

GDPR Privacy Policy

Ricksoft Co., Ltd. (hereinafter referred to as "us") is committed to protecting privacy of users of our Website in accordance with the General Data Protection Regulation and equivalent laws of the United Kingdom of Great Britain and Northern Ireland (the "UK") (the "GDPR") and this GDPR Privacy Policy (this "Privacy Policy").

Please read this Privacy Policy carefully prior to using our Website (<https://www.ricksoft.jp/>).

Article 1 Definitions

The definitions of terms in this Privacy Policy are as follows:

Applicable privacy laws	Applicable privacy-policy laws, including the General Data Protection Regulation and equivalent laws of the United Kingdom of Great Britain and Northern Ireland (the "UK") ("GDPR")
Contract	Contracts concluded between the customer and us concerning goods or services, etc
Personal data	Any and all information relating to any identifiable natural person to be processed by Us as set forth in Article 3 of this Privacy Policy
Process	A single or series of operations performed on personal data or a series of personal data, whether by automatic means or not (including, collecting, recording, editing, structuring, saving, modifying, restoring, referencing, using, disclosing by transfer, providing, sorting, joining, restricting, deleting, destroying, etc. of data)
Administrator	A natural person, a corporation, a governmental authority, an agency, or any other person who, alone or jointly with others, determines the purpose and means of processing personal data
Our Website	https://www.ricksoft.jp/company/privacy.html
We	Ricksoft Co., Ltd. 〒100-0004 Taisei Otemachi Building 16F, 2-1-1 Otemachi, Chiyoda-ku, Tokyo

Article 2 Information of third parties

2.1 Our Website may contain information of third parties.
(e.g. hyperlinks, banners, buttons, etc.).

We do not manage the information of these third parties, and we do not assume any responsibility for compliance with applicable privacy laws by third parties.

Users of our Website should carefully read the privacy policy of the third party's website.

Article 3 Personal data collected

3.1 We may obtain the following personal data from users of our Website.

a. Name
b. E-mail Addressing
c. Telephone Number
d. Content of the inquiry
e. IP addresses, cookies (Cookie), etc.

3.2 We do not collect sensitive personal data, such as passport information and health data, through our Website.

3.3 We collect personal data when the following actions are performed by our Website users:

- a. When sending questions by inquiry on our Website – You are required to provide us with certain personal data when you send questions by inquiry on our Website. Personal data that is mandatory is indicated in the relevant forms. We may not be able to provide our inquiry services to you if such data is not provided.
- b. Other uses of our Website – When you interact with our Website, we automatically collect technical data regarding your usage of our Website, including pages that you visit and links you click on, online identifier (cookies, IP addresses, etc.).

3.4 We process personal data only in accordance with applicable privacy laws and regulations as described in this Privacy Policy.

Article 4 Purpose and Legal Rationale of Data Processing

4.1 We collect and process your personal data only for the purposes described below.

- a. We may use your personal data on our Website to answer questions you have asked us. The lawful basis for these uses is to fulfil our contract with you, to comply with our legal obligations or to pursue our legitimate interests in

improving our Website and giving our users the best experience.

4.2 If we wish to process further personal data for any purpose other than the processing purpose of collecting the personal data, we will provide information about the other purpose and all relevant additional information prior to the processing.

Article 5 Transfer of personal data outside of the EEA

5.1 As a Japan based company, We shall securely process the personal data of users of our Website in Japan. On January 23, 2019 the European Commission has adopted an adequacy decision on Japan, allowing Personal Information to flow freely between the two economies on the basis of strong protection guarantees.

5.2 We share the personal data of users of our Website within any of our group Companies. If your Personal data is transferred to a third party located in a country that has not received an adequacy decision by the European Commission, We shall put the appropriate legal framework in place, notably Standard Contract Clauses (SCC) approved by the European Commission.

Article 6 Security

6.1 We take appropriate organizational and technical security measures to protect the personal data of our Website users and prevent the unauthorized use, loss or alteration of personal data.

It also grants access to personal data only to employees, agents, contractors, and other third parties who need access to the data.

They have a confidentiality obligation based on their hiring contract or (data processing) contract.

6.2 We have established in-house rules for the protection of personal information, including a data breach policy that specifies how to respond to any breach of personal data.

When required under applicable privacy laws and regulations, we notify the relevant supervisory authorities and data entities.

Article 7 Retention period

7.1 We will not store personal data of our Website users exceed a period of 5 years maximum after the collection of such data, except where legal requirements imposing that we keep your personal data longer or less longer apply.

7.2 Users of our Website can request that we delete their personal data at any

time.

We will remove your personal data if it is no longer necessary for your purpose of collection or processing. If your personal data is no longer needed for the purpose of collecting or processing that data, we will delete your personal data.

Article 8 Cookies (COOKIES)

8.1 We use cookies (Cookie) to ensure that our Website works correctly.

8.2 Cookies are information that is stored by the browser on our Website's user's computer.

We use different types of cookies for different purposes.

a. **Functional Cookies (Functional cookies):** These are the cookies required for our Website to function properly, including the cookies required to create accounts.

b. **Analytical Cookies (Analytical cookies):** Cookies that let our Website users know how our Website (some of them) is being used.

This allows us to improve our Website and make our Website as much as possible consistent with the concerns and importance to our Website users.

We will only use the data obtained by cookies to analyze the usage of our Website at a comprehensive level, not at an individual level.

8.3 We use third-party cookies only to improve the quality and effectiveness of our Website.

For example, we use Google Analytics (Google Analytics), which is set up in a privacy-friendly way. Google Analytics handles IP addressing for us.

8.4 Most browsers default when cookies are enabled.

The browser settings allow you to disable cookies and display them when you send cookies.

However, if cookies are disabled, features and services on us and other Websites may not work properly.

Article 9 Our Website users' rights

9.1 If the processing of personal data is based on consent, the user of our Website reserves the right to withdraw any consent relating to your personal data at any time.

9.2 Users of our Website reserve the right to request access to their personal data.

This allows our Website users to receive copies of their personal data that we

own.

9.3 Users of our Website have the right to request correction of their own personal data held by us. This will allow us to correct any incomplete or inaccurate data regarding our Website users.

9.4 Users of our Website have the right to request the deletion of their personal data. This allows you to delete or remove personal data that we continue to process without good reason.

9.5 Our Website users have the right to object to the processing of their personal data for our legitimate benefit. If we are processing personal data for direct marketing purposes, we will always accept objections from our Website users. In the event the Personal Data is processed for any other purpose, we will cease to process the Personal Data unless there is an unavoidable justifiable reason for (i) giving priority to the interests, rights, and freedoms of the users of this Website or (ii) commencing, implementing, or proving legal measures.

9.6 Users of our Website have the right to seek restrictions on the processing of their personal data.

9.7 We reserve the right to require that you or a third party transfer your personal data.

We provide the personal data of our Website users to our Website users or third parties designated by our Website users in a structured, commonly used, machine-readable format. Please note that this right applies only to automated processing information that we use to obtain first consent from the users of our Website or to fulfill our contract with the users of our Website.

9.8 There is no cost to exercise the above rights. We will promptly and in any event within one month of receipt of a request from a user of our Website, provide information on the response to a request made by a user of our Website. Depending on the complexity and number of invoices, the time may be extended by two more months. In the event of an extended period of time, we will notify you of this within one month of receipt of your request to our Website.

9.9 If our Website user's request is clearly missing or excessive, especially if the request is repeated, we will request reasonable fees from our Website user or refuse to respond to your request.

9.10 In addition to the above rights, our Website users have the right to complain to a supervisory authority at any time, in particular, the supervisory authority of EU Member States that the address, office location, or GDPR of our Website users is said to have been violated. Nevertheless, we would like to have an opportunity to respond to complaints from our Website users before they reach the supervisory authorities. Please contact us in advance.

Article 10 Contact Information

We are responsible for your personal data as a data controller. If you have questions or complaints, or if you wish to exercise the rights listed in Article 9 of this Privacy Policy, please contact us at:

Contact point	In charge of Personal Information Management, Information Security Secretariat, Software Corporation
Address	〒100-0004 Taisei Otemachi Building 16F, 2-1-1 Otemachi, Chiyoda-ku, Tokyo
Telephone Number	03(6262)3947
E-mail address	Isms[at]ricksoft.jp

Article 11 GENERAL PROVISIONS

11.1 We reserve the right to periodically revise this Privacy Policy.

Please check the applicable terms and conditions regularly at your own risk.

This Privacy Policy was last revised on 01/01, 2025.

11.2 In the event any provision of this Privacy Policy conflicts with laws and regulations, such provision shall be replaced by a provision to the same effect reflecting such intent to the extent permitted by laws and regulations.

In such case, the other provisions shall continue to apply without change.