

# Privacy Policy

## Personal Information Protection Policy

Arithmer Inc. ("the Company") recognizes that in the course of its business of researching and developing AI technology and related solutions, the protection of personal information entrusted to the Company by its customers and employees is an important social responsibility, and the Company is committed to implementing, maintaining, and continually improving the following policies.

### 1. Basic Policy

1) The Company shall establish a secretariat to establish and operate a Personal Information Protection Management System (hereinafter referred to as "PMS") and continuously improve the PMS.

2) The Company will acquire, use and provide appropriate personal information to individuals, outsourced and contracted services and employees only to the extent necessary for the performance of the Company's business. In addition, the Company will not use personal information beyond the extent necessary to achieve the specified purpose of use (use for purposes other than the intended purpose), and the Company will take measures to achieve this.

3) The Company will comply with laws, national guidelines and other standards related to PMS, as well as the terms of our contracts with our customers.

4) The Company will make every effort to prevent and correct unauthorized access to, leakage, loss, damage, loss or alteration of personal information.

5) The Company will respond appropriately and promptly to complaints and consultations regarding personal information.

6) When outsourcing the handling of personal information, the Company will select and supervise a business operator with a well-developed management system.

7) The Company will take appropriate control measures when handling personal information in the cloud.

8) The Company will plan information security training for the PMS and provide appropriate training to its employees on a regular basis.

Date of establishment: September 02, 2019

Final correction date: June 20, 2022

Founder and CEO Yoshihiro Ohta

Inquiries: Please contact the Company's "Personal Information Protection Desk" for any inquiries regarding the Company's policy on the protection of personal information or the personal information held by the Company.

<Personal Information Consultation Service>

Personal Information Protection Manager: General Manager of Human Resources & General Affairs Department /  
General Affairs Team Manager

TEL: 03-5579-6683

Address: 3F ONEST Hongo Square, 1-24-1 Hongo, Bunkyo-ku, Tokyo 113-0033, Japan

## Handling of Personal Information

### 1. Our company's name

Arithmer Inc.

### 2. The purpose of using personal information handled

The Company uses personal information for the purposes described below.

Types of Personal Information	Purpose of Use
(1) Personal information obtained in connection with contracts for the purchase or use of the Company's products and services	To fulfill contractual rights and obligations, to provide information about our products, services and events, and to confirm and authenticate an individual's identity.
(2) Personal information obtained when the Company procures goods and services from third parties.	Used to fulfill contractual rights and obligations
(3) Personal information of those attending or participating in events sponsored or exhibited by the Company	Used to provide information about services and related events
(4) Personal information of those who wish to be considered for employment with the Company	Used for employment selection
(5) Personal information about company visitors	Used to ensure the security of the Company
(6) Personal information about the person who submitted the inquiry to the Company	Used to confirm and respond to the content of the request
(7) Employee information (including retirees)	Human Resources and Labor Management, Benefits and Health Management Business operations, management, etc., labor and personnel management, tax and social security related paperwork

### Purpose of use of "personal information" provided

Types of Personal Information	Purpose of Use
(8) Personal information entrusted to the Company as a result of the outsourcing of business operations by the Company (including specified personal information)	Used to conduct the relevant business

### 3. Outsourcing the handling of personal data

For the purposes described in 2. above, the Company may share personal information with contractors that the Company has assessed as having security controls equivalent to those of the Company and with whom the Company has entered into a contract.

#### 4 . Disclosure of Personal Information

The Company will respond promptly to requests for information about the purpose of use, disclosure, correction, amendment, deletion, suspension of use, removal, and suspension of provision to third parties (hereinafter referred to as "disclosure, etc.") of personal information (other than information that has been entrusted to the Company) that the Company has received directly from the individual. Please refer to "Disclosure, etc. Procedure" for details.

#### 5 . Voluntary nature of personal information

We respect your choice in handling your personal information. However, please understand that if the Company is unable to obtain the necessary personal information, you may not be able to receive the requested service.

#### 6 . Information obtained by means not readily apparent

The Company may use cookies, web beacons, and IP addresses on the Company's website to respond to problems, gather statistical data, etc., in a manner that does not personally identify you. You may refuse the use of cookies and web beacons by the Company and others by choosing not to receive cookies. However, some features, such as customization, may not be available.

To improve usability, the Company's website uses Google Analytics from Google, Inc. to collect and analyze data about usage patterns. The information collected is used solely for the purpose of analyzing and reporting on website usage.

The information collected is subject to Google's privacy policy.

For a description of the Google Analytics terms of use and Google's privacy policy, please visit the following website

Google Analytics Terms of Use:

<https://www.google.com/analytics/terms/us.html>

Google's Privacy Policy:

<https://www.google.com/intl/en/policies/privacy/>

## Procedures for Disclosure, etc.

### 1. Contact for discovery requests, etc.

Personal information held by the Company that falls under the category of "retained personal information" (see (1). through (7). in "2. Purposes of Use of Personal Information Handled by the Company"). ~ (1) to (7). (1) to (7) of "2. Purposes of Use of Personal Information Handled by the Company"). (1) through (7) of "2. Purposes of Use of Personal Information"), we will respond to requests for notification of the purpose of use, disclosure, correction, addition, deletion, suspension of use, elimination, and suspension of provision to third parties (hereinafter referred to as "Request for Disclosure, etc.") from the individual or his representative (legal representative/representative based on delegation) in accordance with the following procedures. The following procedures will be used to respond to such requests. Please send the completed "Request for Disclosure, etc." form, documents verifying the identity of the requester, documents verifying the identity of the representative if the request is made by a representative, and a postal money order for the fee (only for requests for Notification of Use and Disclosure) to the "Personal Information Consultation Service" as indicated below.

< Person in charge of the Personal Information Helpdesk >

Manager of Personal Information Protection: General Manager of Human Resources & General Affairs

Department / General Affairs Team Leader

PHONE: 03-5579-6683

Address: 3F ONEST Hongo Square, 1-24-1 Hongo, Bunkyo-ku, Tokyo 113-0033, Japan

### 2. Documents to be produced in response to discovery requests, etc.

Please refer to Appendix 1.

As a general rule, a written response will be sent to the individual.

Please send one of the following copies along with the request for information by mail. The place of residence information contained in each document should be limited to the prefecture of origin, and any information beyond that should be redacted or otherwise edited. Please send us the documents that do not contain personal numbers or redact all numbers.

#### (1) At the request of the person himself/herself

Official identification (e.g. driver's license, health insurance card, personal number card (my number card) surface, passport, resident card, special permanent resident certificate, pension book).

#### (2) If requested by a representative

< In the case of a representative authorized by the applicant to make a request for disclosure, etc. >

A power of attorney, the applicant's seal registration certificate, and the documents listed in 1).

< In the case of a legal representative of a minor >

An original copy of the extract from the family register and the official certificate mentioned in ①.

< If the representative is the legal representative of an adult ward >

Original copy of the certificate of registration and the official certificate mentioned in (1).

### 3. Purpose of use of personal information obtained in connection with requests for information, etc.

The Company will use the Personal Information for the purpose of responding to requests for information, etc., and for contacting the Customer.

4. Contact for complaints regarding the handling of retained personal information

Please contact the person in charge of the Personal Information Consultation Desk in 1.

5. "Notice of Purpose" and "Disclosure" fees

The fee for a personal application is 800 yen (including tax). However, if the request is made by mail (within Japan only), please enclose a self-addressed envelope with 84 yen stamps.

6. Authorized Personal Information Protection Organizations

Japan Information Processing Development Corporation (JIPDEC)

Personal Information Protection Complaint Consultation Office

Roppongi First Building, 1-9-9 Roppongi, Minato-ku, Tokyo 106-0032, Japan

Telephone number: 0120-700-779

※Please note that the above is not the contact information for inquiries about the Company's products and services.

No.

Billing Date :        /        /

## Request for Disclosure Form

(Notice of Purpose; Disclosure; Correction, Amendment, or Deletion of Content; Suspension or Termination of Use; Suspension of Disclosure to Third Parties )

**To the General Manager, General Affairs, Arithmer Inc.**

Please complete the appropriate sections of the following items and submit the request to the Personal Information Consultation Service.

Applicant's Name	
Address	

Please fill in the personal information that is the subject of the disclosure, etc.

<input type="checkbox"/> Applicants themselves
<input type="checkbox"/> Personal information relating to
Name of person subject to disclosure
Address of person subject to disclosure
Relationship between the disclosing party and the applicant

Please provide the details of the application for personal data held.

(1) Reason for application
(2) Request details