

# SHARE SPACE GAKUYA

## Direction for Protection of Personal Information

### 1. Basic Policy

Your personal information is your most important asset. All staff working at Share Space GAKUYA are committed to protecting your information and earning your trust by adhering to a compliance program regarding the protection of your personal information and by handling your personal information accurately and securely.

### 2. Comprehensive Program for Personal Information Purpose

- (1) Standards for the appropriate collection and use of personal information and standards for the operation of these standards.
- (2) We will establish a code of conduct and specific rules to prevent unauthorized access to, and loss, destruction, falsification, or leakage of, personal information.

### 3. Organizational Activities

In order to implement the basic policy, the following activities will be carried out.

- (1) All executives and employees of Share Space GAKUYA shall comply with laws and other regulations regarding personal information.
- (2) We will appoint a Human Information Protection Manager and give him/her responsibility and authority for the implementation and operation of the compliance program.
- (3) We will request companies and individuals with whom we do business to cooperate in achieving the specified objectives.
- (4) This basic policy shall be posted on our website and in our corporate brochure, etc., so that it can be viewed at any time.
- (5) The compliance program will be continuously improved

### 4. Handling of personal information

- (1) Collection, use and provision of personal information

When we collect personal information, we will clarify the purpose of collection to our customers, limit the scope of use of the collected personal information, and handle it appropriately.

(2) Respect for rights

We respect your rights regarding your personal information and will comply with your requests for disclosure, correction or deletion of your own personal information within a reasonable period of time and to a reasonable extent.

(3) Implementation of security measures

We will maintain internal regulations and implement security measures to prevent any problems such as leakage of personal information outside the company or unauthorized falsification.

April 1, 2021

Shere Space GAKUYA Management Company

Naspa Corporation

Representative Director Hideki Hirayama