

## Privacy Policy

postalk Inc. (the "Company") sets forth this Privacy Policy (this "policy") with regard to the treatment of users' information, including but not limited to personal information, during the performance of services provided by the Company (the "Services"), as follows:

### **1. User's Information to be Collected and Method of Collection**

For purposes of this Policy, "Users Information" means information that identifies users, history of actions on communication services and other information created or accumulated in relation to user or users' devices, which shall be collected by the Company pursuant to this Policy.

Depending on the method of collection, the User's Information that we may collect for a user to use the Services includes:

(i) information provided by the user, including

- information about profile such as name
- information about contact such as mail address
- information about method of payment such as credit card information
- still image information including user portrait and
- other information entered by the user into such form as specified by the Company: or other method

**(ii) information provided from services outside the Services, to the extent that the user permits for use with the Services;**

the Company may collect the following information from services outside the Services, including but not limited to social network services, to the extent the user permits for use with the Services at that time:

- ID used by the user for such outside service; and
- other information that the user has authorized the other service provider to disclose through its privacy settings in such outside service;

**(iii) information collected by the Company for the use by the user of the Services**

The Company may collect information upon access to or use of the Services, including:

- referrer:
- IP address:
- Information about server access logs: and
- Cookie, ADID, IDFA or other extension

**2 Purpose of Use**

Specific purposes of the User’s Information for the provision of the Services shall include the following:

(i) provision, maintenance, protection, and improvement of the Services, including but not limited to acceptance of registration for the Services, identification of individuals, User authentication, Recording use settings, and computation of use fees:

(ii) user traffic measurement and behavior measurement

(iii) Delivering, displaying and measuring the effectiveness of advertisements

(iv) guidance or response to inquiries relating to the Services:

(v) addressing a violation of rules, regulations or policies relating to the Services (the "Rules");and

(vi) notice of any modification to the Rules

**3 Method of Notice, Publication and Permission; Method of Discontinuance of the Use**

3-1 If the user specifies a certain setting, the user is entitled to require the Company to, and the Company shall immediately, discontinue the use of any or all of the User’s Information, in accordance with such rules as may be from time to time prescribed by the Company. Depending on the item of the User’s Information, if such collection or use is required for the Services, the Company may not be able to discontinue such collection unless the user withdraws from the Services pursuant to the procedures as determined by the Company.

3-2 Withdrawal will be successful by logging in the Service, accessing website where the user can show their own User Information, and checking the procedure in the "delete Account" section.

**4 Outside Transmissions: Provision to Third Parties: Information Collection Modules**

4-1 The following partner may store Cookies on user’s device and store and use user information by using such cookies:

(i) Name of Partner	Google, Inc.
(ii) URL of Partner’s Privacy Policy	<a href="https://policies.google.com/technologies/partner-sites?hl=ja">https://policies.google.com/technologies/partner-sites?hl=ja</a>

(iii) URL of Partner's opt-out procedures	<a href="https://tools.google.com/dlpage/gaoptout?hl=ja">https://tools.google.com/dlpage/gaoptout?hl=ja</a>
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4-2 The following information collection module is incorporated into the Services. Thus, the Company provides the User's Information to the provider of such information collection module (including those outside Japan) in accordance with the following:

(i) Name of Information Collection Module	Firestore
(ii) Provider of Information Collection Module	Google, Inc.
(iii) Items of User's Information to be Provided	Name, e-mail address, profile image, login history, posted data, other data that needs to be stored to provide other services (excluding credit card information)
(iv) Means and the Methods of Provision	Sending online
(v) Purposes of Use by Provider	operating the Service
(vi) Whether or not Provider Intends to Provide Information to Third Parties	Non
(vii) URL or Provider's Privacy Policy	<a href="https://firebase.google.com/support/privacy?hl=ja">https://firebase.google.com/support/privacy?hl=ja</a>

(i) Name of Information Collection Module	Stripe
(ii) Provider of Information Collection Module	Stripe, Inc.
(iii) Items of User's Information to be Provided	Information of credit card (including name), e-mail address
(iv) Means and the Methods of Provision	Sending online with encryption
(v) Purposes of Use by Provider	Payment agency
(vi) Whether or not Provider Intends to Provide Information to Third Parties	Non
(vii) URL or Provider's Privacy Policy	<a href="https://stripe.com/jp/privacy/">https://stripe.com/jp/privacy/</a>

(i) Name of Information Collection Module	SendGrid
(ii) Provider of Information Collection Module	Twilio, Inc.
(iii) Items of User's Information to be Provided	e-mail address
(iv) Means and the Methods of Provision	Sending online
(v) Purposes of Use by Provider	Sending e-mail
(vi) Whether or not Provider Intends to Provide Information to Third Parties	Non

(vii) URL or Provider's Privacy Policy	<a href="https://twilio.com/legal/privacy">https://twilio.com/legal/privacy</a>
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(i) Name of Information Collection Module	Algolia
(ii) Provider of Information Collection Module	Algolia, Inc.
(iii) Items of User's Information to be Provided	Posted data
(iv) Means and the Methods of Provision	Sending online
(v) Purposes of Use by Provider	Full-text search
(vi) Whether or not Provider Intends to Provide Information to Third Parties	Non
(vii) URL or Provider's Privacy Policy	<a href="https://algolia.com/policies/privacy">https://algolia.com/policies/privacy</a>

(i) Name of Information Collection Module	Sentry
(ii) Provider of Information Collection Module	Functional Software, Inc.
(iii) Items of User's Information to be Provided	error reporting
(iv) Means and the Methods of Provision	Sending online
(v) Purposes of Use by Provider	Detecting errors and fixing bugs
(vi) Whether or not Provider Intends to Provide Information to Third Parties	Non
(vii) URL or Provider's Privacy Policy	<a href="https://sentry.io/privacy/">https://sentry.io/privacy/</a>

## **5 Provision of Personal Information to Third Parties**

the Company shall not provide to any third party (including those outside Japan) personal information contained in the User's Information without the prior consent of the user, unless:

(i) The Company authorize such third party to handle the personal information in whole or in part to the extent necessary to accomplish the purpose of the use;

(ii) The personal information is provided through a business transfer by way of merger or other similar transactions;

(iii)The personal information is provided to a provider of an information collection module pursuant to Section 4 hereof;

(iv) The Company is required to cooperate with state or local governmental organizations or their agents to perform their duties or obligations pursuant to applicable laws and regulations, and such performance is likely to be precluded if the consent of the user must be obtained; and

(v) In addition to the foregoing, the Company is entitled to disclose

information pursuant to the Personal Information Protection Act or other applicable laws and regulations.

## **6 Security Control Measure**

The company take following security control measure for personal data (prescribed in Personal Information Protection Act 16-3).

### **(i) establishment of basic policy**

The Company established a basic policy about “compliance with relevant laws, regulation and guideline” and “contact for questions and complaints” in order to ensure the proper handling of personal data.

### **(ii) establishment of discipline in the handling of personal data**

The Company established a basic method in the case of acquiring, using, and storing personal data

### **(iii) organizational security control measures**

A person in charge confirms that personal data is handled in accordance with the established handling procedures.

### **(iv) human security control measures**

The Company provides regular training to its employees on points to be considered in the handling of personal data.

### **(v) physical security control measures**

The Company has taken measures to ensure that personal data cannot be easily accessed by anyone other than employees who are authorized to handle personal data and the individual to whom the data pertains.

### **(vi) technical security control measures**

The Company prevent unauthorized access to personal data by clearly specifying the equipment on which personal data can be handled and the employees who are to handle such equipment.

### **(vii) understanding of the external environment**

The Company store personal data in the U.S. and take security control measures based on our knowledge of the U.S. system for the protection of personal information.

## **6 Disclosure of Personal Information**

Upon request from the user to disclose its retained personal data (prescribed in Personal Information Protection Act 16-4) or third party provision record (prescribed in Personal Information Protection Act 33-5) under the Personal Information Protection Act, the Company shall, without delay, disclose to the user such information after confirming its identity (or notify it of the non-existence of such

personal information), to the extent required to do so pursuant to the Personal Information Protection Act and other applicable laws and regulations.

## **7 Correction and Suspension of Use of Personal Information**

7.1 If the Company is required by the user to (1) correct, add, delete (collectively referred to as "correct") the content of personal information under the provisions of the Personal Information Protection Act because such information is false, or (2) delete or suspend the use of (collectively referred to as "suspend use of") personal information because such information is being handled beyond the scope of the purpose of the use previously made public or has been collected in a fraudulent or otherwise illicit manner or has been used in a manner that may encourage or induce illegal or unjust acts. Then the Company shall, without delay, conduct an appropriate investigation after confirming the requesting party's identity, and based upon the results, correct the content, or suspend the use of such personal information, and notify the party to that effect. The user shall also be notified of any determination, if applicable, not to correct or suspend the use of such information, together with the justification for such determination.

7.2 In the event that the Company is required by the user to suspend the use of its personal information and has determined that it is necessary to accept such request, the Company shall suspend the use of such personal information confirming the requesting party's identity and shall notify the party to that effect.

7.3 Should the Company not be obligated to correct or suspend use of information pursuant to the Personal Information Protection Act and other applicable laws and regulations, the preceding paragraphs shall not apply.

## **8 Inquiries**

Any suggestions, questions, complaints, or other inquiries on the handling of the User's Information must be submitted to:

[Company Name] postalk Inc.

[Name of responsible department] Representative Director Yohei Kawano

[Contact Address] Inquiry form at <https://postalk.app/>

## **9 Procedure to Amend this Privacy Policy**

The Company shall make modifications to this Privacy Policy as

may be necessary. If such modifications require consent from the user pursuant to applicable laws and regulations, The amended policy shall apply only to users who have agreed to the amendment in the manner prescribed by the Company. Any modification to this Privacy Policy shall be notified to user by posting such amended policy on the Company's website or by other appropriate methods.

*This Policy shall be executed in the Japanese language. Japanese shall be the governing language and any translation of this Policy into any other language is for convenience of reference only and shall not be bind the parties hereto.*