

# Privacy Policy

SEYMOUR INSTITUTE Inc. (hereinafter referred to as the “Company”), as below, makes the protection policy for personal information, establish systems to protect personal information, make all the employees to perceive the importance of protecting personal information and take measures for it thoroughly, thereby promoting the protection of personal information.

## Article 1 (Personal Information)

“Personal information” means “personal information” as stipulated in Act on the Protection of Personal Information (Act No. 57 of May 30, 2003; hereinafter referred to as “Personal Information Protection Act”) and means information about a living individual which can identify the specific individual by name, date of birth or other description contained in such information or which includes a code with which to identify the specific individual.

## Article 2 (Acquisition and Use of Personal Information)

The Company may acquire and use personal information of the persons within the scope necessary for the purpose below:

- (1) To provide our Services
- (2) To improve and refine our Services, or to develop new services
- (3) To notify the users of new functions of the Services, updated information, campaigns, etc. and other services we provide (including delivery of e-mail, flyers, and other direct mails)
- (4) To inform the users of maintenance, important news, etc.
- (5) To answer questions from the users on the Services (including to check their identification)
- (6) To report to the users the situation regarding their use of the Services
- (7) To request the users to answers questionnaires & questions on the Services, etc. or to attend events, or to report on the results of these, etc.
- (8) To research and analyze the use history of the Services and to utilize the results for improvement and development of the services and for sending advertisement
- (9) To identify the users who violated the Terms of Use or intend to use the Services for unlawful or illegitimate purposes and to refuse their use.

## Article 3 (Management and Protection of Personal Information)

1. Personal information will be managed carefully and closely and will not be disclosed or provided to any third parties without the consent of the persons, except for the cases in the following items. Also, taking safety into consideration, we will take preventive and corrective measures against risks such as unlawful access to personal information, loss, destruction, falsification or leakage of personal information, etc.
  - (1) Cases in which the handling of personal information is necessary for the protection of the life, body, or property of an individual and in which it is difficult to obtain the consent of the person
  - (2) Cases in which the handling of personal information is specially necessary for improving public health or promoting the sound growth of children and in which it is difficult to obtain the consent of the person

- (3) 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 laws and regulations and in which obtaining the consent of the person is likely to impede the execution of the affairs concerned
  - (4) Cases in which we entrust the handling of personal data in whole or in part within the scope necessary for the achievement of the purpose of utilization in order to implement our operation smoothly
  - (5) Cases in which personal data is provided as a result of the succession of business in a merger or otherwise
  - (6) Cases in which personal data is used jointly between specific individuals or entities and in which this fact, the items of the personal data used jointly, the scope of the joint users, the purpose for which the personal data is used by them, and the name of the individual or business operator responsible for the management of the personal data is, in advance, notified to the person or put in a readily accessible condition for the person
  - (7) Cases in which other laws and regulations permit
2. We may upload the names and university names of the users, which fall under personal information, on our webpage, etc. for disclosing our achievements.

#### Article 4 (Entrustment of the Handling of Personal Information)

We may entrust an individual or a business operator with the handling of personal data in whole or in part, in which case we will examine their eligibility sufficiently, provide for matters concerning confidentiality obligation, etc. in contracts, and exercise necessary and appropriate supervision over the trustee. Also, we may use jointly the whole or a part of acquired personal information in accordance with Personal Information Protection Act.

#### Article 5 (Disclosure of Personal Information)

When we are requested by a person to disclose personal information, we will disclose it to the person without delay. However, in falling under any of the following items, we may keep all or part of the personal data undisclosed, in which case we will notify you without delay:

- (1) Cases in which disclosure is likely to harm the life, body, property, or other rights or interests of the person or a third party
- (2) Cases in which disclosure is likely to seriously impede the proper execution of our business
- (3) Cases in which disclosure violates other laws and regulations

#### Article 6 (Correction and Deletion of Personal Information)

1. If personal information retained by us include wrong information, we will, upon the request of the person, correct or delete it in accordance of our procedures.
2. If we decide that it is necessary to act in accordance with the request of the person in the preceding sub-article, we will correct or delete the personal information and notify the person of that effect.

#### Article 7 (Discontinuation, etc. of Use of Personal Information)

Where we are requested by a person to discontinue using or to erase the personal information (hereinafter referred to as “Discontinuation, etc.”) on the ground that the personal information is being handled beyond the scope of the purpose of use or has been acquired by unlawful means, we will implement necessary research without delay and based on the result, implement Discontinuation, etc. of the personal information and notify the person of that effect. However, in cases in which it costs large amount or otherwise difficult to implement Discontinuation, etc. of the personal information and in which we can take necessary alternative measures to protect the rights and interests of the person, we will take the alternative measures.

#### Article 8 (Procedures for Amending Privacy Policy)

We will review the content of this privacy policy appropriately and endeavor to improve it. The content of this privacy policy may be amended unless otherwise stipulated in laws, regulations, and this privacy policy. The amended privacy policy will be valid when the it is notified to the users or uploaded on our website in accordance with our procedures.

#### Article 9 (Compliance with Laws, Regulations and Norms)

We will comply with laws, regulations and other norms in Japan which apply to personal information we retain.

#### Article 10 (Response to Complaints and Consultations)

We will receive complaints and consultations of the persons as to how we handle the personal information and will respond to them properly and promptly. Also, will react properly and promptly to requests for disclosure, correction, addition, deletion, refusal of use or provision regarding the personal information, etc.

#### Article 11 (Customer Desk)

For inquiry concerning our handling of personal information, please contact as below:

SEYMOUR INSTITUTE Inc. Personal Data Protection Unit  
Taisei Koi Bldg. 4F 5-4-12 Hiroo Shibuya Tokyo 150-0012  
Mail: [info@seymour-inst.com](mailto:info@seymour-inst.com)

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