



## Koeeru VOC Community Privacy Policy

Koeeru Inc., (hereinafter referred to as the “**Company**”) provides various services (hereinafter referred to as the “**Service**”) consisting of community sites, fan clubs, surveys and monitoring membership services, mail magazines and the like through their websites or mobile applications. The Company handles the personal data of customers acquired in relation to the Service based on this privacy policy (hereinafter referred to as the “**Policy**”) and handles such data appropriately, in compliance with laws concerning the protection of personal information, as well as other applicable data protection laws.

### 1. Acquired Personal Data

#### (1) Personal data provided by customers

The Company acquired the following personal data from customers in relation to the Service.

- ① Name, address, gender, date of birth, phone number, email address and other such information provided by customers when they register for the Service.
- ② Information provided in posts on community sites, as well as information provided by posting, entering, uploading and the like in other segments of the Service
- ③ Information provided by responding to surveys and the like
- ④ Information provided when inquiring or contacting the Company in relation to the Service
- ⑤ Information provided voluntarily by customers

#### (2) Personal data acquired automatically from the devices of customers

The Company acquires personal data described below when customers use the Service, from personal computers, tablet devices, smartphones and other devices used by customers.

- ① Browsing history of websites, usage history of mobile applications and other usage history of the Service.
- ② Cookie Ids, advertisement identifiers, IP addresses and other online identifiers.
- ③ Rough position information is estimated based on IP addresses.
- ④ Technical information pertaining to devices of customers, such as types of browsers, language settings, etc.

#### (3) Personal data acquired from third parties.

The Company may acquire the personal data of customers when approved by applicable data protection laws, in such instances as when consent is given by customers.

## 2. Purposes for Using Personal Data

The purposes for the Company using the personal data of customers are described below.

- ① Management of agreement between customers and the Company. Provision of the Service to customers. Provision of notifications and the like, pertaining to the Service.  
\* Such purposes include the need to customize details of the Service for each customer, based on the attribute information pertaining to the customer and the usage status of the Service.
- ② Assurance of security, such as monitoring and preventing unauthorized use of the Service, etc.
- ③ Investigations and analyses pertaining to usage statuses of the Service, conducted for the purpose of providing the Service of higher quality.
- ④ Consideration of marketing programs for business partners of the Company, businesses that use the Service of the Company and other third parties (hereinafter referred to as the “**Business Partners**”), as well as for the purpose of providing announcements and advertisements relating to products, services and programs and the like offered by the Company and Business Partners. \* Such purposes include providing announcements and advertisements based on results derived by analyzing attributes of customers, as well as their interests and concerns, based on the usage statuses of the Service by customers.
- ⑤ Responding to inquiries from customers and requesting a response to survey requests, etc.
- ⑥ Provision of information to third parties, as stipulated by “Provision of Personal Data to Third Parties” in Article 3 below.

## 3. Provision of Personal Data to Third Parties

Personal data of customers, who grant consent to the Policy, may be provided to a third party as described below.

- ① Provision of information and statistical information with phoneticized names

The Company provides to Business Partners and publishes details of responses to surveys collected from customers. Except for cases where consent is granted by the customer, however, the Company processes details of survey responses in such a way that the customer cannot be identified, prior to providing or publishing such information. The Company also provides to Business Partners and publishes survey results and usage statuses of the Service by customers after processing them into statistical information.

② Provision of contents posted to the Service

Some community sites, fan clubs and other features of the Service include functions that enable customers to post comments and content. Posted contents are disclosed within the Service. The Company collects disclosed posted content and provides them to Business Partners and publishes them.

③ Verification on duplication conducted with Business Partners.

Collaborations may be made by the Company with Business Partners, in order to verify duplications of the personal data of customers owned by Business Partners and personal data of customers owned by the Company. Through such effort, it becomes possible, for instance, to avoid requesting customers to take part in identical surveys from the Company and Business Partners, or to request only duplicated customers to take part in surveys from the Company or Business Partners. The Company uses personal data only to the extent that is necessary for conducting such duplication verification (such as hashed email addresses and phone numbers).

④ Provision of information to advertisement agencies

The Company utilizes the personal data of customers owned by the Company, such as usage status of the Service, etc., to distribute online advertisements, analyze and measure advertisement effects, as well as analyze the interests and concerns of customers. As a part of such effort, the Company may provide personal data of customers who have given their consent to the Policy, to business operators that provide advertisement-related services and to business operators that provide data analysis services (these are combined and hereinafter referred to as the “**Advertisement Agents**”).

Furthermore, personal data provided by the Company to the Advertisement Agents shall be limited information that cannot be used to identify customers on their own, such as hashed email addresses. Advertisement Agents, however, can find out, for instance, that a customer is a user of an online service provided by Advertisement Agents (such as SNS) by comparing received information with the information they own.

⑤ Others

The Company provides personal data of customers to third parties, in the event any of the following descriptions corresponds, aside from instances where consent is obtained from customers.

- a. When needed by the Company to observe legal obligations.

- b. When needed to protect significant interests of customers and third parties.
- c. Any other instance where consent from customers is deemed unnecessary according to applicable data protection laws.

#### **4. Consignment of Handling Personal Data**

The Company consigns the handling of personal data of customers, to the extent necessary to achieve objectives of use, to other business operators. The Company shall conduct assessments and selections of consignees, and then perform appropriate supervision of consignees, based on standards stipulated separately in advance by the Company.

#### **5. Security Control Measures**

The Company shall implement necessary and appropriate measures for the purpose of security control for the personal data of customers, such as prevention of leaks, losses and tampering of personal data. In the event the customer wishes to find out details about security control measures implemented by the Company, such customer is directed to inquire with the contact details described in “Inquiries” of Article 9 below.

#### **6. Overseas Transfer of Personal Data**

Personal data of customers may be transferred and stored in a country or region outside Japan. Please be advised that the same level of data protection laws as those in Japan may not exist in such countries. In such instances, appropriate protection measures will be implemented to protect the personal data of customers when conducting any overseas transfers, according to the Act on the Protection of Personal Information in Japan, as well as other applicable data protection laws.

#### **7. Retained Period of Personal Data**

The Company shall never retain data beyond the necessary period for the purpose of using the personal data described in “Purposes for Using Personal Data” in Article 2. In the event a customer withdraws from the membership of the Service, the Company shall generally delete the personal data of a customer within six months from the date of withdrawal. In the event a relevant law or regulation requires the Company to retain such personal data, then the Company shall comply with such law or regulation.



## **8. Rights of Customers Pertaining to Personal Data**

Customers may have the right to request access to their own personal data, as well as to copy, correct or delete such data in relation to their own individual personal data, based on applicable data protection laws. Such rights must be executed according to applicable data protection laws.

\* In the event the Act on the Protection of Personal Information in Japan applies, customers have the right to have their own personal data disclosed, corrected, additional entries made, deleted, as well as demand termination of use, deletion and provision of data to third parties, and the right to demand disclosure of records on the provision of data to third parties. Such rights are subject to the application of restrictions stipulated by the Act on the Protection of Personal Information in Japan.

In the event the customer wishes to execute such rights, they will be directed to inquire with the contact details described in “Inquiries” of Article 9 below. Appropriate responsive actions will be taken upon confirming the identity of the customer.

## **9. Inquiries**

Please address questions and requests relating to the handling of personal data by the Company by contacting us as stated below.

Postal code 248-0011

3F Yamaguchi Building, 1-8-1 Ogigayatsu, Kamakura City, Kanagawa Prefecture

Koeeru Inc.

Telephone number: 0467-38-4220 (main switchboard)

Email: [hello@koeeru.com](mailto:hello@koeeru.com)