

## **mui Privacy Policy**

mui Lab, Inc. (the “**Company**”) handles personal information in accordance with the following privacy policy (the “**Policy**”):

### **1. Definitions**

For purposes of the Policy, the following terms shall have the meaning set forth below:

- (1) “**Personal Information**” means personal information as defined in Article 2 (1) of the Act on the Protection of Personal Information (Act No. 57 of 2003, the “**Personal Information Protection Act**”).
- (2) “**Personal Data**” means personal data set forth in Article 16 (3) of the Personal Information Protection Act.
- (3) “**Retained Personal Data**” means the retained personal data set forth in Article 16 (4) of the Personal Information Protection Act.

### **2. Name and Address of the Company and Name of its Representative**

mui Lab, Inc.

295-1, Tawaraya-Cho, Ebisugawa-Dori Yanaginobanba Higashi-Iru, Nakagyo-Ku, Kyoto-Shi,  
Kyoto

Representative Director Kazunori Oki

### **3. Compliance with Laws and Regulations**

The Company properly handles personal information in compliance with laws and regulations, including the Personal Information Protection Act, and guidelines established by the Personal Information Protection Commission.

### **4. Purpose of Utilization**

The Company uses Personal Information for the following purpose:

- (1) Personal Information of customers (in case of corporate customers, including all of their officers and employees):
  - ① For identification or authentication of customers at the time of registration or login

for services provided by the Company;

- ② For responding to, confirming, or recording customers' inquiries, consultations, complaints, support, etc.;
  - ③ For negotiations with customers and other necessary interactions in the course of business;
  - ④ For management of customers' information;
  - ⑤ For providing the Company's products and services;
  - ⑥ For bills and payments for the Company's products and services;
  - ⑦ For development, maintenance, improvement, and enhancement of the Company's products and services;
  - ⑧ For researching, analyzing, and examining for the purposes of development, maintenance, improvement, and enhancement of the Company's products and services (including processing into statistical information, anonymously processed information, and pseudonymously processed information, utilization of the processed information, and disclosure and publication of the processed information to the extent permitted by law);
  - ⑨ For understanding and analyzing data such as usage history, browsing history, location information, etc. of the Company's products, services, apps, websites, etc. and providing services or information related to services based on such understood and analyzed data;
  - ⑩ For providing information on products, services, campaigns, events, surveys, and other information, advertising, and other marketing activities of the Company or its business partners by letter, e-mail, chat, or other methods (including measuring the effectiveness of such activities);
  - ⑪ For providing the Company's services safely (including investigation, detection, and confirmation of those who are violating laws and regulations, violating contracts, committing fraud, and other problematic acts, contacting such persons, investigating, detecting, and preventing problematic acts, and responding to such acts);
  - ⑫ For notifying customers of changes to the Company's terms and conditions, policies, etc. regarding the Company's services; and
  - ⑬ For purposes incidental or related to the above purposes of utilization.
- (2) Personal Information of applicants for recruitment activities:

- ① For review and decision of employment;
  - ② For contacting, interviewing, and otherwise communicating with applicants; and
  - ③ For purposes incidental or related to the above purpose of utilization.
- (3) Personal Information of the Company's employees:
- ① For business communication;
  - ② For payment of salaries, etc.;
  - ③ For personnel and labor management operations; and
  - ④ For purposes incidental or related to the above purpose of utilization.

## **5. Third Party Provision of Personal Data**

The Company will not provide Personal Data to third parties except in the following cases:

- ① cases in which there is a principal's consent in advance;
- ② cases based on laws and regulations;
- ③ cases in which there is a need to protect a human life, body or fortune, and when it is difficult to obtain a principal's consent;
- ④ cases in which there is a special need to enhance public hygiene or promote fostering healthy children, and when it is difficult to obtain a principal's consent;
- ⑤ cases in which there is a need to cooperate in regard to a central government organization or a local government, or a person entrusted by them performing affairs prescribed by laws and regulations, and when there is a possibility that obtaining a principal's consent would interfere with the performance of the said affairs;
- ⑥ cases in which it is necessary for a third party that is an organization or group aimed at academic studies, etc., to handle Personal Data for academic research purposes (including cases in which part of the purpose of handling such Personal Data is for academic research purposes, excluding cases in which there is a risk of unjustified infringement on the rights and interests of individuals);
- ⑦ cases in which the handling of Personal Data is entrusted within the necessary scope to achieve the purpose of utilization;
- ⑧ cases in which Personal Data is provided accompanied with business succession caused by a merger or other reason; and
- ⑨ cases in which Personal Data to be jointly utilized by a specified person is provided to the specified person (limited to cases in which a principal has in advance been informed

or a state has been in place where a principal can easily know to that effect as well as of the categories of the jointly utilized Personal Data, the scope of a jointly utilizing person, the utilization purpose for the utilizing person and the name or appellation and address, and the name of the representative in case of corporations, of a person responsible for controlling such Personal Data).

## **6. Security control action for Personal Data**

- (1) The Company takes necessary and safe security control action for the management of Personal Data, including preventing the leakage, loss, or damage of Personal Data.
- (2) The Company exercises necessary and appropriate supervision over its employees handling Personal Data and trustees (including re-trustees) entrusted with handling Personal Data to ensure the security control of Personal Data.
- (3) An overview of the security control action taken by the Company is as follows:
  - ① Establishment of basic handling methods when acquiring, using, and storing Personal Data;
  - ② Organizational security control action (e.g., selection and assignment of persons responsible for handling Personal Data);
  - ③ Human security control action (e.g., training of the Company's employees who handle Personal Data);
  - ④ Physical security control action (e.g., implementation of measures to prevent theft or loss of electronic devices handling Personal Data); and
  - ⑤ Technical security control action (e.g., measures to control access to electronic devices handling Personal Data).

## **7. Handling of Personal Data in foreign countries**

If the Company entrusts the handling of Personal Data to an external party located outside of Japan, the Company takes the necessary and appropriate security control action and requires in the contract with the trustee equivalent to the security control action for Personal Data at the trustee.

## **8. Requests for disclosure, etc. of Retained Personal Data**

Procedures, etc., in the event of a request, etc., as described in (1) below, involving Retained

Personal Data, are as described in (2) below.

(1) Contents of requests., etc.

- a. Request for notification of purpose of utilization.
- b. Request for disclosure.
- c. Disclosure of records when having provided Personal Data to third parties.
- d. Request for correction, addition, or deletion of contents.
- e. Request for utilization cease or deletion.
- f. Request for cease of provision to a third party.

(2) Procedures, etc.

- a. Please contact the “Inquiries” described in Section 11 below.
  - b. Please submit identification documents designated by the Company, based on which the Company will verify your identity (in the case of a request from a representative, this will include verification of the right of representation).
  - c. The Company will decide whether or not to respond to the request.
  - d. Based on the decision in c., the Company will respond to the request, etc. (if the Company does not respond to the request, etc., the Company will notify thereof).
- A fee of 1,100 yen per request (including consumption tax) plus postage and other actual costs will be charged. Payment of the fee shall be made by bank transfer to the account designated by the Company (bank transfer fees shall be borne by the customer) or by any other method designated by the Company.

## **9. Automatically acquired information**

For the purposes of Section 4 above, the Company may automatically acquire the following information:

(1) Terminal information

The Company may acquire information unique to the terminal used by the customer (e.g., ID or other individual identification information).

(2) Access log information

The Company may acquire the customer’s access log information (IP address, login time, etc.).

(3) Location information

The Company may acquire location information sent from the customer's smartphone, tablet, or other information terminal. The customer may stop the transmission of location information by changing the settings on the customer's information terminal, but the customer may not be able to use all or part of the services provided by the Company.

#### **10. Use of cookies, etc.**

For the purposes of Section 4 above, the Company may use cookies or other identifiers. By using cookies, etc., the Company may acquire the customer's action history (URL accessed, contents, order of reference, etc.), but the information acquired will not contain any information that can identify the customer personally.

The customer may reject the sending and receiving of cookies, etc. by setting their browsers, etc. However, in this case, the customer may not be able to use all or part of the services provided by the Company.

#### **11. Acquisition and use of user data on external services**

##### **(1) Information collection modules**

For the purpose of Section 4 above, the Company acquires user information through the following information collection modules incorporated into the mui Mobile App:

##### **① Google Analytics**

Name of the provider of the information collection module

: Google LLC and its wholly subsidiary

User information to be acquired

: usage of the Company's application

Utilization of user information by information collection module provider

: User information will be stored on a server system managed by Google.

For more information regarding Google Analytics, please refer to the following:

<Privacy Policy>

<https://policies.google.com/privacy>

##### **② Amazon Pinpoint**

Name of the provider of the information collection module

: Amazon Web Services, Inc.

Utilization of user information by information collection module provider  
: User information acquired by the Company will be transferred to the server installed by Amazon Web Services, Inc. (“AWS”).

For more information regarding Amazon Pinpoint, please refer to the following:  
<Privacy Policy>

<https://aws.amazon.com/compliance/data-privacy-faq/>

(2) When the customer uses the Company’s services and desires to use authentication or any service in conjunction with the following external services, the Company may acquire the customer’s user data registered with the external service (name, telephone number, e-mail address, ID and other information related to external services that the customer has authorized the Company to acquire):

- ① “Google Account” provided by Google LLC;
- ② “Google Calendar” provided by Google LLC;
- ③ “Amazon ID” provided by Amazon.com, Inc.;
- ④ “Apple ID” provided by Apple Inc.; and
- ⑤ Other external services as determined by the Company.

The Company uses the acquired user data of the customer for the purposes described in Section 4 above.

The customer shall, at its own responsibility, use the external services while managing the ID, etc. of the external services, and the Company shall not be liable to nor responsible for the customer regarding the external services.

## **12. Inquiries**

If the customer has any questions, comments, or concerns regarding the Company’s handling of Personal Information, please contact us by e-mail at the following address. The Company does not accept inquiries in person or by telephone:

**【Inquiries】**

mui Lab, Inc.

[support@muilab.com](mailto:support@muilab.com)

## **13. Changes to the Policy**

(1) The Company may change the Policy at any time.

(2) The Company makes efforts to review and continuously improve the Policy in order to further ensure the proper handling of Personal Information.

The Policy was initially released on January 29, 2020.

The Policy was updated on May 20, 2020, Feb 5 2021 and February 15, 2023.