

GDPR Privacy Policy

Article 1. Scope of Application

This Privacy Policy explains how Idein Inc. (“the Company,” “We” or “Us”) process Personal Data, or personal information about customers and users of our services who reside in the European Union (“EU”) or European Economic Area (“EEA”), which is subject to the EU General Data Protection Regulation (EU) 2016/679 (“GDPR”). The Company is incorporated and registered in Japan.

Article 2. Personal Data

Personal Data, or Personal Information (“Personal Data”), means any information about an individual who can be identified. We collect Personal Data about you directly from you or through our third party processors such as our business partners, including name, e-mail address, and credit card numbers.

Article 3. Processing of Personal Data

We may collect and process Personal Data for the purposes set out below, and may disclose Personal Data to our service providers who act as ‘controller’ or ‘processor’ on our behalf. These purposes include:

Purpose of use	Basis for Processing under GDPR	Examples of Personal Data
User registration process	Articles 6(1)(b) and (c)	Name, e-mail address
Verifying a user’s identity	Article 6(1)(f)	Name, e-mail address
Sending notices to user of important information such as updates to the Actcast platform	Articles 6(1)(b) and (c)	Name, e-mail address
Investigating and assessing a violation of the Terms of Service	Article 6(1)(f)	Name, e-mail address
Responding to user inquiries	Articles 6(1)(b) and (c)	Name, e-mail address
Payment	Articles 6(1)(b) and (c)	Name, e-mail address, credit card number
Providing information to a contractor or a third party in relation to the aforementioned purposes of use (including overseas contractors or third parties)	Articles 6(1)(b) and (c)	Name, e-mail address, credit card number

Other than those purposes as set forth above, and those processed under a basis lawful under the GDPR, the Company may only process Personal Data with your consent. Consent may be withdrawn at any time.

Article 4. Disclosure of Personal Data

The Company may share your Personal Data with third parties for the purposes set out in the table above.

For the purpose of providing our services, the Company may disclose Personal Data to data processors, inside or outside of the EU/EEA countries. If the Company shares Personal Data with a data processor, the Company will establish the appropriate legal frameworks necessary to permit the transfer and processing (GDPR Articles 26, 28 and 29).

The Company requires all third parties to respect the security of your Personal Data and to treat it in accordance with the law. The Company does not allow our third-party service providers to use your Personal Data for their own purposes, and only permits them to process your Personal Data for specified purposes and in accordance with our instructions.

Article 5. International Transfer

Our websites and online services are controlled and operated from Japan and the file containing your Personal Data will be maintained on our servers or those of our service providers, which are located in Japan. Although Japan is outside of the EU/EEA, we will process your Personal Data in accordance with the GDPR. When the Company transfers your data to any entity outside the EU or the EEA, the Company will implement the appropriate legal frameworks, approved by the European Commission, that are necessary to permit those transfers (GDPR Articles 44 ff.), or the Company will share Personal Data based on the rules of the GDPR. A copy of the documents showing the relevant legal frameworks will be made available upon request.

Article 6. Records of Data Processing

The Company will record the processing of Personal Data in accordance with the obligations established by the GDPR (GDPR Article 30), both when the Company acts as a controller or as a processor. In these records, the Company will include the information necessary in order to comply with the GDPR and to cooperate with the supervisory authorities as required (GDPR Article 31).

Article 7. Data Retention

The Company will process Personal Data for as long as necessary to perform our services, conduct our business, and comply with applicable fiscal, tax, securities and regulations.

Article 8. Your Rights

You have the following rights:

- **Access to Personal Data:** You have the right to access full information about your Personal Data held by the Company.
- **Data correction:** You have the right to require that the Company correct any inaccurate information held by the Company.
- **Data deletion:** You have the right to ask that the Company delete your Personal Data. Certain conditions may apply to the exercise of this right.
- **Restriction on the processing of Personal Data:** You have the right to ask that the Company restrict the use of your Personal Data. Certain conditions may apply to the exercise of this right.
- **Objection to the processing of Personal Data:** You have the right to object to the Company's use of your Personal Data. Certain conditions may apply to the exercise of this right.
- **Portability of Personal Data:** You have the right to receive your Personal Data in a structured and commonly used format. Certain conditions may apply to the exercise of this right.
- **Access to applicable documents:** You have the right to obtain from us a copy of the Binding Corporate Rules or of any Standard Contract Clauses that the Company uses if the Company transfers your Personal Data outside the EEA pursuant to such arrangements.

To exercise these rights, or for further information about how the Company uses Personal Data, contact us at:

Address: 10F Jinbōchō Mitsui Building, 1-105 Kanda Jinbocho, Chiyoda-ku, Tokyo 101-0051

Company name: Idein Inc.

Email: contact@actcast.io

The following is an outline of the procedure for exercising your rights:

- Upon receiving your request, the Company will contact you to confirm that the request is in process, and will indicate a reasonable timeframe for our response to your request.
- The Company will make an initial assessment of the request to decide whether it is valid and whether further verification of identity is required.
- If verification of identity is required, we may ask for identification documents from you.
- The Company will notify you of the result of our assessment and whether the Company will proceed with the processing of your request.
- For any unfounded or excessive (e.g., repetitive) requests, the Company may charge a reasonable fee based on its administrative costs.

Article 9. Complaints

You may send a complaint in writing to the contact information provided above.

Within one week after receiving the complaint, the Company will notify you of its receipt. The notice may include inquiries for clarification. The Company will provide a response to you as soon as reasonably practicable, but no later than one month after receiving the complaint. If, due to the complexity of the complaint, a substantive response within one month cannot be provided, the Company will provide you with a reasonable estimate of the timeframe for a response that does not exceed two months from receipt of the notice.

You may also raise the complaint with the relevant Data Protection Authority or lodge a claim with a court of competent jurisdiction.

Article 10. Changes to our Privacy Policy

The Company may revise or update this Privacy Policy from time to time. Any changes that the Company may make to our Privacy Policy in the future will be posted on this webpage. If the Company makes changes that it believes are significant, the Company will inform you through the website to the extent possible and seek your consent where applicable.

Cookies

To facilitate the effective administration of the service, the Company uses “cookies,” which are sent to the user’s browser and stored on the browser for identification purposes. The purposes of the use of cookies are as follows:

1. Server monitoring
2. Resolution of server issues and problems
3. Improvement of the website
4. Customization of the website
5. Collection of statistical data

We retain cookies as necessary to carry out the purposes mentioned above. To refuse cookies, users can change the settings of their browser. For more information, users should refer to their browser help features.

Use of Google Analytics

As part of its services, the Company uses Google Analytics, a Google product, to collect, record, and analyze the usage history of the service, based on cookies transmitted by the Company. The results of the analysis from Google help the Company to evaluate and assess the use of the service. 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 not collect

this personal information: <https://tools.google.com/dlpage/gaoptout>