

## WEBSITE PRIVACY POLICY

Last modified: February 22, 2021

### Introduction

SPRIX, Ltd. (“*Company*” or “*We*”) respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit our website that conducts TOFAS examination (which is a fundamental skills examination, hereinafter referred to as the “*Exam*”) (<https://tofas.education>) (our “*Website*”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On our Website.
- In email, text, and other electronic messages between you and this Website.

It does not apply to information collected by:

- Use offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from our Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see “Changes to Our Privacy Policy”). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### Children Under the Age of 16

The Children's Online Privacy Protection Act of 1998 and its rules (collectively, “*COPPA*”) require us to inform parents and legal guardians (as used in this section, “*parents*”) about our practices for collecting, using, and disclosing Personal Information (as defined in “Information We Collect About You and How We Collect It”) from children under the age of sixteen (16) (“*children*”). It also requires us to obtain verifiable consent from a child's parent for certain collection, use, and disclosure of the child's Personal Information.

This section notifies parents of:

- The types of information we may collect from children.
- How we use the information we collect.
- Our practices for disclosing that information.

- Our practices for notifying and obtaining parents' consent when we collect personal information from children, including how a parent may revoke consent.
- All operators that collect or maintain information from children through our Website.

This section only applies to children under the age of sixteen (16) and supplements the other provisions of this privacy policy. Only our other provisions of this privacy policy apply to those who are sixteen (16) years of age and older.

Terms that are defined in the general privacy policy have the same meanings as used in this this section.

### ***Information We Collect from Children***

Children can access our Website and its content for the purpose of applying for and taking the Exam in accordance with the “TOFAS Exam Terms of Use” (the “***Exam Terms of Use***”) (<https://tof.as.education/eng/pdf/ExamTermsOfUse.pdf>). However, the Children’s use of our Website requires us to collect certain information, including Personal Information, from them. In addition, we use certain technologies, such as cookies, to automatically collect information from our users (including children) when they visit or use our Website.

We only collect as much information about a child as is reasonably necessary for the child to participate in the Exam, and we do not condition his or her participation on the disclosure of more Personal Information than is reasonably necessary.

### ***Information We Collect Directly***

A child must provide us with the following information to register with our Website: the child's first and last name and age, and the parent’s first and last name and email address. We also require the child to create a member name and password. We may request additional information from your child, but this information is optional. We specify whether information is required or optional when we request it.

### ***Automatic Information Collection***

We use technology to automatically collect information from our users, including children, when they access and navigate through our Website and use certain of its features. The information we collect through these technologies may include:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on our Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We do not combine non-personal information we collect through these technologies with Personal Information about you or your child that we collect online.

For information about our automatic information collection practices, including how you can opt out of certain information collection, see the “Information We Collect Through Automatic Data Collection Technologies” and “Choices About How We Use and Disclose Your Information” sections of this policy.

### ***How We Use Your Child’s Information***

We use the information, which may include Personal Information, that we collect from your child:

- To register him or her to take the Exam.
- To provide study guides, as well as information regarding our services and seminars, related to the Exam.
- To conduct the Exam in a smooth manner and facilitate our business operations.
- To communicate with him or her about the Exam, including the schedule, notices, and results.
- To track and recognize his or her performance and progress in the Exams taken.
- To provide information, products, or services that you or your child requests from us.
- To create, maintain, customize, and secure his or her account with us.
- Perform surveys, and prepare and perform analysis on statistical materials categorized by customer attributes.
- Notify you about changes to our Website or any educational products or services we offer or provide through it.
- For customer service purposes and to respond to inquiries from you or your child.
- For any other purpose with your consent.

We use the information we collect automatically through technology (see “Information We Collect Through Automatic Data Collection Technologies”) and other non-personal information we collect to improve our Website and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about the child's preferences, allowing us to customize the content according to individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

### ***Our Practices for Disclosing Children's Information***

We do not share, sell, rent, or transfer children's Personal Information other than as described in this section.

We may disclose aggregated information about many of our users, which are first converted to statistical information that does not identify any individual or device. In addition, we may disclose children's Personal Information:

- If we are required to do so by law or legal process, such as to comply with any court order or subpoena or to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of SPRIX, Ltd., our customers or others, including to:
  - protect the safety of a child;
  - protect the safety and security of our Website; or
  - enable us to take precautions against liability.
- To law enforcement agencies or for an investigation related to public safety.

In addition, if SPRIX, Ltd. is involved in a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SPRIX, Ltd.'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding or event, we may transfer the Personal Information we have collected or maintain to the buyer or other successor.

#### *Accessing and Correcting Your Child's Personal Information*

At any time, you may review the child's Personal Information maintained by us, require us to correct or delete the Personal Information, and/or refuse to permit us from further collecting or using the child's information.

You can review, change, or delete your child's Personal Information by:

- Logging into your child's account and visiting his or her account profile page.
- Sending us an email at [tofas@sprix.jp](mailto:tofas@sprix.jp). To protect your privacy and security, we may require you to take certain steps or provide additional information to verify your identity before we provide any information or make corrections.

#### *Operators That Collect or Maintain Information from Children*

Other than Company, no other operators collect or maintain personal information from children through our Website. For any inquiries about our privacy practices and use of children's information, please contact us by either:

- Calling us at: +81.3.5927.1687; or
- Emailing us at: [tofas@sprix.jp](mailto:tofas@sprix.jp).

## **Information We Collect About You and How We Collect It**

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name (first name or first initial and last name), full mailing address, e-mail address, telephone number, gender, date of birth, or credit or debit card number that would permit access to an individual's financial account ("***Personal Information***"); and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Indirectly from you. For example, through information we collect from you in the course of providing our products and/or services related to the Exam.
- Automatically as you navigate through our Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, JavaScript, and other tracking technologies.
- From third-parties that interact with us in connection with the products and/or services that we offer to you. For example, third party entities that assist us in sending direct and electronic mail, removing duplicate information from user lists, analyzing data, and providing marketing analysis.

### ***Information You Provide to Us***

The information we collect on or through our Website may include:

- Information that you provide when applying for and taking the Exam on our Website. This includes information provided at the time of registering for the Exam on our Website or requesting further services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Your search queries on the Website.

### ***Information We Collect Through Automatic Data Collection Technologies***

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication

data and the resources that you access and use on the Website.

- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is only statistical data and does not include Personal Information. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

We do not combine non-personal information we collect through these technologies with Personal Information that we collect online.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** Our Website uses cookies to improve your use of our Website. Cookies are files with information that are transmitted from our Website to your computer and kept on your computer's hard drive to collect information from you. The cookies do not collect any private information about you, but may include an anonymous unique identifier that is used to collect aggregate or statistical data. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **JavaScript.** JavaScript is a computer language that enhances the functionality of websites, particularly with respect to pictures. We use it to analyze and improve our Website's functions. You may deactivate JavaScript through your browser settings or activate it the same way. If you disable JavaScript, you will not be able to use some of the functions of our Sites.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any Personal Information:

- To register you in connection with taking the Exam.
- To provide study guides, as well as information regarding our services and seminars, related to the Exam.
- To conduct the Exam in a smooth manner and facilitate business operations.

- To communicate with you about the Exam, including the schedule, notices, and results.
- To track and recognize your performance and progress in the Exams taken.
- To provide you with information, products, or services that you request from us.
- To create, maintain, customize, and secure your account with us.
- To perform surveys, and prepare and perform analysis on statistical materials categorized by customer attributes.
- To notify you about changes to our Website or any educational products or services we offer or provide through it.
- For customer service purposes and to respond to inquiries from you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred.
- For any other purpose with your consent.

### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of SPRIX, Ltd.'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by SPRIX, Ltd. about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.

- With your consent.

We may also disclose your Personal Information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Exam Terms of Use (<https://tofas.education/eng/pdf/ExamTermsOfUse.pdf>) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of SPRIX, Ltd., our customers, or others.

### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly. You may deactivate JavaScript through your browser settings or activate it the same way. If you disable JavaScript, you will not be able to use some of the functions of our Sites.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way; we therefore advise you to review the privacy policies of those third-party sites.

California residents may have additional personal information rights and choices. Please see "Privacy Provisions for California Residents" for more information.

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated email address: [tofas@sprix.jp](mailto:tofas@sprix.jp). However, please know that we do not currently sell data triggering that statute's opt-out requirements.

### **Accessing and Correcting Your Information**

You can review and change your personal information by logging into the Website and visiting your account profile page.

You may also send us an email at [tofas@sprix.jp](mailto:tofas@sprix.jp) to request access to, correct or delete any Personal Information that you have provided to us. We cannot delete your Personal Information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your information from our Website, copies of your information may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of information provided on our Website, is governed by our Exam Terms of Use (<https://tofas.education/eng/pdf/ExamTermsOfUse.pdf>).

California residents may have additional Personal Information rights and choices. Please see "Privacy Provisions



for California Residents” for more information.

### **Privacy Provisions for California Residents**

These Privacy Provisions for California Residents (“*California Provisions*”) supplement, and do not limit in any way, the privacy policy set forth above. These California Provisions apply solely to residents of the State of California (“*CA Users*”). We adopt these California Provisions in compliance with the California Consumer Privacy Act of 2018 (“*CCPA*”). Any terms defined in the CCPA have the same meaning when used in these California Provisions.

### ***Categories of Information We Collect***

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular CA User or device (as used in this context, “*personal information*”). In particular, we have collected the following categories of personal information from CA Users within the last twelve (12) months:

| <b>Category</b>   | <b>Examples</b>   | <b>Collected</b> |
|---|---|------------------|
| A. Identifiers.   | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, telephone number, or other similar identifiers.  | YES              |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | A name, signature, Social Security number, physical characteristics or description, postal address, telephone number, passport number, driver's license or State identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories. | YES              |
| C. Protected classification characteristics under California or federal law.  | Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).  | YES              |
| D. Commercial information.  | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.  | NO               |
| E. Biometric information.   | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.   | NO               |
| F. Internet or other similar network activity.  | Browsing history, search history, information on a CA User's interaction with a website, application or advertisement.  | YES              |
| G. Geolocation data.  | Physical location or movements.   | NO               |
| H. Sensory data.  | Audio, electronic, visual, thermal, olfactory, or similar information.  | NO               |

|   |  |    |
|---|--|----|
| I. Professional or employment-related information.  | Current or past job history or performance evaluations.  | NO |
| J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). | Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records. | NO |
| K. Inferences drawn from other personal information.  | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.  | NO |

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated CA User information.
- Information excluded from the CCPA's scope, such as:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources (with the specific categories of personal information indicated in parenthesis):

- Directly from our CA Users, such as when our CA Users register for the Exam. (Categories A, B and C)
- Indirectly from our CA Users. For example, through information we collect from our CA Users in the course of providing our products and/or services related to the Exam. (Categories A, B, C and F)
- Directly and indirectly from activity on the Website. This includes information about your computer and internet connection, including your IP address, operating system, and browser type. In addition, we obtain certain Website usage details and analytics as same are collected automatically by us. (Category F)
- From third-parties that interact with us in connection with the products and/or services that we offer to our CA Users. For example, third party entities that assist us in sending direct and electronic mail, removing duplicate information from CA User lists, analyzing data and providing marketing analysis. (Categories A, B, C and F)

### ***Use of Personal Information***

We may use or disclose the personal information that we collect (including: (a) name; (b) e-mail address; (c) telephone number; (d) full mailing address; (e) gender; and/or (f) date of birth) for one or more of the following business purposes (with the specific categories of personal information indicated in parenthesis):

- To register you in connection with taking the Exam. (Categories A, B, C, and F)

- To provide study guides, as well as information regarding our services and seminars, related to the Exam. (Categories A, B, C, and F)
- To conduct the Exam in a smooth manner and facilitate business operations. (Categories A, B, C, and F)
- To communicate with you about the Exam, including the schedule, notices, and results. (Categories A, B, C, and F)
- To track and recognize your performance and progress in the Exam. (Categories A, B, C, and F)
- To provide you with information, products or services that you request from us. (Categories A, B, C, and F)
- To create, maintain, customize and secure your account with us. (Categories A, B, C, and F)
- To provide you with e-mail, direct mail, and other form of messaging concerning our products and/or services related to the Exam that we believe may be of interest to you. (Categories A, B, C, and F)
- To perform surveys, and prepare and perform analysis on statistical materials categorized by customer attributes. (Categories A, B, C, and F)
- To notify you about changes to our Website or any educational products or services we offer or provide through it. (Categories A, B, C, and F)
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including the Site's Terms and Conditions. (Categories A, B, C, and F)
- For customer service purposes and to respond to inquiries from you. (Categories A, B and C)
- As necessary or appropriate to protect our rights, property or safety, and that of our clients or others. (Categories A, B, C, and F)
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations. (Categories A, B, C, and F)
- As described to you when collecting your personal information or as otherwise set forth in the CCPA. (Categories A, B, C, and F)
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us is among the assets transferred. (Categories A, B, C, and F)

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you with notice.

### ***Sharing Personal Information***

We may share your personal information by disclosing it to a third party for a business purpose.

When we disclose personal information to a third-party service provider or other entity, we enter into a contractual relationship that describes the purpose for which such third party may use the personal information and requires that third party to both keep the personal information confidential and not use it for any purpose other than the performance of its services under the applicable contract. We do not share personal information

concerning children who are less than sixteen (16) years of age to any third parties (see “Children Under the Age of 16”).

In the preceding twelve (12) months, we have disclosed the following categories of personal information (including: (a) name; (b) e-mail address; (c) telephone number; (d) full mailing address; (e) gender; and/or (f) date of birth) for a business purpose:

|            |   |
|------------|---|
| Category A | Identifiers.  |
| Category B | California Customer Records personal information categories.              |
| Category C | Protected classification characteristics under California or federal law. |
| Category F | Internet or other similar network activity.                               |

We disclose your personal information for a business purpose to the following categories of third parties (with the specific categories of personal information indicated in parenthesis):

- Our subsidiaries and affiliates. (Categories A, B, C, and F)
- Service providers. (Categories A, B, C, and F)

### ***Your Rights and Choices***

The CCPA provides CA Users with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

#### *Opt-Out from the Sale of Your Personal Information*

You have the right to opt out of our sale of your personal information to third parties. To exercise your right to opt out of our sale of your personal information to third parties, please submit a verifiable CA User request to us as provided in “Contact Information” at the end of this policy. However, please know that we do not currently sell data triggering the statute’s opt-out requirements.

#### *Access to Specific Information and Data Portability Rights*

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable CA User request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we have shared that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable CA User request, we will delete (and direct our service providers to delete) your personal information from our (their) records, unless an exception applies; *provided, however*, that in some cases, strictly for regulatory compliance purposes and to better evidence/honor opt-out/unsubscribe requests (and for no other purposes), we may retain certain items of your personal information on a de-identified and aggregated basis in such a manner that the data no longer identifies you.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our obligations in connection with our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech rights, ensure the right of another CA User to exercise her/his free speech rights or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, but only if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with CA User expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### Exercising Access, Data Portability and Deletion Rights

To exercise your access, data portability, and/or deletion rights described above, please submit a verifiable CA User request to us by either:

- Calling us at: +81.3.5927.1687; or
- Emailing us at: tofas@sprix.jp.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable CA User request related to your personal information. You may also make a request to know or delete on behalf of your child as described in “Children Under the Age of 16”.

You may only make a verifiable CA User request for access or data portability twice within a 12-month period. The verifiable CA User request must:

- Provide sufficient information that allows us to reasonably verify that you are: (1) the person about whom we collected personal information; or (2) an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that the personal information relates to you. Making a verifiable CA User request does not require that you create an account with us. We will only use personal information provided in a verifiable CA User request to verify the requestor's identity or authority to make the request.

#### Response Timing and Format

We endeavor to respond to all verifiable CA User requests within forty-five (45) days of the receipt thereof. If we require more time (up to ninety (90) days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures that we provide will only cover the twelve (12) month period preceding the receipt of your verifiable request. The response that we provide will also explain the reasons that we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable CA User request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; and/or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

#### **Data Security**

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure, including through encryption and password-protection. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' Personal Information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

## **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, register a complaint or concern, or need to access this policy in an alternative format due to having a disability, please contact us by either:

- Calling us at: +81.3.5927.1687; or
- Emailing us at: tofas@sprix.jp.