# **Privacy Policy**

Shingijutsu Global Consulting Company (hereinafter referred to as "the Company") respects the privacy of its customers and is fully committed to the protection of personal information. This policy outlines how the Company handles customer data in accordance with key regulations, including Japan's Act on the Protection of Personal Information, the European Union's General Data Protection Regulation (GDPR), California's Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), as well as Washington State's My Health My Data Act (MHMDA).

### 1. Scope of Application

This Privacy Policy applies to the handling of personal information on the Company's website and throughout all improvement consulting services provided by the Company.

#### 2. Information We Collect

To provide services, comply with legal obligations, and operate our business, the Company may collect the following types of information:

- Name, company name, department, and job title
- Contact details (email address, phone number, physical address, etc.)
- Inquiry details
- Health information (e.g., food allergies, medical conditions, or other considerations requiring special attention)
- Official identification details (e.g., passport number, visa information, nationality)
- Payment and billing information (e.g., bank account details, credit card numbers)
- Service usage history and contract details
- Website usage data (e.g., cookies, IP address, access logs)
- Any other information necessary for service provision or legal compliance

Note: When collecting special category information such as health data or passport numbers, we will clearly state the purpose and, where required, obtain the individual's consent prior to handling such data.

### 3. Purpose of Use

The personal information collected will be used for the following purposes:

- Responding to inquiries, sending materials, and providing services
- Delivering information about seminars, events, and similar activities
- Managing health and safety (e.g., food allergies or special accommodations)
- Collecting and managing identification details for travel and related procedures
- Analyzing data to improve services and enhance the website
- Ensuring compliance with laws and responding to audits

### 4. Use of Cookies and Similar Technologies

The Company may use cookies and similar technologies to analyze website usage and enhance service quality. If you do not consent to the use of cookies, you may disable them through your browser settings.

### 5. Legal Basis (Applicable under GDPR)

For personal information of customers located in the European Economic Area (EEA), the Company processes such data based on the legal grounds required by the GDPR, including the individual's consent, performance of a contract, compliance with legal obligations, and legitimate interests.

#### 6. Disclosure to Third Parties and International Data Transfers

- The Company does not disclose personal information to third parties except where required by law, where the customer has provided consent, or where disclosure is necessary to subcontracted service providers.
- When transferring data outside of Japan—such as to the United States or Europe—the Company complies with applicable legal procedures and implements appropriate security measures.

### 7. Customer Rights

Customers are entitled to the following rights under applicable laws in each jurisdiction:

- Request disclosure, correction, deletion, suspension of use, restriction of processing, or data portability of their personal information
- Withdraw consent regarding the handling of their personal information (where processing is based on consent)
- Opt out of direct marketing and similar communications
- File a complaint with a supervisory authority when necessary

### 8. Information on "Sale" or "Sharing" (CCPA/CPRA Compliance)

The Company does not "sell" or "share" customers' personal information with third parties.

#### 9. Compliance with Washington State's My Health My Data Act (MHMDA)

The Company handles health information and personally identifiable data (such as passport numbers) in accordance with MHMDA and other applicable state laws. Such information is used and managed only within the scope of its intended purpose, based on the individual's explicit consent. We also respond appropriately to requests for consent withdrawal or data deletion.

#### 10. Personal Information of Minors

As a general rule, the Company does not collect personal information from individuals under the age of 16. If it is discovered that such data has been collected, we will promptly delete it and take appropriate action.

### 11. Security Measures

The Company implements physical, technical, and organizational security measures to prevent unauthorized access, loss, alteration, or leakage of personal information.

#### 12. Internal Education and Awareness

The Company conducts regular education and awareness programs for all officers and employees regarding the protection and proper management of personal information. These efforts ensure compliance with laws and internal regulations, and safeguard personal data.

#### 13. Data Retention Period

Personal information is retained only for the duration necessary to fulfill its intended purpose. Once no longer needed, it is deleted or disposed of using appropriate methods.

#### 14. Response to Data Breaches

In the event of a personal data breach, the Company will promptly implement measures to prevent further damage, report to relevant authorities, and notify affected customers.

#### 15. External Links

The Company's website may contain links to external sites. The Company is not responsible for the handling of personal information on those external websites.

### 16. Data Protection Officer (DPO / Personal Information Protection Manager)

The Company's Personal Information Protection Manager also serves as the Data Protection Officer (DPO), overseeing the establishment and supervision of systems related to personal data protection. For inquiries or consultations regarding the DPO (Personal Information Protection Manager), please contact the following:

#### Data Protection Officer (DPO) / Personal Information Protection Manager

**Shingijutsu Global Consulting Company** 

Personal Information Protection Manager: Naohiro Yoshikawa

Address: 1-56-1 Asahira, Fukujucho, Hashima City, Gifu 501-6255, Japan

**E-mail:** office@shingijutsu-global.com

**TEL:** +81-58-394-3320

### 17. Inquiries and Complaints Contact Point

For inquiries, consultations, complaints, or requests for disclosure regarding the handling of personal information, please contact:

## **Shingijutsu Global Consulting Company**

1-56-1 Asahira, Fukujucho, Hashima City, Gifu 501-6255, Japan

**TEL:** +81-58-394-3320 **FAX:** +81-58-394-3321

**Email:** office@shingijutsu-global.com

Customers residing in the European Union may also file complaints with the relevant GDPR supervisory authority.

#### 18. Revisions

This policy may be revised without prior notice in response to changes in applicable laws and regulations or modifications to the content of our services. The revised policy shall take effect upon publication on the Company's website.

**Date of Establishment / Last Revision** 

**Established:** March 28, 2018 **Last Revised:** December 4, 2025