

(English Translation Only)

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# Privacy Policy

kubell Co., Ltd. and its Group companies (hereinafter collectively referred to as the “Company”) have established the following Privacy Policy (hereinafter referred to as the “Policy”) for the handling of information of customers (including applicants undergoing recruitment screening and designated representatives of business partners) using any of the services we provide, which shall be taken to mean all services and websites provided by the Company (hereinafter collectively referred to as the “Services”; this shall include recruitment screening by the Company, media events, and websites).

The meanings of terms used in this Policy shall be in accordance with the Act on the Protection of Personal Information (Act No. 57 of 2003).

## 1 Handling of Information by the Company

### 1.1 Acquisition of Personal Information

The Company may acquire the following information from the customer for the Services. If the information is not provided, the customer may not use the Services in whole or in part.

- 1 Information acquired directly from the customer through registration for the Services or changes to registered information, or through inquiries and communications from the customer  
(Example)
  - Information about the customer, including name, email address, and telephone number
  - Information about the customer’s company, including company name and company department
  - Login information, information about usage plans (this includes contract details, billing dates, and expiry dates), and information concerning the customer’s use of the Services, such as the purpose for using the Services and job details
  - Information entered or sent by the customer using methods stipulated by the Company, including information from customer inquiries, evaluations, and complaints
  - Any information acquired by the Company from applicants, etc. for the purposes of screening, etc.
  
- 2 Information automatically collected from the customer through the use of the Services  
(Example)
  - Location information
  - Information on service usage (e.g., information about chat usage, information about usage plans, information about connections between

users on the Company's services, information on operating settings, number of files uploaded, device orientation at the time of crashes, etc.)

- Dates and times of access of the Services
- The type of device applications and browsers used to view the Services and the pages viewed (this includes the websites of third-party services used by the customer prior to using the Services)
- Information regarding devices used to access the Services, hardware models, device IP addresses, MAC addresses and other unique identifiers, OS and their versions, selected languages, advertising identifiers, serial numbers, device operating information, and mobile network information

### 3 Information acquired through services operated by third parties

If the Company is permitted to acquire customer information through a service operated by a third party, the Company may acquire this Information. In such cases, the Company may adapt the information it acquired on its own and the information obtained from third parties in order to improve the Services and provide advertisements that are of interest to the customer.

## 1.2 Purpose of Use of Personal Information

The Company uses acquired personal information concerning the Services for the following purposes.

1. Providing and maintaining the Company's services
2. Developing and improving the Company's services
3. Security and preventing/addressing unauthorized usage
4. Optimizing the customer experience of the Company's services

Examples of the purpose of use of personal information include the following:

- 1 Providing and maintaining the Company's services
  - For the purpose of accepting registration of Services, identifying individuals, and calculating usage fees, etc.
  - For recording the usage status of the Services
  - To announce information about the content of the Services, updated information, information on events and campaigns, and information regarding rule changes, etc.
  - For conducting business in relation to the Services and responding to communications, procedures, inquiries, etc.
  - For providing information concerning the Services, other of the Company's services the Company (including business partners and outsourcing contractors) deems beneficial, and other companies' services and responding to inquiries, etc.
  - For supporting customers' use of the Services
  - For sending prizes to customers who have been selected in campaigns, etc.
  - For performance of recruitment screening, issuance of notifications, and providing relevant information
- 2 Developing and improving the Company's services
  - For the planning, proposal, and implementation of future Services

- For the adding or removing of features/functions from future Services in accordance with their respective usage statuses
  - For generating statistical data regarding use of the Services within the scope of not being able to identify individuals
- 3 Security and preventing/addressing unauthorized usage
    - For responding to acts violating the Company's rules for the Services and other terms and conditions, complaints, disputes, and litigation, etc.
    - For identity authentication when logging in and logging out when using the Services
    - For monitoring usage with the purpose of preventing unauthorized usage of the Services
  - 4 Optimizing the customer experience of the Company's services
    - For analyzing registered information and usage in order to improve usefulness for the customer of the content and advertising provided by a third party to be viewed during use of the Services
    - For understanding the distribution status of advertising, measuring advertising effectiveness, and displaying behavioral targeting advertising
    - In order to provide partial information to our advertising business partners (hereinafter simply "Advertising Provider") (information that identifies a particular individual is not included in the information provided for use in advertising services of the particular business partner)
    - For the distribution or display of advertisements from the Company or a third party
    - For researching market and customer trends and for marketing initiatives

## **1.3 Provision of Personal Information**

### **1.3.1 Provision to a Third Party**

The Company shall not provide, disclose, or share personal information with a third party without the consent of the customer or as otherwise permitted by applicable law. However, the Company may provide personal information to a third party in situations such as the following:

- 1 Disclosure by the individual customer themselves  
Information such as profile information that has been set as visible to the public may be viewed by third parties in addition to the customer themselves. The Company may provide such public information on the customer to third parties.
- 2 Provision to supporting companies and content providers  
The Company may, in the following circumstances, provide a third party with personal information on customers who have applied to Company media, etc.
  - (1) Persons who apply to events hosted by the Company  
The Company may provide exhibitors, co-hosts, and supporting companies (hereinafter referred to as the "Supporting Companies, etc.") with personal information on customers. This includes cases where the Supporting Companies, etc., directly acquire the personal information.

- (i) Recipients
    - Co-hosts and Supporting Companies, etc., of events hosted by the Company (detailed in informational materials for the respective events)
  - (ii) Items of personal information to be provided
    - Company name, type of business, department name, job title, industry, address, name, contact information, etc.
  - (iii) Purpose of provision of information
    - For Supporting Companies, etc., to respond to inquiries
    - For providing information on the services, seminars, events, etc., of Supporting Companies, etc.
    - For Supporting Companies, etc., to distribute email newsletters, etc.
    - For Supporting Companies, etc., to publish and disclose records of events in print, on websites, or via other such media for the purposes of public relations, advertising, sales activities, etc.
    - For Supporting Companies, etc., to track the distribution of advertisements, measure the effectiveness of advertisements, and display behavioral targeting advertisements
    - For use in other marketing applications
    - For use in various other informational and communications applications
  - (iv) The Company may provide various press institutions, news media outlets, etc., with records of events for the purpose of responding to reports, interviews, publications, etc., by the said press institutions, news media, etc. This may include instances where the said press institutions, news media, etc., directly prepare the records of events.
  - (v) The Company may publish or disclose records of events, etc., in print, on websites, or via other such media for the purposes of public relations, advertising, sales activities, etc.
- (2) Persons who use the Company's media, website, etc.
- When a customer registers as a member, requests/views materials, performs a download, or views/listens to videos, etc., while using the Company's media, website, etc. (hereinafter referred to as the "Content, etc."), the Company may provide the provider of that Content, etc. (hereinafter referred to as the "Provider of the Content, etc."; including any parties subcontracted by the said provider; the provider may not be the affiliated company, but an individual who belongs to the company) with personal information of the said customer. This shall also include instances where the provider of such materials, etc., directly acquires personal information.
- (i) Recipients
    - The Provider of the Content, etc., who publishes Content, etc., on the Company's media, website, etc.
  - (ii) Items of personal information to be provided
    - Name, telephone number, email address, company name, company address, industry, type of business, size of workforce, responsible department, job title (including whether or not the said member has any decision making authority), information

on the company to which the said member belongs, details of any Content, etc., viewed or downloaded, the status of any considerations pertaining to information included within the said content, and other such information

- Information acquired automatically upon use of the Company's media or website by the customer (including date/time of access, browsing/download and video viewing histories, the number of video views, video viewing time, the type of app or browser used and the pages viewed (including the websites of third party services used by the customer before using the Services) when viewing the Company's media or website, and other such information)

(iii) Purpose of provision of information

- For Providers of Content, etc., to respond to inquiries
- For providing information on the services, seminars, events, etc., of Providers of Content, etc.
- For Providers of Content, etc., to distribute email newsletters, etc.
- For Providers of Content, etc., to publish and disclose records of services, seminars, and events in print, on websites, or via other such media for the purposes of public relations, advertising, sales activities, etc.
- For Providers of Content, etc., to track the distribution of advertisements, measure the effectiveness of advertisements, and display behavioral targeting advertisements
- For use in other marketing applications
- For use in various other informational and communications applications

## **1.3.2 Entrustment**

- 1 Upon the outsourcing of work to contractors, the Company may entrust the handling of acquired personal data, in whole or in part, to the contractor within the scope necessary for the achievement of the purpose of use. In this event, the Company will sufficiently examine the eligibility of outsourcing contractors and establish a system to appropriately manage information by stipulating matters concerning confidentiality obligations in the contract.
- 2 Upon using external services, the Company may entrust the handling of acquired personal data, in whole or in part, within the scope necessary for the achievement of the purpose of use. In this event, the Company will sufficiently examine the eligibility of the external services and establish a system to appropriately manage information by stipulating matters concerning confidential obligations in the contract.
- 3 The Company may store or process acquired personal data in foreign countries upon the implementation of Paragraphs 1 and 2 above. In that case, the Company will research regulations etc. for each individual country as well as provide necessary information on the following webpage. Please read and agree to this before use of the Services.
  - Provision of Personal Data to Third Parties in Foreign Countries

### 1.3.3 Joint Use

- 1 The Company may use personal data jointly within the scope provided below to further improve the Services.
  - (1) For cases of joint use among kubell Group companies
    - Categories of personal data that may be used jointly  
Information provided in section 1.1
    - Scope of entities that will jointly use personal data  
The Company's Group companies listed on the following website:  
<https://www.kubell.com/about/company/>
    - Purpose of joint use  
Purposes provided in 1.2 (When referring to the purposes of use by joint users, the term "Company" shall be replaced with the term "Group companies of the Company" and the term "Company's services" shall be replaced with the term "services provided by Group companies of the Company".)
    - Name and address of the person responsible for management of personal data for joint use and name of the representative  
WeWork Nogizaka, 1-24-3 Minamiaoyama, Minato City, Tokyo  
kubell Co., Ltd.  
Masaki Yamamoto Representative Director
  - (2) For cases of joint use between kubell storage Co., Ltd. and agencies
    - Items of personal information subject to joint use  
Information provided in section 1.1 where acquired by kubell storage Co., Ltd.
    - Scope of entities using data jointly  
Agencies of the Company
    - Purpose of joint use  
Purposes provided in 1.2
    - Name and address of the person responsible for management of personal data for joint use, and name of the representative  
Business name: kubell storage Co., Ltd.;  
Name of representative: Tetsujo Nakaba;  
Address: WeWork Nogizaka, 1-24-3 Minamiaoyama, Minato City, Tokyo
  - (3) For cases of joint use between kubell partner Co., Ltd. and Social Insurance Labor Corporation MINAGINE
    - Items of personal data subject to joint use  
Information provided in section 1.1 where acquired by kubell partner Co., Ltd.
    - Scope of entities using data jointly  
Social Insurance Labor Corporation MINAGINE
    - Purpose of joint use  
Purposes provided in 1.2
    - Name and address of the person responsible for management of personal data for joint use, and name of the representative  
9F, Iino Building, 2-1-1 Uchisaiwaicho, Chiyoda City, Tokyo, Japan  
Social Insurance Labor Corporation MINAGINE  
Masakazu Takahashi, Representative Employee
- 2 In addition to the above paragraph, if the Company requires a business partner to jointly conduct its business in the provision of Services to the

customer, the customer's personal data shall be jointly used by this particular business partner. In that case, before the joint use, the Company will disclose to the customer the categories of personal data that may be used jointly, the scope of entities using the data jointly, as well as the name and address of the person responsible for management of personal data for joint use and name of the representative.

### **1.3.4 Acquisition by Third Party**

- 1 In order to improve the customer experience of the Services, display content and advertising matching the customer's interests and preferences, and improve the Services through access analytics, the Company may use third-party tools and cookies, etc. (hereinafter referred to as "Tool") and collect and distribute information about the customer (user information) to external parties. Please read the following in regard to information to be public based on rules governing the external transmission of user information under the Telecommunications Business Act (name of the external provider for each external transmission Tool and Tool names, the names and service names of external providers, details about user information transmitted to the external provider, and the purpose of use of the information distributed to the external provider).  
[External Transmission of User Information](#) (kubell)  
[External Transmission of User Information](#) (kubell partner)  
[External Transmission of User Information](#) (kubell storage)
- 2 The Company uses Google Analytics to collect and analyze data from how the customer uses the Company's websites. For details about Google Analytics, please view the following pages.  
[Google Analytics Terms of Service](#)  
[Google Policy & Terms](#)

## **1.4 Retention Period of Personal Data and Secure Management, etc.**

The Company shall keep personal data accurate and up-to-date to the extent necessary to achieve the purpose of use, and when the retention period prescribed by law has expired, or when the personal data is no longer required to be used for achieving the purpose of use, the Company will strive to delete personal data without delay. The Company has established an Information Security Policy as a policy for measures regarding information security. The Company shall take necessary and appropriate measures for the secure management to prevent the leakage of personal data or the loss or damage of other personal data (this includes personal information acquired by the Company or being acquired and intended to be handled as personal data by the Company).

## 2 Customer Rights

### 2.1 Disclosure, Correction, and Suspension of Use, etc. of Held Personal Data

- 1 When the Company receives a request from the customer to disclose the personal data that it holds in accordance with the Act on the Protection of Personal Information, the Company will disclose the personal data that it holds without delay after confirming that the request is from the customer itself and provided the Company has an obligation for disclosure under the Act on the Protection of Personal Information. For each disclosure of personal data held, the Company may charge a disclosure fee in accordance with separately established procedures.
- 2 When the Company receives a request from the customer to revise the personal information that it holds in accordance with the Act on the Protection of Personal Information due the personal information in the Company's possession being incorrect, or for the suspension of the use of the personal information on the grounds that the information has been handled beyond the scope of already announced purposes of use or when the information has been acquired through deception or other wrongful means in accordance with the Act on the Protection of Personal Information, the Company will undertake the necessary investigation after confirming that the request is made from the customer themselves, and based on the results of the investigation, the Company will revise the particulars of the personal data it holds or suspend use and notify the customer to the effect.
- 3 When the Company receives a request from the customer to delete the customer's personal data it holds, provided the Company deems that it must comply to the particular request, the Company will delete the personal data in its possession without delay after confirming the request is from the customer themselves and notify the customer to the effect.
- 4 When making a request as prescribed in the preceding paragraphs, the customer will send the details stipulated below as well as the information and documents required by other companies.
  - (1) Name, address, telephone number, email address
  - (2) Details of the request, background information, supporting documents
  - (3) Documents confirming identity
- 5 The Company may not be able to comply with the requests in Paragraphs 1 and 2 when any of the following below apply. In such cases, the Company will notify the customer to the effect and explain the reasons.
  - (1) When it may harm the life, wellbeing, and property or other rights or interests of the customer or third party
  - (2) When disclosure may severely interfere with the proper implementation of the Company's business
  - (3) When doing so would be in violation of laws
  - (4) When confirmation cannot be made that the request is from the customer themselves

## **3 Other Important Information**

### **3.1 Disclaimer**

For websites provided by operators other than the Company and linked to from the Services, the particular operator may acquire personal information. However, in such cases, this Privacy Policy shall not apply and the Company assumes no obligation or responsibility concerning the acquisition of personal information by the particular operator.

### **3.2 Inquiries**

For comments and questions concerning this Privacy Policy (except as otherwise noticed in 1.1-2 in this article) and other inquiries about the handling of personal information and requests based on Article 7, please contact the Company on [this form](#).

### **3.3 Revisions**

The Company may revise the Policy, and the Customer shall consent to any such revisions. Unless otherwise stipulated, any changes to the Policy shall be announced as necessary to customers through publications to the Services, and these changes shall become effective as they are published.

End

Last revision: December 11, 2025