

## **Privacy Policy**

Thank you very much for using the services provided by Churapps Co., Ltd.(hereinafter, "we/our/us").

The Privacy Policy (hereinafter, "the Policy") sets forth our privacy information handling principles. You or users are deemed to have agreed with the Policy if you use our services.

### **What is privacy information?**

Privacy information" refers to "personal information" as defined in the Personal Information Protection Law, and refers to information about a living individual that can identify the specific individual by name, date of birth, address, telephone number, contact information, or other description contained in the information, as well as information that can identify the specific individual by itself, such as appearance, fingerprints, voice print data, and health insurance card insurer number.

### **How do you collect privacy information?**

When a user registers for use, we may ask for personal information such as name, date of birth, address, telephone number, e-mail address, bank account number, credit card number, and driver's license number. In addition, transaction records including the user's personal information and information related to payments made between the user and our partners and other parties (including information providers, advertisers, and advertisement distributors, etc.; hereinafter referred to as "partners") may be shared with our business partners. Hereinafter referred to as "partners"). The Company may also collect transaction records and payment information, including personal information of users, from the Company's business partners (including information providers, advertisers, advertisement distributors, etc.).

### **For what purpose do you use privacy information?**

The following gives purposes of our collection and use of privacy information.

- A) To present registered information including the user's name, address, contact, and payment methods, used services, purchased products, and charges for such services/products so that users can view and/or correct their registered information and/or view the status of use
- B) To use such information such as name, date of birth, address, telephone number, bank account number, credit card number, driving license number, and arrival of mails with delivery certificate for user identity verification
- C) To display information registered to us on an input screen so that users can enter data easily or forward such information to external services under instructions of users
- D) To use information for identify individuals, such as state of using, name and address, to refuse the use of the Service by those users who violate the Terms of Use of the Service, for example, causing damage to a third party or by those users who try to use the Service for unjust/unlawful purposes
- E) To use information necessary for our provision of services for users, such as information about details of inquiries and billing, status of use of services by users, and contact information of users so as to answer inquiries by users
- F) To prepare statistical data that is processed in the form that does not permit personal identification in connection with our services
- G) To distribute or display advertisements of us or a third party
- H) Purposes incidental to the purposes of using above

### **Do you provide privacy information for a third party?**

We will not provide privacy information for a third party without the prior approval of users except for the following. However, this excludes cases in which the provision is permitted under the Act on the Protection of Personal Information or any other laws and regulations.

A) Where requested under laws and regulations

B) Where the provision is required for protecting human life, body or property and it is difficult to obtain an approval of the user him/herself

C) Where it is especially necessary to improve public health or promote the sound growth of children and it is difficult to obtain the approval of the user him/herself

D) Where it is necessary to help any national organization, a local public organization, or a contractor perform the clerical work prescribed in laws and regulations and the approval of the user him/herself could disturb the performance of the clerical work

If we outsource all or part of privacy information handling to the extent necessary to achieve the purpose of the use or privacy information is provided along with succession of business due to merger or for any other reasons, it will not correspond to the provision of privacy information to a third party.

We may share or disclose privacy information upon user's request if a user links any our services with any external services when using our services.

#### **Can I check my privacy information or request you to correct it?**

If a user himself/herself requests the disclosure of the privacy information (excluding history or characteristic information) to the user himself/herself, we will disclose it without delay. However, if disclosure could harm the life, body, property, or other interests of the user or a third party, could cause significant hindrance to the proper performance of our business, or violates laws and regulations, we will refrain from disclosing all or part of the information. If we decide not to disclose the information, we will inform you without delay.

We will charge you 1000 yen for each instance of disclosure of personal information.

If any user's personal information we own is incorrect, the user can request us to correct or delete the personal information by the procedure stipulated by us. If a user makes such a request and we judge it is necessary to meet the request, we will correct or delete the personal information and inform the user without delay.

#### **Can I request you to discontinue the use of my privacy information?**

When the user requests discontinuation of the use of his/her privacy information (hereinafter, "Discontinuation of the Use") claiming the privacy information is handled beyond the scope of the purposes of use or the privacy information is obtained by unjust means, we will conduct a necessary investigation, and based on the outcome of the investigation make take measures such as Discontinuation of the Use, and inform the user without delay.

However, we will take alternative measures if Discontinuation of the Use of privacy information involves an inordinate expense or if it is difficult and alternative measures are possible so as to protect rights and benefits of the users

#### **Change of Privacy Policy**

This Privacy Policy is subject to changes without notice to users.

The changed Privacy Policy will take effect when it is placed on this website unless otherwise specified by us.

#### **Inquiry contact**

If you have any question about the policy, please contact us at the following contact address/e-mail address:

Contact person: Norio Nakayama

Address: O2 Okinawa Office 3F BlockA Kahuna Asahibashi 1-20-1 Izumizaki, Naha City,

Okinawa Prefecture 900-0021 Japan  
E-mail address: [cs.samurailudo@churapps.co.jp](mailto:cs.samurailudo@churapps.co.jp)  
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