

## PRIVACY POLICY

Pax Creation Co., Ltd. (hereinafter referred to as the "Company") provides services such as system development contracts, human resources services such as temporary staffing, money transfer services and travel/tourism. When handling personal information entrusted to us, we fully recognize its importance and pay the utmost attention to protecting privacy. Our company's approach to privacy is shown in the items listed below, and we will ensure that this is implemented.

### 1. Acquisition, use and provision of personal information

When acquiring personal information, our company will clarify the purpose of use, acquire it in a lawful and fair manner, and will not handle it beyond the scope of the stated purpose of use. The purpose of use determined by our company is as described in "Handling of personal information".

We will not provide your personal information to a third party without your consent. However, if we are required to provide personal information based on the law that we are subject to, we may provide information accordingly.

When acquiring, using, and providing personal information in services provided by our company other than those listed above, we will notify you in some way of the necessary matters regarding the acquisition, use, and provision of that personal information.

In order to ensure that personal information is not used for purposes other than its intended purpose, our company has established internal regulations regarding the handling of personal information, and all officers, employees, contract employees, etc. (hereinafter referred to as "employees") are made aware of these regulations and are required to comply with these regulations. We will operate it pursuant to internal regulations.

### 2. Compliance with laws and regulations

Our company complies with laws, national guidelines, and other norms regarding the handling of personal information.

### 3. Safety management of personal information

In order to ensure the accuracy and safety of personal information, our company will implement appropriate preventive and corrective measures against leakage, loss, or damage of personal information.

### 4. Complaints and inquiries regarding the handling of personal information

If you have any complaints or inquiries regarding the handling of personal information, please contact the contact point below.

Additionally, if you wish to confirm, correct, or delete personal information that you have provided to us, please contact us. We will respond within a reasonable range only if we can confirm that you are the person in question.

<Inquiries Counter>

Pax Creation Co., Ltd. Personal Information Inquiries Desk

Postal Code: 153-0064

1-4-7-308 Shimomeguro, Meguro-ku, Tokyo

E-MAIL: [privacy@paxcreation.com](mailto:privacy@paxcreation.com)

5. Continuous improvement of personal information protection management system

Our company will establish, implement, maintain, and continuously improve a "Personal Information Protection Management System" to protect and appropriately handle personal information.

If there are any important changes to our personal information protection policy, we will notify you by posting them on our website.

Date of enactment: December 1, 2018

Date of last revision: November 6, 2023

Pax Creation Co., Ltd.

Chief Executive Officer: Shigenori Sato

**About the handling of personal information**

1. Purpose of use of personal information acquired by our company

The purposes of use of personal information acquired by our company are as follows. When acquiring personal information directly from the person in writing, we will specify the purpose of use in a separate document and obtain the consent of the person in writing. (Including registration on the web, etc.)

<b>Personal information name</b>	<b>purpose of use</b>
Business partner personal information	The information will be used for selection of business partners, sales information, execution of consignment business, contract agreement, transaction management, and similar purposes.
Temporary employee personal information	Communication/reception for registration procedures, selection, applicant selection work such as determination of registration success/failure, personnel and labor management work after registration, dispatch management work, and execution of similar work.
Personal information of temporary employee scheduled to be dispatched placement	Communication/reception for registration procedures, execution of job placement-related duties, and execution of duties equivalent to these.
Personnel introduction registrant personal information	Communication/reception for registration procedures, execution of job placement-related duties, and execution of duties equivalent to these.
Personal information at the time of recruitment	Communication/reception for interviews, applicant selection, hiring success/failure determination, and execution of similar duties.
Employee personal information	Performing personnel and labor-related tasks, safety and health management tasks, and similar tasks after joining the company

Personal information of applicant for money transfer service	Performing applicant screening operations such as whether or not to register as a member, and similar operations.
Personal information of money transfer service members	Communication and reception for registration procedures, execution of fund transfer service operations, legal compliance operations, and execution of operations similar to these.
Personal information of travel applicant	Communication and providing services related to the travel such as transportation, stay etc. * Credit card related information of travel applicant is used only for settlement, and will be deleted after settlement.
Personal information for various inquiries	It will be used only for responding to inquiries and similar purposes.

2. Dissemination of matters regarding retained personal data or records provided to third parties  
Requests for notification of purpose of use, disclosure (including disclosure of records provided to third parties), correction, addition or deletion of content, suspension of use, cancellation, or suspension of provision to third parties (hereinafter referred to as "disclosure, etc.") If you wish to do so, please check the following items before making your request. Even if personal information does not fall under retained personal data, if we have the authority to respond to all requests for disclosure, etc. requested by the individual, we will handle it in the same way as retained personal data.

(1) Business name and address, representative name

Pax Creation Co., Ltd.

Postal code: 153-0064

Address 1-4-7-308 Shimomeguro, Meguro-ku, Tokyo

Chief Executive Officer: Shigenori Sato

(2) Job title and contact details of Head of personal information protection

Job title of Head of personal information protection: Manager of Legal department

E-MAIL: [privacy@paxcreation.com](mailto:privacy@paxcreation.com)

(3) Purpose of use of all retained personal data

Please refer to "1. Purpose of use of personal information held by our company". However, personal information related to outsourced business is excluded.

(4) Where to submit complaints regarding the handling of retained personal data.

Please submit complaints to the "Point of Complaint" listed in the following section (5)-(a).

(5) Procedures for responding to requests for disclosure, etc.

(b) Where to make requests for disclosure, etc.

If you wish to make a request for disclosure, etc., please contact the address below.

In addition, when we cannot confirm your identity or when there is an error in the information on the request for disclosure, etc., we will contact you to that effect and advise you to re-request, but within two weeks of the notification, If we do not receive a re-request, we will treat your request as if there was no request for

disclosure, etc.

(Address to)

Pax Creation Co., Ltd. Personal Information Protection Consultation Desk

Postal code: 153-0064

Address: 1-4-7-308 Shimomeguro, Meguro-ku, Tokyo

TEL: 03-6420-0045

E-MAIL: [privacy@paxcreation.com](mailto:privacy@paxcreation.com)

(b) Format of documents to be submitted when making a request for disclosure, etc., and other methods for requesting disclosure, etc. Please contact the address set forth in the preceding paragraph. After that, we will send you the necessary format of documents.

(C) Method of identity verification

① In the case of mail and e-mail:

Copy of driver's license, passport, individual number card (front side only), health insurance card or alien registration card, and copy of resident card. We will receive and confirm your submission.

② In the case of an agent: Regarding

the agent's authority, if the agent is the legal representative of a minor, the person will be identified by a copy of the family register, and if the agent is the legal representative of an adult ward, the guardianship commencement judgment document will be used to confirm the identity. I will do it.

If the agent is a voluntary agent, in addition to ① above, the identity of the agent will be verified using a power of attorney and a seal registration certificate for requests for disclosure, etc.

③ How to collect fees

Based on Article 33 of the Personal Information Protection Law, our company collects fees for notifications of purpose of use and requests for disclosure.

Please pay the handling fee of 430 yen (tax included) per request by registered mail or by transfer to the bank account designated by our company.

\*The transfer fee will be borne by the person himself/herself.

(d) Disclosure method when a request for disclosure is received. Information

will be sent by post or email to the requester's address or email address listed on the request for disclosure, etc. Please note that in this case, it may take several days before shipping. Please note that we may not be able to respond to disclosure due to legal provisions. If we decide not to disclose the information, we will reply with the reason.

(6) Regarding safety management measures for retained personal data

Formulation of basic policy	In order to ensure the proper handling of personal data, we have formulated and published a personal information protection policy.
Establishment of regulations regarding	We have established personal information protection regulations regarding handling methods, persons in charge and their duties, etc. for each acquisition, use, storage, provision, deletion/disposal, etc.

the handling of personal data	
Organizational security control measures	In addition to establishing a person responsible for handling personal data, we will clarify the employees who handle personal data and the scope of personal data handled by those employees, and if we discover facts or signs of violation of laws or personal information protection regulations. We have established a system for reporting to the person in charge. We regularly conduct self-inspections regarding the handling of personal data.
Personnel safety management measures	We provide regular training to employees regarding matters to be noted regarding the handling of personal data. Matters regarding confidentiality regarding personal data are stated in the employment regulations.
Physical safety control measures	In areas where personal data is handled, we control the entry and exit of employees and take measures to prevent unauthorized persons from viewing personal data. We take measures to prevent the theft or loss of devices, electronic media, and documents that handle personal data, and when carrying such devices, electronic media, etc., we take measures to prevent personal data from being easily discovered.
Technical safety control measures	We implement access control to limit the scope of personnel and personal information databases handled. We have introduced a mechanism to protect information systems that handle personal data from unauthorized external access or software.

### **Main office**

(Address) 1-4-7-308 Shimomeguro, Meguro-ku, Tokyo

(Postal code) 153-0064

TEL: 03-6420-0045 / FAX: 03-6420-0046

### **Satellite office**

Arco Tower 7F, 1-8-1 Shimomeguro, Meguro-ku, Tokyo 153-0064

### **Vietnam System Development (Local subsidiary)**

Charmington La Pointe, căn hộ số 3.54, tầng 3, số 181, đường Cao Thắng, phường 12, quận 10, Tp. Hồ Chí Minh, Việt Nam.

### **Ukraine System Development (Local subsidiary)**

PAXCREATION Ukraine

Volodymyrska St 101 Kyiv, Ukraine LIFT99 Kyiv Hub