

Privacy Policy

1. Purpose of Protection of Personal Information

TPO Co., Ltd. (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 Co., Ltd.

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

(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 trustee which is provided by such trustee

To perform entrusted business

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 Co., Ltd.

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.

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.

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.