

# Privacy Policy

Knowledge Piece Co., Ltd. (hereinafter referred to as "the Company") operates a talent matching business aimed at providing opportunities for highly skilled business professionals to engage in advisory roles and contribute to the development of companies. In the process, the personal information handled by the Company requires extremely careful handling, and its protection is considered a matter of utmost importance for the business operation.

The Company promises to establish and implement the following basic principles for the protection of personal information in the course of conducting its business, including advisory services, personnel introduction services, other management support services, and public relations activities. This policy is a collaborative effort of all officers and employees of the Company, and by seeking understanding and cooperation from the companies with which the Company conducts business transactions, we strive to ensure appropriate protection of personal information.

## **Basic Principles for Handling Personal Information**

### **■ Proper Acquisition**

Personal information shall be acquired through lawful and fair means, with the identification of the purpose of use to the extent possible, and with the consent of the individual concerned as a general rule.

### **■ Prohibition of Unauthorized Use**

Acquired personal information shall be used or provided only within the scope of the consented purpose and shall not be used or provided for any other purpose. Appropriate measures shall also be taken for this purpose.

### **■ Compliance with Laws and Regulations**

In operating the personal information management system related to personal information protection, the Company shall comply with laws and regulations regarding personal information protection, guidelines established by the government, and other applicable norms.

## ■ **Security Measures**

In managing personal information, the Company shall make efforts to implement appropriate preventive and corrective measures to prevent leakage, loss, destruction, and other security management measures.

## ■ **Ensuring Transparency**

The Company shall establish a personal information protection management system, appoint a person in charge of personal information protection, grant them the authority and responsibility for operation, and establish and manage the personal information protection management system. By conducting regular audits, we will review the operational procedures as needed and strive for continuous improvement.

## ■ **Handling Inquiries**

In the event of complaints or consultations regarding personal information, the Company will respond promptly and in good faith.

Established: October 1, 2020

Revised: July 18, 2023

Knowledge Piece Co., Ltd.

CEO: Hiroyuki Sakai

## Handling of Personal Information (Personal Information Handling Agreement)

Knowledge Piece Co., Ltd. (hereinafter referred to as "the Company") recognizes the importance of the personal information entrusted by individuals (hereinafter referred to as "the person") who join or register for the purpose of providing a service (hereinafter referred to as "the Service") to introduce suitable personnel to companies (hereinafter referred to as "job-seeking companies") seeking advisory and employment services. The Company handles such personal information in accordance with the laws and regulations concerning the protection of personal information, the Company's privacy policy, and agreements.

### ■ Article 1 (Personal Information)

Personal information refers to information about an individual user of the Service that can identify the user, including but not limited to the user's name, address, date of birth, gender, telephone number, email address, and any other descriptions. Even if the information alone cannot identify the individual, if it can be easily matched with other information and as a result identify the individual, it is also included in personal information.

### ■ Article 2 (Purpose of Use of Personal Information)

The Company shall acquire and appropriately use personal information within the scope of the following purposes for the provision of the Service:

- (1) Performance of advisory and personnel introduction services, provision of information, and related services.
- (2) Registration for the Service and verification of the user's identity when using the Service.
- (3) Payment and billing related to the provision of the Service.
- (4) Processing, analysis, and statistical compilation of information for publication on websites and other media.
- (5) Delivery and transmission of various communications, newsletters, direct mail, notices, etc., from the Company.
- (6) Listening to opinions and requests for the purpose of improving the Service.

- (7) Development, marketing, maintenance, and management of the Service.
- (8) Provision of advice and proposals for the establishment of job-seeking companies' plans for utilizing external personnel.
- (9) Response to inquiries, consultations, complaints, and dispute resolution.
- (10) Other purposes specified in various services provided by the Company.

■ Article 3 (Provision of Personal Information to Third Parties)

1. Except as provided below, the Company shall not provide personal information handled by the Company to third parties without the prior consent of the individual:

- (1) When the Company determines that it would be detrimental to the individual to do so.
- (2) When it is necessary for the improvement of public health or the promotion of healthy child development, and obtaining the individual's consent is difficult.
- (3) When it is necessary to cooperate with national or local government agencies or those entrusted by them in performing tasks prescribed by law, and obtaining the individual's consent may hinder the performance of those tasks.
- (4) When requested to disclose personal information by a court, public prosecutor's office, police, or other authority with similar powers regarding personal information.
- (5) When explicitly requested by the individual to disclose or provide personal information to a third party.
- (6) When the disclosure or provision is permitted by law.
- (7) When personal information is provided in the event of a merger or other business succession and is handled within the scope of the original purpose of use before the succession.

2. Notwithstanding the provisions of the preceding paragraph, the Company may provide

job-seeking companies, etc., which have entered into contracts including matters regarding the appropriate handling of personal information, taking into consideration the knowledge and preferences of the individual, with personal information received from the individual or publicly available personal information, including company names, job titles, job descriptions, etc., by sending them in writing or electronically or by bringing them in person, in order to carry out the Service. Furthermore, if the Company provides personal information to job-seeking companies, etc., it may use the personal information for confirming the post-service situation, providing advice and proposals for job-seeking companies' plans for utilizing external personnel, and other purposes.

■ Article 4 (Disclaimer regarding Third-Party Provision)

The Company shall not be responsible for the acquisition of personal information by third parties in the following cases:

- (1) When the individual voluntarily discloses personal information to job-seeking companies, etc. through other means (regarding the handling of personal information by job-seeking companies, please contact each company directly).
- (2) When the individual is inadvertently identified based on the information entered into the Service.
- (3) When personal information is provided by the individual and used on external websites linked from the Service.

■ Article 5 (Outsourcing of Personal Information Processing)

The Company may outsource part or all of the personal information handling tasks. When disclosing personal information to such outsourcing partners, the Company selects them based on the assurance of an adequate level of personal information protection, and concludes confidentiality agreements with them.

■ Article 6 (Voluntariness of Providing Personal Information)

While it is not necessary to respond to all items requested by the Company, if necessary information is insufficient, the Company may not be able to provide the Service.

■ Article 7 (Use of Processed Statistical Data)

The Company may create statistical data processed in such a way that individuals cannot be

identified based on the provided personal information. The Company may freely use such statistical data without any restrictions.

■ Article 8 (Changes to Personal Information)

As a general rule, individuals have the right to request notification of the "purpose of use of personal information," disclosure of registered personal information, correction, addition or deletion of personal information, suspension of use, and suspension of third-party provision (referred to as "changes to personal information"). Please contact the personal information management contact provided below for specific procedures. However, changes to personal information may not be made in the following cases:

- (1) When there is a risk of harming the life, body, property, or other rights and interests of the individual or a third party.
- (2) When there is a significant risk of hindering the proper implementation of this service.
- (3) When it would violate other laws and regulations.

Furthermore, in cases where changing the personal information in question would require a large amount of expense or when it is difficult to make changes to the personal information for other reasons, measures necessary to protect the rights and interests of the individual may be taken instead, and changes to personal information may not be made.

■ Article 9 (Accuracy of Personal Information)

We will make efforts to accurately process the personal information provided to us. However, the individual is responsible for ensuring the accuracy and currency of the personal information provided.

■ Article 10 (Restrictions on Collection of Sensitive Personal Information)

As a general rule, we do not collect personal information that includes the following content. However, this does not apply if the individual provides the information voluntarily.

- (1) Matters related to thoughts, beliefs, and religions
- (2) Matters related to race, ethnicity, lineage, domicile (excluding information about the prefecture of residence), physical or mental disabilities, criminal history, or other factors

that may cause social discrimination

- (3) Matters related to the right of workers to organize, engage in collective bargaining, and other collective actions
- (4) Matters related to participation in group demonstrations, exercise of the right to petition, and other political rights
- (5) Matters related to health care, medical treatment, and sexual activities

■ Article 11 (Identity Verification)

When an individual uses this service and requests disclosure, correction, deletion, or suspension of use of personal information, etc., we will verify their identity using information that can identify the individual (such as name, address, telephone number, date of birth, email address, member number, password). However, we do not take responsibility if someone other than the individual obtains and uses information that can identify the individual.

■ Article 12 (Personal Information Management Officer)

Knowledge Piece Co., Ltd. Personal Information Protection Manager: COO

■ Article 13 (Contact for Personal Information Inquiries)

Please contact the following contact for inquiries regarding personal information held by our company:

- ◆ Knowledge Piece Co., Ltd. Personal Information Protection Inquiry Desk
- ◆ Email address: [privacy@knowledge-piece.com](mailto:privacy@knowledge-piece.com)

■ Article 14 (Security Measures)

We will take necessary and appropriate measures to prevent the leakage, loss, or damage of personal information and ensure the security management of personal information. For details regarding the security measures taken by our company, please contact the personal information protection inquiry desk in Article 13.

■ Article 15 (Requests for Disclosure, etc.)

We will respond to requests for disclosure, etc. (notification of purpose of use, disclosure of personal information or records of third-party provision, correction, addition, deletion,

suspension of use, suspension of third-party provision). For specific procedures and the amount of fees related to requests for disclosure, etc., please contact the personal information protection inquiry desk in Article 13.

■ Article 16 (Changes to Privacy Policy)

Except where otherwise provided by laws and regulations, we may change the privacy policy at any time. The revised content will be posted on our website, and users who continue to use this service after one month from the date of posting will be deemed to have agreed to the revised privacy policy.

Enacted on October 1, 2020

Revised on July 18, 2023