Privacy Policy

Komehyo Holdings Co .,Ltd. and its group companies listed in the "List of Group Companies" (collectively, "**we**" or "**us**") will process your Personal Data in compliance with the General Data Protection Regulation (EU) 2016/679 (the "**GDPR**"), the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (the "**CCPA**"), and other applicable data protection laws and regulations (collectively, "**Applicable Law**").

Please read this Privacy Policy (this "**Policy**") carefully to understand our views and practices regarding the processing of your Personal Data.

1. Information We Collect

We collect the following types of Personal Data from you:

- Name
- Address
- E-mail address
- Company name
- Details of your communications, inquiries, and responses
- Cookies
- Usage environment to access our website
- Your interactions with our website

In this Policy, "**Personal Data**" means any information relating to an identified or identifiable natural person.

2. Source of Personal Data

We may collect your Personal Data directly from you or through third parties such as our service providers. When you visit our websites, we may automatically collect, store, and use usage environment to access our website and your interaction with our website. This information will be sent from your computer or other devices to us using a variety of cookies.

The provision of your Personal Data may be mandatory for reasons such as being a statutory or contractual requirement or being a necessary requirement for entering into a contract. Please be advised that we may not be able to provide services or products to you if you do not provide such Personal Data.

3. Use of Personal Data

We may use your Personal Data for one or more of the following business purposes indicated below:

- To provide our products and services;
- To conduct sales promotion activities, including advertising, promotion, and implementation of questionnaires for our products and services;
- To develop and improve our products and services;
- To create statistical information regarding our products and services;
- To communicate with you, including responding to your inquiries to us;
- To perform your background check;
- To analyze information such as browsing history and purchase history obtained, and to advertise products and services in accordance with browsing and purchase trends; and

- To comply with Applicable Law and cooperate with relevant governmental authorities and agencies, including competent data protection authorities and those that are engaged in administrative or criminal investigations.

4. Legal Grounds for Data Processing

We primarily process your Personal Data based on your consent to this Policy. If you wish to withdraw your consent, you may proceed at any time by informing us of the withdrawal of your consent through our contact channel as specified in Section 10 (Contact Us). Please note, however, that the withdrawal of your consent will not affect the collection, use, or disclosure of Personal Data for which you have already given your consent to us.

Other than where permitted based on your consent, we also usually process Personal Data where necessary: (i) to perform contracts executed with you; (ii) to ensure compliance with our legal obligations; or (iii) for our legitimate interests (or those of a third party), provided that your interests and fundamental rights do not override those interests.

5. Disclosure of Personal Data

We may disclose your Personal Data to the following recipients in order to achieve the purposes of processing:

- Our group companies (https://komehyohds.com/company/group/);
- Ad-serving companies;
- Website management service providers; and
- Marketplace platform providers.

6. International Transfer of Personal Data

We may transfer your Personal Data to countries outside your country of residence. These countries may not have personal data protection laws as comprehensive as those that exist in your country of residence, and the same level of protection as that set forth in the personal data protection laws in your country may not necessarily be guaranteed. In such case, we will take necessary safety management measures in accordance with Applicable Law.

The Personal Data that we hold about data subjects in the EEA may be transferred to and stored by a third party outside the European Economic Area. In cases where we transfer such Personal Data outside the European Economic Area, we will ensure that:

- The recipient destination has been subject to a finding by the European Commission that it ensures an adequate level of protection for the rights and freedoms that the data subjects possess in respect of their Personal Data; or
- The recipient enters into standard data protection clauses with us that have been approved by the European Commission.

You can obtain more details of the protection given to the Personal Data when it is transferred outside the European Economic Area (including a copy of the documents used to protect your Personal Data) by contacting us in the manner set forth in Section 9 (Contact Us).

7. Data Storage and Retention Period

We retain your Personal Data for as long as is necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting

requirements, to establish or defend legal claims, or for compliance and protection purposes.

To determine the appropriate retention period for the Personal Data, we consider: (i) the amount, nature and sensitivity of the Personal Data; (ii) the potential risk of harm from unauthorized use or disclosure of the Personal Data; (iii) the purposes for which we process the Personal Data and whether we can achieve those purposes through other means; and (iv) the applicable legal requirements.

8. Your Rights and Choices under Applicable Law

Pursuant to Applicable Law, you may have several rights with respect to our processing of your Personal Data, which may include, requesting access to, correction or deletion of your Personal Data, restricting processing of your Personal Data, asking for data portability, and withdrawing your consent to this Policy. You are also entitled to object to the processing of your Personal Data in certain instances.

When we receive a request based on your rights above, we will conduct all necessary investigations without delay and consider whether your request meets the criteria and conditions to exercise such rights under Applicable Law. To exercise your rights specified in this Section, you can reach out to us by contacting us in the manner set forth in Section 10 (Contact Us).

You can also lodge a complaint with the competent data protection authority under Applicable Law if you have any complaint regarding our processing of your Personal Data.

If you are a California resident, you may have certain additional rights. Please refer to the Supplementary Provisions for California Residents for more information.

9. Changes to this Policy

We may modify this Policy from time to time and will post an updated policy as necessary. We recommend that you review this Policy periodically. If we make any material changes to this Policy, you will be provided with appropriate information, such as notice of such change being posted on our website.

10. Contact Us

If you have any questions or comments about this Policy or the ways in which we collect and use your information as described above, or if you wish to exercise your rights provided in this Policy, please do not hesitate to contact us at:

The contact information for our representative in the USA is as follows:
KOMEHYO USA Inc.
Address: Part 7th Floor, 110 Greene Street, New York, NY 10012
Phone: 1-888-639-4349 (toll-free)

The contact information for our representative in the EU is as follows:
TMI Avocats & Associés
Address: 40 avenue Niel 75017 Paris, France
E-mail: komehyo_holdings_eu_representative@tmi.gr.jp

This Policy Last Updated and Effective: April 1, 2025

Supplementary Provisions for Processing of Personal Information of California Residents

In addition to the provisions set forth above, the following provisions apply to the processing of information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household ("**Personal Information**") in accordance with the CCPA.

1. Categories of Personal Information We Collect

We will collect, and have collected in the last twelve (12) months, the following categories of Personal Information directly from you for the purposes described in Section 3 (Use of Personal Data) of this Policy:

Category	Examples
A. Identifiers.	Real name, postal address, email address, online identifier, internet protocol address, social security number, driver's license number, date of birth, citizenship, company name, and other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Name, address, social security number, and driver's license number.
C. Internet or other electronic network activity information.	Browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.
D. Sensitive personal information.	Social security number and driver's license number.

2. Disclosure of Personal Information

We may disclose your Personal Information (including sensitive personal information; the same shall apply hereinafter in these Supplementary Provisions) to a third party for business or commercial purposes.

When we disclose Personal Information to service providers or contractors for business or commercial purposes, we enter into a contract that describes such purposes and requires the service providers or contractors to keep such Personal Information confidential and to not use the same for any purpose except for performing the contract.

In the preceding twelve (12) months, we have disclosed the above-described categories of Personal Information to the third parties described in Section 5 (Disclosure of Personal Data) of this Policy.

3. Sale or Sharing of Personal Information

We have not sold or shared and will not sell or share your Personal Information collected from you.

4. Your Rights and Choices under CCPA

The CCPA provides consumers who are residents of California with specific rights regarding Personal Information. If you are a California resident, the following describes your rights under the CCPA and explains how to exercise those rights.

(1) Right to Access Specific Information

You have the right to request that we disclose certain information to you about our collection, sharing, disclosure or use of your Personal Information over the past twelve (12) months from the time of your request. Once we receive and confirm your verifiable consumer request, we will disclose the following information to you:

- The categories of Personal Information we collected about you;
- The categories of sources for the Personal Information we collected about you;
- Our business or commercial purpose for collecting, selling, or sharing such Personal Information;
- The categories of third parties with whom we disclosed such Personal Information;
- The categories of Personal Information that we sold or shared, and for each category identified, the categories of third parties to whom we sold or shared such Personal Information;
- The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of third parties to whom we disclosed such Personal Information; and
- The specific pieces of Personal Information we collected about you.

(2) Right to Request Deletion

You have the right to request that we delete any of your Personal Information that we have collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and notify our service providers or contractors and third parties to whom we have sold or shared such Personal Information to delete) your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers or contractors in order to:

- Complete the transaction for which Personal Information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated by you within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Help to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for those purposes;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the rights of other consumers to exercise their free speech rights, or exercise other rights provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent; and
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us; or
- Comply with legal obligations.

(3) Right to Request Correction

You have the right to request that we correct any of your inaccurate Personal Information that we have collected from you and retained. Once we receive and confirm your verifiable consumer request, we will correct (and notify our service providers or contractors and third parties to whom we have sold or shared such Personal Information to correct), your inaccurate Personal Information. We may deny your request for correction if we determine that the contested Personal Information is more likely than not to be accurate based on the totality of the circumstances.

(4) Rights to Opt-Out of Sale or Sharing

We have not sold or shared and will not sell or share your Personal Information collected from you.

(5) Right to Limit Use and Disclosure of Sensitive Personal Information

We will not use or disclose any sensitive personal information collected from you for any purposes other than those listed below:

- To perform the services or provide the goods reasonably expected by an average consumer who requests such goods or services;
- To help to ensure security and integrity to the extent the use of your sensitive personal information is reasonably necessary and proportionate for those purposes;
- For short-term, transient use;
- To perform services on our behalf; and
- To undertake activities to verify or maintain the quality or safety of our service or device, and to improve, upgrade, or enhance our service or device.

(6) Non-Discrimination

We will not discriminate against California residents for exercising any of their rights under the CCPA. Moreover, unless permitted by the CCPA, we will not:

- Deny you the goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services;
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services; or
- Retaliate against an employee, applicant for employment, or independent contractor.

(7) Exercising Rights under CCPA

To exercise your rights under the CCPA described above, please submit a verifiable consumer request to us by contacting us in the manner set forth in Section 10 (Contact Us) of this Policy. Only you, a natural person or a person registered with the California Secretary of State that you authorize to act on your behalf, or a person who has a power of attorney or is acting as a conservator for the consumer, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond thereto.