

Privacy Policy

SALT Consulting Co., Ltd (hereinafter referred to as “Company”) set forth the following privacy policy with regard to the acquisition and the use of personal information in relation to surveys conducted by the Company (hereinafter referred to as “Survey”). The Company shall comply with GDPR (General Data Protection Regulation) and other relevant laws and regulations including the Japanese Act on the Protection of Personal Information.

Article 1. (Definition)

In this privacy policy (hereinafter referred to as “Policy”), “Participants” means any individuals who participate in the Survey; and “Participants Information”, which the Company collects in accordance with this Policy, means the Participants’ personal information (the phrase ‘personal information’ herein shall have the meaning defined in Article 2(1) of the Japanese Act on the Protection of Personal Information, and the same meaning shall apply hereinafter), the Participants’ input information, the Participants’ activity history on communication services, or other information generated or accumulated in the information terminal used by the Participants.

Article 2. (Participants Information collected in the Survey)

With the prior explicit consent from the Participants, the Company, in the Survey, collects the Participants Information including personal information, as set forth below. Depending on the content of the Survey, the Participants Information may include the following.

- (1) Information to be provided by the Participants.
 - (a) Basic information: name, date of birth, gender, postal code, address, phone number, e-mail address, occupation, and financial status such as annual salary; and if the Participants are under the age of sixteen (16), the name and e-mail address of the person having the parental authority of the Participants.
 - (b) Sensitive personal information: medical history, status of health, and the result of health checkups or other medical examinations.
 - (c) Other information: information on payment including bank account, purchase history of products, and usage history of services.
 - (d) Identification information: information on driver’s license, passport, and health insurance card.
- (2) Information to be collected by the Company.
 - (a) Terminal information
The Company may collect terminal-specific information on the terminal used by the Participants (for example, individual identification information such as a unique identifier of the terminal).
 - (b) Log information
The Company may collect information on the Participants’ purchase history of products, browsing history of products, IP address that is automatically generated and saved at the time when participating in the Survey, date and time of request made by the Participants, and operation history on the Company’s website.

Article 3. (Consent)

- 3.1. The Participants may withdraw their consent at any time by contacting the Company, provided, however, that, it shall not affect the legality of the processing of any personal information based on the consent before the Participants’ withdrawal.
- 3.2. The Participants under the age of sixteen (16) are required to obtain the consent of their legal representatives such as parental authorities. Such Participants shall not participate in the Survey without the consent of their legal representatives.

Article 4. (Purpose of Use)

- 4.1. GDPR requires companies handling any personal data in the European Economic Area to process such personal data based on specific legal bases as outlined below.
 - (1) If Participants’ consent with regard to the handling of personal data has been obtained in advance by companies.
 - (2) When it is necessary to fulfill the performance of a contract between the Participants and the Company, or to take steps to prepare to enter contracts between the Participants and the Company.
 - (3) When the handling of personal data is necessary for the Company to comply with its legal

obligations.

(4) When it is necessary to protect the vital interests of the Participants or other persons.

(5) When the handing of personal data is necessary for the performance of a task carried out in the public interest or the exercise of official authority vested in the Company.

(6) When the handling of personal data is necessary for the purpose of the legitimate interests pursued by the Company or a third party.

4.2. The Company will not use the Participants Information obtained through the Survey for purposes beyond the scope of the purpose of use as prescribed in this Policy without the prior consent of the Participants. The Company will appropriately handle the Participants Information it has obtained within the scope of the purposes as outlined hereunder.

Information to be used	The details of purposes of use	Legal basis
Basic information: name, date of birth, postal code, address, phone number, and e-mail address.	<ul style="list-style-type: none"> To verify the identification in the Survey 	Performance of contracts
Other information: information on payment including bank account.	<ul style="list-style-type: none"> To pay the reward for participation in the Survey 	Performance of contracts
Identification information: information on driver's license and passport.		
Basic information: name, postal code, address, phone number, and e-mail address. Other information: information on payment including bank account. Identification information: information on driver's license and passport.	<ul style="list-style-type: none"> To announce the Survey and respond to inquiries 	Legitimate interests
	<ul style="list-style-type: none"> To notify or provide new surveys in relation to the Survey 	Legitimate interests
	<ul style="list-style-type: none"> To notify revision of this Policy in relation to the Survey, suspension and discontinuation of the Survey, termination of contracts, and other important matters of the Survey. 	Performance of contracts and Legitimate interests
	<ul style="list-style-type: none"> To handle troubles or lawsuits. 	Legitimate interests

<p>Basic information: name, date of birth, gender, postal code, address, phone number, e-mail address, occupation, and financial status such as annual salary</p> <p>Sensitive personal information: medical history, status of health, and the result of health checkups or other medical examinations.</p> <p>Other information: information on the purchase history of products, and usage history of services</p> <p>Terminal information, Log information.</p>	<p>The Company uses the information in the left column for the following purposes.</p> <ul style="list-style-type: none"> Analyzing information to create analysis data that is processed into anonymized data in an unidentifiable format (hereinafter simply referred to as “Analysis Data”). <p>The Company and a third party who receives the Analysis Data from the Company will use the Analysis Data for the following purposes.</p> <ul style="list-style-type: none"> To display advertisements that match the needs and interests of the users. To analyze advertising effectiveness. To conduct market analysis and marketing. 	–
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4.3. With the prior consent of the Participants, the Company may provide the Participants Information, including personal information, to other third parties including the Company’s affiliated partners to the extent necessary to achieve the purposes as provided for in the preceding paragraph.

4.4. Except otherwise permitted by laws and regulations, the Company does not use any Participants Information for automated decision-making.

Article 5. (Change of the Purpose of Use)

The Company may change the purpose of use as provided for in the preceding Article to the extent that the changed purpose of use is reasonably deemed to be related to the purpose of use before such change. If the Company makes such change, the Company shall notify the Participants of the change and relevant information to such change in a manner separately specified by the Company.

Article 6. (Acquisition of the Participants Information)

6.1. The Company shall properly obtain the Participants Information without deception or other improper means.

6.2. If the Company obtains the Participants Information in a manner other than through the Survey, the Company shall notify in advance the purpose of using such information and the information required to be provided to the Participants by the laws and regulations or rules.

Article 7. (Safety Management)

7.1. The Company shall take necessary and corrective measures to safely manage the Participants Information including the prevention of the Participants Information from leakage, loss, and damage.

7.2. If the Company entrusts all or part of the handling of the Participants Information to a third party, the Company shall execute in advance a contract, such as a non-disclosure agreement, with such third party having to comply with this Policy and shall conduct necessary and appropriate supervision over such third party to ensure that the third party safely manages the Participants Information. The Company shall notify all Participants of any important information that should be notified in a manner specified by the Company.

Article 8. (Disclosure and Sharing of the Participants Information)

- 8.1. The Company shall not disclose or share any personal information contained in the Participants Information without the consent of the Participants, except in cases where the disclosure is required under laws and regulations including the Japanese Act on the Protection of Personal Information, provided, however, that this shall not apply to the following cases:
- (1) When the Company entrusts all or a part of the handling of personal information to a third party to the extent necessary to achieve the purpose of use by the Company;
 - (2) Where necessary measures are taken when the Participants participating in the Survey engage or attempt to engage in any act that may damage others and/or is contrary to the public order and morals;
 - (3) When there is imminent danger to persons or property and urgency is required;
 - (4) When personal information is provided as a result of the succession of business due to business events such as a merger;
 - (5) When disclosure of personal information is required by public institutions such as courts or police pursuant to laws.
- 8.2. The Company may transfer the Participants Information to a country or an international organization other than those countries or international organizations which the European Commission has determined to have an adequate level of protection of personal data. In such a case, the Company shall take measures required by laws and rules (ex. taking appropriate safeguards) and obtain explicit consent from the Participants after providing information on risks that may arise from such transfer.

Article 9. (Rights of Participants)

The Participants shall have the following rights with respect to the Participants Information collected and processed by the Company.

- (1) Information on the processing of the Participants Information.
The Participants may obtain all necessary information from the Company in relation to the processing of data on the Participants which is conducted by the Company.
- (2) Access to Personal Information
The Participants may contact the Company and enquire whether or not their Participants Information is being processed. If the Company processes the Participants Information, the Participants may access such Participants Information and its related information.
- (3) Correction or Deletion of Personal Information
The Participants may request for correction of their incorrect personal information and such correction must be done without undue delay. In addition, the Participants may make complete of their incomplete personal information, if any. The Participants may request the Company to delete their Participants Information, and such deletion must be done without undue delay if the GDPR requirements are met.
- (4) Restrictions on the Processing of Personal Information.
The Participants may request the Company to restrict in processing of their Participants Information, and such restriction must be adhered to by the Company if the GRPR requirements are met.
- (5) Objection to the Processing of Personal Information
The Participants may, at any time, object to the processing of the Participants Information on the ground that is specific to the Participants, and such objection must be adhered to by the Company, provided that the GDPR requirements are met.
- (6) Data Portability of Personal Information
If the Participants meet GDPR requirements, Participants may receive their personal information that has been structured, is commonly used, and is in a machine-readable format. In addition, the Participants shall have the right to transfer such information to another data administrator without hindrance from the Company.

Article 10. (Disclosure and Correction of the Participants Information)

- 10.1. If the Participants make requests in writing for the disclosure, correction, addition, deletion, or the restrictions on the handling of their personal information, or if Participants exercise their rights to object to the processing of the Participants Information or the data portability, the Participants is required to make such request through postal service by enclosing the necessary documents for identity verification (if the request is made by the Participants' representative, include the confirmation that such representative is proper) together with the request form.
- 10.2. In a case where a request is made pursuant to the preceding paragraph and the personal identity of the representative is verified, the Company will, in principle, disclose, within reasonable limits, the

Participants Information within one (1) month after the said request is made. However, this shall not apply to the case where the Company does not have the obligations to disclose based on the provisions set forth in the Japanese Act on the Protection of Personal Information or other laws and regulations; or where the same request is repeatedly made without justifiable reasons; or where there is a case similar to thereto. If the Company is not able to respond to the request for disclosure, the Company shall notify thereof to the Participants.

- 10.3. In the event that the Participants Information possessed by the Company is found to be incorrect, the Participants may request for the correction, addition, or deletion of such information through postal service by enclosing the necessary document for identity verification (if the request is made by the Participants' representative, include the confirmation that such representative is proper) together with the request form.
- 10.4. In a case where the request is made pursuant to the preceding paragraph and the personal identity of the representative is verified, the Company shall examine the request to a reasonable extent without delay, and then, in principle, the Company will correct, add, or delete the Participants Information based on the result of such examination within one (1) month after the said request is made. However, this shall not apply to the case where the Company does not have the obligations to disclose based on the provisions set forth in the Japanese Act on the Protection of Personal Information or other laws and regulations; or where the same request is repeatedly made without justifiable reasons; or where there is a case similar to thereto.
- 10.5. In a case where the Company receives requests from the Participants for the suspension of use, restrictions on the handling of, or deletion of the Participants Information (hereinafter referred to as "Suspension of Use") pursuant to the provisions of laws and regulations including the Japanese Act on the Protection of Personal Information or rules on the ground that the Participants Information is used beyond the scope of the purpose of use notified in advance or was obtained by a deception or other wrongful means, the Company shall verify and ensure that the request is made by the Participants, then conduct the Suspension of Use of the personal information without delay and notify thereof to the Participants. However, this shall not apply to the case where the Company does not have the obligations to disclose based on the provisions set forth in the Japanese Act on the Protection of Personal Information or other laws and regulations; or where the same request is repeatedly made without justifiable reasons; or where there is a case similar to thereto. If the Company is not able to comply with the request for the Suspension of Use, the Company shall notify thereof to the Participants.
- 10.6. The Participants have the right to file a complaint to the supervisory authority regarding the Company's use of the Participants Information.
- 10.7. The Company shall notify the Participants in advance if the Company intends to lift the restrictions on the handling of personal information.

Article 11. (Safekeeping of the Participants Information)

The Company will destroy the Participants Information if such information is no longer necessary for the achievement of the purpose of use, or if the proper retention period of the Participants Information as specified by the Company has expired, unless the Company is required to safekeep such information. To determine the proper retention period, the Company shall consider the volume, nature, and sensitivity of the personal data, any potential risk from the unauthorized use or disclosure of the Participants Information, the purpose of the processing of the Participants Information, or whether the Company can accomplish such purpose in other means, and any applicable legal requirements.

Article 12. (Organization and System)

The Company shall appoint the president (CEO) of the Company as the person in charge of the management of the Participants Information and shall implement appropriate management and foster continuous improvement of the management of the Participants Information.

Article 13. (Disclaimer)

The Company shall not be liable in any way in the event that the Participants reveal their information to any third parties.

Article 14. (Revision)

The Company shall, from time to time, use its endeavor to review the operational status of the handling of the Participants Information and continuously improve the handling of the Participants Information. The Company may revise the Policy as necessary without the prior consent of the Participants. Unless otherwise stipulated separately by the Company, the revised Policy shall immediately come into effect after

a public announcement on such revision is made. However, if such revision requires the consent of the Participants by laws and regulations, the Company shall gain the consent of the Participants in a manner separately specified by the Company.

Article 15. (Inquiry)

For any comments, inquiries, or complaints regarding the Company's handling of the Participants Information or other matters related to the handling of the Participants Information, please contact the Company at the following address or send an e-mail to the following e-mail address.

3-20-2-501 Tamagawa, Setagaya-ku, Tokyo 158-0094
SALT Consulting Co., Ltd

Inquiry counter
E-mail : admin@passme-thesalt.com

(The inquiry counter handles inquiries by e-mail 24 hours a day, but please note that it may take a while for us to respond depending on the time when we receive inquiries.)

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