

Privacy Policy

The Company offers business operators total services of payment that can be safely and conveniently processed at convenience stores or by other ways such as credit card, electronic money, or Pay-easy. The business purposes of the Company are to construct a payment infrastructure in Japan that achieves customer satisfaction and to contribute to society as a creator of additional values related to credit-card payment. The Company views the protection of personal information as the top priority issue, and recognizes that the safe and appropriate handling of personal data is one of its significant social responsibilities.

Thus, the Company hereby announces its privacy policy within and outside the Company, and pledges to manage personal data appropriately through the provisions of education on the importance of personal information(※) to employees and assignment of managers who protect personal information at relevant organizations.

In addition to personal information protection, the Company appropriately handles specific personal information. Unless otherwise specifically noted, personal information does not include specific personal information(※).

1. The Company collects personal information and the specific personal information and uses the personal information to the extent necessary to achieve the purposes specified. The collected personal information will not be disclosed to third parties without consent, except for cases allowed by law. The Company continuously takes necessary measures to prevent personal information from being used for purposes other than the original intent.
2. The Company abides by the Japanese laws, guidelines, and other rules related to specific personal information and personal information, including the Act on the Protection of Personal information, the Act on the Use of Numbers to Identify a Specific Individual in the Administrative Procedure, the Guideline for the Use of Specific Personal Information, and the Act on the Protection of Personal Information.
3. To prevent any leak, loss, or damage of personal information, the Company takes reasonable and appropriate safety measures through the provisions of internal rules and systems of responsibility. In addition, the safety measures

are examined on a periodic basis and updated if any problem is found. The Company continuously takes necessary measures to prevent personal information from being used for purposes other than the original intent. In addition, the Company appropriately handles specific personal information.

4. Claims or inquiries for specific personal information and personal information and the Company's personal information management systems from customers are immediately handled by administrators of the office shown below.
5. The Company strives to continually improve its privacy policy by establishing personal information protection management systems and providing continued training to relevant parties including the Company's executives.
6. As a result of changes in the business of the Company or the law, this policy may be modified without prior notice.

Claim and Inquiry Handling/Privacy Policy Inquiry Office

GMO Payment Gateway, Inc.
Personal Information Inquiry Contact
privacy@gmo-pg.com

Instituted on October 1, 2002

Revised on Jan 27, 2016

GMO Payment Gateway, Inc.
President Issei Ainoura

- "Personal information"
"Personal Information" means the information that can identify a specific individual, such as the name, the date of birth and/or any other descriptions (including information that can be easily collated with other information so that a specific individual can be identified).
- "Specific Personal Information"
Personal information including the individual number
- "Individual Number"
A 12-digit identification number notified by each municipality
- "Personal information protection management systems" mean a set of frameworks for the protection of personal information, such as formulation of the policy, maintenance of the systems, planning, implementing, inspections, and reviews.

The handling of personal/specific personal information

GMO Payment Gateway, Inc. (hereafter the "Company") handles personal information and the specific personal information provided by relevant parties based on the following provisions. The relevant parties referred to here are: Unless otherwise specifically noted, personal information does not include specific personal information.

- Business operators who use or wish/plan to use the Company's services (hereafter referred to as "affiliates")
- Those who use the Company's services via an affiliate to make payment at a convenience store or by other ways such as credit card, electronic money, or Pay-easy
- Business partners who establish or wish/plan to establish a partnership with the Company to offer the services (hereafter referred to as "affiliate partners")
- Those who wish to receive the Company's IR information (hereafter referred to as "investors")
- Those who wish to work for the Company (hereafter referred to as "job applicants")

1. Personal information and the specific personal information protection administrator

The Company assigned the following person as a personal information protection administrator in order to properly manage the personal information held by the Company.

Personal Information Protection Administrator	System Department General Manager
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2. Usage purposes of personal information

With exception of cases requested by the law, the Company uses personal information within the scope below:

i. Usage purposes of the personal information obtained by means other than in writing direct consent

【Personal information of representatives obtained from affiliates】

- To conduct an application procedure for the services and conclude an agreement
- To respond to inquiries about and document requests for the services
- To issue and mail documents relevant to the services such as usage details, bills, and payment notes
- To send a notification when the services are changed, stopped, or canceled
- For the purpose of sending news such as questionnaires or campaigns
- To answer inquiries or share information about services offered by affiliate partners
- For the purpose of other tasks relating to provision of the above services

【Personal information of consumers obtained from affiliates for provision of contract services】

- For the purpose of credit-card or other payment procedures to provide services commissioned by affiliates
- To respond to inquiries about payment from consumers
- For the purpose of other tasks relating to provision of the above services

【Personal information of representatives obtained from affiliate partners】

- To conclude a business alliance agreement
- To answer inquiries from affiliates
- For the purpose of other tasks relating to provision of the above services

ii. Usage purposes of the personal information obtained in writing direct consent

【Information from users】

- To conduct an application procedure for the services and conclude an agreement
- For the purpose of providing and performing the services
- To respond to inquiries about and document requests for the services
- For the purpose of contacting users to provide and maintain the services
- To send a notification when the services are changed, stopped, or canceled
- For the purpose of customer management to operate the services smoothly
- For the purpose of analysis to improve the services

- To solve issues relevant to the services
- To store information relating to provision of the services including progresses
- For the purpose of other tasks relating to provision of the above services

iii. Usage purposes of personal information subject to disclosure

【Personal information obtained from investors】

- To respond to inquiries about IR information
- For the purpose of sending IR information news
- For the purpose of other tasks relating to provision of the above services

【Personal information obtained from job applicants】

- To inform job applicants of details of recruitment information, interviews, and company information session
- For the purpose of other tasks relating to provision of the above services

【Personal information obtained from employees】

- For the purpose of employee welfare benefits

3. Usage purpose of the specific personal information

With exception of cases requested by the law, the Company uses personal information within the scope below:

i. Usage purposes of the specific personal information obtained in writing direct consent

【Specific personal information obtained from stockholders】

- To create a notification about dividends and surplus funds
- For the purpose of other tasks relating to provision of the above services

4. For claims or inquiries about personal information and the specific personal information

Contact

Please submit any claims or other inquiries for disclosure in regard to personal information and the specific personal information to the point of contact below.

Name	GMO Payment Gateway, Inc. "Personal Information Inquiry Contact"
Address	Humax Shibuya Bldg.7F 1-14-6, Dogenzaka, Shibuya-ku, Tokyo, 150-0043, Japan
E-mail	privacy@gmo-pg.com

Authorized Personal Information Protection Organization

Name	Japan Institute for Promotion of Digital Economy and Community
Office	Personal Information Protection Consultation Service Office
Address	Roppongi First Building, 1-9-9 Roppongi, Minato-ku, Tokyo, 106-0032, Japan
Phone Number	03-5860-7565