disclosure of information other than an individual's own personal information, the Company may decline to do so.

- 2 Please contact us via the information provided at the end of this document if you any feedback or questions regarding the Company's handling of personal information.

Article 7 (Organization and System)

The company shall appoint personal information security staff and conduct appropriate management of personal information.

- 2 The company shall train managers and staff in personal information security and proper management methods, and ensure the proper handling of personal information in the performance of daily duties.

Article 8 (Changes to Terms and Conditions)

The Company may change the contents of the Privacy Policy as necessary. When changes are made, notification of the changes will be displayed on the Company's website, and the date that the changes take effect shall be clearly indicated.

Article 10 (Inquiries)

Please direct inquiries regarding personal information to the contact information below.

<Contact Information>
Primo Co., Ltd. Personal Information Desk
6-16-13 Jingumae, Naias Jingumae 5F
Shibuya, Tokyo
150-0001 E-mail: privacy@primo.im

Supplementary Provisions

These Terms shall be applied from 8/25/2016.

Created 8/25/2016