

# Privacy Policy

## Scope of Application

This privacy policy (hereinafter, “the Privacy Policy”) establishes the procedures for the handling of personal information obtained by Seafood Legacy Co., Ltd. (hereinafter, “the Company”) through services operated by the Company (hereinafter “Company services”) or in connection with the Company’s business operations from its customers (This includes users of Company services, business partners, and other third parties hereinafter referred to collectively as “customers”).

In cases where there are provisions such as separate privacy policies established for the Company services, or there are separate agreements (Both separate provisions and separate agreements are hereinafter collectively referred to as “separate agreements.”), personal information will be handled in accordance with the relevant separate agreements.

## Definition of Terms

### 1. Personal Information

In the Privacy Policy, “personal information” refers to any information regarding a living individual which can be used to identify said specific individual, such as their name, address, telephone number, email address, place of employment, date of birth, or other descriptions, etc. Information which, even if it cannot be used by itself to identify individuals, can be easily compared with other information to identify a specific individual, and information considered personal information by the Act on the Protection of Personal Information shall be included in the definition of the term “personal information.”

### 2. Activity Log Data

In the Privacy Policy, the term “activity log data” refers to anonymized data which can be used to analyze customer interests and preferences when aggregated, including the services and software used by the customer, their advertisement viewing logs, purchased products, search keywords, usage dates, usage environment, logs of operation on websites, IP address, location information, fixed terminal identification information, the connection status when using the service via a mobile device, and information on the settings during use, etc., but not specific enough to identify that person.

## Handling of Personal Information

1. The Company shall comply with the Act on the Protection of Personal Information in connection with the customer personal information it obtains, establish internal systems for the protection of personal information, and make continuous efforts to improve them. Activity log data is also considered to be personal information, and efforts will be made to establish internal security systems.
2. The Company may ask customers for their personal information, such as their name, date of birth, gender, address, telephone number, email address, bank account

information, and credit card number when they register for Company services. Furthermore, records of transactions between customers and the Company's partners (This includes the Company's business partners, advertisers, advertising distributors, and other information providers, referred to hereinafter as "partners.") which contain personal information, and information regarding payments may be collected by the Company's partners. The Company may also collect customer activity log data when customers use the services of the Company or its partners, or when viewing websites.

3. When using Company services, please do not enter or transmit, etc., information such as your race, religion, social status, medical history, criminal history, or the fact of having been the victim of a crime (hereinafter, "sensitive personal information") if it is not explicitly permitted by the relevant service.

## Purpose of Use of Personal Information

The Company shall use customer personal information it has obtained within the scope of the following purposes (hereinafter, "purposes of use").

- (1) Personal information regarding customers using Company services
  1. To conduct correspondence regarding registration for Company services
  2. To verify the customer's identity during and after login when they are using Company services as a registered member, and to display member information automatically on various pages
  3. To serve as an intermediary and forward information in accordance with the customer's application with respect to organizers or co-organizers of the applied events, or with respect to advertiser companies and organizations which are information providers
  4. To provide information and conduct surveys regarding the service via email (including newsletters), post, and telephone, etc.
  5. To perform analysis and sampling, etc., in order to improve the quality of services and advertisements provided by the Company
  6. To personalize advertisements related to the content, etc., of the Company or third parties viewed by a customer by combining personal attributes of the customer such as gender, age, area of residence, hobbies, and preferences with other information, including viewing logs for websites operated by the Company, usage logs for Company services, and activity log data.
  7. To provide information which the Company has determined to be beneficial to customers, such as advertisements
  8. To respond to inquiries and complaints from customers
  9. To study and analyze marketing data in order to develop and advertise new services
  10. To maintain systems, resolve bugs, or take any other measures necessary from a technological or management perspective
  11. To examine the number of users and traffic on the Company website, and analyze usage of Company services
  12. To utilize anonymized statistical data
  13. To monitor unauthorized activity
  14. To provide services (including after-sales services) to customers

15. To carry out duties outsourced by third parties
16. For any other purposes established in separate agreements

(2) Personal information regarding partners

1. To conduct necessary business communications, execution of contracts, and business negotiations, etc.
2. To manage the information of partners
3. To accomplish any other purposes established in separate agreements

(3) Personal information regarding third parties provided to the Company by partners

1. To provide to the partners which provided such personal information to the Company (hereinafter, "providers"), and to provide Company services
2. To conduct surveys and provide information regarding the service to the provider and the individual whose personal information was provided via email (including newsletters), post, or telephone, etc.
3. To perform analysis and sampling, etc., in order to improve the quality of services and advertisements provided by the Company
4. To receive applications for services and campaigns provided by the Company, contact winners, and ship gifts and rewards to the individual whose personal information was provided
5. To personalize advertisements related to the content, etc., of the Company or third parties viewed by the individual whose personal information was provided by combining personal attributes, such as their gender, age, area of residence, hobbies, and preferences with other information, including viewing logs for websites operated by the Company or its partners, usage logs for services provided by the Company or its partners, and activity log data, etc.
6. To provide information such as advertisements which the Company has decided to be beneficial to the individuals whose personal information have been provided to it
7. To analyze usage of partner services
8. To respond to inquiries and complaints from individuals whose personal information has been provided
9. To study and analyze marketing data in order to develop and advertise new services
10. To maintain systems, resolve bugs, or take any other measures necessary from a technological or management perspective
11. To study the number of users and traffic on the websites of partners, and analyze usage of services provided by partners
12. To utilize anonymized statistical data
13. To monitor unauthorized activity
14. To provide services (including after-sales services) to customers
15. To carry out duties outsourced by third parties
16. To accomplish any other purposes established in separate agreements

(4) Personal information of individuals who have made inquiries

1. To respond to inquiries

2. To accomplish any other purposes established in separate agreements

## Management of Personal Information

The Company shall take organizational, personnel, physical, and technical security control measures as deemed appropriate by the Company from time to time to prevent leakage, loss, or damage of personal information and to properly manage personal information.

## Provision to Third Parties

1. The Company shall not provide personal information to third parties except when the customer has consented in advance, such as when it is clearly stated in the terms of use of a service used by the customer, when it is required by law, when the handling of personal information is outsourced within the extent necessary to accomplish the purposes of use, or when it is permitted by law.
2. Notwithstanding the preceding clause, the Company may provide personal information it has obtained to its partners and other third parties after processing data containing personal information in an anonymized form.
3. In the event the Company provides customer personal information to a third party in accordance with the two preceding clauses, the management of said personal information shall be placed under the administration of said third party at the point in time which the provision of information occurs. The Company and the third party shall both handle customer personal information in compliance with their individual privacy policies.

## Outsourcing of the Handling of Personal Information

The Company may outsource the handling of personal information to third parties in whole or in part. In such cases, to ensure the secure management of the entrusted personal information, the outsourcer will be required to handle personal information properly, and they will be supervised as necessary and appropriate, including regular checks on security status.

## Contact for the Handling of Personal Information

For inquiries regarding the handling and management of personal information, or communications and consultations concerning notification of the purposes of use, disclosures, corrections, additions or deletions, suspension of use, and the suspension of provision to third parties (hereinafter, "disclosure, etc.") regarding one's own personal information, please contact the inquiries contact below. We do not handle inquiries in person or over the telephone, etc. Thank you for your understanding.

Seafood Legacy Co., Ltd. (CEO Wakao Hanaoka)  
Personal Information Inquiries Contact

201 Duplex Ginza Tower 8/14, 8-14-9 Ginza, Chuo-ku, Tokyo 104-0061

Email Address: [info@seafoodlegacy.com](mailto:info@seafoodlegacy.com)

## Procedures for Personal Information Disclosure, etc.

The procedures for personal information disclosure, etc. are as follows.

1. Contact for Requesting for Disclosure, etc.  
Please contact the inquiries listed above to request disclosure, etc. After receiving a request for disclosure, etc., the prescribed forms will be sent by post.
2. Procedures for Requesting Disclosure, etc.  
Please complete all required entries in the forms prescribed by the Company, and send them back to the inquiries contact. When sending the forms back, please make a note stating, "Contains personal information disclosure request forms." In the event of errors in the request paperwork or failure to establish contact, etc., we will be unable to comply. Thank you for your understanding.

### (1) Requests for disclosure, etc., by the individual

Please enclose a copy of any of the following identification documents. Please choose a document which does not list a personal identification number, or remove the listed personal identification number.

1. Driver's license
2. Health insurance card
3. Pension book
4. Resident card
5. Passport
6. Alien registration card

### (2) Requests for disclosure, etc., by proxy

In addition to an identification document for the relevant individual, please also enclose an identification document for the proxy (any of the documents listed above in Section (1)), and a letter of proxy.

### 3. Responses to Requests for Disclosure, etc.

Requests for disclosure, etc., received will be verified by the Company, and a response will typically be sent within 1 month of receipt of the request forms. However, there may be delays depending on the circumstances.

In the event the Company cannot respond to a request for disclosure, etc., on grounds enumerated below, the customer shall be notified to that effect. However, the grounds may not be disclosed depending on the circumstances.

#### (1) The individual's identity could not be verified

- (2) The authority to act as a proxy cannot be verified in cases of request by proxy
- (3) There are errors in the submitted paperwork
- (4) The object of the request for disclosure, etc., is not "personal information subject to disclosure"
- (5) There is the possibility of harm to the life, body, property, or the other rights or interests of the individual or a third party
- (6) There is the possibility of interference with the operations of the Company
- (7) There is the possibility of violation of another law or statute

#### 4. Handling Fee

A handling fee prescribed by the Company must be paid for disclosures, etc. After the request for disclosure, etc., is received, you will be notified when the prescribed forms are mailed to you.

### Amendment of the Privacy Policy

The Company shall comply with all applicable Japanese laws and statutes regarding the personal information in its possession, continuously revising the Company's personal information protection efforts, and may amend the contents of the Privacy Policy at any time during the process of making improvements and enhancements. When amendments are made, they will be announced on the Company website, etc.

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