

Privacy Policy for Pay ID

BASE, Inc. (hereinafter referred to as “the Company”) recognizes the importance of protecting the personal information of customers and complies with the Act on the Protection of Personal Information (hereinafter referred to as the “Personal Information Protection Law”). In accordance with the following privacy policy (hereinafter referred to as “this Privacy Policy ”), the Company will endeavor to handle and protect it appropriately.

1. Definition of Personal Information

In this Privacy Policy, personal information means personal information defined by Article 2, Paragraph 1 of the Personal Information Protection Law, that is, information about living individuals, including name, date of birth and other information contained in the information. A person who can identify a specific individual by description (including those that can be easily compared with other information, thereby identifying a specific individual), or a personal identification code Means information that contains.

2. Purpose of use of personal information

The Company uses your personal information for the following purposes:

- (1) To provide products and services (hereinafter collectively referred to as “the Service”) of the Company and its affiliates (as defined in Paragraph 8 Item 1 of this Privacy Policy).
- (2) To provide information and respond to inquiries, etc. regarding the Service (including where it is necessary for promotional activities or for distribution of advertisements through advertisement distribution companies as described in Paragraph 7 of this Privacy Policy and measurement of its effectthe Service)
- (3) To respond to acts that violate the terms and policies of the Company and its affiliates related to the Company's services (hereinafter referred to as “Terms”).
- (4) To notify you of changes to the terms and conditions of the Service
- (5) To help improve the Service and develop new services for our company and our affiliates
- (6) To create statistical data processed in a format that cannot be individually identified in relation to the Service
- (7) To prevent any fraudulent use of the Service and to respond to the occurrence of any fraudulent use
- (8) For other purposes associated with the above purpose of use

3. Change of personal information usage purpose

The Company may change the purpose of use of personal information within a range that is reasonably recognized to be relevant, and will notify or announce to the customer in the event of a change.

4. Restrictions on the use of personal information

The Company will not handle personal information beyond the scope necessary to achieve the purpose of use without obtaining customer consent, except as permitted by the Personal Information Protection Law and other laws.

5. Appropriate acquisition of personal information

The Company will acquire personal information appropriately and will not acquire it by deception or other illegal means.

6. Safe management of personal information

The Company will provide necessary and appropriate supervision to the Company’s

employees so that personal information can be safely managed against risks such as loss, destruction, falsification, and leakage of personal information. Please contact the Inquiry Desk for information on the Safety Management Measures we take. In addition, when entrusting all or part of the handling of personal information, the Company will provide necessary and appropriate supervision so that the personal information can be managed safely at the outsourcer.

The Company may store personal information on the servers managed by a business operator in a third country (U.S.). To ensure that personal information is securely managed by a business operator in the third country, the Company intends to gather information on the regimes of the protection of personal information in the third country and to strictly manage the personal information including limiting access authorities to the servers.

7. Provision to A third party

The Company does not provide personal information to third parties without prior consent from customers, except when disclosure is permitted under the Personal Information Protection Law and other laws. However, the following cases do not fall under the provision to the third party specified above.

- (1) When the Company provides personal information as a result of entrusting all or part of the handling of personal information within the scope necessary to achieve the purpose of use
- (2) When personal information is provided in connection with business succession due to a merger or other reasons
- (3) When jointly used in accordance with the provisions of the Personal Information Protection Law

8. Shared use of personal information

(1) The Company shares personal information with the Company's affiliates. The current affiliates are listed below.

PAY Corporation

(2) Information used jointly is personal information obtained from customers by the Company, such as name, address, telephone number, email address, age, gender, product purchase / sales history, etc.

(3) The purpose of shared use is the same as the purpose of use described in Section 2.

(4) The person responsible for managing personal information to be shared is BASE Co., Ltd (Sumitomo Real Estate Roppongi Grand Tower 37F, 3-2-1 Roppongi, Minato-ku, Tokyo: CEO Yuta Tsuruoka).

9. Use of Information Related to Personal Information, etc.

The Company may (i) acquire personal information or information related to personal information such as identifiers related to customers (including but not limited to Cookie, ADID/IDFA, IP addresses, MAC addresses, SSID, RDID), telephone numbers, email addresses, browsing histories, location information, behavior histories (e.g., web beacons) and preferences from third parties such as DMP businesses and other advertising companies, affiliate service providers, data analysis providers, unauthorized use detection service providers and various other service providers, and (ii) use it after linking it with the personal information of customers the Company already possesses.

10. Disclosure of personal information

When the customer requests disclosure of personal information based on the provisions of the Personal Information Protection Law (including records related to the provision to third parties), the Company will disclose to the customer without delay after confirming that the

request is from the customer. (If the relevant personal information does not exist, the Company will notify you.) However, this does not apply if the Company is not obligated to disclose it under the Personal Information Protection Law or other laws.

11. Correction of personal information

If the customer requests correction, addition or deletion of content (hereinafter referred to as "correction") based on the provisions of the Personal Information Protection Law because the personal information is not true, after confirming that it is a request from the customer himself / herself, within the scope necessary to achieve the purpose of use, the Company will conduct necessary investigations without delay, and based on the results, the Company will correct the contents of personal information, The Company will notify you (if you decide not to make corrections, the Company will notify you). However, this shall not apply if the Company is not obliged to make corrections under the Personal Information Protection Law or other laws.

12. Suspension of use of personal information

If the Company is requested by a customer to suspend the use of or delete the customer's personal information or to cease to provide it with a third party (hereinafter referred to as "use cessation, etc.") pursuant to the provisions of the Personal Information Protection Act due to reasons such as those that the Company handles the customer's personal information beyond the scope of the purpose of use that has been publicly disclosed, the Company handles the customer's personal information in a way that there is a possibility of promoting or inducing unlawful or unjust act, the Company obtained the customer's personal information by false or other illegal means, the Company no longer needs to use the customer's personal information, or there is a leakage, etc. of customer's personal information or otherwise there is a situation where handling of customer's personal information by the Company is likely to harm the customer's rights and interest, after confirming that it is a request from the principal of the personal information, the Company will conduct use cessation, etc. without delay and notify the customer to that effect.

However, this shall not apply to cases where the Company is not obligated to suspend use due to the Personal Information Protection Act or other laws.

13. Use of cookies and other technologies and information transmission order communications

(1) The Service may use cookies and similar technologies. These technologies help us understand the usage status of the Service and contribute to improving the Service. Users who want to disable cookies can disable cookies by changing their web browser settings. However, if you disable cookies, you may not be able to use some functions of the Service.

(2) The Company may transmit information about you to outside service providers on our website and services (hereinafter referred to as "Information Transmission Order Communications").

(3) For more information on the use of cookies and similar technologies, as well as on information transmission order communications, please click [here](#).

14. Contact Us

If you have any requests regarding disclosure, comments, questions, complaints, or other inquiries regarding the handling of personal information, please contact the following contact.

Sumitomo Real Estate Roppongi Grand Tower 37F,
3-2 Roppongi, Minato-ku, Tokyo 106-6237
BASE, Inc.

CEO Yuta Tsuruoka

TEL 03-6416-5450

E-mail: hi [at] binc.jp (BASE, Inc. : Person in charge of Personal Information Protection)

(Reception hours are from 10:00 to 18:00 on weekdays.)

15. Continuous improvement

The Company shall review the operational status regarding the handling of personal information from time to time and strive for continuous improvement and may change this Privacy Policy as necessary.

【Established on September 24, 2024】