

Personal Information Protection Policy

DIVA CORPORATION (hereinafter referred to as the “Company”) will observe the “Act on the Protection of Personal Information (Act No. 57 of 2003)” and other related laws and regulations/guidelines, etc., and will handle the personal information acquired by the Company in accordance with the following personal information protection policy (hereinafter referred to as the “Policy”).

1. Purpose of Use of Personal Information

The Company will acquire each of the following types of information for the purpose of use specified below for such information in the method specified below for such information:

Purpose 1 : For the provision of the products/services handled by the Company.			
Information to be acquired	IT system information (the user name, user ID, location information, IP address, online identifier, accessed resource, access time, device name, domain name, information on IT resource included in alert, and tracking information of the software using patterns, such as cookies)	Method of acquisition	1) Method by which the Company directly receives the personal information from the relevant individual. 2) Method by which the relevant individual automatically records the personal information at the time of his/her use of the services of the Company. 3) Method by which the Company indirectly receives the personal information from any third party.
	Control information on security log and alert, such as a malicious file, network/fragment, processing details, domain name, and network connection		
	User/account information to access the services of the Company		
	Contact information (name, address, email address, telephone No., facsimile No., and information on local		

	time zone)		
	Employment information (the company name, office organization, position, and allocation)		
	Details of email and transmit data of the data subject which may be accessed incidentally in the course of the provision of the consultation, support, and service concerning the information technology (incidental access shall include the communication and data by email concerning the sending, routing, and receiving of email)		
Purpose 2: For business communication and meetings with customers, and the performance/management of contracts.			
Information to be acquired	Contact information (name, address, email address, telephone No., facsimile No., and information on local time zone)	Method of acquisition	1) Method by which the Company directly receives the personal information from the relevant individual. 2) Method by which the relevant individual automatically records the personal information at the time of his/her use of the services of the Company. 3) Method by which the Company indirectly receives the personal information from any third party.
	Employment information (the company name, office organization, position, and allocation)		
Purpose 3: For the research/analysis necessary for the planning/research & development of products/services or other business activities.			
Information to be acquired	Employment information (the company name, office organization, position, and allocation)	Method of acquisition	1) Method by which the Company directly receives the personal information from the relevant individual. 2) Method by which the relevant individual automatically records the personal information at the time of his/her use of the services of the Company. 3) Method by which the Company indirectly receives the personal information from any third party.
	Details of email and transmit data of the data subject which may be accessed incidentally in the course of the provision of the consultation, support, and service concerning the information technology (incidental access shall include the communication and data by		

	email concerning the sending, routing, and receiving of email)		
Purpose 4: For the provision of the information on the products/services handled by the Company, up-to-date information, and the information on various events, etc.			
Information to be acquired	Contact information (name, address, email address, telephone No., facsimile No., and information on local time zone)	Method of acquisition	1) Method by which the Company directly receives the personal information from the relevant individual. 2) Method by which the relevant individual automatically records the personal information at the time of his/her use of the services of the Company. 3) Method by which the Company indirectly receives the personal information from any third party.
	Employment information (the company name, office organization, position, and allocation)		
	Details of email and transmit data of the data subject which may be accessed incidentally in the course of the provision of the consultation, support, and service concerning the information technology (incidental access shall include the communication and data by email concerning the sending, routing, and receiving of email)		
Purpose 5: For response to an inquiry, request, etc.			
Information to be acquired	Contact information (name, address, email address, telephone No., facsimile No., and information on local time zone)	Method of acquisition	1) Method by which the Company directly receives the personal information from the relevant individual. 2) Method by which the relevant individual automatically records the personal information at the time of his/her use of the services of the Company. 3) Method by which the Company indirectly receives the personal information from any third party.
	Employment information (the company name, office organization, position, and allocation)		
	Details of email and transmit data of the data subject which may be accessed incidentally in the course of the provision of the consultation, support, and service concerning the information technology (incidental		

	access shall include the communication and data by email concerning the sending, routing, and receiving of email)		
Purpose 6: For the promotion/improvement of the publicity/IR activities.			
Information to be acquired	Contact information (name, address, email address, telephone No., facsimile No., and information on local time zone)	Method of acquisition	1) Method by which the Company directly receives the personal information from the relevant individual.
	Employment information (the company name, office organization, position, and allocation)		
Purpose 7: For the ensuring of the security and risk management of the Company.			
Information to be acquired	Contact information (name, address, email address, telephone No., facsimile No., and information on local time zone)	Method of acquisition	1) Method by which the Company directly receives the personal information from the relevant individual. 2) Method by which the relevant individual automatically records the personal information at the time of his/her use of the services of the Company. 3) Method by which the Company indirectly receives the personal information from any third party.
Purpose 8: For the provision of information on the employment to job applicants and the employment screening.			
Information to be acquired	Contact information (name, address, email address, telephone No., facsimile No., and information on local time zone)	Method of acquisition	1) Method by which the Company directly receives the personal information from the relevant individual. 3) Method by which the Company indirectly receives the personal information from any third party.
	Gender		
	Age		
	Information on the fact, such as family relationship		
	All of the information indicating the judgement or evaluation on the attributes of an individual, such as		

	body, property, type of occupation, title, etc., by which a specific individual can be identified (including the information that can be easily compared with other information and thereby a specific individual is identifiable)		
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Purpose 9: For the personnel and labor management of officers and employees.

Information to be acquired	Contact information (name, address, email address, telephone No., facsimile No. and information on local time zone)	Method of acquisition	1) Method by which the Company directly receives the personal information from the relevant individual.
	Gender		
	Age		
	Information on the fact, such as family relationship		
	All of the information indicating the judgement or evaluation on the attributes of an individual, such as body, property, type of occupation, title, etc., by which a specific individual can be identified (including the information that can be easily compared with other information and thereby a specific individual is identifiable)		
	Personal identification number, such as the identity number, member number, etc.		3) Method by which the Company indirectly receives the personal information from any third party.
Elements peculiar to physical, physiological, generic, psychological, economic, cultural, or social identity, or others which may become symbols to uniquely identify an individual held by a hospital, doctor, etc.			

Purpose 10: For the implementation of other works incidental to the above, and the works to be conducted for the appropriate and smooth

performance of the work/operation of the Company.

Information to be acquired	Contact information (name, address, email address, telephone No., facsimile No., and information on local time zone)	Method of acquisition	<ol style="list-style-type: none"> 1) Method by which the Company directly receives the personal information from the relevant individual. 2) Method by which the relevant individual automatically records the personal information at the time of his/her use of the services of the Company. 3) Method by which the Company indirectly receives the personal information from any third party.
	Employment information (the company name, office organization, position, and allocation)		

Purpose 11: For the implementation of measures in accordance with the provisions of laws and regulations or the notification/guidance, etc. from the administrative authorities.

Information to be acquired	Contact information (name, address, email address, telephone No., facsimile No., and information on local time zone)	Method of acquisition	<ol style="list-style-type: none"> 1) Method by which the Company directly receives the personal information from the relevant individual. 2) Method by which the relevant individual automatically records the personal information at the time of his/her use of the services of the Company. 3) Method by which the Company indirectly receives the personal information from any third party.
	Employment information (the company name, office organization, position, and allocation)		

Purpose 12: For the exercise of rights and performance of obligations in accordance with laws and regulations by shareholders, the notification to shareholders, the provision of various information to shareholders, and the management of shareholders.

Information to be acquired	Contact information (name, address, email address, telephone No., facsimile No., and information on local time zone)	Method of acquisition	1) Method by which the Company directly receives the personal information from the relevant individual.
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2. Measures for Safety Management

The Company will conduct the following as measures necessary for the safety management of the personal information, such as the prevention

of the divulgement, loss or damage of such information, and will take necessary and appropriate measures, such as endeavoring to ensure/improve security.

Establishment/implementation of verification procedures to secure the confidentiality (safety of the authentication system (verification method of user identification))	In the authentication system used for the user identification, the security verification procedures protected by a password are used.
Access control	Necessary matters, such as the number of characters, type of characters, etc. to be used, are specified in the password policy, and the operation is conducted in accordance with such password policy.
	The password used for access to the personal data can be promptly invalidated electronically.
	The file/holder, in which the personal data is stored, sets an appropriate permission system.
	The access to the personal data is permitted only through a safety connection.
Control of input/change management	The location of storage of the personal data is recorded.
	The person who accessed the personal data and the time of such access, and the person who changed or deleted the data, and the details of such change and deletion are recorded. (Including the case where the log is in a state of possible acquisition)
Record of response to the relevant individual's access right	The inquiries from the relevant individual and the supply source of the personal information are recorded and managed.
	The process for the response to inquiries from the relevant individual and the supply source of personal information is established, and the recorded details can be promptly reported, if so requested.
Ensuring of availability/reversibility	The redundancy storage is used.
	The backup data is stored in storage means.
	The restore and recovery test are conducted. The restore test can be conducted, if necessary.
Obligation to immediately give notification	If any personal information is divulged, the fact is immediately reported to the management

	section even on Saturday, Sunday, or a national holiday.
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3. Provision to Any Third Party

The Company will not provide the personal information to any third party without the prior consent of the relevant individual, except for the case where there are justifiable reasons. However, the joint use of the personal information and the disclosure of the personal information to the commissioned party (the details are set forth in “5. Supervision of Commissioned Party”) shall not be deemed as a provision to any third party.

Since the following cases shall be deemed as the case where there are justifiable reasons, the Company may provide the personal information without the prior consent of the relevant individual:

- 1) If the provision is conducted in accordance with the laws and regulations;
- 2) If the provision is necessary for the protection of the life, body, or property of any person, and it is difficult to obtain the consent of the relevant individual;
- 3) If the provision is especially necessary for the improvement of public hygiene or the promotion of the sound growth of children, and it is difficult to obtain the consent of the relevant individual;
- 4) If the provision is necessary for cooperating with a state organ or local government, or a person commissioned by either of them in executing the affairs prescribed by the laws and regulations and in which obtaining the consent of the relevant individual is likely to impede the execution of the affairs concerned.

4. Joint Use of Personal Information

The Company may jointly use the personal information held by the Company.

1) Items of personal information jointly used

Name, company name, department name, title, address, telephone No., facsimile No., email address, and other items necessary to achieve the purpose of use

2) Scope of persons who may jointly use

AVANT (<https://www.avantcorp.com/corporate/outline.html>)

AVANT Group Companies (<https://www.avantcorp.com/corporate/group.html>)

3) Purpose of use

To achieve the purpose of use set forth in the above "1. Purpose of Use of Personal Information."

4) Person responsible for management of joint use

Person responsible for the protection/management of personal information of DIVA CORPORATION

5. Supervision of Commissioned Party

The Company may commission the whole or any part of the handling of personal information to any third party within the scope necessary to achieve the purpose of use. In such cases, the Company will conduct a necessary and appropriate selection and supervision in order that the safety management of personal information, the handling of which is commissioned, is conducted as if such safety management is conducted in the Company, upon imposing obligations on the commissioned party by concluding a contract, etc.

6. Confirmation, Amendment, etc. of Personal Information

The Company will endeavor to keep personal information held by the Company in the correct and latest conditions to the extent necessary for the purpose of use set forth above. If you have any inquiry on personal information, such as the desire of confirmation, amendment, addition, deletion, suspension of use or erasure, or suspension of provision to any third party of the personal information, please contact the following contact for handling of personal information:

《Contact for Personal Information Handling Office》

Mail:	Contact for Personal Information Handling Office of DIVA CORPORATION, 13rd floor, Building B of Shinagawa Intercity, 2-15-2, Konan, Minato-ku, Tokyo 108-6113
E-mail:	privacypolicy@diva.co.jp

7. Cookies

The Company may use cookies for the following purposes:

- 1) To indicate the most appropriate advertisement on the website of other companies, upon considering the contents in which the customer

- takes an interest or the usage status on the website operated by the Company (hereinafter referred to as the "Site");
- 2) To conduct the advertisement delivery and publicity of the products/services handled by the Company;
 - 3) To indicate the contents suitable for the customer on the Site;
 - 4) To research the number of users or traffic of the Site; or
 - 5) To improve the services of the Company.

Furthermore, the Company may store and refer to the cookies obtained through any third party to whom the Company commissions the advertisement delivery and operation of the website.

* Cookies are a system to store the usage history, input content, etc. sent/received between the browser and server at the time of use of the webpage as a file in the customer's computer. If you access the same page next time, the operator of the webpage can change the indication for each customer by using the information stored in the cookies.

If a customer permits the sending/receiving of cookies in the setting of the browser, the website can obtain cookies from the browser of the customer. If a customer permits the sending/receiving of cookies in the setting of the browser, the Company may link the action history collected from the cookies obtained to personal information.

Depending upon the browser used, a customer can nullify the function of the cookies by changing the setting, but as a result of such change, the customer may be restricted in the use of any service on the Internet, such as the case where the customer cannot receive the service for which the certification is required.

8 . Acquisition of Access History

The Site records the access history of customers for the purpose of the maintenance of the website and the improvement of services. The access history includes the information on the domain name and IP address, type of browser and OS, access time, the browsed page of the customer who browses the website, etc.

9. Retention Period of Personal Information

The Company will delete the personal information acquired by the Company at either time of point of the following:

- 1) The time when the purpose of use set forth in the above " 1 . Purpose of Use of Personal Information" is achieved, and it becomes unnecessary to retain the personal information due to reasons related to such purpose, or

2) The time when the purpose of use set forth in the above "1. Purpose of Use of Personal Information" is not achieved, but it becomes unnecessary to retain the personal information by reason of the suspension of the business concerned, etc.

10. Content of the Policy

The content set forth in the Policy shall apply on and after the publication date. The content set forth in the Policy may be changed. In such cases, the latest renewal day of the Policy shall also be renewed to indicate the fact of such change, and the changed content shall apply on and after the renewal date.