

## **Privacy Policy**

### **Personal Information Protection Policy**

In the course of the planning and service operations for human resources solutions, WORKSJAPAN Co., Ltd. (hereinafter “the Company”) provides solutions for human capital management (“human capital recruitment” “human capital development” “human capital utilization”) in order to enhance the value of “individuals” to the maximum level and recognizes that it is our important social responsibilities to strictly manage security of a variety of “information” handled by the Company. Among others, strongly recognizing the importance of personal information, the Company treats the protection of privacy as one of top priorities in the corporate activities. In order to ensure to do so, our officers and employees shall strive to appropriately handle and manage personal information in accordance with this Policy.

#### **[1] Acquisition, Use and Provision, and Prohibition on Unintended Use of Personal Information**

The Company will not acquire or use personal information without consent of the personal information provider. Under our internal regulations, even with the consent of the personal information provider, the Company will use personal information only within the scope of the intended purpose for which such consent is obtained and prohibit any unintended use, and the Company takes measures to ensure this. If an individual consents to provide his or her personal information, the Company will not provide such personal information to any third party except where permitted by law.

#### **[2] Proper Management of Personal Information, Prevention and Correction of Risks**

The Company will securely and correctly manage any personal information acquired by the Company and personal information entrusted to the Company from outside the Company and will implement information security measures against unauthorized access, loss, destruction, alteration, leakage or other incidents of such personal information and endeavor to prevent and correct such incidents. When outsourcing the services to outside the Company and entrusting the handling of personal information, the Company will do so under our strict control.

#### **[3] Compliance with Laws and Norms**

The Company will comply with the laws, regulations, ordinances, guidelines established by the national government of Japan, and other norms concerning the personal information protection, and the Japanese Industrial Standards “Personal Information Protection Management System” (JISQ15001:2006).

**[4] Development and Continuous Improvement of Personal Information Protection Management System**

The Company will establish a “personal information protection management system” and continuously review and improve it.

**[5] Complaint and Consultation**

If the Company receives complaints or requests for consultation from customers regarding the handling of the personal information and the personal information protection management system, the Company will accept them at the customer consultation desk and respond to them appropriately and promptly.

July 7, 2010

WORKSJAPAN Co., Ltd.

Representative Director and President

Shinichiro Shimizu

## Handling of Personal Information

WORKSJAPAN Co., Ltd.

Toshiyuki Matsui, PMS Manager

The Company will comply with laws and regulations, guidelines established by the national government of Japan, and other norms concerning the handling of personal information.

The Company will appropriately handle personal information in accordance with the following provisions.

### 1. Purpose of Use of Personal Information

The Company will acquire personal information relating to the services contracted by a customer enterprise for either of the following purposes of services and properly handle such personal information within the scope of the purpose of use.

- To make communication about the decision of acceptance/rejection or various notifications on commission by the customer enterprise.
- To manage information of the applicants for the customer enterprise, including the management of the status of selection.

### 2. Purpose of Use of Personal Information subject to Disclosure

#### (1) Purpose of use of customer information and trading partner information

Services relating to the human resources business.

To contact and give sales information to customers; and to contact persons-in-charge of trading partners.

#### (2) Purpose of use of the information of applicants to recruitment

Recruitment and selection, and correspondence.

#### (3) Purpose of use in the services relating to the human resources business

The Company will use the relevant personal information to the extent necessary for the following services in relation to personnel placement, and provision of part-time job information and employment information.

1. Services and correspondence in relation to the performance and management of contracts.
2. Services in relation to the matching of enterprises requesting personnel placement (job offerers) and job applicants.
3. Provision of information relating to student life (such as travelling, residence, part-time job and employment) and implementation of questionnaires.
4. Any other service associated with or related to each of the above services.

Dispatch of goods, provision of the relevant after-sales services, and announcement of new products or services in the course of the services listed in 1 through 3 above

(4) Purpose of use of employee information

Personnel payroll service, social insurance work, attendance management, safety and health management, welfare benefits, and business correspondence.

### **3. Matters Pertaining to Cases where Personal Information is to be Provided to Third Parties**

The Company may provide personal information acquired by it to a third party in the following manner to the extent necessary for the achievement of the purposes of services.

1. Purpose of provision of personal information to third parties and entities to which personal information is provided

Member information and job applicant information in the services relating to the human resources business.

(i) The Company will provide personal information to enterprises, etc. that participate in various kinds of seminars and events sponsored or operated by the Company for the purpose of employment placement, employment support or employee recruitment.

(ii) The Company will provide personal information to the relevant contractee enterprises for the purpose of implementing the employee recruitment service.

2. Items of personal information to be provided

Name, address, telephone number, email address and other items necessary for contacting or providing information to customers, and minimum items necessary for the implementation of purposes.

3. Means or Method of Provision

Personal information will be provided in writing or by electronic means.

4. Contract pertaining to handling of personal information

As for the handling of personal information to be sent in writing or by electronic means, the Company mandates in the confidentiality agreement, etc., as a general rule, that the entity to which the personal information is provided shall protect personal information appropriately.

### **4. Procedures for Requesting Disclosure, etc. of Personal Information**

Please contact us using the following contact details if you have a request for notification of purpose of use of, disclosure, correction, addition or deletion, refusal of use or provision (hereinafter referred to as “Disclosure, etc.”) of the personal information subject to disclosure held by the Company. The Company will respond to your request without undue delay. If the Company directly receives such request relating to the personal information falling under item 1. of the section above, the Company will decide on how to respond after making inquiries to the relevant contractee enterprise.

## **5. Procedure Method for Submitting Complaints about Handling of and Requesting Disclosure, etc. of Personal Information**

- (i) The Company will conduct personal identity verification based on the personal information held by the Company.
- (ii) In the case of an inquiry by a personal information provider's representative, the Company will verify the representative's identity based on the power of attorney or seal certificate, etc.

## **5. Procedure Method for Submitting Complaints about Handling of and Requesting Disclosure, etc. of Personal Information**

- (i) The Company will conduct personal identity verification based on the personal information held by the Company.
- (ii) In the case of an inquiry by a personal information provider's representative, the Company will verify the representative's identity based on the power of attorney or seal certificate, etc.

If you have any questions or submit complaints or request Disclosure, etc. of personal information, please contact us at the following:

WORKSJAPAN Co., Ltd., Customer Consultation Desk

TEL: 03-5209-5011                      E-Mail: [wj-privacy@worksjapan.co.jp](mailto:wj-privacy@worksjapan.co.jp)

## **Contact Details for Complaints and Consultation**

WORKSJAPAN Co., Ltd., Customer Consultation Desk

TEL: 03-5209-5011                      E-Mail: [wj-privacy@worksjapan.co.jp](mailto:wj-privacy@worksjapan.co.jp)

## **Name of Accredited Personal Information Protection Organization and Contact Details for Resolution of Complaints**

1. Name of accredited personal information protection organization

JIPDEC

Contact details for resolution of complaints

PrivacyMark Promotion Center

Address: Roppongi First Building, 1-9-9, Roppongi, Minato-ku, Tokyo 106-0032

<https://www.worksjapan.co.jp/contact/privacy.html>

TEL: 03-5860-7563 (PrivacyMark Office) / 0120-700-729 (Consumer Consultation Desk)