

Privacy Policy

1. Basic Policy

JIG-SAW US, INC. (hereinafter, the “Company” or “we”) has adopted the management philosophy of "Be a Path Finder to the Connected World" and strives to contribute to society by providing high-quality IoT solution services. Personal information is essential to the development of our business, and we believe that it is our social responsibility to protect and use personal information in a strict and appropriate manner. The Company will comply with personal information protection laws and guidelines of each country and region including the Act on the Protection of Personal Information (hereinafter, the “APPI”) and the European General Data Protection Regulation (hereinafter “GDPR” collectively “Data Privacy Laws”), the Company Code of Conduct, this Privacy Policy and other internal rules. The Company will strictly manage personal information (as defined by applicable Data Privacy Laws hereinafter “Personal Information”) of customers, business partners, shareholders, officers, employees and other third parties (hereinafter “Data Subjects”) and will not make unauthorized use or disclosure of such Personal Information not only while they are employed, but also after their retirement.

Moreover, the Company will clarify the purpose of use before obtaining Personal Information of Data Subjects and obtain such information by lawful and fair means. The Company will not handle personal information beyond the scope necessary to achieve the intended purpose of use, and will take measures to ensure this.

When the Company requires the collection, use, and provision of personal information in the development of business activities, considering the content and scale of our business, the Company shall build and comply with the Company's information security management systems and shall continually review our internal regulations, employee education, internal audits, and other organizational and structural changes in response to changes in the surrounding environment and social conditions, and strive to maintain and improve our standards for protecting personal information.

2. Method of Collection

The Company may collect Personal Information from the Data Subjects themselves, through publicly available information and through social media and from third parties.

3. Purpose of Use

The Company will use, including to help the Company’s train machine learning or artificial intelligence models, obtained Personal Information for the following purposes:

- (1) to provide JIG-SAW Group’s services;
Personal information regarding client companies or related companies such as outsources and contractors shall be used in the guidance of the Company's products and services, in the responses to various inquiries and after-sales service, including requests for advice on products and services, in conducting customer satisfaction surveys and other survey, in R&D and improvement of products and services etc. and in communication for the execution of business services or outsources.
- (2) to perform the outsourced business services;
In the course of the Company's business services outsourced by client companies such as Web system/application development, development support, server monitoring/management, data control, data security, Web design/server construction services, providing “NEQTO”, “Prime” and “Safing” services, providing hosting services and dashboard services, business alliance and joint development, personal information handled based on client companies' instructions shall be used only for performing the outsourced business services.
- (3) to verify client identification;
- (4) to settle payment and billing of fees of JIG-SAW Group's services;
- (5) to conduct, cosponsor or participate in prize competitions, seminar, workshop, event campaigns, etc.;

- (6) to send newsletters, notices and other communication via email;
- (7) to provide advertisement for JIG-SAW Group's services;
- (8) to manage workforce;
Personal Information regarding the Company's employees and their family shall be used for the business communication and the workforce management, including assignment, payment of salaries, etc., working hours management and health care administration.
- (9) to use for overall activities in relation to applicants for employment;
Personal information regarding applicants for employment by the Company shall be used for overall business activities such as communication regarding employment opportunities and consideration and determination of adoption. For the avoidance of doubt, personal information of adopted persons shall be continuously used as employee information for the purposes of utilization described in the item (8).
- (10) to use for overall activities in relation to retired employees;
Personal information regarding retired employees of the Company shall be used for providing information for and have communication, etc. with retired employees of the Company.
- (11) to take measures toward contracts, communication with government office based on laws; and
- (12) for any other purpose as separately stipulated at the time such Personal Information is collected.

We do not "sell" or "share" personal information of job applicants, corporate representatives of customers, prospective customers, our vendors and other partners and/or our customer's phone numbers with third parties or affiliates etc.

4. Lawful basis for Processing (GDPR)

The lawful basis for processing is as follows;

- (1) the Data Subject has given consent (including consent given under the Company’s terms of services) to the processing of his or her personal data for one or more specific purposes (the Data Subject can withdraw the consent);
- (2) processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (3) processing is necessary for compliance with a legal obligation to which the Company is subject;
- (4) processing is necessary in order to protect the vital interests of the Data Subject or of another natural person;
- (5) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company;
- (6) processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party. Such legitimate interests include management of Personal Information within the Company, and marketing of products and services.

5. Provision to Third Parties

The Company will not provide Personal Information to any third party without the consent of the Data Subject. The Company may provide Personal Information for the following cases with regard to Personal Information of Data Subjects residing in the U.S, Japan, and may provide Personal Information of Data Subjects residing in the European Union or European Economic Area (hereinafter collectively referred to as "EU") pursuant to the lawful basis set forth in the preceding section 4.

- (1) Cases of joint use in accordance with the procedures stipulated in the APPI;
- (2) Cases of entrusting the handling of Personal Information;
- (3) Cases of disclosing Personal Information to financial institutions, credit card companies, and other payment agents for payment of usage fees;
- (4) Cases based on laws and regulations;
- (5) Cases in which there is a need to protect a human life, body or assets, and when it is difficult to obtain the consent of the Data Subject;

- (6) Cases in which there is a special need to enhance public hygiene or promote the upbringing of healthy children, and when it is difficult to obtain the consent of the Data Subject; or
- (7) Cases in which there is a need to cooperate in regard to a central government organization or a local government, or a person entrusted by them performing affairs prescribed by laws and regulations, and when there is a possibility that obtaining the consent of the Data Subject would interfere with the performance of the said affairs.

6. Joint Use

The Company may use provided Personal Information of Data Subjects residing in Japan jointly with group companies of the Company within the extent necessary to achieve the purposes described in the section 3. above. The categories of jointly used Personal Information, the scope of the use and the person responsible for controlling such information are as follows:

- (1) Categories of jointly used Personal Information
Names, company names, affiliation, telephone numbers, email addresses and other contact details and other matters necessary to achieve the purpose of use described above
- (2) Scope of a jointly using person (JIG-SAW Group)
(US) The Company
(Japan) JIG-SAW INC., SBI JIG-SAW Modernizations Co., Ltd., and
(Canada) JIG-SAW CA, INC.
- (3) Person responsible for controlling information of JIG-SAW Group
JIG-SAW INC. As to its address and a representative person, please see the URL: <https://www.jig-saw.com/en/company-en/>

7. Provision to Persons Overseas

If the Company provides Personal Information for third parties or overseas group companies across national borders including group companies in the United States, it will confirm laws, regulations and rules regarding cross-border transfer of Personal Information and implement such transfer in compliance with those laws, etc. A member of the Company in the EU shall provide Personal Information to Japan shall be done pursuant to the adequacy recognition.

8. Security Control Actions

In order to handle Personal Information properly, the Company will take the following organizational, personal, physical and technical safety control measures and strive to prevent and correct any leakage, loss or damage.

[Organizational Security Control Measures]

Appointing of the Personal Information Protection Manager, complying with laws, regulations and guidelines, developing, operating and revising internal regulations, audit systems etc.

[Personal Security Control Measures]

Providing training and awareness-raising activities to officers and employees, etc.

[Physical Security Control Measures]

Access control to areas where personal information is handled, etc.

[Technical Security Control Measures]

Controlling access to personal information, installing antivirus software and strengthening virus countermeasures, etc.

In addition, upon entrusting the handling of Personal Information, the Company will select as an entrusted party a person that handles Personal Information properly, stipulate matters necessary to enable the entrusted party to control Personal Information properly and strive to protect Personal Information.

9. Various Procedures for Disclosure, Revision, Cessation of Use, Etc. of Personal Information

The Company will promptly respond to inquiries regarding disclosure, revision, cessation of use, deletion and other handling of Personal Information pursuant to this

Privacy Policy, the provisions of laws and regulations.

The Company may ask inquirers about their contact details and other detailed information to confirm that they are the Data Subjects of the relevant Personal Information.

- a) Contact information for requests for disclosure, etc.
Same as the above contact information for the consultation service for protection of personal information.
- b) Forms of documents to be submitted by request for disclosure, etc. and other methods of request for disclosure, etc.
It shall be accepted by receiving by post documents containing a requester's address, name, and method of contact and documents verifying the identity of the principal or the agent.
- c) Method to verify that a requester for disclosure, etc. is the principal or the agent
It shall be verified by a method to request provision of registration details. A power of attorney shall be required if the requester is an agent.
- d) Method to charge fees (limited to cases where fees are specified) in cases where the purpose of utilization of personal information for disclosure is notified or where personal information for disclosure is disclosed. It shall be free of charge for the time being.

<Contact information for complaints concerning the handling of personal information for disclosure>

Principal Executive Office to Protect Personal Information of JIG-SAW US, INC.
Address : 33th Floor, Yaesu Central Tower, Tokyo Midtown Yaesu, 2-2-1 Yaesu, Chuo-ku, Tokyo, Japan 104-0028
Telephone: +81-3-6262-5160

10. Rights under the GDPR

- Data Subjects in the EU hold the following rights under the GDPR
- (1) The right to access - You have the right to request the Company for copies of your personal data.
 - (2) The right to rectification – The Data Subject has the right to request that Company correct any information you believe is inaccurate. The Data Subject has the right to request Company to complete the information you believe is incomplete.
 - (3) The right to erasure – The Data Subject has the right to request that Company erase your personal data, under certain conditions.
 - (4) The right to restrict processing – The Data Subject has the right to request that Company restrict the processing of your personal data, under certain conditions.
 - (5) The right to data portability – The Data Subject has the right to request that Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.
 - (6) The right to object to processing – The Data Subject has the right to object to Company's processing of your personal data, under certain conditions.
 - (7) The right to not be subject to profiling and automated decision making- The Data Subject has the right not be subject to automated decision making such as profiling.

11. The right to file a complaint with the authorities

Data Subjects in the EU have the right to file a complaint with the data authorities in their respective jurisdictions.
JAPAN: Personal Information Protection Commission
<https://www.ppc.go.jp/>

12. Use of Cookies on Website

In order to improve services provided to the users on its website, the Company may use cookies only for the following purposes:

- (1) To improve its website, emails, advertisement, marketing and other services;
- (2) To investigate usage of its website, emails; and
- (3) To customize its website, emails and other services for each of the users.

Users may refuse the Company’s use of cookies by refusing to accept cookies on the settings of their Internet browser. However, in such case, there may be certain restrictions, including unavailability of the customize function and other functions. If you experience such restrictions, please consult with the point of contact for consultation regarding protection of Personal Information described in the section 9.

13. Retention Period of Personal Information

The retention period of Personal Information shall be as permitted under the applicable laws and regulations. Personal Information shall be promptly erased after the retention period, unless necessary for contractual or other purpose of processing.

14. Amendment of Privacy Policy

The Company may amend all or part of this Privacy Policy from time to time.

< On Google Analytics>

Some pages of the Company’s website use Google Analytics, a service provided by Google Inc. in order to understand the status of visits by users to this site. When Google Analytics is used on our company's site, Google Inc. collects, records, and analyzes a user's history of visits to this site by using cookies issued by our company. Our company receives results of the analysis from Google Inc. to understand the status of visits by users to this site. User information in the result of the analysis our company receives does not include information that can identify a specific individual. Information collected, recorded, and analyzed by Google Analytics is managed by Google Inc., based on its privacy policy. For a description regarding the terms of service of Google Analytics, please visit the Google Analytics site, and for a description regarding the privacy policy of Google Inc., please visit the company's site.

Google Analytics Terms of Service:
<https://www.google.com/analytics/terms/us.html>
Google Privacy Policy:
<https://policies.google.com/privacy?hl=en>
Google Analytics Opt-out Browser Add-on:
<https://tools.google.com/dlpage/gaoptout?hl=en>

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JIG-SAW US, INC.
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