

# Privacy Policy

Lazuli Inc., (hereinafter "Lazuli") shall handle personal information of customers (hereinafter "Customer Information") in the services provided by Lazuli (hereinafter "Services") as follows.

## **Article 1 (General Provisions)**

1. Lazuli shall comply with the Personal Information Protection Law and other related laws and regulations in order to protect Customer Information.
2. This policy applies to Services (including services provided by Lazuli in conjunction with Services).
3. In the event that Lazuli stipulates the handling of Customer Information in its privacy policy, other personal information protection policies, or terms of use posted on the website operated by Lazuli, such stipulations shall also apply, and if such stipulations conflict with this policy, this policy shall prevail.
4. The provisions of this policy shall not apply to services provided by parties other than Lazuli related to Services (hereinafter "External Services"). Please refer to the privacy policy, etc. separately stipulated by the service providers for the handling of Customer Information in such services.

## **Article 2 (Information to be Obtained)**

1. Lazuli may acquire Customer Information, including personal information ("personal information" as defined in Article 2, Paragraph 1 of the Personal Information Protection Law, hereinafter the same shall apply) as follows.
  - (1) Information provided by customers.
  - (2) E-mail address.
  - (3) Name, affiliation, and other information specified by Lazuli.
  - (4) Information collected by Lazuli when customers use Services.
  - (5) Terminal information of customers.
2. Lazuli may collect information specific to the terminal used by customers (individual identification information such as a unique terminal ID) for the operation of the system necessary for the implementation of Services, maintenance and improvement of Services, or to prevent fraudulent activities.
3. Lazuli may collect information on customer usage of Services, access log information, and action history information in order to maintain and improve Services or to prevent fraud.

- Lazuli shall not use deception or other wrongful means to acquire Customer Information, but shall acquire such information in an appropriate manner. In addition, when obtaining Customer Information by any means other than through the use of Services, Lazuli will notify or publicly announce the purpose of use in advance.

**Article 3 (Purpose of Use)**

- Lazuli shall properly handle Customer Information acquired under Services within the scope of the following purposes. Lazuli shall not use Customer Information beyond the scope of the purposes of use without the consent of customers.

Purpose of Use	Purpose of Use (Details)	Information to be used
Provision, maintenance and improvement of Services	<ul style="list-style-type: none"> <li>To verify customers' identity and prevent unauthorized use of Services.</li> <li>To provide, maintain, and improve Services smoothly.</li> </ul>	<ul style="list-style-type: none"> <li>E-mail address.</li> <li>Name, affiliation, and other information required to provide Services.</li> </ul>
Notification to and response from customers, etc.	<ul style="list-style-type: none"> <li>To provide information on Services and to respond to inquiries, etc.</li> <li>To notify or provide new services related to Services.</li> <li>To notify customers of changes to the Terms of Service or this Policy, suspension, discontinuation, or termination of Services, and other important notices related to Services</li> </ul>	<ul style="list-style-type: none"> <li>E-mail address</li> <li>Name, affiliation, and other information necessary to provide Services</li> </ul>
Provision of Customer Information to third parties	<ul style="list-style-type: none"> <li>Third parties who receive the information listed to the right may use such information for the following purposes <ul style="list-style-type: none"> <li>To provide affiliated services.</li> <li>To display advertising information, etc. that matches the needs, interests, and concerns of customers.</li> <li>To analyze advertising effectiveness.</li> <li>For market analysis and marketing</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Name, affiliation, and other information necessary to provide Services.</li> <li>Terminal Information.</li> <li>Log and action history information</li> </ul>

- Lazuli may change the purpose of use described in the preceding paragraph to the extent

that it is reasonably deemed to be related to the purpose of use before the change, and in the event of a change, Lazuli shall notify customers or make a public announcement in a manner separately determined by Lazuli.

#### **Article 4 (Protection of Personal Information)**

Lazuli shall appoint a person responsible for the management of Customer Information in order to handle Customer Information, make its reasonable effort to establish a system to prevent unauthorized access to, loss, falsification, or leakage of personal information, and strive to properly manage Customer Information.

#### **Article 5 (Provision to Third Parties)**

1. Lazuli shall not provide personal information among Customer Information to third parties, except in the following cases;
  - (1) when the customer's consent has been obtained.
  - (2) When required by law.
  - (3) When a customer commits or attempts to commit an act that harms the interests of others or offends public order and morals or otherwise violates the Terms of Use of Services, and when taking necessary action against such an act.
  - (4) When it is necessary for the protection of the life, body, or property of an individual and it is difficult to obtain the consent of the individual.
  - (5) When the provision of personal information is particularly necessary for improving public health or promoting the sound growth of children and it is difficult to obtain the consent of the person concerned.
  - (6) Cases in which the provision of personal information is necessary for cooperating with a state organ, a local government, or an individual or entity entrusted by either a state organ or local government to execute affairs prescribed by law, and in which obtaining the consent of the individual is likely to impede the execution of the affairs concerned.
  - (7) When a merger, corporate separation, business transfer, or other such event results in the succession of a business that contains customers' personal information.
2. In order to provide affiliated services, Lazuli may provide Customer Information to business operators who provide services affiliated with Services with the prior consent of the customer.

#### **Article 6 (Entrustment of Handling of Personal Information)**

Lazuli may entrust a third party with the handling of all or part of the personal information Lazuli has obtained from customers (this refers to the case where Lazuli entrusts a third party with the management of Customer Information, including personal information). In such cases, Lazuli shall enter into a confidentiality agreement with the third party in advance that conforms to this policy, and provide necessary and appropriate supervision to ensure that the third party appropriately manages the information in a secure manner.

#### **Article 7 (Security Management System)**

1. In order to prevent leakage, loss, or damage of Customer Information and to protect other Customer Information, Lazuli shall take necessary and appropriate measures for the safe management of Customer Information, such as restricting access to personal information files, recording access logs, and installing security software to prevent unauthorized access from outside.
2. The representative director of Lazuli is responsible for the management of Customer Information, and Lazuli implements appropriate management and continuous improvement of Customer Information.

#### **Article 8 (Disclosure, Correction, etc. of Customer Information)**

1. For disclosure, correction, addition, deletion, or discontinuance of use of personal information provided by customers, please refer to our separate guide to requesting disclosure, etc. of personal information. However, depending on the nature of the information, there may be cases where these procedures cannot be performed.
2. In the case of a request based on the preceding paragraph, upon verification of the identity of the applicant, Lazuli shall disclose personal information to a reasonable extent. However, this does not apply to cases in which Lazuli is not obligated to disclose, etc. under the Personal Information Protection Law or other laws and regulations.

#### **Article 9 (Changes to this Policy)**

1. Lazuli shall review the operation of the handling of Customer Information from time to time and strive for continuous improvement, and may change this Policy from time to time as necessary.
2. Lazuli shall notify customers of any changes to this Policy by posting the revised Policy on Services or on the website operated by Lazuli, or by other easily understandable means. However, when making changes to the contents of this Policy that require the consent of customers under laws and regulations, Lazuli shall obtain the consent of the customer in

a manner separately determined by Lazuli.

**Article 10 (Inquiries)**

If customers have any opinions, questions, complaints, or other inquiries regarding our handling of Customer Information, please contact us at the following address.

Lazuli Personal Information Handling Inquiry Desk

E-mail : yuji\_ikeuchi@lazuli.ninja

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