

# Engoo Privacy Policy

## 1. Personal information protection policy

DMM.com LLC. (hereafter, “we,” “our,” “us”) has strived to manage personal information properly in recognition of the importance of social responsibility in the operation of the online English conversation service “Engoo” (hereafter, “this service”).

Provided here is our Personal Information Management Policy for the proper handling of personal information by way of a system as well as voluntary rules commensurate with our corporate philosophy and business activities, in compliance with the Act on the Protection of Personal Information (hereafter, “Personal Information Protection Act”) as well as other norms, with the goal of further reinforcing personal information protection.

All of our officers and employees will strive to protect personal information by adhering to our Personal Information Protection Compliance Program (this policy, in-house rules and regulations, etc.) which was formulated based on this policy.

### a) Personal information protection system

We will appoint a manager and establish an in-house system clarifying roles and responsibilities in order to properly manage personal information.

We will strive to protect information through encryption and other methods in order to protect the privacy of customers who have used this service.

### b) Security of personal information

We will take necessary preventive and corrective measures and conduct proper management with respect to all personal information to protect against the loss, destruction, alteration, or leakage thereof due to unauthorized access, theft, misappropriation, or the like. We require third parties to undertake appropriate management as well as contractual obligations to prevent leakage, further provision, or the like of personal information except with your consent.

### c) Compliance with laws and regulations as well as other norms regarding personal information.

We adhere to the Act on the Protection of Personal Information (Act No. 57 of May 30th, 2003) and the Japanese Industrial Standard “Requirements for Compliance Program on Personal Information Protection” (JIS Q 15001) as well as other norms regarding personal information protection.

### d) Continual improvement of compliance program

We will continually review and improve our Personal Information Protection Compliance Program in response to changes in our business activities as well as changes in the legal and social environment and IT environment of business.

## **2. Name of entity handling personal information**

DMM.com LLC.

### **3. Matters concerning the collection of personal information**

We will collect the following personal information about you in providing this service. Furthermore, the following are examples and may not correspond to personal information depending on the specific nature of the information.

#### **a) Information provided by you**

Name, address, telephone number, e-mail address, contact details, and other information necessary for transactions:

- Information about date of birth
- Information about credit card data
- Information about requests for registration or changes
- Information about the purchase of various products and services
- Information about shipping procedures and delivery of various products
- Information about payment for various products and services
- Information about various inquiries to our customer support center
- Information about member registration
- Any information voluntarily entered by you including nickname, gender, occupation, categories of interest, or other information regardless of designation
- Any other information you provide to us

#### **b) Information collected in relation to the use of our services**

Information about transaction history in a state associated with information capable of identifying you including pre-orders, bids, and purchases of various products or services as well as the history thereof, gift applications, and when other transactions have been requested

Information about subscriptions to our e-mail newsletters and the like

Information about verbal or written statements made when asking us questions, participating in surveys or campaigns, reviewing our service, and so forth, by means of telephone, e-mail, or otherwise

#### **c) Information collected automatically when you visit our website**

IP address and domain name

Browser type and version, operating system and version, language used, location  
Device information (PC, mobile phone, smartphone, mobile carrier, model information, unique identifier information, etc.)

Information collected in cases (1) - (3) will be limited to your personal information which we determine to be the minimum necessary for the provision of this service.

Furthermore, although we may ask about additional details for purposes such as providing information to meet your needs, your provision of information in such cases is a matter of your personal judgment.

#### **d) Cookies**

Cookies are files that record information like what pages you have visited for the sake of efficient Internet usage. DMM uses cookies for the following purposes to ensure that you have a pleasant experience using this website.

- To access registration information held by DMM and provide you with individualized information like MyDMM when you log in

- To display products and services that you have purchased for easy viewing after you log in

- To analyze DMM's traffic and number of users

- To improve DMM's content and services

- To verify your information for license authentication of downloaded files

Cookies do not violate your privacy. Furthermore, cookies will never be used to collect your personal information. Please ensure that cookies are always turned on when you use this service.

#### **e) Use of third-party tracking systems**

We use systems provided by third parties (Adobe SiteCatalyst, Google Analytics, ClickTale) to analyze user trends.

### **4. Matters concerning purposes of use of retained personal data (Personal Information Protection Act Art. 24 Sec. 1)**

Our purposes of use (except for cases in Personal Information Protection Act Art. 18 Sec. 4 Items 1 - 3) of retained personal data (including any information that does not fall under "retained personal data" as defined by the Personal Information Protection Act) are as described below. However, addressee information and the like specified by you and belonging to individuals other than yourself will only be used for the purposes specified.

In the event that we outsource specific functions, we may, after taking protective measures, provide the relevant outsourcing contractor with your personal information to the extent necessary to achieve a purpose of use. In the event that we delegate provision or other functions regarding personal information to a contractor selected according to our standards, we will manage and supervise to ensure the use of appropriate controls as well as conclude a contract requiring the protection of personal information.

Forms and purposes of use of personal information regarding retained personal data:

**a) Name**

Personal inquiries, product shipping, payment, customer support, prevention and investigation of and countermeasures against unauthorized use, provision to sellers as shipping address information for products in DMM Marketplace, notice of changes to our website, introducing new services on our website, performance of other tasks necessary for transactions, mailing and sending advertisements for our services and the like as well as those of other companies, provision to third parties

**b) Address**

Personal inquiries, product shipping, payment, customer support, prevention and investigation of and countermeasures against unauthorized use, provision to sellers as shipping address information for products in DMM Marketplace, introducing new services on our website, performance of other tasks necessary for transactions, mailing and sending advertisements for our services and the like as well as those of other companies, provision to third parties.

**c) Telephone number**

Personal inquiries, product shipping, payment, customer support, prevention and investigation of and countermeasures against unauthorized use, performance of other tasks necessary for transactions, provision to third parties

**d) Email address**

Personal inquiries, payment, customer support, prevention and investigation of and countermeasures against unauthorized use, performance of other tasks necessary for transactions, notice of changes to our website, notification messages for the user, provision to third parties

**e) Credit card information (name, number, expiration date)**

Personal inquiries, payment, customer support, prevention and investigation of and countermeasures against unauthorized use, performance of other tasks necessary for transactions, notice of changes to our website

**f) Bank account information (name, account number, etc.)**

Payment of advertising fees, proceeds, remuneration, and the like, customer support, performance of other tasks necessary for transactions

**g) Official documents for identity verification or age verification (driver's license, insurance card, etc.)**

Identity verification, name verification

**h) Transaction details**

Product shipping, payment, customer support, prevention and investigation of and countermeasures against unauthorized use, other tasks necessary for transactions, provision to third parties

**i) IP address**

Prevention and investigation of and countermeasures against unauthorized use, responding to your questions or asking our own questions of you

**j) User agents (browser used, device information, etc.**

Prevention and investigation of and countermeasures against unauthorized use, responding to your questions or asking our own questions of you

**k) Any information voluntarily entered by you**

Customer identification, provision of content from registration, provision to third parties

**l) Other information collected automatically when you visit our website**

User authentication at login and logout, transfer of member information during any service transitions, multiple login detection, determining whether to allow use of sample videos, prevention and investigation of and countermeasures against unauthorized use

**m) Any other information provided with your advance consent**

Limited to analysis of service usage, service improvement, and as reference for planning new services, as well as purposes of use indicated at the time the information is collected.

We may collect and use personal information for purposes not provided above in the planning of other individual services and the like. In such cases, we shall state and announce the purposes of use on the page of the individual service or elsewhere and use such information only for said purposes after obtaining the consent of the user.

**5. Matters concerning procedures, etc. for requests for disclosure, etc. of retained personal data (Personal Information Protection Act Art. 29)**

Pursuant to the requirements of Personal Information Protection Act Art. 29 and other provisions, we have established an inquiry method (hereafter, "Inquiry Guidelines") as follows, and in the event that we receive a request from you or your representative about disclosure, correction, discontinuation of use, questions about purposes of use, or the like (hereafter, "disclosure requests, etc.") with respect to our retained personal data, we will respond to the extent necessary and reasonable in accordance with these Inquiry Guidelines. Moreover, please be aware that we may refuse requests if such requests do not conform to the Inquiry Guidelines.

Matters concerning the reception of inquiries about your information or complaints and the like

Engoo Support Center

Email: please contact us at [info@engoo.com](mailto:info@engoo.com).

## **6. Matters concerning the provision of personal information to third parties**

We will not provide your personal information to third parties unless we have obtained your consent in advance, except that such information may be provided in the following situations. (Personal Information Protection Act Art. 23 Secs. 2 and 3)

- a) If we receive a request pursuant to laws or regulations
- b) If problems contrary to the public interest would arise due to our refusal to provide the information, and it is difficult to obtain your consent
- c) If our cooperation is necessary for a national government agency, local public body, or contractor thereof to perform functions required by law, and it is likely that obtaining your consent would impede the performance of said functions
- d) If it is necessary to exercise our legitimate rights

## **7. Other matters**

- a) The provisions set forth here apply within this service.
- b) Although this service may link to other websites, please check for yourself regarding the handling of personal information on such linked websites.
- c) This website may be revised with regard to the above activities, after appropriate review. We will provide notice within this service of all revisions.
- d) For questions on any other procedures or the like, please contact us at the location below.

Engoo Support Center

Email: [info@engoo.com](mailto:info@engoo.com)

Created: May 28th, 2014

DMM.com LLC.

Representative Director: Tatsuya Matsue