

Privacy Policy

Idein Inc (the "Company") establishes the following privacy policy (this "Policy") regarding the handling of personal information for "Actcast" and the Company's services provided in connection with Actcast (including applications, websites, and devices and cameras, etc. used in coordination thereto, the "Service, etc.>").

Article 1. Definitions

1. "Personal Information" refers to:
 - (1) Information that enables to establish a user's identity, such as name or date of birth, as specified in Article 2 (1) of the Act on the Protection of Personal Information (the "Personal Information Protection Act") (including information which can be collated with other data to identify an individual, even if identification of specific individuals with this information alone is not possible);
 - (2) Data which includes an individual's personal identification code as prescribed in Article 2, Paragraph 2 of the Personal Information Protection Act.
2. "Payment-related information" refers to payment and billing information, including details of an individual's credit card number.
3. "Actlog" refers to data collected by users through the device used by users (regardless of whether such data was intentionally collected), and may include images, facial coordinates and other data encoded in a lossless format, depending on the software used by the user.
4. "Actcast records" refers to records that makes use of Actlog and devicelog in combination to identify the user, the date and time of use and the methods of use.
5. "Personal Information, etc." refers collectively to Personal Information, payment-related information, Actlog, and Actcast records.

Article 2. Collection of Personal Information, etc.

The Company collects and processes the Personal Information or payment-related information of users from users for user registration, use of the Service, etc. by users, and other purposes.

Users' Personal Information and payment-related information that may be collected by the Company include, without limitation, the user's name (including the name of the person in charge), gender, age, email address, address, name of employer, telephone number, credit card number, etc.

Due to the nature of the Service, etc., the Company may unintentionally collect and temporarily store Actlog, and Actcast records as a result of the provision of the Service, etc. to users.

Article 3. Purpose of Collection and Use of Personal Information, etc.

The Company uses the Personal Information, etc. for the following purposes:

1. To process user registration applications (including updating registered information and de-registration procedures)
2. To verify a user's identity
3. To send notices to users (including information on updates to the Service, etc. and announcements of new services relating to the Service, etc.)
4. To investigate violations of the Terms of Use (including prevention of security breaches and unauthorized use)
5. To respond to inquiries from users and to provide other services to customers (including implementing surveys relating to the Service, etc. and new services)
6. To process payments (including issuing payment demands and refunds, etc.)
7. To provide the Service, etc. to users (including sending products in connection to the Service, etc.,

maintaining, managing, developing and improving the Service, etc., and other matters necessary to provide the Service, etc. to users)

8. To plan, investigate, develop and provide new services in connection to the Service, etc.
9. To provide information to a contractor or a third party in relation to the aforementioned purposes of use (including overseas contractors or third parties)
10. Other purposes incidental or related to the aforementioned purposes of use

Article 4. Handling of Personal Information, etc.

1. The Company complies with the Personal Information Protection Act and other applicable laws and related guidelines and handles the Personal Information, etc. within the scope required for achieving the purposes stated in the preceding article.
2. The Company endeavors to delete specific Personal Information, etc. immediately once the purposes of use specified in Article 3 have been achieved. However, if it is necessary to retain the Personal Information, etc. in accordance with the provisions of the Companies Act, the Commercial Code and other related domestic and foreign laws and regulations, the Company reserves the right to store the Personal Information, etc. for a certain period of time as prescribed in the relevant laws and regulations.
3. The Company may process the Personal Information collected and use the Personal Information of multiple individuals as statistical information by statistically processing it.

Article 5. Safety and Security Measures

The Company implements strict safety and security measures in the handling of the Personal Information, etc., in accordance with the Personal Information Protection Act and other applicable laws and regulations and related guidelines in order to prevent leakage, loss, or damage to the Personal Information, etc. The details of the safety and security measures implemented by the Company for the handling of the Personal Information, etc. are as follows:

(Establishment of basic policy) In addition to this Policy, the Company establishes a Personal Information protection policy and policy regarding internal security, and ensures the proper handling of the Personal Information, etc. in accordance with the relevant policies.

(Placement of rules on handling of Personal Information, etc.) With respect to the handling of the Personal Information, etc., the Company determines the handling method and the responsible officer for acquisition, use, storage, sharing, deletion/disposal and other steps, and establishes and complies with the relevant handling rules.

(Organizational safety and security measures) The Company appoints a responsible officer regarding the handling of the Personal Information, etc., investigates the handling of personal data, and reports its results to the department in charge.

(Personnel safety and security measures) The Company enters into confidentiality agreements with its employees, promotes awareness of matters that require attention concerning the handling of the Personal Information, etc., and educates and trains its employees regarding the relevant matters.

(Physical safety and security measures) The Company implements physical access control including control of entry to and exit from areas handling the Personal Information, etc., and implements measures to prevent theft and other similar incidents.

(Technical safety and security measures) With respect to the handling of the Personal Information, etc., the Company only allows access to those who need to gain access, and regularly keeps a record of those had access to the Personal Information, etc. and analyzes and stores the records of access to check for any suspicious, unauthorized access or use of personal data. The Company also considers and implements the optimization of information security measures from time to time. Any Personal Information, etc. which does not need to be stored continuously will be disposed or deleted in an appropriate manner.

(Understanding of external environment) When handling the Personal Information, etc. in a foreign country, the Company takes necessary and appropriate measures for the safety of the Personal Information, etc. after understanding the system, etc. concerning the protection of the Personal Information in the relevant foreign country.

Article 6. Supervision of Contractors

When entrusting the handling of the Personal Information, etc. externally, the Company manages the process properly by choosing appropriate contractors, establishing consignment agreements, and confirming that the contractor has proper safety and security measures in place.

Article 7. Sharing Personal Information, etc. with Third Parties

1. Except in the following cases, the Company will not share the Personal Information, etc. with third parties (including overseas third parties) without prior consent of the user.
 - (1) If disclosure is required by laws and regulations;
 - (2) If disclosure is required to prevent death, personal injury or damage to property, and the consent of the user cannot be obtained;
 - (3) If disclosure is required for the benefit of public health or to promote the health of children, and the consent of the user cannot be obtained;
 - (4) When cooperation is required so that a national agency, a local public entity or a person entrusted with responsibility can fulfill duties as prescribed by laws and regulations, and if obtaining the consent of the user would risk obstructing the performance of these duties.
2. Notwithstanding the provisions of the preceding paragraph, the Company has the right to provide the Personal Information, etc. to a third party in the following cases.
 - (1) Where the Company entrusts the handling of the Personal Information, etc. in whole or in part to a third party within the scope necessary for achieving the purposes of use specified in Article 3.
 - (2) Where the Company takes on the Personal Information, etc. from another company, or it is transferred because of a merger or some other reason.
 - (3) If the Personal Information, etc. is to be used in cooperation with a specific person or entity, the user will be informed in advance of this intention and the items of the Personal Information, etc. to be shared, as well as the scope of use of the shared information by this person, the purpose of the use of this information and the full name and identity and address of the person responsible for the management of the Personal Information, etc., and the name of its representative. Otherwise, this information shall be made readily accessible for the user.
3. In the event that the Company provides the Personal Information, etc. to a third party, it shall confirm and record all necessary matters in accordance with the Personal Information Protection Act and other laws and regulations and guidelines, and keep these records appropriately.

Article 8. Disclosure of Personal Information, etc.

1. When a user requests the Company to disclose the Personal Information, etc. (in this Article, this includes any record required to be prepared under the Personal Information Protection Act when the Personal Information is provided to a third party and when the Personal Information is received from a third party), the Company shall disclose such information without delay (or else notify the user of the non-existence of such Personal Information, etc.).
2. If disclosure of the Personal Information, etc. falls under any of the following categories, the Company may not disclose this information either in whole or in part. If the Company decides not to disclose this information, it will notify the user without delay.
 - (1) If there is a threat to life, a risk of physical injury or damage to assets or other rights and interests of the user or a third party.
 - (2) If there is a serious risk of obstruction or interference to the proper implementation of the Company's business.
 - (3) If disclosure would violate other laws and regulations.

Article 9. Correction, Addition and Deletion of Personal Information, etc.

1. If the Personal Information, etc. about a user stored by the Company is incorrect, the user may request the correction, addition or deletion of this Personal Information, etc. according to the Company's specified procedure.
2. If the Company deems that it is necessary to respond to a request received from a user, it shall correct, add or delete the relevant Personal Information, etc. without delay and notify the user to this effect.

Article 10. Suspension of Use Personal Information, etc.

1. If a user requests to suspend use, delete or suspend provision to third party of the Personal Information, etc. ("suspension of use of the Personal Information, etc.") on the grounds that such Personal Information, etc. is being used for purposes beyond the scope of the purposes of use, that such Personal Information, etc. is being used by a manner that is likely to aid, abet or induce illegal or unjust acts, that such Personal Information, etc. has been collected or acquired improperly, or any other grounds permitted under the Personal Information Protection Act, the Company shall investigate the matter without delay.
2. Based on the results of the investigation prescribed in the previous paragraph, the Company shall suspend use of the Personal Information, etc. if it deems that it is appropriate to do so, and shall notify the user accordingly. However, if the suspension of use of this Personal Information, etc. will incur a significant cost or else is difficult to implement, the Company may take alternative measures as necessary to safeguard and protect the rights and interests of the user.

Article 11. Inquiries

Please contact the Company at the following address for requests for the disclosure, correction, addition, deletion or suspension of use of the Personal Information, etc., the disclosure of records provided to third parties, complaints or any other inquiries regarding this policy.

Address: 1-4-13 Kanda Jinbocho Chiyoda-ku, Tokyo Japan 101-0051

Company name: Idein Inc.

Email: contact@actcast.io

Article 12. Amendments and Revisions to the Privacy Policy

1. The Company reserves the right to amend or revise the terms of this Policy at its own discretion. Unless otherwise specified, the revised policy applies from the time it is posted on the Company's website (actcast.io) (This also applies to a changed domain if the website domain changes, for any reason).
2. Any user who uses the Service, etc. after revisions have been made to this Policy is considered to have consented to the revised policy.

Article 13. Use of Cookies, etc.

To facilitate the effective administration of the Service, etc., the Company uses "cookies" which are sent by servers to the user's browser and stored on the browser for identification purposes and other Service, etc. usage records for the following purposes:

1. Server monitoring
2. Resolution of server issues and problems
3. Improvement of the website
4. Customization of the website
5. Use for the purposes of statistical data
6. Responding to requests from users

To refuse cookies, users can change the settings of their browser. For more information, users should refer to their browser help features.

Article 14. Use of Google Analytics

The Company uses Google Analytics, a Google product, as part of its Service, etc., to collect, record and analyze the usage history of the Service, etc., based on cookies transmitted by the Company.

The Company receives the results of analysis from Google which helps it to evaluate and assess the use of the Service, etc. The information collected, recorded and analyzed by Google Analytics does not include information that can be used to identify particular individuals. This information is managed by Google in accordance with the Company's privacy policy.

Google Analytics can be disabled in a browser's settings if a user prefers that the Company stops the collection of this personal information. <https://tools.google.com/dlpage/gaoptout>

Article 15. Language of the Terms

If there is any contradiction between the Japanese version of the Terms and an English translation, then the Japanese version shall prevail.

1-4-13 Kanda Jinbocho Chiyoda-ku, Tokyo Japan 101-0051

Idein Inc.

CEO Koichi Nakamura