

Privacy Policy

Where we have provided you with an English translation of the Japanese language version of a webpage, the translation is provided for your convenience only and the Japanese language version will govern the relationship between you and us. If there is any contradiction between the Japanese language version and the translation, the Japanese language version shall take precedence.

1. Compliance with Laws and Regulations

Our group complies with the Act on the Protection of Personal Information along with related laws and regulations, related guidelines, and the like (“Personal Information Protection Act and Related Provisions”), as well as this Policy.

2. Applicability

Where we have established terms, rules, guidelines, or other provisions on personal information protection separately from this Policy (referred to below by the general phrase “Separate Terms”) for any of the services that our group provides, such Separate Terms form part of this Policy.

In cases where the provisions of this Policy and the provisions of the Separate Terms differ, the provisions of the Separate Terms will take precedence unless otherwise stipulated.

3. Personal Information

“Personal information” in this Policy includes not only personal information as defined in the Act on the Protection of Personal Information (Article 2, Section 1 of the Act) but also information on the use of our services, cookie information, location information, and the like. If you do not provide such information, some services may not be available.

4. Information that We Collect

When our group collects personal information from you, it will do so by legal and appropriate means, having stated the purposes for which such personal information will be used. The information of yours that our group collects in relation to each of our services is listed in the items below. However, in any service, we may collect information listed under another service, and information collected in a specific service may also be used in another service.

(1) my nobitel

Name, sex, birth date, email address, ID, password, nickname, postal code, prefecture you live in, health problems (stiff shoulders, low back pain, eyestrain, diet, etc.), concerns (training, losing weight, supplements), etc.

(2) nobitel+

Point history, favorite articles, favorite shops, answers to surveys, etc.

(3) nobitel store

Recipient address, recipient name, etc.

(4) wepo

Location information, healthcare data, body temperature log, period log, etc.

(5) Dr. stretch

Name, sex, phone number, email address, address, occupation, health problems (stiff shoulders, low back pain, eyestrain, diet, etc.), etc.

(6) Tennis 365

Name, sex, phone number, email address, address, occupation, etc.

(7) Tennis School Concierge

Name, sex, phone number, email address, address, occupation, etc.

(8) Call Center Assistance

Name, sex, phone number, email address, address, occupation, payment information to be used for payment of refunds and the like (including credit card information, bank account information, information on e-money, and other payment-related information), etc.

(9) Wellness TRIP

Name, sex, phone number, email address, address, payment information (including credit card information, bank account information, information on e-money, and other payment-related information), etc.

(10) WEACLE

Name, sex, age, phone number, email address, address, occupation, health problems, etc.

(11) THE SCENE

Name, sex, birth date, age, phone number, email address, address, occupation, etc.

(12) TMS

Name, sex, phone number, email address, address, bank account information, etc.

(13) Dr.stretch Fitness24

Name, sex, phone number, birth date, age, address, occupation, email address, ID, password, nickname, postal code, facial data, health problems (stiff shoulders, low back pain, eyestrain, diet, etc.), concerns (training, losing weight, supplements), height, weight, BMI, body fat percentage, muscle mass, subcutaneous fat percentage, visceral fat percentage, protein, water mass, bone mass, BMR (basal metabolic rate), WHR (waist-hip ratio), physical age, blood pressure, heart rate, etc.

(14) Other

Information related to the use of our services, regardless of whether or not it may be personal information, including device information, IP addresses, cookie information, website and app usage information, shop visit information, information on integration with external services, and other information that you have agreed to provide us

5. Purposes of Use

We will use your personal information within the scope of the purposes of use below or within the scope of purposes of use that are clear from the circumstances under which the personal information was collected. We will not use your personal information for any other purposes unless we have your consent, or such use is allowed by law.

- To provide our group's common ID login function
- To provide login functionality for any service with its own ID function
- For use in our entry/exit management system
- To provide services of our group or of a third party working with our group
- For the improvement and development of our services
- For issuing bills or refunds to you and related processing
- For shipping products to you
- To send brochures, direct mail, email newsletters, and the like to you
- To conduct advertising of our group or of a third party working with our group

- For marketing research, statistics, and analysis
- After processing to remove any personally identifiable information, to use for our own research and development or to disclose or provide to third-party business partners or the like
- To respond to your inquiries
- To complete reservations for tennis courts or other facilities that you request
- To ship products that you purchase online or by other means
- To communicate information to you about our services, products, shops, and the like
- To understand your health status and offer appropriate management and support
- For us to contact you as necessary for any reason
- To carry out statistical analyses for use in improving our services and products or in our advertising and the like without identifying you personally
- To deliver ads and the like after collecting users' web browsing histories and analysis results provided by our partners and relating such information to your personal data
- To use for other purposes that we have stated separately in advance

6. Provision to Third Parties

Except as stated below or otherwise allowed by law, we will not disclose or provide your personal information to third parties without obtaining your consent in advance.

- (1) In cases where it is necessary to protect a person's life, health, or property, and it is difficult to obtain your consent
- (2) In cases where it is specifically necessary for improving public health or promoting the sound growth of children, and it is difficult to obtain your consent
- (3) In cases where it is necessary to cooperate with a national agency or local government or their contracted agent in the performance of duties required by law, and obtaining your consent may hinder the performance of such duties

7. Subcontracting

In order to serve you better, our group may subcontract with third parties for the handling of your personal information. In such cases, we will supervise the subcontractors to ensure appropriate and secure management of your personal information.

8. Log Information and Use of Cookies

(1) In order to improve our services, and to personalize our service to you or conduct targeted advertising (an advertising method that delivers ads matching your needs, interests, or preferences) by third-party advertising providers and the like, our group may collect and use, or provide, the information set out in the items below (referred to below by the general phrase "Log Information and Other Data") in the provision of our services or partner services.

(i) Log information and past activity information

We may collect information about IP addresses, dates and times of requests, and past activities within our services, which is automatically generated and saved when our services are used.

(ii) Cookies and anonymous IDs

We may use cookies and similar technologies in our services. Cookies are able to identify devices but cannot identify individuals. Although you can disable cookie functionality by changing the settings on your device, you may no longer be able to use some or all of our services.

(2) Our group will retain collected Log Information and Other Data only as long as it is required legally and for legitimate business purposes.

(3) If you do not wish us to collect or use the Log Information and Other Data set out in item (1), please go to the pages at the links for each provider, browse to their opt-out pages, and follow the procedures provided on those pages.

Provider links

Google Inc., Privacy Policy

(<http://www.google.co.jp/policies/privacy/>)

Ad management

(<http://www.google.com/ads/preferences/?hl=ja>)

Yahoo! Inc., Privacy Policy

(<https://about.yahoo.co.jp/common/terms/chapter1/#cf2nd>)

Behavior-targeted advertising delivered by Yahoo! JAPAN

(<http://btoptout.yahoo.co.jp/optout/index.html>)

Disabling behavior-targeted advertising

(<http://btoptout.yahoo.co.jp/optout/preferences.html>)

9. Sharing

To the extent necessary for the purposes of use set out in Section 5 above, our group shares among its constituent companies the personal information set out in the items in Section 4 above.

Our company is responsible for managing such sharing.

10. Disclosure of Personal Information

If you request disclosure of your personal information (limited to personal information set out in the Personal Information Protection Act and Related Provisions; same applies with regard to sections 11 and 12), our group will make such disclosure to you without delay in accordance with the Personal Information Protection Act and Related Provisions. However, if disclosure would fall into any of the cases listed below, we may not make such disclosure in whole or in part. If we decide not to make a disclosure, we will notify you to that effect without delay. Moreover, when disclosing personal information, we will charge a fee of ¥1,000 per disclosure.

(1) In cases where it may harm your or a third party's life, health, property, or other rights or interests

(2) In cases where it may significantly hinder the reasonable conduct of our business

(3) In cases where it would otherwise violate the law

11. Correction and Deletion of Personal Information

You may review or correct your registered personal information in any of our services at any time.

If you seek disclosure by our group of personal information not reviewable on our services or records of provision to third parties, you may request such disclosure pursuant to the procedures established separately by our group, except in the cases below.

- (1) In cases where disclosure may harm your or a third party's life, health, property, or other rights or interests
- (2) In cases where disclosure may significantly hinder the reasonable conduct of our group's business
- (3) In cases where disclosure would violate the law
- (4) In cases where we are unable to verify that the disclosure request is from you
- (5) If you determine as a result of the disclosure that any of your personal information held by our group is not true, you may request that the personal information be corrected, added to, or deleted pursuant to procedures established separately by our group. In that case, our group will conduct an investigation without delay to the extent necessary to achieve our purposes of use and, based on the results, correct, add, or delete the corresponding personal information.

Further, you may request that we stop using or erase your personal information or stop providing it to a third party pursuant to procedures established separately by our group. In that case, our group will conduct an investigation without delay to the extent necessary, and if our group's handling of your personal information is found to be improper or your request is otherwise found to be reasonable, we will stop using or erase the corresponding personal information or stop providing it to the third party to the extent necessary to protect your rights and interests. However, if there are inadequacies in the way your request is made, if your request is unreasonable, or if complying would otherwise present legal difficulties, then we may be unable to comply with your request.

12. Stopping Use of or Erasing Personal Information

If you ask our group to stop using or erase your personal information because you believe such personal information is being used beyond the scope of our purposes of use or was collected by improper means, we will conduct any necessary investigation without delay. If we determine that it is necessary to comply with your request based on the results of the above investigation, we will stop using or erase the personal information without delay in accordance with the Personal Information Protection Act and Related Provisions. If our group stops using or erases your personal information based on the preceding provision or decides not to stop using or erase your personal information, we will notify you of this without delay.

13. Secure Management System

In order to prevent personal information leakage, loss, or damage and to otherwise protect personal information, our group takes necessary and appropriate measures for the secure management of personal information, such as restricting access to personal information files, limiting access authority to the minimum number of individuals necessary, keeping access logs, and installing security software to prevent unauthorized external access.

14. Notice of Facts Concerning Personal Information Subject to Disclosure

Requests to disclose, correct, delete, stop using, stop providing to third parties, or any other requests ("Disclosure or Other Requests") regarding personal information subject to disclosure and held by our group are processed under the following framework.

- (1) Business operator name

nobitel inc.

(2) Personal Information Protection Manager

Manager name: Hidetaka Morita

Department: Information Security Committee

Please see the “Contact Information” section at the bottom of this page on how to contact us with comments, questions, or complaints about our handling of personal information or any other concerns you may have about our handling of personal information (support is available on weekdays from 10:00 a.m. to 6:00 p.m.).

15. Changes to this Policy

Our group will review its operations with respect to the handling of personal information from time to time and strive toward continuous improvement, and we may change this Policy as needed. If we make a change that requires your consent by law, we will obtain your consent by a method that we establish separately.

The revised version of this Policy will be announced by a means such as publication on our group website.

16. Contact Information

If you have any comments, questions, requests, or other concerns about our group’s handling of personal information, please contact us using the information below. Our address for personal information disclosure and the like is provided below.

nobitel inc., Information Security Committee, Information Security Supervisor

Gran First Shinjuku Gyoen, 2nd Floor

22-1 Daikyocho, Shinjuku

Tokyo 160-0015

Contact email address: p-contact@nobitel.jp

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