

Established: December 1, 2024

## **PRIVACY POLICY**

The Company recognizes the importance of protecting personal information (personal information defined in the "Act on the Protection of Personal Information", as well as individual numbers and specific personal information defined in the "Act on the Use of Numbers to Identify a Specific Individual in the Administrative Procedure"). With this in mind, the Company has formulated the following privacy policy to safeguard personal rights and interests, and will take great pains to ensure that officers and employees abide by the policy.

### **1. Acquisition of Personal Information**

We acquire personal information through lawful and fair means.

### **2. Specification of Purpose of Use**

We specify the purpose of use of personal information as much as possible when handling it.

### **3. Use of Personal Information**

Except as required by law, personal information will be used within the scope of the purposes notified to the individual or publicly disclosed in the section "Handling of Personal Information" below.

### **4. Supervision of Contractors**

When providing personal information to contractors to fulfill the purpose of use, we will appropriately manage and supervise the contractors to ensure the safety of the personal information.

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

Except as required by law, we will not provide personal information to third parties without the individual's consent.

### **6. Management of Personal Information**

We implement sufficient security measures to prevent unauthorized access, loss, destruction, falsification, or leakage of acquired personal information, and strive for appropriate and reasonable safety management.

When personal information is no longer necessary, such as after the statutory retention period, it will be promptly discarded or deleted.

## **7. Pseudonymized Information**

We create pseudonymized information in accordance with laws so that individuals cannot be identified unless matched with other information.

We take necessary measures to prevent leakage of deleted information and ensure its safe management.

We do not match pseudonymized information with other data for the purpose of identifying individuals.

We disclose the items of personal information included in pseudonymized information as required by law.

We do not provide pseudonymized information to third parties unless permitted by law.

## **8. Anonymized Information**

We take necessary measures to ensure that anonymized information cannot identify individuals or be restored to the original personal information.

We do not match anonymized information with other data for the purpose of re-identifying individuals.

We disclose the items of personal information included in anonymized information as required by law.

When providing anonymized information to third parties, we disclose the items and methods of provision and clearly indicate that the information is anonymized.

## **9. Related Information**

We do not provide related information (limited to those forming part of a personal information database) to third parties if it is expected that the third party will acquire it as personal data, unless the following conditions are confirmed in advance:

- (1) The individual has consented to the third party acquiring the information as personal data.
- (2) In the case of provision to a foreign third party, the individual has been informed in advance of the personal information protection system in that country, the measures taken by the third party, and other relevant information.

## **10. Requests for Disclosure of Personal Information**

If an individual wishes to request notification of the purpose of use, disclosure, correction, addition, deletion, suspension of use, erasure, or disclosure of records of third-party provision of their personal information, we will respond promptly in accordance with applicable laws and regulations.

## **11. Organization • Structure**

We appoint a Personal Information Protection Officer and ensure the proper management of personal information.

We provide training to officers and employees on the protection and proper handling of personal information, and ensure appropriate handling of personal information in daily operations.

## **12. Compliance with Laws and Review**

We comply with applicable laws, regulations, and guidelines related to personal information, and review and improve our initiatives under each of the above items as necessary to further enhance the protection of personal information.

If you wish to request further notification of this policy, please contact with the General Affairs Dept. in a mail or an email to the addresses below.

E-mail Address: [soumubu@kgk-j.co.jp](mailto:soumubu@kgk-j.co.jp)

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