

Privacy Policy

CLOVERS Inc. (hereinafter referred to as "the Company") establishes this Privacy Policy (hereinafter referred to as "this Policy") to ensure the proper handling of personal data in accordance with the "Act on the Protection of Personal Information" (Act No. 57 of 2003, hereinafter referred to as the "Personal Information Protection Act") and to implement an organizational approach for securing the proper handling of personal data.

1.Acquisition and Use of Personal Information

When acquiring personal information, the Company discloses or notifies the purpose of use (including disclosure through this Policy) and, when acquiring personal information directly from individuals through contracts or other documents (including electronic records), clarifies the purpose of use in advance and acquires such information through lawful and fair means.

The Company uses personal information appropriately within the scope necessary to achieve the purpose of use.

2 .Purpose of Use of Personal Information

The Company uses personal information for the following purposes:

[Purpose of Use of Customer Information]

To provide the Company's services.

To offer information on services provided by the Company and partner companies.

For the development or improvement of the Company's services.

To provide customer information to third-party contractors or outsource within the scope necessary for fulfilling tasks entrusted by customers.

To provide information to event organizers in events planned or co-sponsored by the Company or partner companies (including seminars and lectures).

For communication related to events, such as notifications, guidance, material delivery, and invoice dispatch, and for responding to inquiries.

To analyze event outcomes and utilize them for planning and developing new events.

To respond to inquiries or consultations from customers, including verification and record-keeping.

For customer information management and to contact customers for emergency purposes.

For necessary business communications, contract performance, negotiations, etc.

For other communications related to the above.

[Purpose of Use of Applicant Information]

To conduct recruitment selection procedures for applicants.

To manage information related to applicants.

To provide applicants with information and updates regarding recruitment activities.

To analyze and consider recruitment strategies to conduct more effective recruitment activities within the Company.

3.Provision of Personal Data to Third Parties

The Company will not provide personal data to third parties except in the following cases:

When prior consent is obtained from the customer.

When outsourced within the scope necessary for achieving the purpose of use.

When required by law.

When necessary to protect the life, body, or property of an individual, and obtaining customer consent is difficult.

When necessary to improve public health or promote the sound growth of children, and obtaining customer consent is difficult.

When it is necessary to cooperate with national or local governments for legally prescribed tasks, and obtaining customer consent may interfere with the execution of such tasks.

4. Security Measures for Personal Data

The Company implements necessary and appropriate security measures to prevent leakage, loss, or damage of personal data. The Company also supervises employees and contractors (including sub-contractors) appropriately. The specific security measures for managing personal data are stipulated separately in the "Personal Information Handling Rules."

(Formulation of Personal Information Protection Policy)

To ensure proper handling of personal data, this Policy (Personal Information Protection Policy) stipulates compliance with relevant laws, guidelines, and a contact point for inquiries and complaints.

(Establishment of Rules for Handling Personal Data)

The Company has established "Personal Information Handling Rules" for each stage of handling personal data, such as acquisition, use, storage, provision, deletion, and disposal, specifying handling methods, responsible personnel, and duties.

(Organizational Security Measures)

The Company appoints a person responsible for handling personal data and clarifies the scope of personal data handled by employees. It establishes a reporting and communication system with the person in charge of managing personal data protection to report any violations or signs of violations of the Personal Information Protection Act or Personal Information Handling Rules.

The Company conducts regular self-inspections of the handling status of personal data and audits by other departments or external parties.

(Human Security Measures)

The Company provides regular training on matters to consider when handling personal data to employees.

The employment rules include confidentiality obligations concerning personal data.

(Physical Security Measures)

The Company manages the entry and exit of employees and restricts the devices allowed in areas where personal data is handled, as well as prevents unauthorized individuals from viewing personal data.

The Company implements measures to prevent the theft or loss of devices, electronic media, and documents containing personal data. It also implements measures to prevent the easy identification of personal data when transporting such devices and media within and outside the office.

(Technical Security Measures)

The Company implements access control to limit the scope of employees and personal information databases they handle.

The Company introduces measures to protect information systems handling personal data from unauthorized access or malware from external sources.

5. Request for Disclosure, etc., of Retained Personal Data

When there is a request for the disclosure, correction, suspension of use, or deletion of retained personal data, the Company will promptly respond after verifying the individual's identity through the prescribed procedure. For inquiries regarding this Policy or for exercising rights, please contact the consultation desk in Section 6 below.

6. Contact for Inquiries

For inquiries regarding the handling of personal information at the Company, please contact the following:

CLOVERS Inc. Personal Information Consultation Desk

Address: 19F, Kitahama NEXU BUILD, 4-33 Kitahama-Higashi, Chuo-ku, Osaka City, Osaka 540-0031, Japan

Contact Form: <https://clovers2023.com/en/contact>

7. Revisions to the Privacy Policy

The Company reserves the right to modify this Policy at any time. The revised Privacy Policy will take effect from the time it is notified to you by a method prescribed by the Company or posted on the Company's website.