

# PRIVACY POLICY

Coincheck, Inc. (hereinafter referred to as the "Company") recognizes the importance of protecting its customers' personal information, shall comply with the Act on the Protection of Personal Information (hereinafter referred to as the "Personal Information Protection Act"), and properly handle and protect all personal information pursuant to the following privacy policy (hereinafter referred to as the "Privacy Policy").

## 1. DEFINITION OF "PERSONAL INFORMATION," etc.

(1) In this privacy policy, personal information refers to the personal information defined in Paragraph (2) of Article 1 of the Act on the Protection of Personal Information, which is the information relating to a living individual falling under either of the following items:

① those containing a name, date of birth, or other descriptions etc. whereby a specific individual can be identified (including those which can be readily collated with other information and thereby identify a specific individual); or

② those containing an individual identification code.

(2) In this privacy policy, special care-required personal information means the special care-required personal information defined in Paragraph (3) of Article 2 of the Act on the Protection of Personal Information, which is the personal information comprising a principal's race, creed, social status, medical history, criminal record, fact of having suffered damage by a crime, or other descriptions etc. prescribed by the Order for Enforcement of the Act on the Protection of Personal Information for those of which the handling requires special care so as not to cause unfair discrimination, prejudice or other disadvantages to the principal.

(3) In this privacy policy, sensitive (sensitive) information means personal information refers to special care-required personal information, membership in a labor union, lineage, permanent address, health care and sexual life (of these, except special care-required personal information), information concerning the person (except the person, national organization, local public organizations, Paragraph (1) of Article 76 of the Act or listed in each item of the Article 6 of enforcement regulations), or visually inspect the person, Or it means that it is clear by the outline obtained by taking pictures.

## 2. PURPOSES OF USE OF PERSONAL INFORMATION

The Company intends to use its customers' personal information for the following purposes:

- (1) to accept orders for the products and services that are offered by the Company;
- (2) to provide information on the products and services that are offered by the Company;
- (3) to conduct market research that is relevant to the products and services offered by the Company and also to conduct research and development activities pertaining to financial products and services through data analysis and questionnaire surveys, etc.;
- (4) to provide maintenance and support concerning the services that are offered by the Company;
- (5) to provide notifications on any changes, etc. made to the terms, rules, guidelines, explanation of risks, policies, precautions, and any other individual regulations, etc. (hereinafter collectively referred to as the "Terms, Etc.") that concern the services being provided by the Company;
- (6) to provide answers or send replies to any inquiries and consultation requests concerning the services being provided by the Company;
- (7) to respond to any acts that are in violation of the Terms, Etc.;
- (8) to verify the identities of customers;
- (9) to verify information on bank and other financial service accounts and also to check the status of money remittances;
- (10) to communicate with customers in emergencies;
- (11) to create back-up data;
- (12) to conduct internal audits at the Company; and
- (13) to serve any other purposes that are ancillary to any of the aforementioned purposes of use.

### **3. LIMITATION OF USE OF PERSONAL INFORMATION**

Our company will not deal with personal information without obtaining beforehand a customer's consent beyond the necessary scope to achieve its utilization purposes; provided, however, that this shall not apply if such use is permitted by the Act on the Protection of Personal Information or other laws and regulations.

#### **4. PROPER ACQUISITION, ETC. OF PERSONAL INFORMATION**

Our company will acquire personal information in a proper and lawful manner within the necessary scope to perform its businesses. Our company also strives to delete or discard unnecessary personal information according to its regulations. It should be noted that the documents submitted by customers to confirm their identities will not be returned to them.

#### **5. MANAGEMENT OF SAFETY OF PERSONAL INFORMATION**

The Company shall implement proper safety management measures in order to prevent its customers' personal information from getting lost, manipulated, divulged, etc. In addition, the Company shall provide training to all its directors, officers, and employees that must handle personal information as to the importance of protection of personal information, and shall also provide proper supervision over any outside contractor to which the Company entrusts its customers' personal information.

#### **6. PROVISION OF PERSONAL INFORMATION TO THIRD PARTIES, ETC.**

If the Company intends to provide any personal information pertaining to its customers to a third party, it shall only do so after obtaining the consent of those customers in advance, except in any of the following cases, unless it is permitted under the Personal Information Protection Act or another applicable law:

(1) if the Company contracts a third party to handle personal information, in whole or in part, to an extent that is necessary to achieve the specified purposes of use, provided that the Company properly supervises the third party pursuant to the applicable law; or

(2) if the Company's business operation including provision of personal information is succeeded by a third party due to a merger, company split, business transfer, or any other reason.

#### **7. DISCLOSURE, ETC. OF UTILIZATION OF PURPOSE OF PERSONAL INFORMATION**

In cases where a customer requests our company to notify utilization purposes of, disclose, correct, make an addition to, delete, cease a utilization of, delete, erase or suspend a provision of personal information (herein referred to as "disclosure, etc."), our company will, upon confirming that such request has been made by a specific individual identifiable by such personal information, reply within a reasonable period and appropriate scope, unless laws and regulations do not require a disclosure, etc. of such personal information. Additionally, customers need to understand in advance that they will be charged the handling fee for a notification of utilization purposes or disclosure of personal information (2,000 yen per request (excluding the consumption tax)).

#### **8. HANDLING OF SPECIAL CARE-REQUIRED AND SENSITIVE PERSONAL INFORMATION**

Our company will not acquire the special care-required and sensitive personal information without obtaining in advance a customer's consent; provided, however, that this shall not apply if such

acquisition is permitted by the Act on the Protection of Personal Information or other laws and regulations.

## **9. USE OF COOKIES, ETC.**

The Company may obtain and use its customers' cookie information, etc. in some instances while providing its services in order to improve the quality of the services that it provides to the customers. If a customer does not want the Company to do so, it can turn off its cookies by changing the setting in its web browser. However, turning off the cookies could lead to the customer not being able to use all functions that are available in the services that the Company provides.

## **10. INQUIRY**

If there is a need to request disclosure, etc. of personal information, express an opinion, ask a question, file a complaint, or make an inquiry as to the handling of personal information by the Company, it must be directed to the following contact point.

Contact point for inquiry on personal information  
email: [support@coincheck.com](mailto:support@coincheck.com)  
Coincheck, Inc.

## **11. AMENDMENT OF PRIVACY POLICY**

If the Company intends to make an amendment to its purposes of use of personal information (to an extent that a certain level of relevance will be reasonably maintained compared to the purposes of use before they are amended) or to any other part of the Privacy Policy, it shall publish the information by making the amendment on this page.

April 15, 2019

Coincheck, Inc.