

Justa Privacy Policy

Active Connector Inc. (hereinafter, the “Company”) provides services through Justa for (i) Company’ s customers (hereinafter, the “Customers”) to post vacant position information (ii) individuals (hereinafter, the “Candidates”) to search and apply for job openings posted by the Customers, and (iii) providing various information through communication services accompanying thereto.

The Company shall respect the privacy of the Customers and the Candidates (hereinafter collectively referred to as the “Users”) who use “Justa” services provided by the Company, and shall exercise the duty of care to manage and properly handle Personal Information (as defined below) of the Users.

1. Handling of Personal Information by Company

The Company shall handle Personal Information in accordance with the “Information Security Policy” , “Active Connector Privacy Principles” as well as the policies set forth in this “Justa Privacy Policy” , both set forth by the Company.

2. Personal Information

Personal Information shall mean information related to living individuals who are Users, based on which specific Users can be identified by names, dates of birth or other descriptions contained in such information. Information which does not by itself allow identification of specific Users is also included in the category of Personal Information, if such information allows easy reference to other information and will thereby enable the identification of specific Users.

3. Data Protection Officer

A Data Protection Officer who presides over all the management of personal information of the Company (hereinafter ‘DPO ‘).

DPO: Active Connector Inc. COO

email: <https://jp.active-connector.com/contact/>

4. Purposes of Acquisition and Use of Personal Information

The purposes of the acquisition and use of Personal Information shall be as follows.

The Company shall acquire Personal Information from Users to the extent necessary to:

- (1) Provide services to Users;
- (2) Allow Users to log in to the services;
- (3) Send e-mails to Users to promote sales;
- (4) Provide matching of Customers’ job posts using Personal Information of Candidates;

(5) Provide Personal Information to Customers based on the consent of Candidates;

The purpose of acquisition and use of Personal Information provided to the Customers, as well as other details, shall be as follows:

Purpose: To help companies hire and job seekers find jobs.

Personal Information to be provided: Entries and data registered upon use of the services.

Method of provision: Provision by data or written document.

(6) Conduct a research to confirm the Customer is not violating any prohibited activities defined by “Justa” such as violation of laws or public order and standards of decency;

(7) Present information, which has been processed by removing names, contact information, job history and names of companies or and other similar information so that individuals cannot be identified, to client companies as reference materials to introduce the Company and its services;

(8) Deliver newsletters to Users and

(9) Respond to inquiries and contact individuals in emergency situations.

✂ The lawful basis for the processing (as set out in Article 6 of the EU General Data Protection Regulation – GDPR) is as follows:

Consent: The User has given clear consent for the Company to process their personal data for a specific purpose.

Legitimate interests: The processing is necessary for the Company’s legitimate interests.

5. Change of Personal Information

Users may change, add, or delete Personal Information that they have submitted. Users may also request the Company to supply all their data in electronical format. Lastly, Users may withdraw their consent to the Company to use their data. (In case the User withdrew their consent, it will not affect its compliance for the agreed terms of the policy.) If so requested, the Company will either delete all User’s Personal Information, or anonymize it to ensure that it is not possible to identify a specific User.

6. Disclosure of Personal Information to Third Parties

1. The Company shall not disclose Personal Information of Users to any third party without the Users’ consent, unless the following criteria are met:

(1) Explicitly requested to do so by the related laws and regulations;

(2) In the event that the Company entrusts all or a part of the handling of Personal Information to a third party to achieve the purposes of acquisition and use of the Personal Information; or

(3) In the event that Personal Information is provided as a result of a succession of business in a merger or similar change in the structure of the Company.

2. In the event of (3) above, the successor organization will not only be provided with the Personal Information but also inherit the status of having consent via this Policy, enabling it to use and modify the information. In such cases, however, the Company shall communicate in advance that cause has arisen for a business succession to occur.

7 Indemnification

The Company shall not be liable for the acquisition of Users' Personal Information by any third party in any of the following situations:

- (1) In the event that the User himself/herself discloses his/her Personal Information, using the functions of Justa or other ways;
- (2) In the event that the User himself/herself has shared information such as IDs and password which can identify individuals; or
- (3) Someone other than the User himself/herself gained information such as IDs and password which can identify individuals from which the Company has no relation to.

8 Shared Use

The Company may make use of Users' Personal Information jointly with the following companies.

- (1) Personal Information to be used jointly: Entries and data registered upon use of the services
- (2) Parties to make joint use of the information
EQIQ K.K., its subsidiaries and its affiliates
- (3) Purpose of use by parties using information
Use of job candidates' Personal Information to match the candidates with jobs
- (4) Names of parties responsible for managing the Personal Information
EQIQ K.K.
Active Connector Inc.

9 Outsourcing

The Company may outsource all or a part of the handling of Personal Information to a trustee. In such case, the Company should ensure that the trustee has a sufficient level of protection of Personal Information, and shall enter into a confidentiality agreement therewith.

The Company shall also exercise the necessary and appropriate supervision over such trustee.

10 Use of Statistical Information, etc.

The Company may, based on the Personal Information provided by Users, create statistical information from data that has been processed so that individuals cannot be identified, and use such information without limitation. Copyrights pertaining thereto shall belong to the Company.

11 Management of Personal Information

The Company has been making efforts to conduct continuing security management measures that are technically and organizationally necessary to protect against the risk of wrongful access to Personal Information or the loss, destruction, falsification, or disclosure of Personal Information. The Company shall also comply with the laws and regulations pertaining to the protection of Personal Information and individual identification number, industry standards and customs, and laws and regulations related to maintaining the public order and morals.

12 Amendments to “Justa Privacy Policy”

The Company shall review and endeavor to improve “Justa Privacy Policy” on a regular basis. The Company may amend it without notice to Users, unless there is a change in purpose of use or use of personal information, lawful basis regarding the treatment of the personal information in which case requires Users consent.

13 For Users Residing in an EEA country: Explicit Approval for Data Transfer to Outside EEA

By accepting “Justa Privacy Policy”, the User accepts the following terms:

- The User’s Personal Information will be moved to Japan. The Company will strive to properly manage this data;
- The User may request the Company to give access to its Personal Information;
- The User may request the Company to modify inaccurate Personal Information data;
- The User may request the Company to restrict processing Personal Information which is undergoing verification of accuracy except for saving of the personal data; and
- The User may file a complaint with an EEA member country’s regulatory agency in case of dissatisfaction with the Company’s handling of Personal Information.

By not accepting this Privacy Policy, the User will not be able to use this service.

14 Inquiries

With respect to the handling of Personal Information for Justa, please feel free to contact us: <https://jp.active-connector.com/contact/>

※ Use of Cookies

The website for Justa may use information called Cookies, which are used to make access more convenient. The Company does not consider Cookies as Personal Information, as it does not allow for the identification of certain individuals. However, it shall be treated as Personal Information if used with any information which allows for the identification of certain individuals.

※ About Google Analytics

The website for Justa uses access analyzing services provided by Google LLC (Google Analytics) to assess the use of the website. Google Analytics uses Cookies or technology similar to Cookies to collect and process data. The information used in Google Analytics does not contain any content which allows for the identification of individuals. Please see the Google LLC website below for details on Google Analytics' s mechanisms related to the collection and processing of data.

<https://policies.google.com/technologies/partner-sites?hl=en>