

## Privacy Policy

KOEI TECMO GAMES CO., LTD., with its principal place of business at KT Building, 4-3-6, Minatomirai, Nishi-ku, Yokohama, Kanagawa, 220-8503, Japan and having Mr. Hisashi Koinuma as President and COO (hereinafter referred to as “**Koei Tecmo**”, “**we**”, “**our**”, or “**us**”), recognizes the importance of personal information and promises to comply with the Act on the Protection of Personal Information of Japan (the “**APPI**”) and other related laws and regulations and to handle your personal information in a transparent, fair and secure manner.

### **1. Subject matter**

This privacy policy stipulates that Koei Tecmo is a personal information handling business operator under the APPI and that we are responsible for the acquisition and use of personal information in connection with our provision of services and operation of other businesses.

### **2. Information to be acquired**

We may acquire, use, and analyze the following kinds of information for the purposes specified in “3. Purposes of use of personal information.”

- (1) Identification information (user ID, user name, etc.)
- (2) Preference information (language and other preference information)
- (3) Online activity logs (logs of your activity within our services, including date and time, activity type, IP address, cookies, device identifier, OS type and version, and purchase records)
- (4) Inquiry information (identification information, such as name, address, and e-mail address, of you or each of our business partners; services you use or are interested in; your computing environment (platform, device model, OS type and version); and your messages and questions)
- (5) Location information
- (6) Information on employees and dispatched staff (name, address, and other information)
- (7) Information on applicants for recruitment (name, address, and other information)

If you do not provide personal information, all or some of our services may not be made available to you. In addition, we may not be able to respond to your inquiries based on appropriate and correct information.

### **3. Purpose of use of personal information**

We use personal information to the extent necessary to achieve the purposes set out below.

- (1) To continue to provide products and services through the ascertainment of identification information, etc.

- (2) To maintain and improve the quality of products and services through analysis of activity logs, etc.
- (3) To conduct prompt recovery from all problems in products and services through analysis of activity logs, etc.
- (4) To provide appropriate and correct information in response to your inquiries about products and services through the use of inquiry information, etc.
- (5) To perform service termination procedures through the use of inquiry information, etc.
- (6) To develop new products and services through the analysis of inquiry information, etc.
- (7) To display ads personalized for you in our services through the analysis of activity logs, etc.
- (8) To conduct campaigns, etc. through the use of inquiry information, etc.
- (9) To send you products, prizes, and the like through the use of inquiry information, etc.
- (10) To make personnel evaluations, personnel decisions (e.g., promotion, assignment, etc.), and to perform personnel management through the use of information on employees and dispatched staff
- (11) To notify or communicate with business partners for performance of operations through the use of inquiry information
- (12) To decide whether to employ applicants or to select subcontractors through the use of information on applicants for recruitment
- (13) To send you notices about our products or services through the use of inquiry information
- (14) To properly and efficiently perform operations other than those described in the foregoing items

In order to achieve the above-mentioned purposes of use, we may, with your consent, provide a third party with your personal data. When providing personal data to a third party, we are obligated to supervise that third party to ensure proper management of your personal information

Other than the foregoing, we will not provide any personal data to any third party without your prior consent, unless we are required to do so by laws and regulations, etc.

#### **4. Joint use of personal data**

We will, in the manner set out below, conduct joint use of the personal information we have acquired.

##### **(1) Items of personal data subject to joint use**

The acquired information set out below that falls under the category of personal data

- (i) Identification information (user ID, user name, etc.)
- (ii) Preference information (language and other preference information)
- (iii) Online activity logs (logs of your activity within our services, including date and time,

activity type, IP address, cookies, device identifier, OS type and version, and purchase records)

- (iv) Inquiry information (identification information, such as name, address, and e-mail address, of you or each of our business partners; services you use or are interested in; your computing environment (platform, device model, OS type and version); and your messages and questions)
- (v) Location information
- (vi) Information on employees and dispatched staff (name, address, etc.)
- (vii) Information on applicants for recruitment (name, address, etc.)

## **(2) Scope of joint users**

Koei Tecmo's group companies listed on the following webpage

<https://www.koeitecno.co.jp/e/company/group/>

## **(3) Purpose of use by joint users**

- (i) To continue to provide products and services through the ascertainment of identifying information, etc.
- (ii) To maintain and improve the quality of products and services through analysis of activity logs, etc.
- (iii) To conduct prompt recovery from all problems in products and services through analysis of activity logs, etc.
- (iv) To provide appropriate and correct information in response to your inquiries about products and services through the use of inquiry information, etc.
- (v) To perform service termination procedures through the use of inquiry information, etc.
- (vi) To develop new products and services through the analysis of inquiry information, etc.
- (vii) To send you products, prizes, and the like through the use of inquiry information, etc.
- (viii) To make personnel evaluations, personnel decisions (e.g., promotion, assignment, etc.), and to perform personnel management through the use of information on employees
- (ix) To notify or communicate with business partners for performance of operations through the use of inquiry information
- (x) To decide whether to employ applicants or to select subcontractors through the use of information on applicants for recruitment
- (xi) To properly and efficiently perform operations other than those described in the foregoing items

## **(4) Person responsible for management of personal data**

Hisashi Koinuma, President and COO

KOEI TECMO GAMES CO., LTD.

KT Building, 4-3-6, Minatomirai, Nishi-ku, Yokohama, Kanagawa, 220-8503, Japan

## **5. Measures taken for security control of retained personal data**

We have analyzed various possible risks that may arise out of handling information and have introduced appropriate security control measures set out below to protect personal data from loss, unauthorized access, falsification, leaks, etc.

(1) Establishment of a basic policy

We have established this privacy policy stipulating how to handle personal data and other matters to ensure the proper handling of personal data.

(2) Formulation of internal rules regarding handling of personal data

We have established internal rules called “Rules for Safety Management of Personal Data” that determine the reporting and communication system, measures for responding to information leaks and other issues, and personal data management procedures and the like.

(3) Organizational security control measures

We have appointed a person in charge of handling personal data in each department that handles personal data. In addition, we have specified the employees who handle personal data and the scope of personal data handled by those employees, and we have also established a reporting and communication system through which the person in charge will be notified if there is any actual or possible violation of laws and regulations or our internal rules.

(4) Personnel security control measures

We regularly make announcements to our employees to raise their awareness regarding the handling of personal data. Each of our employees is also required to submit a written pledge to reduce the risk of information leaks when working at home.

(5) Physical security control measures

In the areas where personal data is handled, we control our employees’ entry into and exit from the areas, impose restrictions on devices, etc. to be brought into the area, and take measures to prevent unauthorized persons from seeing personal data.

(6) Technical security control measures

We have implemented access controls to limit the scope of persons in charge and the personal information databases handled by those persons in charge.

(7) Understanding of the external environment

We implement security control measures after understanding local personal information protection systems in each country where our group companies that store personal data are located.

## **6. Request for notification of specific purposes of use of retained personal data**

An individual who is identified and specified by personal information retained by us (hereinafter referred to as an “Individual”) is entitled to request us to provide the specific purposes of use of that Individual’s personal data retained by us. Even if such a request is made by an Individual, we may refuse that request if any of the following applies:

- (1) if the purposes of use of such personal data are obvious because we have made the purposes of use available to the Individual through this privacy policy or any other means;
- (2) if the notification or public announcement of the purposes of use is likely to harm the Individual’s or a third party’s life, body, property, or any other right or interest;
- (3) if the notification or public announcement of the purposes of use is likely to harm any of our rights or interests; or
- (4) if any competent governmental authority or the like requires our assistance in performance of its legal duties under laws and regulations, and our notification to the Individual or public announcement of the purposes of use of the retained personal data received from that authority or the like may hinder the performance of duties by that authority or the like.

In the case that an Individual makes such a request, if we decide not to notify the Individual of the purposes of use of the retained personal data, then we will notify the Individual of that decision without delay.

## **7. Request for disclosure of personal data, etc.**

An Individual is entitled to request us to disclose the Individual’s personal data retained by us or records of provision and receipt of the Individual’s personal data retained by us to and from a third party (hereinafter referred to as “Third Party Provision Records”). Even if such a request is made by an Individual, we may refuse to disclose all or part of that personal data or Third Party Provision Records if that disclosure falls under any of the following:

- (1) if that disclosure is likely to harm the Individual’s or a third party’s life, body, property, or any other right or interest;
- (2) if that disclosure is likely to significantly hinder the proper performance of our business; or
- (3) if that disclosure causes a violation of any other law or regulation.

In the case that any Individual makes such a request, if we decide not to disclose all or a part of the personal data or Third Party Provision Records in question, if neither the personal data nor Third Party Provision Records in question exist, or if it is difficult to make disclosure by the method requested by the Individual, then we will notify the Individual to that effect without delay.

Please note that a fee of 1,000 yen (including consumption tax) will be charged upon a request for disclosure under this section.

#### **8. Request for correction, etc. of personal data**

An Individual is entitled to request us to make a correction, addition, or deletion (hereinafter referred to as “Correction, Etc.”) in relation to the Individual’s personal data retained by us. If we determine that it is necessary to act on such a request after our investigation of that request, we will make the requested Correction, Etc. of the personal data and notify the Individual to that effect without delay. In addition, if we decide not to make the requested Correction, Etc., we will notify the Individual to that effect without delay.

#### **9. Request for cease using personal data, etc.**

An Individual is entitled to make a request to us for the discontinuance of use or erasure (hereinafter referred to as “Discontinuance of Use, Etc.”) of the Individual’s personal data retained by us. If we determine that such a request is reasonable, we will conduct Discontinuance of Use, Etc. of the Individual’s personal data without delay to the extent required by laws and regulations and will notify the Individual to that effect without delay. In addition, if we decide not to conduct Discontinuance of Use, Etc., we will notify the Individual of that decision without delay.

In addition, the Individual is entitled to request us to cease providing personal data to a third party if the Individual’s personal data retained by us is illegally provided to a third party. If we determine that such a request is reasonable, we will cease providing personal data to a third party without delay to the extent required by laws and regulations and will notify the Individual to that effect without delay. In addition, if we decide not to cease providing personal data to a third party, we will notify the Individual of that decision without delay.

#### **10. Contact information for requests for disclosure of personal data, etc.**

With regard to requests for notification of the specific purposes of use of retained personal data, requests for disclosure, correction, addition, or discontinuance of use of personal data, requests for cessation of provision to a third party or deletion of personal data, requests for disclosure of Third Party Provision Records, or complaints and other inquiries concerning handling of personal data, please contact us via e-mail at the information desk stated below.

Please note that the exercise of any of the rights described above may limit your use of all or a part of the games made available to you by us.

Personal Information Protection Desk  
KOEI TECMO GAMES CO., LTD  
1-18-12, Minowa-cho, Kouhoku-ku, Yokohama, Kanagawa, 223-8503, Japan  
E-mail: [privacy@koeitecmo.co.jp](mailto:privacy@koeitecmo.co.jp)

#### **11. Provision of personal data to third parties residing in foreign countries**

We may, with the consent of the Individual in question, provide information acquired for any of the purposes of use set out in Section 3 to an entity residing in a foreign country.

In addition, for the purposes of use set out in Section 3, we may provide personal data retained by us to our overseas group companies. In this case, we will take necessary measures to ensure the continuous implementation of the equivalent measures (i.e., equivalent to the obligations imposed on personal information handling business operators under the APPI) by the recipients and will also, upon the request of an Individual, provide information about those necessary measures.

Enforced from April 1, 2022