

Privacy Policy

Philosophy on the Protection of Personal Information Smapra Corporation (hereinafter referred to as "the Company") complies with this Privacy Policy to smoothly conduct our business activities by collecting and using personal information that can identify customers, such as names, telephone numbers, email addresses, LINE IDs, workplaces, schools, annual income, and other descriptive information related to contractual status (hereinafter referred to as "personal information"). The Company strives for the proper protection of personal information under the following policies:

We accurately grasp the personal information handled in our business activities and strive to protect and preserve personal information by implementing appropriate measures.

We focus on the following points to maintain appropriate operations for the protection of personal information:

Limit the use of personal information to specified purposes.

Collect personal information appropriately.

Restrict the provision of personal information to third parties.

Implement safety measures for personal data (prevention and rectification of unauthorized access, loss, destruction, alteration, and leakage).

Appropriately respond to requests for disclosure, correction, suspension of use, and deletion of personal data.

Comply with laws and other norms concerning the protection of personal information.

Establish a management system for the protection of personal information and strive for continuous improvement of the internal management system.

Raise awareness of the privacy policy among all employees and contractors.

Purpose of Use

To ensure the implementation of products, goods, and services related to all business activities conducted by the Company.

To provide information considered useful to customers in all business activities.

To conduct research, analysis, planning, and development to improve the quality of our products, services, and advertisements.

For the delivery and effectiveness measurement of advertising and content based on attribute information, device information, location data, and behavioral history.

Customer communications based on the above will be conducted via email, post, telephone, SMS, social media, or apps.

Google, Twitter, Instagram, LINE, and other advertising-related businesses may link user lists they hold with our email and phone number data to provide services, information, and

advertisements on their platforms.

Provision and Disclosure to Third Parties The Company properly manages personal information and will not disclose or provide it to third parties except in the following cases:

When provided with the customer's consent in response to inquiries or other interactions.

When providing to other companies in partnership to offer the requested services.

When disclosure or provision is permitted by law.

When requested by courts, prosecutors, police, or equivalent authorities.

When necessary to cooperate with national or local public bodies or their contractors to perform duties stipulated by law, and obtaining consent could hinder the execution of those duties.

When necessary to protect life, body, or property, and it is difficult to obtain consent.

For public health improvement or promoting social safety and security.

In other cases where the customer consents.

Joint Use The Company will jointly use personal data as described below:

Items of personal data for joint use include customer names, addresses, telephone numbers, email addresses, LINE IDs, employer and school names, annual income, and other identifiable information.

Scope of users includes our group companies and cooperating companies.

Purpose of use by users includes ensuring the implementation of products, goods, and services related to all our business activities, responding to customer inquiries, and improving the quality of our products, services, and advertisements through research and development.

The person responsible for managing the jointly used personal information is Smapra Corporation.

Outsourcing When outsourcing the processing of personal information we hold, contracts incorporating necessary security management measures will be established, and appropriate management and supervision will be conducted.

Procedures for Disclosure, Correction, Suspension of Use, and Deletion

Application process: Please refer to form Personal-4-1 for procedures related to disclosure, correction, suspension of use, and deletion of personal information we hold.

A fee of 1,000 yen (excluding tax) per request for disclosure is required, to be paid via bank transfer.

Application contacts: Please apply via post or email using the prescribed application form provided by the Company. Detailed procedures will be provided upon request, but verification of the individual (or representative) and confirmation of payment for the disclosure fee will

be followed by a response via mail or phone.

Application form: Personal-4-2, Request for Changes in Handling of Personal Information

Address: Smapra Corporation, 3-164-1 Norikura, Midori Ward, Nagoya City, Aichi Prefecture

Email: info@smapra.co.jp

Reception hours: Weekdays 10:00 AM to 6:00 PM

Responsible manager: Operations Manager, Smapraa Corporation

Changes to the Privacy Policy This Privacy Policy is subject to change without notice.