

Privacy Policy

In view of the importance of protecting personal information, ZENKIGEN Inc. (hereinafter referred to as "We" or "Us") shall comply with the Act on Protection of Personal Information (hereinafter referred to as "Act on Protection of Personal Information"), properly handle personal information provided by customers, and endeavor to protect the privacy of customers.

1. Collection of Personal Information

(1) Information we obtain from our customers through our service

(Items Common for all services)

- name, telephone number, and e-mail address
- Personal information entered or uploaded by customers to input form designated by us or the companies (including those which have been approved to temporarily use our services such as free trial, the same shall apply hereinafter) using our services (meaning information as defined in Article 2, Paragraph 1 of the Act on Protection of Personal Information, including those concerning living individuals that can identify specific individuals by name, date of birth, and other descriptions contained in the information (including information that can be easily verified against other information and thereby identify a specific individual))
- Information entered or transmitted on our services by customers who have accessed our services (including personal information)
- Access logs, action logs (including information on the status of connection checks in our service), time stamps and IP addresses of customers who accessed our service
- Information about the communication status and connected terminals of customers who have accessed our services

(A. When our services are used for the recruitment selection by the companies using our services)

- Entry videos uploaded by customers for the recruitment selection by the companies using our services, and the contents of interviews with the companies using our services (including portrait, appearance, behavior and speech, audio, and shooting environment information; hereinafter referred to as "Selection Videos").

(B. When our services are used for the improvement of working environment, etc. by the companies using our services)

- Videos of the internal interviews for the improvement of working environment, etc. by the companies using our services, and the contents of such interviews (including portrait, appearance, behavior and speech, audio, and shooting environment information; hereinafter referred to as "Internal Interview Videos").

(C. When our services are used for mock interviews)

- Entry videos uploaded by customers for mock interviews, videos containing mock interviews of customers conducted through our services, and the contents of such interviews (including portrait, appearance, behavior and speech, audio, and shooting environment information; hereinafter referred to as "Mock Interview Videos").

(D. When our services are used for other selection, examination, interview, etc. (hereinafter referred to as "Other Interviews") conducted by the companies using our services)

- Videos uploaded by customers for the Other Interviews conducted by the companies using our services, and the contents of such interviews with the companies using our services (including portrait, appearance, behavior and speech, audio, and shooting environment information; hereinafter referred to as "Other Interview Videos")

(2) Newly generated information based on information obtained by us

- Data analyzed by entering video information (including Selection Videos, Internal Interview Videos, Mock Interview Videos and Other Interview Videos) and other personal information of customers into our AI program (hereinafter referred to as "Analysis Result Data") that can identify a specific individual

(3) Information obtained indirectly from companies using our services

(A. When our services are used for the recruitment selection by the companies using our services)

- Customer information on recruitment selection (including information on companies and jobs to be applied for and evaluation information on recruitment selection)

(B. When our services are used for mock interviews)

- Information on customer who act as an interviewer at mock interviews

(C. When our services are used for the improvement of working environment, etc. by the companies using our services)

- Personnel Information of the companies using our services

(D. When our services are used for Other Interviews conducted by the companies using our services)

- Customer information on Other Interviews and other information disclosed or provided by the companies using our services to us

(4) Information obtained indirectly from third parties

(A. When our services are used for mock interviews)

- Customer information disclosed or provided by third parties to which we entrust certain works (including feedbacks to the customers)
- Customer information disclosed or provided by parties who conduct mock interviews for the customers (meaning an interviewer or interviewee; the same shall apply hereinafter)

(including feedbacks to the customers and contents of inquiries)

2. Purpose of Use of Personal Information

(1) We shall specify the purpose of use of personal information and shall not use personal information for any purpose other than that purpose.

(2) When we obtain personal information from customers, we will use it for the following purposes.

- For the provision, operation and improvement of our services
- For the purpose of providing information on our services
- For accepting inquiries, surveys, and answers
- For provision of information on maintenance, important notices, etc., as necessary
- For compiling, analyzing, and producing statistical data on personal information attributes (Statistical data refers to data processed so that individuals cannot be identified or determined, and may be used or processed in order to carry out our business such as developing new services. Statistical data may be provided to business partners.)
- For marketing research and the development of our new services and functions
- For the purpose of responding to violations of the Terms and Conditions
- In order to analyze Selection Videos (including information taken by customers such as portraits, appearance, behavior and speech, voice, and shooting environment, and if evaluation information is indirectly obtained from companies using our services, including such evaluation information; the same shall apply hereinafter) for the purpose of research and development of AI programs, and to provide and operate our existing services or new services.
※When evaluation information is obtained indirectly from companies using our services, the acquired evaluation information will be used only for the purpose above and will not be used beyond the purpose (e.g. providing to or shared with a company other than the company that has acquired the information).
- In order to analyze Internal Interview Videos (including information such as portraits, appearance, behavior and speech, voice, and shooting environment, and if personnel information is indirectly obtained from companies using our services, including such personnel information; the same shall apply hereinafter) for the purpose of research and development of AI programs, and to provide and operate our existing services or new services.
※When personnel information is obtained indirectly from companies using our services, the acquired personnel information will be used only for the purpose above and will not be used beyond the purpose (e.g. providing to or shared with a company other than the company that has acquired the information).
- In order to analyze Mock Interview Videos (including information recorded by customers

such as portraits, appearance, behavior and speech, voice, and shooting environment, and if customer information is indirectly obtained from companies using our services, third parties to which we entrust certain works or interviewers of mock interviews; the same shall apply hereinafter) for the purpose of research and development of AI programs, and to provide and operate our existing services or new services.

※When customer information is obtained indirectly from companies using our services, third parties to which we entrust certain works or interviewers of mock interviews the acquired information will be used only for the purpose above and will not be used beyond the purpose (e.g. providing to or shared with companies using our services the information of customers who undergo mock interviews).

- In order to analyze Other Interview Videos and other information disclosed or provided by companies using our services (including information such as portraits, appearance, behavior and speech, voice, and shooting environment, and if information related to the Other Interview Videos is indirectly obtained from companies using our services, including such information; the same shall apply hereinafter) for the purpose of research and development of AI programs, and to provide and operate our existing services or new services.

※When information related to the Other Interview Videos is obtained indirectly from companies using our services, the acquired information will be used only for the purpose above and will not be used beyond the purpose (e.g. providing to or shared with a company other than the company that has acquired the information).

- For any act incidental to the above-mentioned purpose of use

(3) When collecting personal information, we will not collect personal information from customers by unfair means such as falsifying the purpose of use.

In addition, we will not use personal information collected by fair means in an inappropriate manner. Unless otherwise provided by law, we will not use personal information provided by customers for any purpose other than the purpose of use specified in advance without the prior consent of the customer.

3. Security Management of Personal Data

We take necessary and appropriate safety management measures in accordance with laws and regulations to strictly store and manage personal information provided by customers and to prevent leakage, loss, or damage to the 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).

We shall endeavor to keep the personal data accurate and up-to-date within the scope necessary for

the achievement of the purpose of use.

Further, 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.

4. Disclosure and Provision of Personal Data to Third Parties

We will not disclose or provide personal data of customers to third parties without prior consent of customers, except in any of the following cases.

- Cases where the handling of personal data is entrusted to a third party
- In accordance with laws and regulations
- When it is necessary for the protection of life, body, or property of a person and it is difficult to obtain consent of the person
- Cases where it is necessary to cooperate with a state organ, a local government, or a person commissioned thereby in performing the work prescribed by laws and regulations and where obtaining consent of the person is likely to hinder the performance of the work
- Cases where consent from the relevant person is not required under laws and regulations

5. CAUTION

(1) When using our services (except for cases set forth in (2)), customers will provide personal information to us and companies using our services through our services. Therefore, customers need to agree with the privacy policy of the companies using our services.

Please note that we are not responsible for the acquisition, storage, and management of personal information at the companies using our services.

(2) When using our services for the purpose of conducting mock interviews, customers will provide personal information to us and interviewers of the mock interviews through our services.

Please note that we are not responsible for the acquisition, storage, and management of personal information at the interviewers of the mock interview.

6. Entrustment of Services Pertaining to the Handling of Personal Information

(1) Except for cases set forth in (2), we input into our AI program and analyze personal information obtained directly from customers through our services by companies using our services and customers' information disclosed or provided by companies using our services based on request from the companies using our services, and then provide the results of the analysis to the companies using our services.

※When our services are used for the recruitment selection by the companies using our services, the

Analysis Results Data will be provided by us only to companies using our services of which customers has undergone recruitment selection, and will not be provided or shared with other companies. And such Analysis Results Data will be provided only as a reference index for recruitment selection, and the results of recruitment selection will be finally determined by the company of which the customer has undergone the recruitment selection.

※When our services are used for the improvement of working environment, etc. by the companies using our services, the Analysis Results Data will be provided by us only to companies using our services, and will not be provided or shared with other companies. And such Analysis Results Data will be provided only as a reference index for improvement of working environment, and the use of such data will be finally determined by the company which the concerned customers are working for.

※When our services are used for the Other Interviews conducted by the companies using our services, the Analysis Results Data will be provided by us only to companies using our services, and will not be provided or shared with other companies. And such Analysis Results Data will be provided only as a reference index for Other Interviews, and the use of such data will be finally determined by the company using our services.

(2) We input into our AI program and analyze personal information obtained directly from customers through our services and information indirectly obtained from companies using our services, third parties to which we entrust certain works or interviewers of mock interviews based on request from customers and interviewers of mock interviews, and then provide the results of the analysis to the customers and the interviewers of mock interviews.

※When our services are used for mock interviews, the Analysis Results Data will be provided by us only to the customers and the interviewers of mock interviews, and will not be provided or shared with other third parties (including companies using our services).

7. 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.

<p>in case of requesting in person</p>	<p>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.</p> <p>① original of a bill of requesting disclosure of personal information Please download the file above and fill out necessary matters.</p> <p>② 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</p> <p>③ 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 documents.</p>
<p>in case of requesting by a representative</p>	<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>① 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>② 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>① original of a letter of proxy(append papers of a bill of requesting disclosure of personal information) Please download the file above, fill out the necessary matters and send the original to us.</p>

	<p>②original 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>③the 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	<p>Shiroyama Trust Tower 21F 4-3-1 Toranomom, Minato-ku, Tokyo 105-6021</p>

(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	<p>E-mail address: privacy@zenkigen.jp ZENKIGEN Inc. Personal information inquiry desk</p>
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8. 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 105-6021

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.

9. Continuous Improvement of Personal Information Protection Management System

We have established a management system for personal information protection, and review this on a regular basis and strive for continuous improvement.

10. Changes to the Privacy Policy

We may change this privacy policy, in whole or in part. In this case, the changed privacy policy shall be posted on our website or on our service page.

Revised: November 20, 2024

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Revised: February 3, 2023

Revised: March 15, 2022

Revised: June 24, 2021

Revised: January 7, 2021

Revised: December 20, 2018

Established: October 2, 2017

ZENKIGEN Inc.

Hibiki Nozawa, President and CEO