

Privacy policy

KOEI TECMO GAMES CO., LTD. (address: 4-3-6 Minatomirai, Nishi-ku, Yokohama, Kanagawa, KT Building, President and COO Hisashi Koinuma, hereinafter referred to as "our company") recognizes the importance of personal information and promises to comply with the Personal Information Protection Law and other related laws and regulations and to handle personal information in a clear, fair and secure manner.

1. Application

This Privacy Policy stipulates that our company is a business operator handling personal information as stipulated in the Personal Information Protection Law and that our company have a legal duty in case acquiring or using personal information in connection with the provision of services and other operations.

2. Information to be obtained

Our company may obtain, use and analyze the following information for the purpose described in "3. Purpose 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 (your activity logs in our service, including date and time, activity type, IP address, Cookie, device identifier, OS type and version, and purchasing records)
- ④ Inquiry information (such as your name, address, and e-mail address), services you are our companying/interested in, your environment (platform, device model, OS type and version), and your messages and questions)
- ⑤ Location information
- ⑥ Information on employees and temporary staff (name, address, and other information)
- ⑦ Information on recruitment applicants (name, address, and other information)

If personal information cannot be provided, some or all of our services may not be available. In addition, our company may not be able to respond to inquiries based on appropriate and accurate information.

3. Intended use of personal information

Our company uses personal information to the extent necessary to achieve the following objectives.

- ① Continue to provide goods and services by grasping identifying information, etc.
- ② Maintaining and improving the quality of goods and services by analyzing activity logs, etc.

- ③ Immediate recovery from all failures in goods and services by analysis of activity logs, etc.
- ④ Providing appropriate and accurate information in response to customer inquiries about products and services through the use of inquiry information, etc.
- ⑤ Handling of procedures at the time of termination of services by using inquiry information, etc.
- ⑥ Development of new products and services by analysis of inquiry information, etc.
- ⑦ Displaying ads in customer-customized services by analyzing activity logs, etc.
- ⑧ Implementation of campaigns, etc. through the use of inquiry information, etc.
- ⑨ Shipment of products and premiums to customers through use of inquiry information, etc.
- ⑩ Examination of personnel evaluation, promotion, assignment, etc., and personnel management through the use of information concerning employees and dispatched employees
- ⑪ Notification and communication to business partners for execution of business by using inquiry information
- ⑫ Consideration of recruitment through our use of information on recruitment applicants and selection of subcontractors
- ⑬ Notification of product and service notices to customers through the use of inquiry information
- ⑭ Other appropriate and efficient performance of operations not covered by the foregoing.

In order to achieve the above-mentioned purpose of use, our company may provide personal data in our possession to a third party with the consent of the person themselves. In providing such information, our company shall be obliged to supervise the proper management of personal information.

In addition to the foregoing, our company will not provide personal data to any third party without obtaining prior consent except at the request of law.

4. Shared use of personal data

Our company will share the acquired personal information as follows.

(1) Items of Personal Data to be shared

The following information that our company acquire falls under the category of personal data.

- ① Identification information (user ID, user name, etc.)
- ② Preference information (language and other preference information)
- ③ Online activity logs (your activity logs in our service, including date and time, activity type, IP address, Cookie, device identifier, OS type and version, and purchasing records)
- ④ Inquiry information (such as your name, address, and e-mail address), services you are our companying/interested in, your environment (platform, device model, OS type and version), and

your messages and questions)

- ⑤ Location information
- ⑥ Information on employees and temporary staff (name, address, etc.)
- ⑦ Information on recruitment applicants (name, address, etc.)

(2) Scope of joint users

KOEI TECHMO Group companies listed below in the URL transition destination

[https://www.koeitecmo.co.jp/company/group/\(Link\)](https://www.koeitecmo.co.jp/company/group/(Link))

(3) Purpose of use by users

- ① Continue to provide goods and services by grasping identifying information, etc.
- ② Maintaining and improving the quality of goods and services by analyzing activity logs, etc.
- ③ Immediate recovery from all failures in goods and services by analysis of activity logs, etc.
- ④ Providing appropriate and accurate information in response to user inquiries about products and services through the use of inquiry information, etc.
- ⑤ Handling of procedures at the time of termination of services by our companying inquiry information, etc.
- ⑥ Development of new products and services by analysis of inquiry information, etc.
- ⑦ Shipment of products and premiums to users through use of inquiry information, etc.
- ⑧ Examination of personnel evaluation, promotion, assignment, etc., and personnel management through the our use of employee information
- ⑨ Notification and communication to business partners for execution of business by our companying inquiry information
- ⑩ Consideration of recruitment through use of information on recruitment applicants and selection of subcontractors
- ⑪ Other appropriate and efficient performance of operations not covered by the foregoing.

(4) Person responsible for management of personal data

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

KOEI TECHMO GAMES CO., LTD.

Hisashi Koinuma, President

5. Measures Taken for Security Management of Retained Personal Data

Our company has introduced the following appropriate security controls to analyze the possibility of various company risks that may arise in connection with the handling of information and to protect personal data from loss, unauthorized access, falsification, leakage, etc.

(1)Formulation of the Basic Policy

To ensure the proper handling of personal data, a privacy policy was formulated that stipulates the handling of personal data.

(2)Development of Disciplines Regarding the Handling of Personal Data

Formulation of the “Rules for the Safety Management of Personal Data”, which stipulates the reporting and communication system, measures to deal with leaks, and methods for managing personal data

(3)Systematic security control measures

A person in charge of the handling of personal data shall be appointed in each department handling personal data, and the scope of personal data handled by the employee and the employee shall be clarified, and a system shall be established to notify the person in charge of the occurrence of a fact or a sign of violation of the laws and regulations on the handling of personal data shall be established.

(4)Human security control measures

Regular announcements are made to employees regarding the handling of personal data, and employees are obliged to submit written pledges to reduce the risk of information leakage when working at home.

(5)Physical security control measures

In areas where personal data is handled, measures are taken to control the entry and exit of employees and to restrict devices etc. brought in, and to prevent unauthorized persons from viewing personal data.

(6)Technical security control measure

Implement access control to limit the scope of persons in charge and personal information databases handled

(7)Grasping the external environment

Implementation of security control measures after understanding the system for the protection of personal information in the country where the group-related companies storing personal data belong.

6. Request for Notification of Purpose of use of Retained Personal Data

A specific individual identified by personal information held by our company (hereinafter referred to as the "Individual") is entitled to claim the Purpose of use of the Personal Data held by our company from our company. Upon request from the Individual, our company shall be entitled to refuse such request if any of the following applies:

(1)In the event the purpose of use of such personal data is obvious due to the fact that our company has made the purpose of use known to the Individual through this Privacy Policy or any other means

(2)Cases where there is a risk of harm to the life, body, property, or other rights and interests of the Individual concerned or a third party by giving notice or publicly announcing the Purpose of use

(3)Cases in which notice or publication of the Purpose of use is likely to infringe our rights or interests

(4)Where it is necessary for a state agency, etc. to obtain cooperation from our company in implementing affairs prescribed by laws and regulations, and where obtaining the consent of the person in question may hinder the execution of the affairs by notifying the Individual of the Purpose of use of the retained personal data that our company have received from a state agency, etc. or publicly announcing the Purpose of use.

In the event our company decides not to notify the Purpose of use of the Retained Personal Data at the request of the Customer, our company shall notify the Company of such decision without delay.

7. Request for Disclosure of Personal Data, etc.

You are entitled to request that our company disclose your personal data in our possession or the records of the provision of personal data held by our company to a third party (hereinafter referred to as the "third party donation records"). Upon request from the Individual, our company shall be entitled to refrain from disclosing all or part of personal data or the records provided by a third party if such disclosure falls under any of the following:

- (1)Cases in which disclosure is likely to harm the life, body, property, or other rights or interests of the Individual or a third party
- (2)Cases in which the proper execution of our business is likely to be seriously hindered.
- (3)Cases in which disclosure violates other laws and regulations

Upon request from the Individual, our company shall notify our decision not to disclose all or part of the Personal Data or the Records provided by a third party, the absence of such Personal Data or the Records provided by a third party, or the difficulty of disclosure by the method requested by the user without delay.

Please note that a fee of 1000 yen (including consumption tax) will be charged upon request for disclosure in this section.

8. Request for Correction, etc. of Personal Data

You are entitled to request our company to correct, add, or delete (hereinafter referred to as "Corrections") your personal data in our possession. In the event our company determines that it is necessary to comply with such request upon investigation of such request, our company shall correct such personal data and notify Individual without delay. In addition, in the event our company makes a decision not to make a correction, etc., our company shall notify that effect without delay.

9. Request for Suspension of use, etc. of Personal Data

You are entitled to request our company to cease our companying or delete (hereinafter referred to as "Suspension of use") your personal data. In the event our company determines that there is a reason for making a request, our company shall suspend the use of personal data without delay to the extent necessary in light of laws and regulations and notify the Individual without delay. In addition, in the event our company makes a decision not to suspend the use, our company shall notify such decision without delay.

In addition, you are entitled to request our company to cease providing personal data to a third party if your personal data in our possession is illegally provided to a third party. Our company will suspend the provision of personal data to a third party without delay to the extent necessary in light of laws and regulations and notify the person of such suspension without delay if our company judge that there are grounds for the request. In addition, in the event our company makes a decision not to suspend provision to a third party, our company shall notify such decision without delay.

10. Contact Information for Disclosure of Personal Data

For notifications of the purpose of use of retained personal data, disclosure, correction, addition, suspension of use of personal data, suspension of provision to a third party, deletion, request for disclosure of records to a third party, complaints concerning the handling of personal data, and other inquiries, please contact the following office by e-mail.

Please note that the exercise of the above rights may restrict use of any or all of the Game our company offer to you.

〒223-8503 1-18-12, Minowa-cho, Kohoku-ku, Yokohama, Kanagawa

KOEI TECHMO GAMES CO., LTD Personal Information Protection Contact

E-mail address: privacy@koeitecmo.co.jp

< For the residents in EU/EEA or UK >

For the purposes of GDPR in the EU/EEA and UK GDPR in the UK, we have appointed DataRep as our data protection representative. If you have any questions or wish to exercise your rights related to Personal Data, please refer to the [details](#) and get contact with DataRep.

11. Provision of Personal Data to Third Parties in Foreign Countries

Our company may, with the consent of the Customer, provide the information obtained for the purposes set forth in Article 3 to a corporation in a third country.

In addition, for the purpose set forth in Article 3, our company may provide our group companies in foreign countries with personal data in our possession. In this case, our company shall take the

necessary measures to ensure the continuous implementation of the appropriate measures (the obligations imposed on business operators handling personal information under the Personal Information Protection Law) by the recipients and shall, upon request of the recipients, provide information on the necessary measures.

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