

NPO Kidsdoor Privacy Policy

NPO Kidsdoor (hereinafter referred to as "Kidsdoor", establishes the following Privacy Policy (hereinafter referred to as "this policy") regarding the handling of user information, including personal information of users (hereinafter referred to as "user information"), of users, donors, and other stakeholders (hereinafter collectively referred to as "users"), who use the website operated by Kidsdoor, participate in its activities, and use other services provided by Kidsdoor (hereinafter collectively referred to as "the Services"). However, for businesses or services that have separately established Privacy Policies or other Personal Information Protection Policies, those shall be followed.

1 User information to be collected and method of collection

In implementing the Services, Kidsdoor will collect the following user information depending on the method of collection:

(1) User information that users actively offer to Kidsdoor

The user information that users actively offer to Kidsdoor through the Services and that Kidsdoor collects is as follows:

- ① Name
- ② Date of birth
- ③ Address
- ④ Telephone number
- ⑤ E-mail address
- ⑥ Usage history of the Service
- ⑦ Other information recorded or described and provided by the users in the user information entry form or documents provided by Kidsdoor.

(2) User information provided by external services that have been allowed to integrate with the Services through the user's permission via the Services.

If a user permits integration with external services such as social networking services through the Services, the user information provided to Kidsdoor by such services and collected by Kidsdoor shall be in accordance with the conditions set during the permission and is as follows:

- ① The user's ID and other information used by the user to identify themselves on the external service that the user uses.
- ② Other information that users have authorized for disclosure to Kidsdoor based on the conditions set when permitting integration with the external service.

(3) Information collected by Kidsdoor itself

Kidsdoor may collect information when users connect to the website operated by Kidsdoor or other web services, as well as information exchanged during the connection.

At this time, the user information collected by Kidsdoor is as follows.

- ① Device information
- ② Location information (only with the prior consent of the user)
- ③ IP addresses, HTTP cookies, and anonymous IDs
- ④ Communication log information

2 Purpose of use

In principle, user information obtained by Kidsdoor shall be used within the scope of the following purposes. However, with respect to those purposes individually communicated within the Services, it shall be used for those specific purposes.

(1) User information of the person using the Services

- ① Membership registration and identity verification to use the Services
- ② Contact and response to inquiries when using the Services
- ③ Distribution of information and delivery of supplies in the Services
- ④ Distribution of information on events sponsored by Kidsdoor, newsletters, and e-mail magazines
- ⑤ Request for responses to various surveys, Creating post-service experience feedback, and Selection of interviewees for advocacy activities of Kidsdoor
- ⑥ Creating various statistical data

(2) User information of donors to Kidsdoor

- ① Communicating rewards for donations and responding to inquiries
- ② Sending business reports and activity reports of Kidsdoor
- ③ Distribution of information on events sponsored by Kidsdoor, newsletters, and e-mail magazines
- ④ Distribution of requests for ongoing and urgent support
- ⑤ Information management and use for donation processing, and Record management and use for issuing receipts
- ⑥ Creating various statistical data

(3) User information of registered volunteers

- ① Creating of volunteer registration lists and identity verification
- ② Contact and response to inquiries during volunteer activities
- ③ Volunteer registration renewal procedure

- ④ Distribution of information on events sponsored by Kidsdoor, newsletters, and e-mail magazines
- ⑤ Request for responses to various surveys
- ⑥ Creating various statistical data
- (4) User information of the person using web services of Kidsdoor
 - ① Marketing activities for the improvement of Kidsdoor's services (including displaying notices based on past website visit data, investigating and analyzing website maintenance and efficiency using Cookies and analytics services, and conducting surveys)
 - ② Creating various statistical data
- (5) Personal information obtained through recruitment activities (including various seminars and internships related to recruitment, etc.)
 - ① Planning, preparation, implementation, and management of recruitment activities
 - ② Operation and management of websites related to recruitment activities
 - ③ Distribution of information related to recruitment activities
 - ④ Recruitment selection, pre-employment procedures, and related communications
 - ⑤ HR management after a job offer (placement, training, salary, benefits, etc.)
 - ⑥ Creating various statistical data
- (6) Personal Information of Employees
 To perform labor management, payroll management, social insurance management, work management, induction and discharge management, health and safety management, education and training management, and welfare and other services necessary to manage employment.
- (7) User information of those who have made inquiries to Kidsdoor
 Creating a response and replying to the inquiry
- (8) In the event that it becomes necessary to use personal information among the user information for purposes other than those described in (1) through (7) above, we will inform the person of the purpose of use in advance and obtain their prior consent, except in any of the following cases.
 - ① When it is necessary to protect the life, body, or property of a person, and it is difficult to obtain the consent of the person.
 - ② When it is particularly necessary for the improvement of public health or the promotion of the sound upbringing of children, and it is difficult to obtain the consent of the person.

- ③ When it is necessary to cooperate with a national institution, local government, or a person entrusted with the execution of duties prescribed by law, and obtaining the person's consent may hinder the performance of such duties.
 - ④ When providing personal data to academic research institutions, etc., and it is necessary for such institutions to handle the personal data for academic research purposes. (This includes cases where part of the purpose of handling the personal data is for academic research purposes, excluding cases where there is a risk of unduly infringing on the rights and interests of the person.)
 - ⑤ When required by law
- (9) Kidsdoor may change the purpose of use of the user information to the extent that it is reasonably considered to be related to the purposes of use described in (1) through (7) above. If the purpose of use is changed, Kidsdoor will notify the person of the changed purpose of use or publicly announce it on Kidsdoor's website.

3 External Transmission, with or without information collection module

- (1) In order to deliver appropriate targeted advertisement using user information, Kidsdoor may incorporate the following information collection module into websites operated by Kidsdoor. In this connection, Kidsdoor will provide user information (but only HTTP cookies) to the provider of the information collection module. Based on the connection information to the websites operated by Kidsdoor and other websites, targeted advertisements will be displayed to the users.
- ① Google Analytics
- (2) Users can refuse the provision of user information as specified in the preceding paragraph by making settings to prohibit the use of HTTP cookie functions on their communication terminals or by using functions provided by information collection module providers to disable the HTTP cookies they provide.

4 Provision to Third Parties

- (1) Kidsdoor do not provide personal information among user information to third parties without obtaining the prior consent of the user, except in the following cases.
- ① When Kidsdoor outsources all or part of the handling of personal information within the scope necessary to achieve the purpose of use.
 - ② Cases in which personal information is provided as a result of the succession of

- business due to merger or other reasons.
- ③ Cases in which it is necessary to cooperate with a national institution, a local government, or a person entrusted with the execution of duties prescribed by law, and obtaining the user's consent may hinder the performance of such duties
 - ④ Other cases permitted by applicable Laws.
- (2) Kidsdoor may provide personal information to third parties located in foreign countries under the following circumstances:
- ① When there is prior consent from the person authorizing the provision to third parties in foreign countries.
 - ② When providing personal information to a third party located in a foreign country, we implement appropriate and rational measures for the handling of personal information in accordance with the provisions of Chapter 4, Section 2 of the Act on the Protection of Personal Information, and such implementation is ensured between us and the relevant organization.
 - ③ When any of the conditions specified in 2. (8)① to ⑤ above apply.

5 Joint Use

When it is particularly necessary for the smooth implementation of the services and to improve the convenience of users, Kidsdoor will indicate the following items to users in advance and jointly use user information.

- ① Scope of parties jointly utilizing the information.
- ② Purposes of use by the parties jointly utilizing the information.
- ③ Items of user information to be jointly utilized.
- ④ The name and address of the person responsible for the management of the user information and, in the case of a corporation, the name of its representative.

6 Pseudonymized Personal Information

- (1) When Kidsdoor creates pseudonymous information (personal information processed in a way that prevents the identification of a specific individual unless compared with other information), we adhere to the applicable laws and regulations.
- (2) Pseudonymized information will not be provided to third parties except as required by law.
- (3) When using pseudonymous information, we will not match it with personal information or use it to contact the person.

7 Anonymized Information

- (1) When Kidsdoor creates anonymized information (information that has been processed to the extent that it cannot be used to identify a specific person, and measures have been taken to ensure the irreversible anonymization of such personal data), we adhere to the applicable laws and regulations.
- (2) If providing anonymized information to a third party, in accordance with relevant laws and regulations, the individual will be notified or the information will be publicly disclosed in advance. This notification or disclosure will include the items of personal information contained in the anonymized information to be provided to the third party, as well as the methods of such provision.

8 Security Control Measures

As part of our measures for the secure management of user information, Kidsdoor has implemented the establishment of fundamental policies, the creation of internal regulations, and organizational, personnel, physical, and technological security measures. In the event of incidents such as leaks, Kidsdoor promptly report the facts and preventive measures for recurrence to the Personal Information Protection Commission and other relevant authorities in accordance with the law. Kidsdoor also promptly notify users of such incidents.

9 Disclosure of Personal Information, etc.

- (1) Kidsdoor, when requested by a user for notification of the purpose of use, disclosure, correction/addition/deletion, suspension of use/deletion, suspension of third-party provision, or disclosure of records of third-party provision (referred to as "disclosure, etc.") regarding personal information among the user information Kidsdoor holds, will, except in cases where special procedures are stipulated by law, confirm that the request is made by the individual in question and then disclose or take other actions related to personal information in accordance with the provisions of the law. However, this does not apply when Kidsdoor is not obligated to disclose, etc., under the Personal Information Protection Act or other relevant laws.

Additionally, for disclosure or notification of the purpose of use, Kidsdoor may charge a designated fee within the limits allowed by applicable laws.

- (2) We will promptly inform the user who made the request about the implementation or non-implementation of the disclosure, etc., as mentioned in the preceding

paragraph. In cases where the request is not implemented, we will make efforts to provide an explanation for the reasons behind the non-implementation.

10 Contact

For your opinions, questions, complaints, requests for disclosure, and other inquiries regarding the handling of user information, please contact the following office:

Address: 7F Yaesu Dai-ichi Park bldg.. 2-1-11

Shinkawa, Chuo-ku, Tokyo Japan 104-0033

Name: NPO Kidsdoor

Board Chairman: Yumiko Watanabe

Tel.: 03 (5244) 9990

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11 Procedure for Amending the Privacy Policy

Kidsdoor periodically reviews the operational status concerning the handling of user information and strives for continuous improvement. As necessary, Kidsdoor may modify this policy. In the event of any changes to this policy, Kidsdoor will notify users through Kidsdoor's website.

However, if the changes involve content that requires user consent according to legal requirements, Kidsdoor will obtain user consent through the designated procedures.

Enacted on January 11, 2022

Revised on July 21, 2022