

# Privacy Policy

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Nikkatsu Corporation  
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<p><b>Basic Policy on the Proper Handling of Personal Information and Specific Personal Information</b></p>
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In recognition of the importance of protecting personal information and specific personal information, Nikkatsu Corporation (hereinafter, the “Company”) has established the following policy in order to make company-wide efforts to ensure the proper handling of such information and declares that it will execute, maintain, and continuously improve the handling of such information.

## **1. Compliance with Laws and Regulations**

In handling personal information and specific personal information, the Company will comply with applicable laws and regulations, including the Act on the Protection of Personal Information (hereinafter, the “Personal Information Protection Act”) and the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (hereinafter, the “Numbers Act”), and also act in accordance with other appropriate and reasonable social norms.

## **2. Strict Adherence to Proper Information Management**

The Company will establish and thoroughly enforce the “Personal Information Management Regulations” and “Specific Personal Information Handling Regulations” for the purpose of ensuring that its directors, employees, and others (hereinafter, “Employees”) recognize the importance of protecting personal information and that personal information and specific personal information are properly used and protected.

## **3. Implementation of Security Measures**

The Company will implement information security measures and other security measures in order to ensure the accuracy and security of personal information and specific personal information while also implementing appropriate preventive and corrective measures in order to prevent any loss, alteration, leakage, unauthorized access, or other damage to personal information and specific personal information.

#### **4. Acquisition of Personal Information and Specific Personal Information**

Except for cases in which the Company is permitted by laws and regulations to acquire personal information through appropriate and fair means and to handle such information when such an exception is made, the Company will publish or clearly indicate the purpose of use in advance to the identifiable person, announce it to the identifiable person, or otherwise notify the identifiable person of it promptly after the acquisition of the information. The Company will acquire any specific personal information only for purposes of use permitted by laws and regulations and strictly manage any such information that it has acquired.

#### **5. Continuous Improvement**

In order to manage personal information and specific personal information properly, the Company will monitor changes in laws and regulations, social norms, and information technologies and always continue to revise and improve its management mechanisms. The Company will also review and revise this Privacy Policy as appropriate. Upon revision, the Company will promptly renew the content of this page accordingly.

#### **6. Responses to Requests and Complaints**

The Company will respond promptly and appropriately to any requests and complaints received concerning the handling of personal information and specific personal information.

### **Privacy Policy (on the Handling of Personal Information)**

The Company has, based on the "Basic Policy on the Proper Handling of Personal Information and Specific Personal Information," established the following "Privacy Policy (on the Handling of Personal Information)" to handle any personal information that the Company may acquire carefully, appropriately, and in compliance with the Personal Information Protection Act and other related laws and regulations, guidelines, etc. It should be noted that this Privacy Policy (on the Handling of Personal Information) and other privacy policies on certain services provided by the Company will be applied in a comprehensive manner and that if there appears to be a contradiction among them, the privacy policy that is specifically applicable to each service shall prevail.

#### **1. Purpose of Use of Personal Information**

The Company will use any personal information only within the purposes of use listed below unless otherwise required by laws and regulations. When the Company intends to use personal information for a purpose not listed below or to acquire a type of personal information not listed below, the Company will separately publish the purpose to the identifiable person or notify the identifiable person of the purpose and handle such

personal information within the limits of that purpose.

#### (1) Personal Information of Customers

- Reception work of various kinds
  - For responding to inquiries, opinions, complaints, etc. including sending relevant materials
  - For accepting applications for goods related to an event and sending such goods
- Accepting applications of various kinds
  - For sending notices to winners of preview screenings or other events
  - For communications necessary for accepting applications for an appearance as an extra, designation as a program reviewer, participation in a program or an audition, or sending requests for questionnaires
  - For holding a lottery or sending gifts to winners as part of a gift campaign
  - For communications necessary for public solicitation of various kinds, including public solicitation for posters
- Providing information of various kinds
  - For sending email newsletters
  - For sending direct mails for advertising purposes
  - For sending necessary notices such as notices of a change in service or discontinuation of service
- Managing the entering and exiting of the Company's facilities
  - For security management such as crime prevention, information security, and disaster prevention
- Other

When the Company intends to use personal information for a purpose not listed above, it will clearly indicate the purpose of use in advance.

\*For the purposes of use of the various services, please also review the privacy policy of each service (if such purposes are separately indicated).

#### (2) Personal Information of Shareholders

Sending business reports and other documents intended for shareholders, managing shareholders, and responding to shareholder inquiries

#### (3) Personal Information of Suppliers

Performing and managing transactions concerning the business or services of the Company

#### (4) Personal Information of Job Applicants

Reviewing job applications, arranging job interviews, and sending notices of job application results

(5) Personal Information of Graduates from Nikkatsu Visual Arts Academy

- Issuing graduation certificates, transcripts, certificates of enrollment, etc.

(6) Personal Information of Employees

Personnel management, work management, management of salaries and bonuses, provision of employee welfare benefits, health management, security management, various post-retirement procedures, and other procedures, notifications, etc., required by laws and regulations or necessary in the course of business.

\*Employees: Officers and employees (including part-time workers) of the Company and all other persons who are currently engaged or were engaged in the past in the business of the Company (including those who have already left the Company)

## **2. Security Measures**

The Company has taken the following measures to ensure the proper management of personal information including measures to prevent any leakage of, loss of, or damage to personal information.

(Establishment of a Basic Policy)

The Company has established this Privacy Policy in order to ensure the proper handling of personal information and to provide contact information for receiving questions and handling complaints.

(Establishment of Discipline on the Handling of Personal Data)

- The Company has established Personal Information Management Regulations to stipulate, among other things, the handling methods and assignments and duties of responsible persons and persons in charge for each personal information processing stage such as acquisition, use, storage, provision, deletion, disposal, etc.

(Organizational Security Measures)

- The Company has appointed a person responsible for personal data handling (a person responsible for the protection and management of personal information);
- has clarified which Employees handle personal data and the scope of the personal data handled by them;
- has established a system to ensure that any violation or sign of a violation of a law or internal regulation will be reported to the person responsible for the protection and management of personal information; and
- ensures that the status of personal information handling is regularly reviewed through

self-checks and audits conducted by responsible persons.

(Personnel Security Measures)

- The Company provides regular training to Employees regarding points to keep in mind when handling personal information; and
- has stipulated, in its Employment Rules, matters concerning the confidentiality of personal information.

(Physical Security Measures)

- The Company has implemented entrance/exit control for Employees, imposed restrictions on equipment being taken in areas where personal data is managed, and has implemented measures to prevent unauthorized persons from accessing personal information in areas where personal data is handled;
- has taken measures to prevent any theft, loss, etc. of equipment, electronic media, documents, etc. that involve personal information; and
- has taken measures to prevent personal information from easily being revealed when equipment, electronic media, etc. that involve personal information are moved including within the business premises.

(Technical Security Measures)

- The Company has implemented access control to personal data; and
- has implemented countermeasures against unauthorized software for information systems that handle personal data.

### **3. Provision of Personal Information to Third Parties**

The Company will not provide any personal information to third parties without obtaining the consent of the identifiable person except in cases where it is permitted by laws and regulations.

### **4. Outsourcing**

The Company may outsource, in whole or in part, the handling of personal information including when sending items to customers, conducting campaigns, and analyzing information such as purchase history to a third-party contractor to the extent necessary for the achievement of the purpose of use. In such case, the Company will perform the necessary and appropriate supervision of such contractors in accordance with the Personal Information Protection Act.

### **5. Joint Use of Personal Information**

The Company may use the personal information of customers jointly with other parties as part of certain services provided by the Company. For further information on the items

of personal data to be used jointly, the scope of use, the purpose of use, and the person responsible for the management of joint use, please refer to the applicable privacy policy among those listed separately on the official website of the Company's services.

## **6. Handling of Personal Information on the Company Website**

### **(1) Ensuring Security**

The Company website is compatible with SSL in order to protect the personal information of its customers. SSL stands for Secure Sockets Layer, which is a mechanism to encrypt communications between a web browser and a web server. By using a browser that is compatible with these security functions, any items of personal information that have been entered, such as names, addresses, and telephone numbers, are transmitted after they have been automatically encrypted.

### **(2) Use of Cookies**

A cookie is a small data file that is sent from the web server to the browser of a device (such as a PC, smartphone, or tablet) when a website is accessed. The web server can identify the browser by referencing the cookie, and this enables the website to be used efficiently. The Company website may collect information by using cookies in order to analyze user statuses for the purpose of improving convenience or services. Files sent by the Company website as cookies do not contain any information that can identify an individual.

Cookies can be disabled by changing the browser's settings. In this case, certain functions of the website may become unavailable for use, or some pages may not be displayed correctly.

For details regarding external transmissions using cookies, please refer to "[External Transmission](#)."

### **(3) Use of Web Beacons**

Web beacon technology transmits information from the device to the web server. Web beacons enable the web server to read and record certain information to recognize which content has been browsed. Such information will be used by the Company website for temporary age verification for websites with age restrictions. In addition, statistical data obtained from web beacons will be used for the purpose of improving the website. Web beacons do not enable the web server to acquire information that can identify an individual.

## **7. Pseudonymized Personal Information**

The Company prepares pseudonymized personal information, which is prepared in a manner to prevent an individual from being identified unless it is collated with other information, and uses it for the purpose of analyzing trends in the use of services, troubleshooting, and improving customer satisfaction.

Regarding the handling of pseudonymized personal information, the Company has taken necessary and appropriate security measures against the risks of leakage, damage, and impairment of such information in compliance with the Personal Information Protection Act and other applicable laws, regulations, etc.

## **8. Request for Disclosure of Personal Data Held by the Company**

Upon receipt of a request from the identifiable person or his or her agent for disclosure of the personal data held by the Company or a record of the provision to a third party of such data, the Company will reply to the request without undue delay except in the cases listed in the items below. If the Company decides not to disclose the personal data or the applicable personal data does not exist, the Company will reply to that effect.

- Such disclosure is likely to harm the life, well-being, property, or other rights and interests of the identifiable person or a third party;
- Such disclosure is likely to seriously interfere with the proper implementation of the business of the Company; or
- Such disclosure would violate laws and regulations.

If the identifiable person or his or her agent has requested correction, addition, or deletion of such information held by the Company or discontinuation of use, erasure, or discontinuation of the provision to a third party of such information, the Company will respond to the request in accordance with applicable laws and regulations after investigating the matter.

Making such requests may require the submission of identification documents or the payment of handling charges. The Company will notify the person making the request of the methods specified by the Company and respond to the request within a reasonable period. However, if the person making the request subscribes to an email newsletter and wants to erase or otherwise change the personal information provided at the time of membership registration, this procedure can be completed by entering the necessary information listed in the email newsletter, on the member webpage, etc. The Company will respond promptly to requests for correction and other requests in accordance with applicable laws and regulations.

## **9. Contact Information for Questions, Disclosure Requests, etc., Regarding Personal Information**

For any questions, complaints, disclosure requests, etc., regarding the Company's handling of personal information, please contact us through the following channels:

### **<Contact>**

General Affairs & Human Resources Division

Please send any inquiries by using the provided form after agreeing to the "Cautionary

Notes" at the bottom of the [Contact page](#).

### <If a Separate Privacy Policy is Posted>

Please refer to the applicable privacy policy among those listed separately on the official website of the Company's services.

## Privacy Policy (on the Handling of Specific Personal Information)

The Company has, based on the "Basic Policy on the Proper Handling of Personal Information and Specific Personal Information," established the following "Privacy Policy (on the Handling of Specific Personal Information)" to handle any specific personal information that the Company may acquire carefully, appropriately, and in compliance with the Numbers Act and other related laws and regulations, guidelines, etc.

### 1. Purpose of Use of Specific Personal Information

The Company will use any specific personal information provided to the Company for the following purposes:

#### (1) Specific Personal Information of Company Employees (Officers, Employees, and Others) and Their Related Dependents

- For preparing withholding receipts pertaining to salary income and retirement income
- For preparing returns, notices, and applications concerning asset-building housing savings and asset-building pension savings
- For making notifications related to resident tax and other administrative work related to Individual Numbers provided for in applicable laws and regulations
- For making notifications related to health insurance and employee pension insurance
- For performing administrative work related to the submission of notices and applications, billing, and preparation of certificates concerning unemployment insurance
- For performing administrative work related to the submission of notices and applications, billing, and preparation of certificates under the Industrial Accident Compensation Insurance Act

#### (2) Specific Personal Information of Spouses of Company Employees (Officers, Employees, and Others)

- For making Category III notifications for those insured under the National Pension Act

#### (3) Specific Personal Information of Individuals Other Than Company Employees (Officers, Employees, and Others)

- For the preparation of reports of payments of remuneration, fees, etc.



- For the preparation of reports of payments of dividends, distributions of surplus, and interest on funds
- For the preparation of reports of payments of real estate rent, etc.
- For the preparation of reports of payments of consideration for acquisition of real estate, etc.

## **2. Security Measures**

The Company has separately established and will comply with Specific Personal Information Handling Regulations for the purpose of ensuring the proper management of Individual Numbers including the prevention of any leakage of, loss of, or damage to specific personal information.

## **3. Outsourcing**

The Company may outsource the handling of specific personal information to a third-party contractor. In this case, the Company will perform the necessary and appropriate supervision of such contractors in accordance with the Numbers Act, the Personal Information Protection Act, and related guidelines.

## **4. Continuous Improvement**

The Company will work to continually improve the handling of specific personal information.

## **5. Requests for Disclosure of Specific Personal Information, Complaints, and Inquiries**

Any requests, such as requests for the disclosure of the specific personal information of an identifiable person held by the Company, complaints, or consultation requests regarding the handling of specific personal information, should be made through the following channel:

### **<Contact>**

General Affairs & Human Resources Division

Please send any inquiries by using the provided form after agreeing to the "Cautionary Notes" at the bottom of the [Contact page](#).

**External Transmission**

The websites for the various services operated by the Company collect information on the visitor (user information) by using terminal identifiers such as cookies and transmit the information to external business operators after ensuring privacy protection. The

transmitted information will be used and managed in accordance with the privacy policies of each external business operator to which the information is transmitted.

▼ **Nikkatsu Corporation Official site**

<b>Name of recipient business operator: Google LLC.</b>
Service name: Google Analytics • Purpose of use by the Company Access analysis to improve the website • Information mainly transmitted Information on telecommunications, browsing and action history, user identifiers (such as terminal identifiers and attributes), etc. • <a href="#">Privacy policies of the recipient</a> • <a href="#">Opt-outs</a>
Service name: Google Tag Manager • Purpose of use by the Company Management of content and tags • Information mainly transmitted Information on telecommunications, browsing and action history, user identifiers (such as terminal identifiers and attributes), etc. • <a href="#">Privacy policies of the recipient</a>

▼ **CHANNEL NECO / MEN'S NECO**

<b>Name of recipient business operator: Google LLC.</b>
Service name: Google Analytics • Purpose of use by the Company Access analysis to improve the website • Information mainly transmitted Information on telecommunications, browsing and action history, user identifiers (such as terminal identifiers and attributes), etc. • <a href="#">Privacy policies of the recipient</a> • <a href="#">Opt-outs</a>
Service name: Google Tag Manager • Purpose of use by the Company Management of content and tags • Information mainly transmitted Information on telecommunications, browsing and action history, user identifiers (such as terminal identifiers and attributes), etc. • <a href="#">Privacy policies of the recipient</a>

Service name: Google Ads

- Purpose of use by the Company

Optimized AD Delivery and marketing

- Information mainly transmitted

Information on telecommunications, browsing and action history, user identifiers (such as terminal identifiers and attributes), etc.

- [Privacy policies of the recipient](#)

**Name of recipient business operator: X Corp.**

Service name: X (formerly and commonly referred to as Twitter) Ads

- Purpose of use by the Company

Optimized AD Delivery and marketing

- Information mainly transmitted

Terminal information, location information, log information, browsing information, etc.

- [Privacy policies of the recipient](#)

- [Opt-outs](#)

Service name: Twitter Developer Platform

- Purpose of use by the Company

Access analysis to improve said service

- Information mainly transmitted

Terminal information, location information, log information, browsing information, etc.

- [Privacy policies of the recipient](#)

#### ▼NECONECO DO

**Name of recipient business operator: Google LLC.**

Service name: Google Analytics

- Purpose of use by the Company

Access analysis to improve the website

- Information mainly transmitted

Information on telecommunications, browsing and action history, user identifiers (such as terminal identifiers and attributes), etc.

- [Privacy policies of the recipient](#)

- [Opt-outs](#)

**Name of recipient business operator: Shopify Commerce Singapore Pte. Ltd.**

Service name: Shopify

- Purpose of use by the Company

provision of e-commerce services

- [Information mainly transmitted](#)

- [Privacy policies of the recipient](#)

▼ **Programming & Production Division of Media Business Department**

<b>Name of recipient business operator: Wix.com Ltd.</b>
Service name: Wix Analytics • Purpose of use by the Company Access analysis to improve the website • Information mainly transmitted Information on telecommunications, browsing and action history, user identifiers (such as terminal identifiers and attributes), etc. • <a href="#">Privacy policies of the recipient</a>

▼ **ROMAN PORNO**

<b>Name of recipient business operator: Google LLC.</b>
Service name: Google Analytics • Purpose of use by the Company Access analysis to improve the website • Information mainly transmitted Information on telecommunications, browsing and action history, user identifiers (such as terminal identifiers and attributes), etc. • <a href="#">Privacy policies of the recipient</a> • <a href="#">Opt-outs</a>

▼ **RAINBOW CHANNEL**

<b>Name of recipient business operator: Google LLC.</b>
Service name: Google Analytics • Purpose of use by the Company Access analysis to improve the website • Information mainly transmitted Information on telecommunications, browsing and action history, user identifiers (such as terminal identifiers and attributes), etc. • <a href="#">Privacy policies of the recipient</a> • <a href="#">Opt-outs</a>
Service name: Google Tag Manager • Purpose of use by the Company Management of content and tags • Information mainly transmitted Information on telecommunications, browsing and action history, user identifiers (such as terminal identifiers and attributes), etc. • <a href="#">Privacy policies of the recipient</a>

The websites for the various services operated by the Company also use social plugins, such as buttons and embedded SNS content. When an SNS button is clicked, certain information, such as the SNS user ID, may be automatically transmitted to the SNS business operator. If the user does not agree to the transfer of such information, the user should be sure not to click on the SNS button or interact with the SNS in a similar manner. In certain SNSs, when browsing a website on which a button or other social plugin of the SNS has been installed, certain information, such as the user ID within the SNS, may be automatically transmitted from the browser to the SNS even if the button or other social plugin has not been clicked.

Please visit the website of each business operator to review the privacy policy and other information regarding the SNSs that are used by the various services operated by the Company.

<b>Name of recipient business operator: X Corp.</b>
Service name: X (formerly and commonly referred to as Twitter) <ul style="list-style-type: none"><li>• Purpose of use by the Company</li></ul> Installation of social plugins, analysis of user trends <ul style="list-style-type: none"><li>• Information mainly transmitted</li></ul> Terminal information, location information, log information, browsing information, etc. <ul style="list-style-type: none"><li>• <a href="#">Privacy policies of the recipient</a></li><li>• <a href="#">Opt-outs</a></li></ul>

<b>Name of recipient business operator: Meta Platforms, Inc.</b>
Service name: Facebook <ul style="list-style-type: none"><li>• Purpose of use by the Company</li></ul> Installation of social plugins, analysis of user trends <ul style="list-style-type: none"><li>• Information mainly transmitted</li></ul> User activity information, user connections with friends and followers, device information, etc. <ul style="list-style-type: none"><li>• <a href="#">Privacy policies of the recipient</a></li><li>• <a href="#">Opt-outs</a></li></ul>
Service name: Instagram <ul style="list-style-type: none"><li>• Purpose of use by the Company</li></ul> Installation of social plugins, analysis of user trends <ul style="list-style-type: none"><li>• Information mainly transmitted</li></ul> User activity information, user connections with friends and followers, device information, etc. <ul style="list-style-type: none"><li>• <a href="#">Privacy policies of the recipient</a></li><li>• <a href="#">Opt-outs</a></li></ul>

**Name of recipient business operator: Google LLC.**

Service name: You Tube

- Purpose of use by the Company

Installation of social plugins, analysis of user trends

- Information mainly transmitted

Information on telecommunications, browsing and action history, user identifiers (such as cookies and terminal identifiers), etc.

- [Privacy policies of the recipient](#)
- [Opt-outs](#)

**Name of recipient business operator: LY Corporation**

Service name: LINE

- Purpose of use by the Company

Installation of social plugins

- Information mainly transmitted

Service usage, location information, information on browsers and terminals, etc.

- [Privacy policies of the recipient](#)
- [Opt-outs](#)

**Name of recipient business operator: LinkedIn Corporation**

Service name: LinkedIn

- Purpose of use by the Company

Installation of social plugins

- Information mainly transmitted

Browser, share button click information, etc.

- [Privacy policies of the recipient](#)
- [Opt-outs](#)

**Name of recipient business operator: Pinterest, Inc.**

Service name: Pinterest

- Purpose of use by the Company

Installation of social plugins

- Information mainly transmitted

Browser, share button click information, etc.

- [Privacy policies of the recipient](#)
- [Opt-outs](#)