

## Privacy Notice

SOU Inc. (hereinafter referred to as the “Company”) shall handle the personal data of customers as follows in accordance with the General Data Protection Regulation of Europe (hereinafter referred to as “GDPR”) and the Privacy Policy of the Company.

1. Management and protection of personal data

The Company shall manage and protect the personal data of customers properly in accordance with its Privacy Policy (<https://www.ai-sou.co.jp/en/privacy/>).

2. Personal data protection manager

Personal data protection manager

SOU Inc.

Address: Shinagawa Season Terrace 28F

1-2-70, Konan, Minato-ku, Tokyo

3. Purpose of use of personal data and legal grounds

The Company shall properly handle personal data of customers within the scope of the following purposes of use.

	Purpose of use	Legal grounds
1	Provision of the services of the Company (assessment, purchase, repairs, and after-sale services of products, store visit reservations, membership subscriptions, etc.)	Agreement performance
2	Provision of other services	Agreement performance
3	Notice of IR Information of the Company and of business activities of the Company	Legitimate interest
4	Judgment on whether or not to perform all sorts of transactions, transaction status management after the start of all sorts of transactions, credit management, claim management	Agreement performance Legitimate interest
5	Prevention of irregular transactions, and identification under the laws of Japan	Agreement performance Legal obligations

6	Notice on services, products, campaigns, and various projects of the Company, the Company's group companies, or other companies allied with the Company, and implementation of questionnaire surveys	Legitimate interest
7	Marketing research and analysis, preparation of statistical numbers for management analysis, use of results of analysis, development of new services	Legitimate interest
8	Maintaining and improvement of service quality in customer handling	Legitimate interest
9	Operations incidental or in relation to 1-8 above, and response to inquiries from customers	Agreement performance Legitimate interest Legal obligations

#### 4. Types of personal data

The Company shall handle the personal data of customers for the purpose of use as stated in "3. Purpose of use of personal data and legal grounds." This personal data includes the following:

##### A) Basic information

Name, address, birth date, telephone number, email address, and other matters stated on the ID

##### B) Member information

Customer ID, transaction history, account information, etc.

##### C) Inquiries information

Details of inquiry, handling logs (voice recording logs, email exchange logs, etc.)

##### D) Collected information

Website access logs (IP address, Cookies, etc.)

Upon acquisition and processing of personal data of customers, the Company may require the consent of customers. In such instance, customers may give consent freely, and have the ability not to provide the relevant personal data, or to change their intent to consent at any time.

#### 5. Refusal to provide personal data

When the customer uses the services of the Company, the customer is required to provide

the customer's personal data. The customer may choose not to provide personal data, however, in that case the customer may be unable to use some or all of the services of the Company.

6. Legitimate interest of the Company

The Company provides effective services as a company that engages in purchase, sale and auction, etc. of hand-me-down items, and has legitimate business interests for using personal data collected to execute the business of the Company.

7. Disclosure and provision of personal data to other companies, etc.

(1) The Company may disclose and provide personal data to the following companies in its Group for achievement of the purposes of use as stated in "3. Purpose of use of personal data and legal grounds." In such instance, the Group companies that receive the provided personal data shall manage and protect the personal data properly, in accordance with this Privacy Notice and the Privacy Policies of individual companies.

- Hakkoudo Inc. (Japan) (<https://www.hakkoudo.com/>)
- Star Buyers Limited (Hong Kong) (<http://starbuyers-auction.hk/>)

(2) On its website, the Company is using Google Analytics, which are web analysis services provided by Google, Inc. (hereinafter referred to as "Google") for tracking the status of accesses to the website, and may use Cookies, Web beacons or other similar technologies to provide the services of the Company. Cookies or Web beacons, etc. will be used for statistical analysis, etc. as anonymous information, and may also be associated with information to distinguish the customer in membership services, etc. for providing more-customized services. Moreover, in a part of the Company's site, third party distribution business operators to whom the Company outsources its ad distribution (such as Google and Yahoo) will distribute ads based on information on past accesses to the website of the Company using Cookies, in accordance with their respective Privacy Policies.

Those can be opt-out at the customer's discretion. Check on the following for opt-out methods:

- When using the website of the Company (English version):

It is possible to refuse Cookie issuance from the Cookie settings screen on the website.

- When using the Company webpage or webpages related to the Company other than the above:

It is possible to stop use of Cookies for ad distribution by accessing the opt-out pages of third party distribution business operators.

It is also possible to nullify Cookie functions by changing the settings on the browser the customer uses. Please note in advance that there is a possibility that the customer may become unable to use some or all of the services on the website as a result.

- (3) If there are demands by administrative organs such as the police or courts under the laws of Japan, the Company may disclose or provide personal data of customers within the scope required thereby.
- (4) When it is necessary to observe the EU Laws or laws and regulations of EU/EEA member countries, the Company may disclose or provide personal data of customers to the authorities or organs specified by the laws.

8. Transfer of personal data to third countries outside the EEA area

The Company may transfer the personal data of customer to countries or areas that the Company and the Company’s Group use as bases from the EEA area for achievement of the purposes of use as stated in “3. Purpose of use of personal data and legal grounds.” In such instance, except for in the case where the Commission of European Community has offered the adequacy decision to relevant country or area, in principle, in accordance with the GDPR and provisions of the applicable laws of EU/EEA member countries, the Company shall transfer the personal data of customers upon conclusion of a SDPC (Standard Data Protection Clause) as a proper protection measure. If there are any questions about protection measures as stated in this paragraph, please notify the inquiry window as stated in “10. Methods of request of disclosure, etc. and inquiry window.”

9. On management of personal data

The Company shall retain the personal data of customers for the period necessary for achievement of the purpose of use as stated in “3. Purpose of use of personal data and legal grounds.” Check the following for individual periods:

Purpose of use as stated in “3. Purpose of use of personal data and legal grounds.”	Period of retention
Purpose of use in 1-5	For 10 years from service provision, information provision, or end of transaction
Purpose of use in 6 and 7	Period necessary for the Company for investigation or analysis
Purpose of use in 8 and 9	Period necessary for provision of better services to the customer

In addition, records in relation to various contracts, transaction status and claims, etc. shall be retained for the period necessary to respond to legal obligations. However, these may be retained long term, if necessary for handling of lawsuits, etc.

10. Methods of request of disclosure, etc. and inquiry window

When there is a request by a person or the person's agent concerning personal data retained by the Company (hereinafter referred to as the "retained personal data"), the Company shall handle the request as follows in accordance with the GDPR:

(1) Disclosure

The Company will disclose the retained personal data by which the person will be distinguished. If there is no retained personal data by which the person is distinguished, the Company shall answer to that effect; provided, however, that the Company may refuse some or all of requests upon notifying of the reason, when any of the following items is applicable:

- There is a possibility of harming the life, body, assets or other rights and interests of the person or a third party;
- There is a possibility of causing a significant disruption to the proper execution of operations of the Company and its Group;
- It is in violation of laws and regulations.

(2) Correction

If the Company is requested to correct or delete (hereinafter referred to as "correction, etc.") retained personal data due to the grounds that the specifics of the relevant retained personal data by which the person can be distinguished are untrue, except for in the case where special procedures are specified by laws and regulations concerning correction, etc. of the specifics, the Company shall carry out the necessary investigations without delay to the extent necessary for achievement of the purpose of use. If the Company performs correction, etc. of some or all of the retained personal data as a result, the Company shall notify the person to that effect without delay. If the Company does not perform a correction, etc., the Company shall notify the person to that effect without delay, with the reasons.

(3) Deletion

If the Company is requested to delete retained personal data by which the person can be distinguished, the Company shall carry out the necessary investigation without delay as to whether the personal data is unnecessary for the purpose of use. If the Company deletes some or all of the retained personal data as a result, the Company shall notify the person to

that effect without delay. If the Company does not perform deletion, the Company shall notify the person to that effect without delay, with the reasons.

(4) Suspension of use

If the Company is requested to suspend use of retained personal data, erase or suspend provision to a third party thereof (hereinafter referred to as “suspension of use, etc.”), the Company shall carry out the necessary investigation without delay as to whether there are grounds for such a request. If the Company suspends use of some or all of the retained personal data as a result, the Company shall notify the person to that effect without delay. If the Company does not suspend use, etc., the Company shall notify the person to that effect without delay, with the reasons.

(5) Data portability

If the legal requirements are satisfied, by structured, generally used formats that are machine-readable, the Company shall provide the personal data provided by the person. If technically possible, the Company shall transmit the personal data provided by the person to another data manager. If the Company does not transmit the personal data, the Company shall notify the person to that effect without delay, with the reasons.

**【Methods of request】**

Please make requests with the respective forms on the Company’s website ([https://www.ai-sou.co.jp/en/privacy\\_center/](https://www.ai-sou.co.jp/en/privacy_center/)).

**【Inquiry window】**

Please contact the following for inquiries relevant to personal information protection of the Company.

Personal Information Office, SOU Inc.

TEL 03-4580-9983

e-mail [privacy@ai-sou.co.jp](mailto:privacy@ai-sou.co.jp)

11. Opinions on personal data

- (1) The customer has the right to file objections as to the handling of the personal data of the customer retained by the Company if the legal requirements are satisfied concerning a specific status. If an objection is filed and the petition satisfies the legal requirements, the Company shall delete or suspend use of some or all of the retained personal data and notify the person to that effect without delay. If the Company does not perform any measures such

as suspension of use as to objections, the Company shall notify the person to that effect without delay, with the reasons.

- (2) The customer has right to file complaints on handling of personal data of the customer himself/herself by the Company with the supervising agency of the EU/EEA member country where the customer lives or works, or the EU/EEA member country where the violation is thought to have occurred. For details of procedures, please inquire of the individual supervising agency.

※ This Privacy Notice covers persons who reside in the European Economic Area (EEA). If the customer lives outside the EEA, please check the Privacy Policy.

Established on July 10, 2019