

Personal Information Protection Policy

We, BA-plus, Inc. (Representative Director: Motohiro Shiotani; hereinafter referred to as "the Company"), considering the significant increase in the use of personal information consequent to the development of an advanced information and telecommunications society, as a Group Companies of Nohara Group, Inc., deeply recognize importance of Personal Information and ensure to handle the personal information appropriately, and have established the "Personal Information Protection Policy" as our guideline.

1. In order to make each of our directors, officers and employees recognize the importance of privacy and to ensure they appropriately obtain, use, manage and provide personal information, anonymized personal information, and processing method etc. related information (hereinafter referred to as "Personal Information, etc."), we develop and implement measures to protect your Personal Information etc., and make continuous efforts to improve them.
2. We acquire your Personal Information, etc. by using a legitimate and fair means.
3. We specify the purpose of use of your personal information as much as possible, and your personal information shall be used and managed appropriately within the scope necessary to achieve the specified purpose.
4. We will never provide your Personal Information, etc. (excluding Personal Information including individual number) to third parties, without the prior your consent, unless we are otherwise required by the provisions of laws or regulations.
5. We respect your rights and when you request disclosure, correction, deletion, etc., of the relevant personal information, we respond appropriately to such requests in light of laws, regulation and customs, etc.
6. In managing your personal information, we are committed to take necessary and appropriate measures to prevent leakage, loss, or damage of your personal information, correct and otherwise manage safely your personal information.
7. We comply with laws and regulations regarding the protection of personal information, and we also establish and continuously review our internal rules for the protection of personal information.

Privacy Policy

We, BA-plus, Inc. (Representative Director: Motohiro Shiotani; hereinafter referred to as "the Company") recognize that personal information and Specific Personal Information, etc. (individual number and personal information including individual number, the same applies hereinafter), your activity history on the communication service, and the information generated or stored in connection with you or your terminal (hereinafter referred to as "Personal Information, etc.") are an important assets, and ensure to protect your Personal Information, etc. based on the following policy.

Article 1: Acquisition of Personal Information

We acquire your Personal Information, etc. by using a legitimate and fair means after informing you the purpose of use in advance.

Article 2: Purpose of Use of Personal Information, etc.

We never use your Personal Information, etc. obtained in the course of business conducted by the Company for purposes other than those listed below, except as permitted by the Act on the Protection of Personal Information (hereinafter referred to as the "Personal Information Protection Act") or other applicable laws and regulations;

(1) Worker dispatch service and Paid Employment Placement Service

① Information about applicants

- To introduce and accomplish the registration process
- To provide information about the Company's services

② Information of registrants

- To accomplish the registration process
- To contact registrants about the employment placement and employment
- To provide the matching services between employers and employees
- To provide the information about surveys, campaigns, and events
- To deliver novelties and gifts
- To provide information about the Company's services

③ Information about employees of Worker dispatch service

- To accomplish the entry process

To provide worker dispatch service and employment placement dispatch service

To maintain the personnel and labor management; calculation, determination and payment of salaries; safety and health management; welfare benefits; other employment and performance management; and proper business operations

To contact employees (about business or emergency)

To provide employees an education and training program

To provide procedures for medical examinations, stress checks, and interviews with doctors

To elect employee representatives

To accomplish other procedures and contractual tasks required by laws and regulations

(2) Information about services other than (1)

① Information about applicants for a position of the Company

To select and determine employees for employment

To contact employees about employment

② Information about employees of the Company

To accomplish the entry process

To maintain the personnel and labor management; calculation, determination and payment of salaries; safety and health management; welfare benefits; other employment and performance management; and proper business operations

To contact employees (about business or emergency)

To provide employees an education and training program

To provide procedures for medical examinations, stress checks, and interviews with doctors

To elect employee representatives

To accomplish other procedures required by laws and regulations

③ Information about participants of training programs provided by the Company

To provide training programs

To manage and contact participants

To provide services about training programs

To conduct surveys related to training programs

- ④ Information about applicants for career consulting services
To provide career consulting services
- ⑤ Information about clients
To manage the Company's clients
To provide the Company's information
- ⑥ Information received in outsourcing business
To perform the outsourcing business
- ⑦ Information about inquiry
To respond the inquiry

Article 3: Provision of Personal Information, etc. to Third Parties

Except in the following cases, we will never provide your Personal Information, etc. to any third party without obtaining the prior your consent;

- ① When providing information to contractors (including Nohara Group, Inc., Health Insurance Society, accounting firms, licensed social insurance consultants, health institutes)
- ② In other cases permitted under the Act on the Protection of Personal Information and other laws and regulations.

Article 4: Outsourcing the Handling of Personal Information, etc.

We may outsource all or part of our operations and entrust the handling of Personal Information, etc. to such outsourced companies within the scope necessary to achieve the purpose of use. In such cases, we will select a party that meets our established standards as the consignee, and will enter into a contract regarding the handling of Personal Information, etc. and conduct appropriate management and supervision to ensure safe management of such information.

Article 5: Safe management of Personal Information, etc.

We maintain the accuracy and recency of Personal Information, etc., and manage it safely. We also implement necessary and appropriate information security measures to prevent loss, falsification, leakage, etc., of Personal Information, etc.

Article 6: Disclosure, Correction, Suspension of Use, and Deletion of Personal Information, etc.

If we receive your requests of disclosure, correction, suspension of use, or deletion of your Personal data the business holds and records on provision of your Personal data to third parties, we will promptly respond to such requests in accordance with the laws and regulations.

Article 7: Use of Online Identifiers

In order to make you re-visit to our website more convenient, we may send you the data called a cookie that identifies your computer or other information that cannot identify a specific individual by only itself (hereinafter referred to as "Online Identifier, etc.") and record it on your hard disk.

In addition, third parties affiliated with us may send cookies to your computers and record them. We may also receive Online Identifiers, etc. from third parties with whom we work.

We may record the Online Identifier by linking it to personally identifiable information (such as member registration information etc.) in our possession and use it for the purposes described in Article 2. You can set your internet browser to refuse to receive such data, however please note that there is a risk that you may not use the website properly.

Article 8: Use of SSL

When obtaining your Personal Information, etc., from this website, we ensure safely transmission of your Personal Information, etc., by applying encryption with secure sockets layer (SSL).

Article 9: Use of Google Analytics

- (1) In order to recognize how you visit our website, we use "Google Analytics" to collect information on the visits to our website. Google Analytics collects, records, and analyzes the history of your visits to this website based on our issued cookies. The data collected and analyzed by Google Analytics does not contain any information that personally identifies you, and is managed by Google in accordance with its privacy policy.
- (2) You may also opt out of the collection of their information through our use of Google Analytics by disabling Google Analytics in their browser's add-on settings. If you want to disable Google Analytics, please opt-out.

For an explanation of the Google Analytics Terms of Use, please visit the Google Analytics website. For an explanation of Google's privacy policy, please visit the Google website.

Google Analytics Terms of Use: <http://www.google.com/analytics/terms/jp.html>

Google's Privacy Policy: <http://www.google.com/intl/ja/policies/privacy/>

Google Analytics opt-out add-on: <https://tools.google.com/dlpage/gaoptout?hl=ja>

Article 10: Review and Modification of Privacy Policy

We may change this Privacy Policy from time to time in response to changes in laws and regulations, business needs, or for other reasons. In the event of a change to this Privacy Policy that requires your consent under the laws and regulations, the changed Privacy Policy shall apply only to those who have consented to the change in the manner prescribed by us. In the event of any changes to this Policy, we will make known or notify you of the effective date and content of the revised Policy by posting the revised Policy on the Site.

Article 11: Inquiries

If you have any questions or concerns regarding our handling of Personal Information, please contact us at the contact information below.

Inquiry Desk

BA-plus,Inc.

Personal Information Protection Manager

1-1-11 Shinjuku, Shinjuku-ku, Tokyo, Japan

03-4535-0007