#### **Privacy Policy**

Hiro's Japanese Classroom (hereinafter referred to as "the Company") establishes the following Privacy Policy (hereinafter referred to as "this Policy") regarding the handling of users' personal information in the services provided on this website (hereinafter referred to as "the Services").

## Article 1 (Definition of Personal Information)

"Personal Information" refers to "personal information" as defined in the Act on the Protection of Personal Information of Japan, and means information relating to a living individual that can identify a specific individual by name, date of birth, address, telephone number, contact details, and other descriptions contained in such information, as well as data relating to physical appearance, fingerprints, voiceprints, and insurance numbers on health insurance cards, and other information that can identify a specific individual by itself (personally identifiable information).

## Article 2 (Method of Collecting Personal Information)

The Company may ask users to provide personal information such as name, date of birth, address, telephone number, email address, bank account number, credit card number, and driver's license number when they register to use the Services.

In addition, the Company may collect transaction records containing users' personal information or information related to payments from the Company's business partners (including information providers, advertisers, advertising distribution destinations, etc., hereinafter referred to as "Partners").

#### Article 3 (Purpose of Collecting and Using Personal Information)

The purposes for which the Company collects and uses personal information are as follows:

- To provide and operate the Company's Services
- To respond to user inquiries (including identity verification)
- To send emails regarding new features, updates, campaigns, and announcements of other services provided by the Company
- To contact users when necessary, such as for maintenance or important notices
- To identify users who violate the Terms of Service or those who attempt to use the Services for fraudulent or improper purposes, and to refuse their use
- To allow users to view, edit, or delete their own registration information and usage status
- To charge usage fees for paid services
- Purposes incidental to the above purposes

# Article 4 (Changes to the Purpose of Use)

- The Company may change the purpose of use of personal information only when it is reasonably recognized that the new purpose is related to the original purpose.
- In the event of a change, the Company shall notify users or publicly announce the revised purpose by a method prescribed by the Company.

Article 5 (Provision of Personal Information to Third Parties)

The Company will not provide personal information to third parties without prior user consent, except in the following cases or when permitted by laws and regulations:

- When necessary to protect a person's life, body, or property, and obtaining user consent is difficult
- When particularly necessary to improve public health or promote the sound growth of children, and obtaining user consent is difficult
- When necessary to cooperate with national or local government organizations or entities entrusted by them to execute duties prescribed by law, and obtaining user consent may hinder the execution of such duties
- When the following items have been announced or made publicly available in advance, and the Company has notified the Personal Information Protection Commission:
  - That the purpose of use includes provision to third parties
  - Items of personal data to be provided to third parties
  - Means or methods of provision to third parties
  - That provision to third parties will be suspended upon the request of the user
  - Method of accepting such user requests

Notwithstanding the items above, in the following cases, the recipient of the information shall not be considered a third party:

- When the Company outsources the handling of personal information, in whole or in part, within the scope necessary to achieve the purpose of use
- When personal information is provided due to the succession of business by merger or other reasons
- When personal information is jointly used with a specific party, and users are notified in advance or placed in a state where they can easily become aware of: the fact of joint use, the items of information jointly used, the scope of parties jointly using the information, the purpose of use by those parties, and the name of the person responsible for managing the information

Article 6 (Disclosure of Personal Information)

When a user requests disclosure of personal information, the Company shall disclose it without delay. However, the Company may decline disclosure in whole or in part if:

- There is a risk of harming the life, body, property, or other rights or interests of the user or a third party
- Disclosure may significantly hinder the proper execution of the Company's business
- Disclosure violates laws or regulations

If the Company decides not to disclose the requested information, the Company shall notify the user without delay. A handling fee of 1,000 JPY per request will be charged for the disclosure of personal information.

Notwithstanding the above, the Company will not disclose non-personal information such as history information or characteristic information.

Article 7 (Correction and Deletion of Personal Information)

If a user believes that personal information retained by the Company is incorrect, the user may request correction, addition, or deletion (hereinafter referred to as "Correction, etc.") through procedures designated by the Company. If the Company determines that it is necessary to respond to the request, the Company shall promptly make the

Correction, etc.

If the Company makes such Correction, etc., or decides not to make it, the Company shall notify the user without

delay.

Article 8 (Suspension of Use of Personal Information)

If the user requests the suspension or deletion of personal information (hereinafter referred to as "Suspension of Use, etc.") on the grounds that personal information is being handled beyond the scope of the purpose of use or obtained through improper means, the Company shall conduct the necessary investigation without delay.

If the Company determines that the request is valid based on the investigation, the Company shall promptly implement Suspension of Use, etc.

If Suspension of Use, etc. is implemented, or if the Company decides not to do so, the Company shall notify the user without delay.

However, if Suspension of Use, etc. requires excessive cost or is otherwise difficult to implement, and alternative measures can be taken to protect the user's rights and interests, the Company shall take such alternative measures.

Article 9 (Changes to the Privacy Policy)

Unless otherwise provided by law or this Policy, the Company may change this Policy without notifying the user. Unless separately specified by the Company, the revised Privacy Policy shall become effective once posted on this website.

Article 10 (Contact Information)

For inquiries regarding this Policy, please contact the following:

Service Provider: Hiro's Japanese Classroom

Email Address: support@hiroengish.jp