

## Personal Information Protection Policy

We, Nohara Group, Inc. (Representative Director: Kosuke Nohara; 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 holding company of the Group Companies of the Company (refers to consolidated subsidiaries and equity-applied companies of the Company), 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, anonymously processed information, and information on processing methods of anonymously processed information, etc. (hereinafter referred to as "Personal Information, etc."), we develop and implement measures to protect Personal Information etc., and make continuous efforts to improve them.
2. We acquire Personal Information, etc. by using a legitimate and fair means.
3. We specify the purpose of use of personal information as much as possible, and the personal information shall be used and managed appropriately within the scope necessary to achieve the said purpose.
4. We will never provide Personal Information, etc. (excluding Personal Information including individual number) to third parties, without the prior consent of the individual, unless we are otherwise required by the provisions of laws or regulations.
5. We respect the rights of the individual concerned, and when individuals request disclosure, correction, deletion, etc., of the relevant personal information, we respond appropriately to such requests with reference to laws, regulation and customs, etc.
6. In managing personal information, we are committed to take necessary and appropriate measures to prevent leakage, loss, or damage of personal information, correct and otherwise manage safely 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, Nohara Group, Inc. (Representative Director: Kosuke Nohara; 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), the user's activity history on the communication service, and the information generated or stored in connection with the user or the user's terminal (hereinafter referred to as "Personal Information, etc.") are an important assets, and ensure to protect Personal Information, etc. based on the following policy.

### Article 1: Acquisition of Personal Information

We acquire 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 Personal Information, etc. obtained in the course of business conducted by us our group companies 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) To provide, improve, develop and advertise the services (hereinafter referred to as the "Services") of us and our group companies (described in Article 6, Shared Use of Personal Information, etc.)

[Click here for more information on our business activities of the Company and our group companies.](#)

- (2) To provide, propose, develop, and improve services appropriate to user preferences and to distribute advertisements by analyzing the situation of use of the Service, usage history, user location information, user attribute information, uploaded drawing data, etc.

- (3) To provide information on new features, updates, campaigns, etc. of the Service (including sending e-mails, flyers, and other direct mailings)
- (4) To contact users as necessary for maintenance, important notices, etc.
- (5) To respond to inquiries from users regarding the Service (including to confirm the identity of the user)
- (6) To perform incidental construction, maintenance, and after-sales maintenance at homes of customers( including users) that we have been involved in construction
- (7) To request cooperation for questionnaires, interviews, etc. related to the Service, to request participation in various events, or to report the results of such events, etc.
- (8) To identify users who violate the Terms of Use or who attempt to use the Service for fraudulent or unfair purposes, and to refuse their use of the Service
- (9) To perform tax and accounting audit confirmations

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

- (1) Except in the following cases, we will never provide Personal Information, etc. to any third party without obtaining the prior consent of the user;
  - ① When providing information to contractors (including, but not limited to, third parties such as business partners, subcontractors, and design firms, contractors when we contract to perform services related to this Service, or contractors to whom we outsource system development, etc.) (Article 4),
  - ② When providing personal information to group companies (Article 6),
  - ③ When the personal information is provided to a third party located in Paraguay in connection with the entrustment of the handling of personal information. The said third party has a system that complies with the standards necessary for the continuous implementation of appropriate measures as referred to in the Act on the Protection of Personal Information, and
  - ④ In other cases permitted under the Act on the Protection of Personal Information and other laws and regulations.
- (2) The Personal Information, etc. to be provided in accordance with each item of the preceding paragraph shall be the user's name, address, telephone number, date of birth, building site information, building information, and other necessary items. The means or method of provision of personal information shall be by telephone, fax, e-mail, postal mail, courier service, or other general means of communication, or by hand delivery.

- (3) Notwithstanding the provisions of Paragraph 1, we may provide Personal Information, etc. to third parties in China and Vietnam. Please click [here](#) for more information on the personal information protection laws and regulations of China and Vietnam.
- (4) We will never provide the Specific Personal Information, etc. to any third party, except as required by 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: Joint Use of Personal Information, etc.

- (1) We may share and jointly use the Personal Information etc. (name, address, company name, department name, telephone number, fax number, e-mail address, drawings, product purchase history, etc.) of users with our group companies, when such Personal Information etc., is necessary when we conduct business activities jointly with our group companies.
- (2) our group companies for joint use
- Nohara Steel Co., Ltd.
  - NOHARA CEMENT CO., LTD.
  - ARC-NOHARA CO., LTD.
  - CAL CO., LTD.
  - Nittobo Material Co., Ltd.
  - BIMobject Japan, Inc.
  - Sanei Sangyo Co., Ltd.

- JUSTKENZAI CO., LTD.

(3) Purpose of joint use

Same as our purpose of use (described in Article 2)

(4) Responsible Party for joint use

Nohara Group, Inc.

Article 7: Disclosure, Correction, Suspension of Use, and Deletion of Personal Information, etc.

If we receive users' requests of disclosure, correction, suspension of use, or deletion of his/her own retained personal data and records provided to third parties, we will promptly respond to such requests in accordance with the laws and regulations.

Article 8: Use of Online Identifiers

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

In addition, third parties affiliated with us may send cookies to the users' 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. User may set user's 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 9: Use of SSL

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

Article 10: Use of Google Analytics

(1) In order to recognize how users 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 users' 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. 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) Users 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 11: 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 the consent of users under the laws and regulations, the changed Privacy Policy shall apply only to those users 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 users of the effective date and content of the revised Policy by posting the revised Policy on the Site.

#### Article 12: Inquiries

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

Inquiry Desk

Nohara Group, Inc.

Personal Information Protection Manager

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

03-3357-2231

