

# EDGEMATRIX Privacy Policy

EDGEMATRIX Inc. (“EMI”) prescribes the privacy policy about the handling of personal information, as follows.

## **Article.1 Compliance with Decree**

When handling personal information, EMI shall comply with the Act on the Protection of Personal Information (“APPI”), decree concerning the protection of personal information, EMI’s inner rules as well as this policy.

## **Article.2 Definition of Personal Information**

“Personal information” in this policy refers to any of the following information.

- (1) information relating to an individual that includes a name, date of birth, or other description, etc., that could be used to identify a specific individual (including information that can be easily collated with other information and thereby identify a specific individual)
- (2) information relating to an individual that includes an individual identification code.

## **Article.3 Utilization Purpose of Personal Information**

Except where the prior consent of the individual has been obtained, or where it is legally permitted, EMI shall handle personal information only to the extent that required to achieve any of following purposes, and shall take measures to achieve such purpose.

- (1) Utilization purpose of personal information about transaction counterparties (including, but not limited to “purchasers of EMI products”, “subscribers of EMI service”, “business tie-up partners”, “investors” and “subcontractors”)
  - Contacts necessary for each transaction
  - Transaction management
  - Fulfillment of contracts
  - Compliance with decree
- (2) Utilization purpose of personal information about officers and employees
  - Personnel and human resource management
  - Compliance with labor decree
  - Business contacts
- (3) Utilization purpose of personal information about retirees
  - Compliance with labor decree
  - Contacts related to retirement

- (4) Utilization purpose of personal information about applicants
  - Performance and management of recruitment
  - Contacts related to recruitment
- (5) Utilization purpose of personal information about those who inquires
  - Response to each inquiry

#### **Article.4 Acquisition of Personal Information**

EMI shall endeavor to obtain personal information after expressing in advance the items, utilization purposes, and contact information for inquiries, etc., of the personal information to be handled, and after obtaining the consent of the individual. In the event that special care-required personal information such as race and creed, etc., is included in the personal information, except where legally permitted, EMI shall not acquire such personal information without the consent of the individual. When obtaining personal information from any third party, if any legal obligation to check or create records arises when receiving provision from any third party, EMI shall comply with this.

#### **Article.5 Restriction on Utilization of Personal Information**

Except where based on the provisions of any of the following cases, EMI shall not handle personal information beyond the scope required for the achievement of any of utilization purposes shown in the Article 3 of this policy without the prior consent of the individual.

- (1) Cases based on decree
- (2) Cases in which it is necessary for protection of the life, body or property of humans in which it is difficult to obtain the consent of the individual
- (3) Cases in which particularly required in order to improve public health or to promote the healthy education of children, and obtaining the consent of the individual is difficult
- (4) Cases in which the handling of personal information is necessary for cooperating with a state organ, a local government, or an individual or a business operator entrusted by either of the former two in executing the affairs prescribed by decree and in which obtaining the consent of the individual is likely to impede the execution of the affairs concerned

#### **Article.6 Change of Utilization Purpose**

In case of changing any of utilization purposes of personal information, EMI shall not change such purpose beyond reasonable limits. EMI shall notify the individual or publicly disclose the new utilization purposes

#### **Article.7 Restriction on Provision to Third Parties**

1. Except where based on the provisions of any of the following cases, EMI shall not provide personal information to any third party without obtaining the consent of the individual. If personal information is provided to any third party, and a legal obligation to create records arises at the time of such provision to third party, EMI shall comply with this.
  - (1) Cases based on decree
  - (2) Cases in which it is necessary for protection of the life, body or property of humans in which it is difficult to obtain the consent of the individual
  - (3) Cases in which particularly required in order to improve public health or to promote the healthy education of children, and obtaining the consent of the individual is difficult
  - (4) Cases in which the handling of personal information is necessary for cooperating with a state organ, a local government, or an individual or a business operator entrusted by either of the former two in executing the affairs prescribed by decree and in which obtaining the consent of the individual is likely to impede the execution of the affairs concerned
2. Despite the preceding paragraph, the following cases shall not fall into any provision of personal information to third parties.
  - (1) Cases in which EMI entrusts personal information to other enterprises to the extent of any of the utilization purposes in the Article 3
  - (2) Cases in which personal information is transferred to any successor entity following the succession of any business due to merger or other reasons
  - (3) Cases in which personal information is used jointly between specific entities and in which this fact, the items of the personal information used jointly, the scope of the joint users, the purpose for which the personal information is used by them, and the name of the individual or business operator responsible for the management of the personal information is, in advance, notified to the individual or put in a readily accessible condition for the individual

#### **Article.8 Security Control Action**

EMI shall endeavor to keep the content of personal information accurate, complete, and up to date within the scope of the utilization purposes, shall take the necessary and appropriate secure management measures in accordance with technological standards at that point in time in order to prevent unauthorized access, leakage, tampering, loss, or damage, etc., and shall make corrections as necessary.

### **Article.9 Strengthening of Internal Systems**

To ensure the appropriate handling of personal information, EMI shall endeavor to continually strengthen and improve internal systems by appointing a manager of personal information, establishing internal regulations, training officers and employees, and reviewing this policy.

### **Article.10 Supervision Over Subcontracts**

EMI, within the scope required for any of the utilization purposes shown in the Article 3, may entrust the handling of personal information to any third party. In that case, EMI will appropriately select such third party from the perspective of protecting personal information. In addition, EMI will make efforts to ensure that secure management is performed by such third party as strictly as possible through the execution of the contract. If EMI entrusts the handling of personal information to any third party in any foreign country, and any legal obligation to create records arises, EMI shall comply with this.

### **Article.11 Respond to Requests etc.**

EMI shall respond appropriately to requests for "the notification of utilization purpose", "disclosure", "amendment", "addition", "deletion", "suspension", and "erasure" of personal information, as well as other comments and inquiries regarding the handling of personal information, based on decree. You can contact us only via regular mail or e-mail.

#### **■ EDGEMATRIX Inc. Contact Information**

CAT Bldg, Ebisunishi 2-3-16, Shibuya-ku, Tokyo 150-0021, Japan

e-mail: [info@edgematrix.com](mailto:info@edgematrix.com)

Reception time:10:00~17:00 from Monday to Friday (except National Holidays and New Year Season)

### **Article.12 Change of Privacy Policy**

EMI may change this policy due to the revision of decree. The updated version of this policy shall be on EMI's website so you can confirm the updated version.

CAT Bldg, Ebisunishi 2-3-16, Shibuya-ku, Tokyo 150-0021, Japan

EDGEMATRIX Inc.

CEO Hiroshi Ohta

Last Updated: August 8, 2022