

Privacy Policy

ICPA International Protocol Co., Ltd

ICPA International Protocol Co., Ltd (hereinafter referred to as "the Company") hereby establishes and declares the following policy regarding the handling of personal information, which it will publish and comply with.

(Compliance with Laws and Regulations)

1. The Company shall comply with the Act on the Protection of Personal Information, provisions of the Telecommunications Business Act concerning the confidentiality of communications, other relevant laws and regulations, guidelines for the protection of personal information in the telecommunications business (hereinafter referred to as "Guidelines"), and this Privacy Policy in all handling of customers' personal information, including acquisition and use.

(Initiatives for the Protection of Users' Rights and Interests)

2. The Company implements the following primary initiatives to protect users' rights and interests regarding personal information:

- i. Upon request from the individual, we will implement measures such as stopping direct mail delivery and telephone solicitation.
- ii. The Company may entrust all or part of the handling of personal information within the scope of the purpose of use. The Company will select contractors that are recognised as handling personal information appropriately and will properly establish matters concerning security management, confidentiality, and other handling of personal information in the entrustment contract, and will conduct necessary and appropriate supervision.

(Purpose of Use)

3. The Company acquires and uses personal information for the following purposes:

- i. Provision of various services operated by the Company
- ii. Billing for various services operated by the Company
- iii. Improvement of various services operated by the Company and development of new services
- iv. Notification of various events and new services organised or co-organised by the Company
- v. Recording course content and improving quality
- vi. The Company's public relations activities

(Use Within the Scope of the Purpose of Use)

4. The Company will not handle personal information beyond the scope necessary to achieve the purpose of use without obtaining the consent of the individual in advance. However, the Company may handle customers' personal information (excluding information concerning the confidentiality of communications) beyond the scope necessary to achieve the purpose of use that has been specified and published in advance without obtaining the customer's consent in the following cases:

1) When required by law

- 2) When necessary for the protection of a person's life, body, or property, and it is difficult to obtain the consent of the customer
- 3) When especially necessary for improving public health or promoting the sound growth of children, and it is difficult to obtain the consent of the customer
- 4) When it is necessary to cooperate with a national agency, local government, or a person entrusted by them in executing affairs prescribed by laws and regulations, and obtaining the consent of the customer might impede the execution of such affairs

(Proper Acquisition)

5. The Company will not acquire personal information by deception or other wrongful means.

(Types of Personal Information Collected)

6. The Company collects the following information:

- i. Name
- ii. Address
- iii. Telephone number and email address
- iv. Occupation
- v. Date of birth
- vi. SNS account (optional)
- vii. Connection information when using online services (IP address, device information, etc.)
- viii. Images, videos, audio data from course participation

(Regarding Photography and Video Recording During Courses)

7. The Company may photograph or record courses for documentation and public relations activities. Images and videos taken may be used in the Company's public relations media such as websites, SNS, and brochures. If you do not wish to be photographed, please contact the Company in advance.

Please note that for some courses and training programmes, consent to photography and publishing of interviews may be a condition for receiving discounts. In such cases, separate contracts or consent forms will be exchanged, and the content of such consent forms shall take precedence over this Privacy Policy. If you withdraw your consent to photography or publication after receiving a discount, you may be required to pay the discount difference. The conditions and procedures for withdrawal are as stipulated in the contract or consent form for each course.

(Retention Period)

8. The Company sets a retention period for customers' personal information within the scope necessary for the purpose of use and will delete customers' personal information without delay after the retention period has passed or after the purpose of use has been achieved. However, this shall not apply in the following cases:
 - 1) When preservation is required by law
 - 2) When the individual has consented

(Security Management Measures)

9. The Company strives to keep customers' personal information accurate and up-to-date, and takes necessary and appropriate security management measures to protect it from unauthorised access, falsification, leakage, loss, and damage.

(Supervision of Employees)

10. The Company provides necessary and appropriate supervision to employees to ensure the security management of customers' personal information. The Company also provides necessary training to employees to ensure the proper handling of personal information.

(Supervision of Contractors)

11. In various service provision, reception operations, fee-related operations, marketing operations, and other operations, the Company entrusts all or part of the handling of personal information within the scope of the purpose of use. In this case, the Company selects contractors that are recognised as handling personal information appropriately and properly establishes matters concerning security management, confidentiality, re-entrustment conditions, and other handling of personal information in the entrustment contract, and conducts necessary and appropriate supervision.

(Provision to Third Parties)

12. The Company may share user information with third parties in the following cases:

- 1) When required by law
- 2) When necessary for the protection of a person's life, body, or property, and it is difficult to obtain the consent of the customer
- 3) When especially necessary for improving public health or promoting the sound growth of children, and it is difficult to obtain the consent of the customer
- 4) When it is necessary to cooperate with a national agency, local government, or a person entrusted by them in executing affairs prescribed by laws and regulations, and obtaining the consent of the customer might impede the execution of such affairs
- 5) When reporting the email sending results to a third party who has provided personal information to the Company and requested email sending service
- 6) When the user has consented

(Requests for Disclosure, etc.)

13. If a customer wishes to be notified of the purpose of use of personal information, or to disclose, correct, add, delete, stop the use of, or stop the provision to third parties of personal information, we accept such requests as follows:

- Personal Information Protection Manager

Contact for requests for disclosure, etc. of personal information subject to disclosure

*By telephone: 03-3216-7177

*By email: contact@icpa-in.com

*By letter: Marunouchi Trust Tower N, 19th floor, 1-8-1 Marunouchi, Chiyoda-ku, Tokyo

(Complaint Handling)

14. The Company will respond promptly and appropriately to complaints and other inquiries from customers regarding the handling of personal information. Complaints and other inquiries are accepted as follows:

(Name of contact point) ICPA International Protocol Co., Ltd

(Contact of the contact point) 03-3216-7177

(Reception hours of the contact point) Weekdays 9:00 a.m. to 6:00 p.m.

(Response to Leakage)

15. In the event of a leakage of customers' personal information, the Company will respond appropriately, such as promptly notifying customers of the facts.

(Continuous Improvement)

16. The Company strives for continuous improvement of the handling of personal information within the company through the development of internal regulations concerning personal information protection, employee education, and implementation of internal audits.

End

Established: September 1, 2020

Revised: March 1, 2025