

Privacy Policy

Article 1: Definitions

When handling Personal Information, 27th Co., Ltd. ("Company") will comply with all laws, regulations, national guidelines, General Data Protection Regulation (GDPR) , and other rules related to the handling of Personal Information, and will practice appropriate management.

Article 2: Acquisition of Personal Information

1. The Company will acquire the Personal Information of the users of Company services, business partners, and shareholders (collectively, "Users etc.") by lawful and proper means.
2. Users are required to provide the Company with certain personal information when signing in to the Company's services. The required personal data is provided on the relevant form. If these data items are not provided, the Company will not be able to provide its services to you.
3. The Company may acquire the following personal information from Users etc., to the extent necessary to achieve the purposes of use described in the following article, in accordance with the following acquisition methods.

[Categories of acquired personal information]

- Email address;
- Payment information;
- IP address, cookies information, and other online identifiers; and
- Country of residence, time zone.

[Acquisition Source]

- Direct Acquisition from Data Subject
- Indirect Acquisition from Data Subject (e.g., IP address acquired when Company websites are accessed)

Article 3: Utilization purpose of Personal Information

1. The Company will use Personal Information for the following purposes.

- To provide services;
- To survey and analyze Users' learning progress and learning effects;
- To settle charges for the Company's services and collect late fees, etc.;
- To plan, develop, maintain, and improve the Company's services;
- To survey and analyze User trends;
- To communicate important notices etc. regarding services;
- To respond to User etc. feedback and requests;
- To communicate about the Company's latest information or about various seminars, exhibitions, etc.;
- For introductions or sales and marketing activities related to Company services;
- To deliver materials, catalogs, etc. requested by Users etc.;
- To manage business partner information, transaction details, etc.;
- To execute transactions;
- For delivery of required documents etc., identity verification, and handling of inquiries or complaints;
- To confirm applications and make deliveries for mail delivery services;
- To solicit participation in surveys and events and report results of the same; and
- When contact with users or business partners is otherwise necessary for some particular reason.

1. The Company handles personal data on the legal basis of the consent of the User etc., the legitimate interests pursued by the Company or by third parties, the performance of agreements between the User etc. and the Company or the preparation for executing an agreement, or compliance with the Company's legal obligations.

2. In cases where the handling of personal data by the Company is based on the consent of a User etc., the User etc. may withdraw such consent at any time; provided, however, that the lawfulness of the handling of personal

data based on consent prior to withdrawal shall not be affected by withdrawal.

Article 4: Use of Cookies

The Company's website uses cookies and other similar technologies for tracking or analysis (collectively, "Cookies") in order to provide services better suited to our customers.

① Overview of Cookies

Cookies are small files containing arbitrary characters that are exchanged between the web server and the customer's Internet browsing software (browser) and stored on the customer's terminal when the customer visits a website. By using these, the Company may acquire non-personally identifiable attribute information, such as customer browsing history, service usage history, and location information.

Customers may set their browsers to indicate in advance that a site uses cookies, disable Cookies, or delete saved Cookies. Please note that refusing or deleting Cookies may limit the functions available on the website.

② About Google Analytics

Some of the Company's pages use Google Analytics, a service provided by Google, in order to understand customers' website visit status. When using Google Analytics on the Company's site, Google collects, records, and analyzes customer website visit history on the basis of Cookies issued by the Company. The Company receives the results of that analysis from Google, Inc. in order to understand customers' website visit status. The information collected, recorded, and analyzed by Google Analytics does not contain any personally identifiable information. Such information is managed by Google in accordance with its privacy policy.

Customers can also suspend the collection of their information through the Company's use of Google Analytics by disabling Google Analytics in their browser's add-on settings. Google Analytics can be disabled by downloading and installing the "Google Analytics Opt-Out Add-on" from the Google Opt-Out Add-on download page (<https://tools.google.com/dlpage/gaoptout>) and changing the add-on settings in your browser. When customers disable Google Analytics, Google Analytics will also be disabled on other websites that they

visit, but customers can re-enable Google Analytics by reconfiguring their browser add-ons.

For an explanation of the Google Analytics Terms of Use, please visit the Google Analytics site, and for an explanation of Google's privacy policy, please visit their site.

Google Analytics Terms of Use:

<https://www.google.com/analytics/terms/jp.html>

Google Privacy Policy:

<https://www.google.com/intl/ja/policies/privacy/>

Google Analytics Opt-Out Add-On:

<https://tools.google.com/dlpage/gaoptout>

Article 5: Matters Related to Security Control Measures

The Company will take necessary and appropriate security control measures for the prevention of leakage, loss or damage of Personal Data, and otherwise for the management of Personal Data. The Company will also provide necessary and appropriate supervision of all employees and contractors (including subcontractors etc.) handling Personal Data.

Article 6: Third Party Provision of Personal Data

1. The Company will not provide the User etc. Personal Data acquired by it to third parties (excluding contractors), except where the relevant Users etc. have personally given prior consent, or where permitted under laws and regulations.
2. The Company provides personal data of Users etc. to tutors and other third parties to which the Company entrusts services in order to provide the Company's services.

Article 7: Revision of Privacy Policy etc.

The Company will review the particulars of this Privacy Policy as appropriate, and may amend the same as necessary. In such cases, the amendments shall take effect from the date of publication of the amended version.

Article 8: Requests for Disclosure etc. of Personal Information

When requesting that the Company disclose, rectify etc., or cease use of personal data, please contact the Company using the contact information in the following article. After confirming the identity of the data subject through the prescribed procedures, we will respond to the request in accordance with laws and regulations. The Company will not discriminate against any person on the basis of such requests.

Article 9: Contact for Inquiries

Contact for Inquiries Related to Personal Information

27th Co., Ltd., Officer in Charge of Personal Information Management
contact@gokigen.jp

Article 10: Company's Name, Address, Representative Name

27th Co., Ltd.

Fujimi Duplex B's 4F, 1-3-11 Fujimi, Chiyoda-ku, Tokyo, Japan

Hirofumi Naramura, CEO

Article 11: Precaution

Company websites may include links to external websites, but the Company owes no liability whatsoever with regard to the handling of personal information protection on such linked websites.

[Prescribed on 07/25/2023]

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