

Privacy Policy

1. Purpose of Protection of Personal Information

TPO, Inc. (the “**Company**”) recognizes the importance of the “personal information” of customers, business partners, related parties and the Company’s employees in the field of corporate concierge service planning and provision business which is the Company’s main business.

The Company has set forth the following privacy policy for appropriate handling of personal information and strives to achieve the protection of personal information.

2. Acquisition of Personal Information

The Company acquires personal information only within the scope necessary to achieve the purposes of use thereof. Moreover, the Company always acquires personal information by using legitimate and fair means.

3. Use of Personal Information

The Company appropriately manages any personal information that it has acquired and does not handle (i.e., using, providing, etc.) the same beyond the scope necessary to achieve the purposes of use thereof.

4. Proper Management of Personal Information

To ensure the accuracy and safety of personal information, the Company implements safety measures such as security measures, and makes sure to prevent any divulgence, loss, damage, etc. of the personal information. In addition, if it becomes necessary to improve the foregoing due to actual cases of security-related incidents in the market or requests from customers, etc., the Company promptly corrects the same and strives to achieve prevention.

5. Compliance with Laws and Regulations

The Company complies with and ensures at all times that its management system is consistent with the laws and regulations, guidelines set forth by the government and other standards in relation to personal information.

6. Continuous Improvement

The Company will continuously improve its management system and maintain the same in the best condition at all times through the opportunities provided by internal audits and reviews of the personal information protection management system.

7. Handling of Complaints and Consultations

The Company has established an appropriate system for complaints and consultations concerning personal information and will handle the same in accordance with the instruction manuals therefor.

Contact Information for Inquiries about this Policy

Person Responsible for Personal Information Management: Ayano Yamazaki

E-mail: info@tpo.me

TPO, Inc.
Mariko Magnan, CEO
Established on April 1, 2019

Purposes of Use of Personal Information

The Personal Information shall be handled at the Company as follows:

1. Personal Information Acquired in Writing Directly from Principal (Personal Information subject to Disclosure to a principal)
 - (1) Customer contact person information
To make contact with the customer's contact person
 - (2) Service user information acquired on the member registration screen
To provide concierge services and other services of the Company
 - (3) Job applicant information
 - (i) To accept applications for employment screening;
 - (ii) To make contact with job applicants (notifying screening results, sending recruitment related documents, etc.); or
 - (iii) To conduct recruitment screening
 - (4) Employee information
 - (i) Personnel management (personnel transfer, evaluation on salary increase and promotion, employee education)
 - (ii) Labor and payroll management (attendance/absence management, salary and bonus payment, withholdings and year-end adjustments)
 - (iii) Employee benefits (management for joining and maintaining employment insurance, health insurance, employee's pension insurance and property accumulation savings)
 - (iv) Health management (conducting periodic health checkups, storing and managing the results thereof, handling long-term absentees)
 - (v) Safety management (theft prevention through entry and exit records)
 - (vi) Sales and public relations (for sales activities and public relations activities such as recruitment)
 - (5) Inquirer information
To provide inquirers with information on the Company's products and services and handle inquiries from inquirers regarding service improvement, etc.
2. Personal Information Acquired Other Than in Writing Directly from Principal
 - (1) Job applicant information acquired from job application websites, etc.
To conduct employment screening for job applicants
 - (2) Personal information held by entrustee which is provided by such entrustee
To perform entrusted business

Safety Control Measures

Our company takes necessary and appropriate measures to prevent leakage, loss, or damage of personal information handled by us, and to otherwise manage personal information safely as described below.

Item	Specific safety measures
Formulation of basic policy	To ensure the proper handling of personal data, we have established a basic policy regarding "compliance with related laws and guidelines," "contact point for questions and complaints," etc.
Discipline for the handling of personal data	Establish rules for handling personal data at each stage of acquisition, use, storage, provision, deletion/disposal, etc., including handling methods, responsible persons/persons in charge, and their duties.
Safety management measures for the organization	<ul style="list-style-type: none">● Establish a person responsible for the handling of personal data, clarify the employees who handle personal data and the scope of personal data handled by such employees, and establish a system for reporting to the person responsible in the event that a fact or indication of a violation of the law or handling rules is detected.● Conduct periodic self-inspections of the status of personal data handling, as well as audits by other departments and outside parties.
Human security management measures	<ul style="list-style-type: none">● Provide periodic training to employees on matters to be considered in handling personal data.● Include confidentiality matters regarding personal data in employment regulations
Physical security management measures	<ul style="list-style-type: none">● In areas where personal data is handled, control employee access to rooms and limit the equipment they bring in, and implement measures to prevent unauthorized persons from viewing personal data.● Take measures to prevent theft or loss of equipment, electronic media, and documents that handle personal data, and implement measures to ensure that personal data is not easily revealed when such equipment, electronic media, etc. are carried, including within the business site.
Technical security management measures	<ul style="list-style-type: none">● Access control is implemented to limit the scope of persons in charge and personal information databases handled.● Our company have implemented mechanisms to protect the information systems that handle personal data from unauthorized external access or unauthorized software.
Understanding the external environment	<ul style="list-style-type: none">● Implement safety management measures in relation to system operation and maintenance, based on an understanding of the system for the protection of personal information in Vietnam, where personal data is handled.● In the case of outsourcing translation and consultation research services to subcontractors residing in the U.S. and Australia, we implement safety management measures based on our understanding of the system for protecting personal information in the U.S. and Australia, where personal data is handled.

Handling Cookies and Other Technologies

Our services may use cookies and similar technologies. Users who wish to disable cookies may do so by changing the settings on their web browsers. However, if you disable cookies, you may not be able to use certain functions of our services.

We also use Google Analytics and receive analysis results from Google to understand how our customers visit our services.

You can disable Google Analytics at any time by clicking on the "Disable Google Analytics" link. Download the "Google Analytics Opt-Out Add-on" from the Google Opt-Out Add-on download page

(<https://support.google.com/analytics/answer/181881?hl=en>). You can do this by installing the add-on and changing the add-on settings in your browser.

Handling of Personally-Related Information

When a third party is expected to acquire personally identifiable information as personal data, we will not provide such personally identifiable information to such third party without confirmation in accordance with the Act on the Protection of Personal Information and other applicable laws and regulations, except as permitted by the Act on the Protection of Personal Information and other applicable laws and regulations.

Handling of Retained Personal Data

Any request made by a principal to notify such principal of the purposes of use of, to disclose, to correct, add or delete the content of, to discontinue the use of, to erase, or to discontinue the provision to a third party of, the Company's retained personal data (collectively, "**Disclosure, Etc.**") shall be handled as specified in Items 1 through 7 below:

1. Contact Information for Disclosure, Complaint and Consultation Concerning Handling of Personal Information TPO, Inc.

Person Responsible for Personal Information Management: Ayano Yamazaki

Email: info@tpo.me

2. Purposes of Use of Retained Personal Data

As specified in Item 1 of "Purposes of Use of Personal Information"

3. Procedures for Disclosure, Etc.

Please make contact as set forth in Item 1 above.

The Company will take procedures for a request for Disclosure, Etc. of your personal information by using either one of the following methods:

- (i) Procedures via Postal Mail

As the Company will send a "Personal Information Disclosure Request Form (for Application by Principal)" to the principal, please send a postal mail together with a copy of an identity verification

document for the principal. The Company will accommodate a request for Disclosure, Etc. upon verifying the principal's identity.

In the case of an agent, please send an identity verification document for the agent (*2) to the Company via postal mail.

(In the case of using postal mail, please black out the section in which the legal domicile is stated.)

(ii) Procedures when Directly Visiting the Company

Please bring a document that can verify the identity of the principal (*1). Upon verifying the identity of the principal, the principal is required to fill in a "Personal Information Disclosure Request Form (for Application by Principal)"; then the Company will accommodate a request for Disclosure, Etc.

In the case of an agent, please bring an identity verification document for the agent (*2).

*1 [Document that can verify the identity of the principal]

In principle, any one of the following documents that contains a photo:

Driver's license, passport, health insurance card, etc.

*2 [Identity verification document for the agent]

a. In the case of a statutory agent of a minor or adult ward

1) Document that can verify the identity of the agent himself/herself (*1)

2) One (1) copy of a family register of the principal himself/herself (in the case of a minor); or one (1) copy of a Certificate of Registered Matters as set forth in Article 10 of the Act on Guardianship Registration, etc. (in the case of an adult ward)

b. In the case of an agent by delegation

1) Document that can verify the identity of the agent himself/herself (*1)

2) Power of attorney bearing the principal's seal (original)

4. Method of Disclosure, Etc.

Disclosure, Etc. shall be made in writing. However, the information shall be disclosed in the manner requested by the individual, except as otherwise provided by the Act on the Protection of Personal Information.

5. Notice Concerning Results of Handling a Request for Disclosure, Etc.

The Company will provide a written notice on the content handled by the Company in response to a request for Disclosure, Etc. However, the information shall be disclosed in the manner requested by the individual, except as otherwise provided by the Act on the Protection of Personal Information.

6. Reason for Non-Disclosure

The Company may choose not to accommodate a request for Disclosure, Etc. if any of (i) through (iii) below are applicable. Further, the Company may choose not to accommodate any request for notification of purposes of use if any of (iv) through (vii) below are applicable. When the Company rejects such request, it shall provide written notification of such rejection and the reasons therefor.

(i) The name or address stated in the "Personal Information Disclosure Request Form (for Application by Principal)" is inconsistent with the name or address stated in the identity verification document;

(ii) The agent's name or address stated in the "Personal Information Disclosure Request Form (for Application by Principal)" is inconsistent with the name or address stated in the identity verification document;

- (iii) Information requested under a request for Disclosure, Etc. does not fall under the types of personal information subject to disclosure;
- (iv) If the presence or absence of any personal information requested under a request for Disclosure, Etc. is made known, it may cause harm to the principal's or a third party's life, limb or property;
- (v) If the presence or absence of any personal information requested under a request for Disclosure, Etc. is made known, it may encourage or induce an illegal or unjust act;
- (vi) If the presence or absence of any personal information requested under a request for Disclosure, Etc. is made known, it may undermine national security, destroy a relationship of trust with a foreign country or international organization, or cause a disadvantage to be suffered in negotiations with a foreign country or international organization; or
- (vii) If the presence or absence of any personal information requested under a request for Disclosure, Etc. is made known, it may hinder the maintenance of public safety and order, such as the prevention, suppression or investigation of a crime.

7. No handling fees will be charged.

8. The Accredited Personal Information Protection Organization and Where to Resolve a Complaint.

Japan Users Association of Information Systems (JUAS)

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