

# Privacy Policy

## 1. Handling of Personal Information and Browsing History

As a company operating in the field of communications, D2C X Inc. (henceforth “D2C X”) fully recognizes the need and importance of protecting personal information and browsing history data of all customers, business partners, and other related parties (henceforth collectively “customers”), and is committed to the appropriate handling of said information. In addition to mandating that all its employees understand and comply with this privacy policy, D2C X has set up an internal management system to handle all personal information.

Yasuhiro Nakanishi, Representative Director of D2C X

## 2. Security Measures

- We appropriately manage personal information via a personal information protection system overseen by dedicated staff.
- When acquiring personal information, we clarify the purpose of collecting it, and only use and share this information within the scope necessary to achieve that purpose. Additionally, we’ve taken appropriate steps to guarantee that your personal information will not be used outside of their stated purpose.
- In order to protect your personal information, we have established the most appropriate management system to prevent the unauthorized access, loss, destruction, tampering, or leaking of said information.
- When providing personal information to another party, we operate under strict guidelines limiting our actions to the scope approved by the individual user.
- The outsourcing of personal information processing to subcontractors is performed under the strict supervision of D2C X.
- When handling personal information, we follow relevant laws, government policies, and other regulations regarding personal information, as well as our own internal information management guidelines. Additionally, we continue to maintain and improve our personal information protection system to meet ever-changing conditions and circumstances.
- We promptly respond to requests for the disclosure or correction of personal information as well as to complaints or consultation requests (for inquiries, see “Contact Information”).

## 3. Privacy Statement

About the Acquisition, Use, and Provision of Personal Information

- D2C X will clarify the purpose of use in advance and only acquire personal information after obtaining the user’s agreement. “Personal information” is defined as information relating to a living individual as stipulated in the Act on the Protection of Personal Information (Act No. 57, May 30, 2003). This includes details through which specific individuals can be identified or details that can be easily

compared with other information to identify specific individuals.

- D2C X will not acquire sensitive personal information about a user without their prior agreement.
- D2C X may outsource parts or all of its obligations to subcontractors within the scope necessary to achieve the stated purpose of collecting personal information. In these cases, D2C X mandates that subcontractors take appropriate safety measures on par with those of D2C X to avoid the loss, damage, or leaking of personal information.
- D2C X will not provide personal information to third parties without prior user agreement and clarification of the requirements of said provision.
- D2C X may provide personal information during a joint venture to D2C X-affiliated companies and councils, but only after obtaining prior user agreement and clarifying the requirements of said provision.
- When contracted by other business entities, D2C X will handle personal information within the scope necessary to carry out said contracts.
- The D2C X website uses cookies for users' convenience, but none of the collected information can be used to identify specific individuals.

#### **4. Purpose of Use**

D2C X uses your personal information for the purposes detailed below. We will not acquire or use personal information beyond the scope specified below.

##### ① Personal Information of Users

- Distributing mail magazines and all other notifications
- Responding to user opinions and consultation requests
- Hosting, operating, and implementing, events and seminars

##### ② Personal Information of Shareholders

- Creating a shareholder register and managing shareholders based on regulations such as the Companies Act

##### ③ Personal Information of Executives, Employees, Temporary Workers, Etc.

- Welfare programs and the management of personnel and labor
- Reports for all relevant departments based on appropriate laws

##### ④ Client Company Information

- Communications about the appropriate management and content of contracts with client companies, as well as other business decisions

D2C X may receive the following related personal data from customers or third-parties: attribute data like sex, age, occupation, residential district, and log data, etc., internet usage data like cookies, IP addresses, advertising ID (AAID, IDFA), location information, and activities history (henceforth collectively "related personal data"), which alone does not constitute personal information. If personal information is provided by the customer to D2C X, D2C X may link said information to the customer's related personal data, in which case it shall also be treated as personal information.

## **5. Provision to Third Parties**

D2C X may provide acquired personal information to D2C Inc. via physical, electronic, or electromagnetic means within the scope specified in section 5 (Purpose of Use). If you do not wish for your personal information to be shared, please follow the procedure laid out in section 7, and your personal information will not be shared.

## **6. Complaints and Requests for Disclosure or Consultation**

To file a complaint, request a consultation, or request the disclosure of personal information stored by D2C X for the purposes of discovery, correction, supplementation, cessation, or deletion, or request the release of third-party provision records, please see the Contact Information section at the end of this page.

## **7. Contact Information**

Tokyo Shiodome Building, 1-9-1, Higashi Shimbashi, Minato-ku, Tokyo 105-7313

Email: [privacy-info@d2cx.co.jp](mailto:privacy-info@d2cx.co.jp)

D2C X Inc.

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Yasuhiro Nakanishi, Representative Director

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