

Handling of Personal Information

ZENKIGEN Inc. (hereinafter referred to as "We" or "Us") will, in light of the importance of protection of personal information, comply with Act on the Protection of Personal Information (hereinafter "Act on the Protection of Personal Information"), handle the personal information provided by you properly and endeavor to protect your privacy.

1. About the purposes

We obtain your personal information by lawful and fair means and use it within the scope of 'the purposes' as provided for the below table.

target information	the purposes	whether we have retained personal data
(i) personal information about users of our services (excluding services set forth in (ii) (iii) below)	<ul style="list-style-type: none">the purposes provided in the privacy policy separately determined by us (https://zenkigen.co.jp/en/privacy/)	○
(ii) personal information about users and event participants of our human resource community service ("ZENKIGEN")	<ul style="list-style-type: none">for provision, operation and improvement of servicefor provision of information about servicefor acceptance, investigation and response to inquiriesfor necessary communication such as maintenance and important noticefor counting of characters, analysis and preparation of statistical materials about personal information (statistical materials means those that cannot identify any person and may be used and processed for our business such as development of new service. We may provide our business partners with the statistical materials.)for marketing research and development of our new service and functionsfor responding to actions that violate the terms of use etc.for other actions associated with the purposes above	○

(iii) personal information about users of our recruitment service "ZEN Career Partners"	• the purposes provided in the privacy policy separately determined by "ZEN Career Partners" (https://zen-career.jp/privacy)	○
(iv) personal information about those who inquire about our services (including services set forth in (ii) (iii) above)	• to guide for the inquiry	○
(v) personal information about our business connections	• to manage business connections	○
(vi) personal information about our employees and retirees	• to employ and manage personal management	○
(vii) personal information about prospective employees	• to choose and notify the acceptance or rejection	○
(viii) personal information about those who make complaints or consult with us	• to answer the complaints or counseling	○

2. Security management of personal data

We will store and manage the personal information provided by you and, in order to prevent leakage, lost or damage of personal data (meaning personal information that constitutes personal information database etc. as provided in Article 2, paragraph 4 of Act on the Protection of Personal Information; the same shall apply hereinafter), take necessary and appropriate measures for security management in accordance with laws and regulations.

We will endeavor to keep personal data accurate and updated to the extent necessary for achievement of the purposes.

We will supervise our employees and contractors who handle personal data as necessary and appropriate. In the event of leakage, lost or damage of personal data, we will manage it in accordance with laws and regulations.

3. Disclosure and provision of personal data to third party

We will not disclose or provide your personal data to a third party without obtaining prior consent from you except for the cases below:

- cases where we entrust handling of personal data to a third party;
- cases where it is based on laws and regulations;
- cases where it is necessary for protection of life, body or property and is difficult to obtain consent from the related person;
- cases where we are required to cooperate with those who are entrusted with certain work provided for in laws and regulations by governmental organizations or local government, and where obtaining consent from the related person will interfere with such work; or
- cases where consent from the related person is not required by laws and regulations.

4. Contact information for inquiry and complains about retained personal data

(1) We will, in accordance with laws and regulations, properly respond to request for notification of purposes, disclosure of contents or correction etc. (meaning correction, addition, deletion, suspension of use, erase or suspension of provision to a third party) or request for disclosure of third party provision record from you or your representative about retained personal data (meaning retained personal data as provided in Article 2, paragraph 7 of Act on the Protection of Personal Information; the same shall apply hereinafter)

We will accept request for notification of purpose, disclosure of contents, correction etc. or disclosure of third party provision record via mail. We may request that you submit additional material for your identification. Please note that we will not return the materials mailed by you and handling fee etc. even if we cannot respond to notification of purpose, disclosure of contents, correction or disclosure of third party provision record.

in case of requesting in person	If you request for notification of purpose, disclosure of contents, correction or disclosure of third party provision record, please prepare the following documents and send them by delivery-certified mail. (i) original of a bill of requesting disclosure of personal information Please download the file above and fill out necessary matters. (ii) papers necessary for identification the copy of documents that can identify your name and present address such as driver's license, passport and health insurance card and so on (iii) handling fee ZENKIGEN charges a fee for request for disclosure or notification of intended use. Fee for each request: 1000 yen (tax included) Please include postal stamps in the amount of 1000yen with the
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	documents.
in case of requesting by a representative	<p>If the person who requests for notification of purpose, disclosure, correction or disclosure of third party provision record is your legal representative (in cases where you are a minor or an adult ward) or a representative whom you delegate to, please send the following documents respectively corresponding to nature of the representative in addition to the preceding documents and a handling fee.</p> <p>【in case of a legal representative】</p> <p>(i) the documents to identify the presence of legal right to represent In case of a copy of a family register and a person with parental authority, the copy of an insurance identification certificate that is filled out by family dependents is acceptable.</p> <p>(ii) the documents to identify the legal representative himself or herself the copy of documents that can identify the representative’s name and present address such as driver’s license, passport and health insurance card and so on</p> <p>【in case of the representative the person delegates】</p> <p>(i) original of a letter of proxy(append papers of a bill of requesting disclosure of personal information)</p> <p>Please download the file above, fill out the necessary matters and send the original to us.</p> <p>(ii) original of a seal registration certificate of the principal Please send the original of a seal registration certificate issued within three months regarding the same seal affixed on the letter of proxy</p> <p>(iii) the documents to identify a representative the principal delegates the copy of documents that can identify the representative’s name and present address such as driver’s license, passport and health insurance card and so on</p>
mailing address	Shiroyama Trust Tower 21F 4-3-1 Toranomon, Minato-ku, Tokyo 105-6021

(2) We will accept inquiries and complaints about our handling of personal information or complaints about retained personal data other than (1) above at the following “contact” via e-mail.

contact	E-mail address : privacy@zenkigen.jp
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	ZENKIGEN Inc. Personal information inquiry desk
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5. Disclosure about ensuring proper handling of retained personal data

(1) Information about business operator handling personal information

Name: ZENKIGEN Inc.

Place of business: Shiroyama Trust Tower 21F, 4-3-1 Toranomom, Minato-ku, Tokyo

Postal code: 105-6021

Hibiki Nozawa, President and CEO

(2) Personal Information Protection Manager

Director, Personal Information Protection

(3) Purpose of use of retained personal data

Our purpose of use of retained personal data is the same as the purpose set forth in Section 1 “About the purposes”.

(4) Measures taken for security management of retained personal data

We have taken the following measures for security management to prevent leakage, lost or damage of retained personal data:

- Preparation of internal rule
We have prepared internal rules providing items necessary for security management of retained personal data such as persons responsible for handling retained personal data and specific handling manner, and periodically review them.
- Building of organizational structure
We have built an organizational structure necessary for security management of retained personal data such as appointment of a person responsible for handling of retained personal information and building a reporting system in case for detecting leakage, and periodically review it.
- Employee education
We have conducted education to our employees necessary for security management of retained personal data such as notification of internal rules and conducting periodical seminars, and periodically review it.
- Prevention of unauthorized access
We have introduced technology and measures necessary for security management of retained personal data such as introduction of measures to prevent unauthorized access from outside

and infection of virus, and periodically review them.

6. Amendment of this policy

We may amend this policy in whole or in part. In such case, we will post the amended policy on our website or our service site.

Revised: November 20, 2024

Revised: March 31, 2024

Revised: July 5, 2023

Revised: March 29, 2023

Revised: February 3, 2023

Revised: March 15, 2022

Established: August 1, 2020