

Personal Information Protection Policy (Privacy Policy)

TSUHO Support Center Co., Ltd.
Representative Director, Shiho Maeda

We, TSUHO Support Center Co., Ltd., conduct our business activities mainly on receiving reports from overseas (the “Service”). Our executives and employees shall strictly protect the personal information we obtain in the course of our work. For this purpose, we hereby formulate this personal information protection policy (this “Policy”) as follows. All of our executives and employees will comply with the Act on the Protection of Personal Information (the “APPI”) in Japan, the General Data Protection Regulation of the EU (the “GDPR”) and other laws and regulations applicable to us, as well as other internal regulations. We will also continuously review and improve our management system for the protection of personal information.

1. Introduction

This Policy applies to all personal data obtained in connection with the Services, regardless of country or region.

2. Personal data that we collect and the purpose of processing personal data

(1) Data on the organizations and persons in charge of our business partners

We collect the following data for the purpose of promoting our business, managing our contractual relationships and providing information on seminars.

- Name
- Department
- Position
- Email address
- Telephone number
- Information on the company or organization (name of the company or organization, address, telephone number, etc.)
- Other data we collect for the purpose of promoting our operations, managing contractual relationships, and providing information on seminars.

(2) Data obtained in the course of executing business entrusted by business partners and organizations

We collect the following data for the purpose of fulfilling the duties entrusted by our business partners and organizations.

- Company code
- Name of company
- Country/Area where the company is located
- Name of whistleblower's department
- Name of whistleblower
- Email address of whistleblower
- Other data acquired by us for carrying out business entrusted by other business partners and organizations

(3) Data on inquiries

We collect the following data for the purpose of contacting individuals and responding to inquiries.

- Name
- Name of company or organization
- Contact information (email address, phone number, etc.)
- Contents of inquiries
- Other data we obtain in order to respond to inquiries

3. Legal basis for the processing of personal data

We will process your personal data based on your consent to this Policy when using this Service; provided, however, that we may, when necessary, process your personal data to the extent permitted by applicable laws and regulations, based on legitimate interests and other legal grounds except for your consent, such as the promotion of our business and the management of our contractual relationship, in order to achieve the purposes set forth in paragraph 2 above.

4. Disclosure and provision of your data

We may disclose to or provide the following persons with your personal data to the extent necessary to achieve the purposes set forth in paragraph 2 above.

- Our group companies
- Competent authorities as defined by applicable laws and regulations (including the courts and other public authorities that have jurisdiction over us or our group companies)

- Any other third party that may reasonably require access to your personal data in connection with the foregoing purposes

We may disclose or provide your personal data to third parties that provide services to us (such as providers of cloud services that process and store data on our services). We will provide necessary and appropriate supervision over such third parties.

We will not disclose or provide your personal data to any third party except in the above cases or in the following cases where:

- we obtain your consent
- the handling of personal information is based on laws and regulations
- the handling of personal information is necessary for the protection of the life, body or property of an individual and it is difficult to obtain the consent of the person
- the handling of personal information is especially necessary for improving public health or promoting the sound growth of children and it is difficult to obtain the consent of the person
- the handling of personal information is necessary for cooperating with a state organ, a local government, or an individual or a business operator entrusted by either of the former two in executing the affairs prescribed by laws and regulations, and obtaining the consent of the person is likely to impede the execution of the affairs concerned

5. Transfer of personal data abroad

Your personal data may be transferred to and stored or otherwise processed in a country or region other than your location (including, without limitation, Japan). However, please be aware that data protection at the same level as your location may not be provided under the laws and regulations of such country or region. In that case, we will comply with our legal obligations and take appropriate protective measures to protect your personal data.

When the GDPR is applied to the processing of your data, we transfer your personal data from the European Economic Area (the “**EEA**”) to outside the EEA only if such country or region outside the EEA receives an adequacy decision under the GDPR.

6. Holding period

We retain personal data for the period required to achieve the purposes stated in paragraph 2 above. However, we will retain your personal data for more than the period specified above if required in accordance with applicable laws and regulations.

7. Security

We take necessary and appropriate safety management measures to prevent leakage, loss, damage and other problems involving personal data. We also take appropriate technical and organizational measures to protect and ensure personal data in order to prevent unauthorized access or unauthorized disclosure. For details of our safety management measures, please make contact as described in “**12. Contact information**” below.

8. Your Rights

You have various rights to your personal data to the extent permitted by applicable laws.

Specifically, you may have the right to request to access your personal data (disclosure of personal data and disclosure of records provided to third parties), copy your personal data, correct, add or delete the contents of your personal data, restrict certain processing of your personal data, or express objections thereto. In addition, you may have the right to data portability.

If personal data is processed with your consent, you may have the right to withdraw your consent. Withdrawal of this consent will not affect the prior processing of personal data that you have already agreed to.

To exercise your rights with respect to personal data, please contact us as described in “**12. Contact information**” below.

9. Filing of Complaints

If you believe that we have handled your personal data illegally without complying with your request, you have the right to file a complaint with the relevant Data Protection Agency, to the extent permitted by applicable law.

10. Obligation to provide personal data

Except for the information listed in paragraph 2 (1) above, the provision of personal data by you upon the use of the Services is not required by law or in the contract between us and the company using the Services. However, if the personal data necessary for using the Services is not provided, you may not be able to use all or part of the Services.

11. Changes to this Policy.

We may revise this Policy from time to time in the future. When this Policy is revised, we will post such change on our website.

TSUHO Support Center Co., Ltd.

12. Contact information

If you have any questions or opinions regarding this Policy, please contact our contact person as follows.

TSUHO Support Center Co., Ltd.

Address: 7F 5-8-14, Hiroo, Shibuya-ku, Tokyo, Japan

Email address: respect@whistle.jp

The contact information for our representatives in the EEA region is as follows.

TSUHO Support Center EU SARL

Address: 43, rue de Liège 75008 Paris, France

Email address: respect@whistle-eu.com

The contact information for our data protection manager is as follows.

Email address: kojinjoho@whistle.jp

Enacted on December 01, 2024