

## PIXTA Group Companies Privacy Policy

### 1. Handling of Our Customer's Information

We, PIXTA Inc. (hereinafter referred to as "Pixta") and PIXTA Group Companies consisting of our subsidiaries and affiliated companies (collectively hereinafter referred to as the "PIXTA Group") hereby provide the following Privacy Policy (hereinafter referred to as the "Privacy Policy"), and will handle with the utmost attention the information including, but not limited to, personal information collected from each user of services operated and provided by companies of the PIXTA Group (hereinafter referred to as the "Services") in accordance with the Privacy Policy. Depending on contents of the Services, the PIXTA Group may designate other handling policy in addition to, or separately from, the Privacy Policy. In such case, the other handling policy shall apply to the information of the users of the said Services.

In case where the Personal Information is collected in the context other than use of the Services such as in case of application for employment, the purpose of use of the Personal Information otherwise designated should be noted. However, such designation may be omitted if the purpose of use can be clearly recognized under the acquisitional circumstances.

### 2. Name, Address, and Name of Representative of Pixta

PIXTA Inc.

3-3-5 Shibuya, Shibuya-ku, Tokyo 150-0002 JAPAN

CEO Daisuke Komata

### 3. Definition

- (1) The term "our subsidiaries and affiliated companies" shall mean the companies of the PIXTA Group as listed under the Group Company.
- (2) The term "Personal Information" shall mean information about a living individual which can identify the specific individual by name, date of birth or other description contained in such information (including such information as will allow easy reference to other information and will thereby enable the identification of the specific individual), and which contains an individual identification code, in accordance with Act on the Protection of Personal Information.

### 4. Our Customer's Information to be Collected

The PIXTA Group will collect and obtain the following information including the Personal Information of the customers in the course of his or her use of the Services. The customers who use the Services shall be hereinafter referred to as the "User":

- (1) Information provided by the User in the course of his or her use of the Services

The PIXTA Group will collect and obtain the User's information such as e-mail address, password,

name, date of birth, postal address, telephone number, gender, and information for settlement such as credit card information and bank account information required in the course of the User's use of the Services including, but not limited to, membership registration, log-in, authentication, inquiries, payment of prices, or receipt of remuneration. The PIXTA Group may require a certain part of the Users such as the Contributor Members or the Photographers of the Services, to provide their profile information, including, without limitation, their display names and real names, in order to make them known to the public, and such information will be accessible by the Users of the Services. Also, The PIXTA Group may, for secure operation of the Services, require such Users to submit their identification upon the membership registration. Due to the particular nature of the Services, the identification will be required in order to prevent impersonation etc. of the Users who provide the contents or services available in the Services, and will be automatically deleted after a certain period of time designated by The PIXTA Group. The PIXTA Group may collect from customers who participate in the campaigns or questionnaires etc. their names, addresses, telephone numbers, e-mail addresses or other information after designating the purposes of use of the information.

Some of the Services provide functions that enable the User to use the Services using the external SNS account other than those of PIXTA Group at the User's option. In such cases, PIXTA Group may, based on the User's consent, collect the User's information from any third party such as the external SNS other than PIXTA Group.

- (2) Information related to the User's devices accessing to the Services and information collected through our use of Cookies etc.

The PIXTA Group will collect and obtain the information collected through the use of Cookies or web-beacon, IP address, browser information, access logs such as browsing record information, device information, or any other information related to the User's use of the Services for improvement of the User's convenience or experience in using the Services. We do not regard such information as included in the Personal Information because it alone cannot identify the specific individual; provided, however, that it shall be regarded as the Personal Information if it is combined and used together with any of the Personal Information.

## 5. Purpose of Use

The PIXTA Group will use the collected Personal Information for the following purposes (hereinafter referred to as the "Purposes").

- (1) For provision and maintenance of the Services;

The PIXTA Group will use the User's Personal Information for provision and maintenance of the Services, including, but not limited to, the following cases where the PIXTA Group:

- i. responds to the User's inquiries or the system troubles etc. in the Services, by investigating the usage status etc. of the Services by the User related thereto;
- ii. verifies or authenticates the User's identity in order to provide the membership registration or login functions;

- iii. bills the fees and pays the remuneration for the use of the Services;
- iv. notifies of the updates of the Terms of Use etc., the changes of functions, and other important notices related to the Services; and
- v. conducts campaigns or questionnaires etc. related to the Services, including, but not limited to, any new services, which may include campaigns or questionnaires etc. related to any other companies' products or services etc.

(2) For security and countermeasures against fraud;

The PIXTA Group will use the User's Personal Information for security and countermeasures against fraud in order for the User to use the Services in safe, for example, when detecting fraudulent acts such as violation of the Terms of Use etc. of the Services, illegal acts, or unauthorized access etc. in advance, and when confirming the facts if any fraud occurs or is suspected to occur;

(3) For provision of appropriate contents to the User;

The PIXTA Group will use the User's Personal Information for provision of appropriate contents to the User, for example, for displaying highly relevant contents as recommended contents from the User's search, purchase or reservation history, etc.

(4) For advertisement, promotion, and marketing;

The PIXTA Group will use the User's Personal Information, based on the User's consent, or in a manner and to the extent as permitted under applicable laws and regulations, in order to send, display or otherwise provide (by telephone, e-mails or other means) advertisements etc. on the products or services of the PIXTA Group or any other companies that will be considered useful to the User. The PIXTA Group may deliver advertisements and e-mail magazines according to the User's interests through analyzing the acquired browsing history, purchase history, and other information.

(5) For service improvement and research development;

The PIXTA Group will use the User's Personal Information for the purpose of improvement of the Services and research development or the PIXTA Group's business operation, for example, for improving the websites of the Services through analyzing the acquired browsing history, purchase history, and other information. The PIXTA Group may conduct service improvement or research development through aggregating or analyzing the attributes of the User's Personal Information, and creating the statistical material processed to make the individuals unrecognizable or unidentifiable.

(6) For handling of the Personal Information in accordance with the terms or rules of, or related to, the Services;

PIXTA Group may, pursuant to the provisions of the Terms of Use etc. of the Services, disclose and use the User's Personal Information for communication between the Users necessary for the use of the Services. If the User violates any provision of the Services' Terms of Use etc. and the PIXTA Group considers it necessary to disclose and use the User's Personal Information to any third party related to the violation, the PIXTA Group may do so, in accordance with the provisions of the Services' Terms of Use etc.

(7) For other purposes related to the above purposes.

## 6. Handling of Personal Information

The PIXTA Group will handle the User's Personal Information in accordance with Act on the Protection of Personal Information or its relevant laws and regulations.

The PIXTA Group will take necessary and appropriate measures for the security control of the collected Personal Information such as prevention of the leakage, loss or damage of such Personal Information.

The PIXTA Group will not provide the User's Personal Information to any third party without the User's prior consent, except the following cases:

- (1) Cases based on laws and regulations;
- (2) Cases in which there is a need to protect a human life, body or fortune, and when it is difficult to obtain the User's consent;
- (3) Cases in which there is a special need to enhance public hygiene or promote fostering healthy children, and when it is difficult to obtain the User's consent;
- (4) 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 the User's consent would interfere with the performance of the said affairs;
- (5) Cases in which the third party is an academic research institution etc. and the third party needs to handle the Personal Information for academic purposes, including the case where part of the purpose of handling the Personal Information is for academic research purposes, except the case where the rights and interests of any individual may be unreasonably infringed;
- (6) Cases in which handling of the Personal Information will be entrusted to subcontractors to the extent required for achievement of the Purposes hereunder;
- (7) Cases in which the User's action has breached the terms, policy or notices etc. of the Services and in which it is considered necessary to protect right or fortune of the other User, the third party, or the PIXTA Group;
- (8) Cases in which disclosure of the Personal Information is lawfully demanded pursuant to order by the court, government authority, or by the police or any other equivalent public agency; or
- (9) Cases in which disclosure or entrustment of the Personal Information is otherwise permitted under laws and regulations or the terms etc. agreed by the User.

## 7. Joint Use of Personal Information

In order to provide the User with better services, we will jointly use the Personal Information with the PIXTA Group pursuant to the provisions of laws and regulation.

- (1) Items that may be used jointly:

The same as set forth in Article 4 "Our Customer's Information to be Collected" of the Privacy Policy.

(2) Scope of joint users:

The companies of the PIXTA Group as set forth in the Article 3 of the Privacy Policy.

(3) Scope of use:

The same as set forth in Article 5 “Purpose of Use” of the Privacy Policy.

(4) Entity responsible for management of joint use:

PIXTA Inc.

3-3-5 Shibuya, Shibuya-ku, Tokyo 150-0002 JAPAN

CEO Daisuke Komata

8. Mail Magazines etc.

The User may cease, suspend, or restart the subscription of our direct mails or mail magazines in accordance with the manner as separately designated by us.

9. Cookies etc.

The PIXTA Group will collect the User’s information by use of Cookies or web-beacon as set forth in Article 4 of this Privacy Policy. Any User who desires to disable Cookies may do so by changing the configuration of web browser. Though the User who disables Cookies can access or use a part of the Services (including, without limitation, the websites of the Services; hereinafter the same.), it should be understood that the services available to the User will be limited in connection with the part of the Services that uses Cookies.

(1) Behavioral Targeting Advertisement Services

Behavioral Targeting Advertisement Services listed on “Behavioral Targeting Advertisement the Services List” may be used in part of the Services in order to distribute proper advertisements to the User. In Behavioral Targeting Advertisement Services, selected advertisements will be distributed in accordance with interests or preference of the User who accesses to the Services on the basis of Cookies information such as the browsing record information. Any User who desires to refuse such Behavioral Targeting Advertisements has to access the opt-out pages of each of the companies listed on Behavioral Targeting Advertisement the Services List, and conduct invalidation procedures.

“Behavioral Targeting Advertisement the Services List” is here.

(2) Analysis Tool

The Services use Google Analytics, and other analysis tools provided by third party corporations for the purpose of service improvement and advertising effectiveness measurement etc. These analysis tools collect and analyze the information related to the User’s use of the Services such as the information collected through the use of Cookies, etc., access logs and device information as set forth in the item (2) of the Article 4 of the Privacy Policy. Pixta will receive from the Google LLC and other third party corporations the analysis data, and understands how the User accesses to the Services. The data has been collected anonymously through the analysis tools and cannot identify any specific

individual, and has been handled in accordance with the privacy policies of the Google LLC (<https://policies.google.com/technologies/partner-sites?hl=en-US>) or other third party corporations. As the User may prevent collection of such data by refusing Cookies in the analysis tools, the User who desires to do so should check the settings of the User's browser. The invalidation of the Google Analytics can be made by downloading and installing the "Google Analytics Opt-out Browser Add-on" available in the download page prepared by the Google LLC and changing the add-on settings of the browser.

"Analysis Tools List" is here.

#### 10. Security Effort

- (1) In order to protect the User's Personal Information, websites of the Services accommodate SSL as appropriate, through which the Personal Information entered by the User will be transmitted after having been automatically encrypted.
- (2) The PIXTA Group will take protection measures against any unauthorized access to our network, and will take the efforts to prevent any access to our server from outside of our network. We take the appropriate measures and control policies upon transmission of any specific Personal Information in order to keep security of the User's Personal Information and maintain accuracy thereof.
- (3) In order to maintain safety of the User's account, it is important for the User by him or herself to protect the password to log-in the account. The User should refrain from setting the same password of another services, or keeping the User's password in any manner that the password may become known to any third party.

#### 11. Safety Management Measures

The PIXTA Group will take necessary and appropriate safety management measures in order to prevent leakage, loss or damage in handling the Personal Information, and will conduct necessary and appropriate supervision to employees and contractors handling the Personal Information. Though the safety management measures are concretely provided in the "Personal Information Handling Policy" or other internal regulations, the main contents thereof are as follows:

##### (1) Formulation of Privacy Policy

This Privacy Policy has been formulated in order to ensure proper handling of the Personal Information.

##### (2) Establishment of disciplines on handling the Personal Information

The PIXTA Group has established disciplines on handling the Personal Information through formulating the Personal Information Handling Policy, the Personal Information Handling Manuals and other rules, for handling methods, responsible persons/persons in charge, at each stage of collection, use, storage, provision, deletion, or disposal.

(3) Organizational safety management measures

The PIXTA Group has set up the Personal Information Protection Manager, who has overall responsibility for handling of the Personal Information, clarified the employees who handle the Personal Information, and the scope of the Personal Information handled by the employees, and established a reporting and communication system to the Personal Information Protection Manager for the case where any fact or sign of violation of Act on the Protection of Personal Information and the Personal Information Handling Policy is detected.

In addition to conducting the self-inspections on status of the Personal Information handling on a regular basis, the internal audit has been conducted by the internal audit department.

(4) Personnel safety management measures

The training for the points on the Personal Information handling has been provided to the employees on a regular basis. The confidentiality provision of the Personal Information has been provided in the Employment Rules, and the oath regarding the confidentiality thereof has been acquired from the employees.

(5) Physical safety management measures

Measures have been taken in order to prevent any access etc. to the Personal Information by unauthorized persons. In addition to taking measures in order to prevent theft or lost etc. of devices, electric medias, and documents etc. handling the Personal Information, any other preventive measures against leakage etc. have been taken in respond to the change of working environment such as migration to remote working.

(6) Technical safety management measures

Access control has been implemented to limit the person in charge who can access, and the scope of database of the Personal Information to be handled. The protection measures have been introduced to protect the information systems handling the Personal Information from unauthorized access or malware from the outside.

12. Correction, etc. of Personal Information

- (1) The User may confirm or correct the registered Personal Information in “account page” or any other equivalent function within the Services.
- (2) The User is entitled to request of the PIXTA Group correction, addition, or deletion of the User’s Personal Information (hereinafter referred to as the “Correction, etc.”), on the ground that such Personal Information is contrary to the fact. If the User requests the Correction, etc. exercising his or her right entitled, the PIXTA Group will make a necessary investigation without delay, after confirming the identification of the requesting User, and will, on the basis of result of such investigation, perform

the Correction, etc. or will not perform the same if the PIXTA Group decides so, and notify the User thereof; provided, however, that the foregoing shall not apply in cases where the PIXTA Group is not obligated to perform the Correction, etc. pursuant to the Act on the Protection of Personal Information or any other laws and regulations.

- (3) The User is entitled to request of the PIXTA Group discontinuance of the utilization or erase of the User's Personal Information (hereinafter referred to as the "Discontinuance of the utilization, etc.") pursuant to the Act on the Protection of Personal Information on the ground that the Personal Information is being handled beyond the scope of the Purposes announced publicly in advance or has been acquired by a deception or other wrongful means. If the User requests the Discontinuance of the utilization, etc. exercising his or her right entitled, the PIXTA Group will, after confirming the identification of the requesting User, perform the Discontinuance of the utilization, etc. or cease providing the User's Personal Information, and notify the User thereof; provided, however, that the foregoing shall not apply in cases where the PIXTA Group is not obligated to perform the Discontinuance of the utilization, etc. pursuant to the Act on the Protection of Personal Information or any other laws and regulations.

### 13. Update or Alteration of This Privacy Policy

Whenever it is reasonably considered necessary by the PIXTA Group, we may change the Privacy Policy pursuant to provisions of laws and regulations. If there is any material change in the Privacy Policy or in our handling the User's Personal Information, we will notify the User thereof in either manner of (i) posting the notice in the Services or (ii) sending an e-mail to the User.

### 14. Other Important Points

The provisions of the Privacy Policy take effect between the User and the Pixta Group, and will not apply to any third party including, but not limited to, the external services being linked from the Services. We shall not be liable to the User's Personal Information that is registered or handled in such external services because it is not covered by or subject to the Privacy Policy under the PIXTA Group's control.

The number of companies constituting the PIXTA Group or the name(s) thereof may be changed due to any reason such as reorganization.

### 15. Inquiries regarding Personal Information

The User is entitled to request disclosure, the Correction, etc., and the Discontinuance of the utilization, etc. of the Personal Information handled by the PIXTA Group to the extent permitted by the applicable laws and regulations. The procedures under which the User requests confirmation, the Correction, etc., the Discontinuance of the utilization with the Services is set forth in Article 12 of the Privacy Policy. If the User requests to the PIXTA Group disclosure of the Personal Information which cannot be confirmed by the User in the Services, the Correction, etc., the Discontinuance of the utilization, etc., notification of the Purposes, or requests to exercises the other rights permitted under the applicable laws and regulations, or



if the User has any inquiry about handling of the Personal Information, the User should contact the PIXTA Group through the following inquiry form. After confirming the User's identification, the PIXTA Group will answer to the User's inquiry within a reasonable period of time pursuant to the related laws and regulations, provided, however, that, if the request or inquiry falls under any of the following items, there may be cases in which the PIXTA Groupe is not obligated to answer the User's request to the extent permitted under the applicable laws and regulations.

- (1) Cases in which it is likely to harm the life, body, property, or other rights or interests of the User or a third party;
- (2) Cases in which it is likely to seriously impede the proper execution of the business of the PIXTA Group;
- (3) Cases in which it violates laws and regulations;
- (4) Cases in which we cannot confirm the User's identification;
- (5) Cases in which it is permitted by the applicable laws and regulations for the PIXTA Group to refuse the User's request or inquiry.

Even after the User has stopped using the Services, the PIXTA Group may retain the Personal Information for a period of time as specified in the Terms of Use of the Services, etc. in order to use the same whenever necessary.

- PIXTA

As of March 30, 2022