

株式会社EventHub プライバシーポリシー

EventHub Privacy Policy *English follows Japanese

株式会社EventHub（以下「当社」といいます。）は、お客様の個人情報保護の重要性について認識し、個人情報の保護に関する法律（以下「個人情報保護法」といいます。）を遵守すると共に、以下のプライバシーポリシー（以下「本プライバシーポリシー」といいます。）に従い、適切な取扱い及び保護に努めます。

1. 個人情報の定義

本プライバシーポリシーにおいて、個人情報とは、個人情報保護法第2条第1項により定義された個人情報、すなわち、生存する個人に関する情報であって、当該情報に含まれる氏名、生年月日その他の記述等により特定の個人を識別することができるもの（他の情報と容易に照合することができ、それにより特定の個人を識別することができることとなるものを含みます。）を意味するものとします。

2. 個人情報の利用目的

当社は、お客様の個人情報を、以下の目的で利用いたします。

- (1) ログイン時、ログイン後における本人認証、各種画面におけるお客様の情報の自動表示など当社サービスの利用に必要なお客様の管理のためのシステム運営
- (2) 当社サービス上でのプロフィールページ（氏名、会社名、役職を含みます。以下同じ）の作成、プロフィールページ記載の情報の全部又は一部を、お客様の公開設定に従い、当社サービス上で他のお客様又はイベント主催者の閲覧に供すること、及び他のお客様からのメッセージの送信等のコミュニケーションを可能とすることなど当社チャット・商談予約サービスの提供
- (3) お客様の同意の範囲で、当社サービス上でプロフィールページ記載の情報の全部又は一部を、お客様の公開設定に従い、お客様の閲覧に供すること、並びにお客様からのメッセージの送信等のコミュニケーションを可能とすることなど当社サービスの提供
- (4) メンテナンス情報、重要なお連絡など当社サービスを運用する上で必要な事項に関するお知らせ
- (5) お客様皆様の氏名、会社名、役職を含む個人情報、当社サービス内でのアクセス履歴、商談予約履歴、商談予約時のメッセージ内容、イベント当日の行動履歴などの統計を用いたイベント運営支援の実施、マーケティングやイベント運営の効率化
- (6) 個人を特定できない範囲においてのお客様皆様の行動、当社サービス内でのアクセス履歴などを用いたターゲティング広告の配信
- (7) 個人を特定できない範囲においての当社サービスに関する統計情報の作成及び利用
- (8) 個人を特定できない範囲内での当社掲載企業、提携先その他第三者へのマーケティング資料としての情報の提供

3. 個人情報利用目的の変更

当社は、個人情報の利用目的を相当の関連性を有すると合理的に認められる範囲内において変更することがあり、変更した場合にはお客様に通知又は公表します。

4. 個人情報利用の制限

当社は、個人情報保護法その他の法令により許容される場合を除き、お客様の同意を得ず、利用目的の達成に必要な範囲を超えて個人情報を取り扱いません。但し、次の場合はこの限りではありません。

- (1) 法令に基づく場合
- (2) 人の生命、身体又は財産の保護のために必要がある場合であって、お客様の同意を得ることが困難であるとき

- (3) 公衆衛生の向上又は児童の健全な育成の推進のために特に必要がある場合であって、お客様の同意を得ることが困難であるとき
- (4) 国の機関もしくは地方公共団体又はその委託を受けた者が法令の定める事務を遂行することに対して協力する必要がある場合であって、お客様の同意を得ることにより当該事務の遂行に支障を及ぼすおそれがあるとき

5. 個人情報の適正な取得

当社は、適正に個人情報を取得し、偽りその他不正の手段により取得しません。

6. 個人情報の安全管理

当社は、個人情報の紛失、破壊、改ざん及び漏洩などのリスクに対して、個人情報の安全管理が図られるよう、当社の従業員に対し、必要かつ適切な監督を行います。また、当社は、個人情報の取扱いの全部又は一部を委託する場合は、委託先において個人情報の安全管理が図られるよう、必要かつ適切な監督を行います。

7. 第三者提供

当社は、個人情報保護法その他の法令に基づき開示が認められる場合を除くほか、あらかじめお客様の同意を得ないで、個人情報を第三者に提供しません。但し、次に掲げる場合は上記に定める第三者への提供には該当しません。

- (1) 当社が利用目的の達成に必要な範囲内において個人情報の取扱いの全部又は一部を委託する場合
- (2) 合併その他の事由による事業の承継に伴って個人情報が提供される場合

8. 個人情報の開示

当社は、お客様から、個人情報保護法の定めに基づき個人情報の開示を求められたときは、お客様ご本人からのご請求であることを確認の上で、お客様に対し、遅滞なく開示を行います（当該個人情報が存在しないときにはその旨を通知いたします。）。但し、個人情報保護法その他の法令により、当社が開示の義務を負わない場合は、この限りではありません。

9. 個人情報の訂正等

当社は、お客様から、個人情報が真実でないという理由によって、個人情報保護法の定めに基づきその内容の訂正、追加又は削除（以下「訂正等」といいます。）を求められた場合には、お客様ご本人からのご請求であることを確認の上で、利用目的の達成に必要な範囲内において、遅滞なく必要な調査を行い、その結果に基づき、個人情報の内容の訂正等を行い、その旨をお客様に通知します（訂正等を行わない旨の決定をしたときは、お客様に対しその旨を通知いたします。）。但し、個人情報保護法その他の法令により、当社が訂正等の義務を負わない場合は、この限りではありません。

10. 個人情報の利用停止等

当社は、お客様から、お客様の個人情報が、あらかじめ公表された利用目的の範囲を超えて取り扱われているという理由又は偽りその他不正の手段により取得されたものであるという理由により、個人情報保護法の定めに基づきその利用の停止又は消去（以下「利用停止等」といいます。）を求められた場合、又は個人情報がご本人の同意なく第三者に提供されているという理由により、個人情報保護法の定めに基づきその提供の停止（以下「提供停止」といいます。）を求められた場合において、そのご請求に理由があることが判明した場合には、お客様ご本人からのご請求であることを確認の上で、遅滞なく個人情報の利用停止等又は提供停止を行い、その旨をお客様に通知します。但し、個人情報保護法その他の法令により、当社が利用停止等又は提供停止の義務を負わない場合は、この限りではありません。

11. Cookie（クッキー）その他の技術の利用

当社サービスは、Cookie及びこれに類する技術を利用することがあります。これらの技術は、当社による当社サービスの利用状況等の把握に役立ち、サービス向上に資するものです。Cookieを無効化されたいユーザーは、ウェブブラウザの設定を変更することによりCookieを無効化することができます。但し、Cookieを無効化すると、当社サービスの一部の機能をご利用いただけなくなる場合があります。

12. メール

利用規約に同意いただいたユーザーには来場者が参加しているイベントでの弊社サービスのご利用に関する情報を弊社サポートアドレスからお送り致しますが、イベントでの利用に関する情報以外のダイレクトメールは送信致しません。

13. お問い合わせ

開示等のお申出、ご意見、ご質問、苦情のお申出その他個人情報の取扱いに関するお問い合わせは、下記の窓口までお願い致します。

株式会社EventHub (EventHub Co., Ltd.)

E-mail : info@eventhub.jp

(なお、受付時間は、平日10時から18時までとさせていただきます。)

14. 継続的改善

当社は、個人情報の取扱いに関する運用状況を適宜見直し、継続的な改善に努めるものとし、必要に応じて、本プライバシーポリシーを変更することがあります。

【2017年9月29日制定】

EventHub Co., Ltd. Privacy Policy

This version is EventHub's company privacy policy translated into English. Please note that the Japanese version is the legally bound version overseen by our lawyers and Japanese law. When you're agreeing to the terms of this document you're agreeing to the terms written in the original version in Japanese.

We (EventHub Co., Ltd.) acknowledge the importance of protecting “users” (Customer using our services, “EventHub” and/or “CommunityHub”) personal information and will make all efforts necessary to abide by Japan’s personal information protection laws according to the following privacy policies.

1. Definition

We define “personal information” as information defined by Japan’s personal information protection law Article 2 Item 2, which defines personal information as any information about a person including his or her name, date of birth, or other information that is unique to his or her identity.

2. Purpose of Use

We will use your personal information for the following purposes and functions of our service:

- (1) Our product's user management operations, such as identification of users upon and after log-in, and automatic display of users' personal information on application screens.
- (2) User profile pages within our application, where users can display their information to other users or event organizers, as well as communicate with other users via our messenger platform. They are able to disclose all or part of their personal information (e.g., name, affiliation, title, etc.) to the extent that they choose in their account settings.
- (3) Provision of messenger services within the application, where users can view each other's personal information to the extent that each user has disclosed under his or her account settings.
- (4) Notification (through email) of important information regarding use of our service.
- (5) Event consultation services based on information collected from data analysis using users' personal information, access and meeting reservation history, meeting reservation messages, and behavior during the event period (while keeping each user account anonymous and undistinguishable).
- (6) Targeted advertisements and notifications based on users' behavior, access history and personal information (while keeping each user account anonymous and undistinguishable).
- (7) Use and creation of statistical analysis regarding our service (while keeping each user account anonymous and undistinguishable).
- (8) For marketing materials and information to share with partner companies (while keeping each user account anonymous and undistinguishable).

3. Changes in purposes of personal information use

We have the right to change purposes written above insofar as it is deemed appropriate, and will notify you in case of such changes.

4. Limitations

We will not use your personal information without your approval beyond the level that we need to deliver our services, except for in the following circumstances.

- (1) When it is legal to do so
- (2) When the information is necessary for safety or security and it is difficult to obtain your approval beforehand
- (3) When the information is necessary for public health and child development and it is difficult to obtain your approval beforehand
- (4) When the government, municipal organizations or any organization working for them mandate disclosure of personal information for them to carry out their governmental duties, and when it is not possible for them nor us to notify you as it will counter their duties.

5. Obtainment of personal information

We will obtain personal information through appropriate, and never fraudulent, means.

6. Proper management of personal information

We commit to making all measures possible and will supervise all employees and external parties (under contract) involved in the management of personal information as to prevent any loss, damage and leakage of information.

7. Disclosure to third parties

We will not share your personal information without prior notice and agreement at all cases, except for when we are legally mandated to disclose such information under personal information protection law. The following acts, however, are not regarded as “disclosure of information to third parties” and therefore do not follow the above clause:

- (1) When we outsource part or all of our operations to another company under a legal contract
- (2) Sharing of information upon mergers or acquisitions with another company

8. Disclosure of personal information

In cases where users request for disclosure of their personal information back to them, we will abide by the personal information protection laws and first confirm their identity and then disclose their information promptly (or let them know if such information doesn't exist). However, we will not do so in cases where we are deemed not responsible by personal information protection laws.

9. Editing personal information

In cases where users assert that their information is false and therefore request an update or deletion, we will abide by personal information protection laws and first conduct research to ensure that the claim is correct. If the claim is correct, we will update or delete his or her information accordingly and notify upon completion. If the claim is not correct, we will inform them of that fact and that we therefore do not need to delete or edit their information. We will also not edit or delete information in cases where we are deemed not responsible by personal information protection laws.

10. Termination of use

In case of requests by users that we have used or obtained their personal information inappropriately and the information should thus be deleted or terminated, or that we have provided their personal information to third parties without their consent, we will abide by personal information laws and act promptly to such requests. We will namely agree to stop using or delete their personal information after confirming their identity, and will let the user know upon completion of the request. However, we will not respond to such requests in cases where we are not held responsible per personal information protection laws.

11. Cookie and other technologies

We use Cookie and other related technologies for continued tracking and improvement of our service. For those users who would like to disable the cookie on their browser, they may do so by changing their browser settings. However, please note that a part of our service will be unavailable for use once the cookie has been turned off.

12. Mail

EventHub will be sending the users emails regarding the use of service for the event that they are attending. We will not be sending them direct emails that are irrelevant to their use of this service for the event that they are attending.

13. Contact Us

Please contact us at the following for inquiries and questions regarding our privacy policy or your personal information at the following:

EventHub Co., Ltd.

E-mail : Info@eventhub.jp

(Offices are open on weekdays from 10AM to 6PM Tokyo time).

14. Continued improvement

We will take all measure possible to improve our personal information management and will regularly review and update this privacy policy as needed.

EventHub GDPR Privacy Policy (for citizens of the EU only)

This GDPR PRIVACY POLICY (this “Privacy Policy”) states the policy for processing of personal data obtained from persons (the “User” or “Users”) residing in the EU (as deifined below) that use the service “EventHub” (the “Service”) of our company (the “Company”). Upon the User’s agreement to this Privacy Policy, the User shall be deemed to have given a voluntary and express consent to the subject matters of the User’s consent stipulated in this Privacy Policy (including, without limitation, the purposes of processing of personal data and transfer of personal data to third countries).

1. Definitions

The following terms as used herein shall have the meanings as set forth below. Definitions of the terms that are not defined herein shall be subject to the applicable definitions provided in GDPR.

- (1) “EU” means the European Union that includes the member states of the European Union, as well as Iceland, Liechtenstein and Norway under Agreement on the European Economic Area (EEA).
- (2) “GDPR” means REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) .
- (3) “Applicable Privacy Laws” means applicable privacy laws including GDPR and domestic laws related thereto of relevant countries.
- (4) “personal data” means “personal data” as defined in GDPR.
- (5) “processing” means “processing” as defined in GDPR.
- (6) “Controller” means “controller” as defined in GDPR.
- (7) “Representative” means “representative” as defined in GDPR.

2. Scope of this Privacy Policy

This Privacy Policy shall be applied to the processing of the personal data of the Users in relation to the Service that shall be governed by the Applicable Privacy laws.

3. Users under the age of 16

If any User under the age of 16 uses the Service, it shall make sure to obtain the guardian’s consent to this Privacy Policy or to give the consent to this Privacy Policy under the guardian’s permission thereto.

4. Controller

The Controller for the processing of the personal data shall be the Company, whose contact details are as follows.

EventHub Co., Ltd.

Lowp 305 Sanaicho 5, Ichigaya, Shinjuku-ku, Tokyo, 〒162-0846

info@eventhub.jp

5. Personal Data to be Collected

5.1 The Company may obtain the following personal data from the Users.

- (1) Name

- (2) Email address
- (3) User name and password
- (4) IP address, information of browser and OS, cookie information, history information of website access
- (5) Company and/or affiliation
- (6) Job title
- (7) Self-Introduction
- (8) Relevant keywords and industry information
- (9) Number of times to contact
- (10) Search history
- (11) Other information that event organizer deemed necessary for event registration

5.2 The Company may collect the personal data in the following cases.

- (1) When the User subscribes for the Service, including, but not limited to, through the registration form of the Company, the registration form of other companies via API linkage or CSV uploading
- (2) When the User otherwise uses the Service
- (3) When the Company receives from affiliated parties information regarding transaction record or payment between the User and the Company or the affiliated parties

6. Purpose and legal basis of Data Processing

6.1 The Company shall process the personal data only for the purposes as set forth below.

- (1) Product's user management operations

The Company may process the personal data of the User for the Company's product's user management operations such as identification of Users upon and after log-in, and automatic display of Users' personal information on application screens for the purpose of performing the contract.

- (2) User profile pages

The Company may process the personal data of the User for User profile pages within the Company's application, where Users can display their information to other Users or event organizers, as well as communicate with other Users via the Company's messenger platform for the purpose of performing the contract. The receiving parties are able to disclose all or part of their personal information (e.g., name, affiliation, title, etc.) to the extent that they choose in their account settings for the purpose of performing the contract.

- (3) Provision of messenger services

The Company may process the personal data of the User for provision of messenger services within the application, where the Users can view each other's personal information to the extent that each User has disclosed under his or her account settings for the purpose of performing the contract.

- (4) Notification

The Company may process the personal data of the User for notification of important information regarding use of the Service for the purpose of performing the contract.

- (5) Event consultation services

The Company shall obtain the User's prior consent if the Company processes the personal data of the User for event consultation services based on information collected from data analysis using Users' personal information, access and meeting reservation history, meeting reservation messages, and

behavior during the event period (while keeping each User account anonymous and undistinguishable).

(6) Targeted advertisements

The Company shall obtain the User's prior explicit consent if the Company processes the personal data of the User for targeted advertisements and notifications based on Users' behavior, access history and personal information (while keeping each User account anonymous and undistinguishable).

(7) Use and creation of statistical analysis regarding the Service

The Company shall obtain the User's prior consent if the Company processes the personal data of the User for use and creation of statistical analysis regarding the Service (while keeping each User account anonymous and undistinguishable).

(8) For marketing materials and information to share with partner companies

The Company shall obtain the User's prior consent if the Company processes the personal data of the User for marketing materials and information to share with partner companies (while keeping each User account anonymous and undistinguishable).

6.2 In cases where the Company intends to further process the personal data for a purpose other than that for which the personal data were collected, the Company shall provide the User prior to that further processing with information on that other purpose.

7. Provision of Information to Third Party

The Company may provide the personal data of the Users to the following parties, to the extent necessary for pursuing the purpose of processing. As set forth in Section 8.2, such third parties may include parties residing or located in countries outside the EU.

- (1) Group companies and partner companies of the Company
- (2) Accountants, lawyers and other professional advisers
- (3) Providers of the services related to the Service, including, without limitation, data storage, maintenance and payment service
- (4) Parties to whom the Company entrusts a whole or part of the handling of the personal data within the necessary scope to achieve purposes of processing
- (5) Successors of business succession of the Company caused by a merger or any other reason

8. Transfer of Personal Data to Third Countries

8.1 When the Company receives personal data from the User, the personal data are transferred from the EU region to Japan.

8.2 In addition to the foregoing, the Company may, to the extent necessary for pursuing the aforementioned purposes of processing, transfer personal data of the Users to countries outside the EU, including, without limitation, Japan, and further process the same. The User may not have the right as a data subject same as that under GDPR in countries outside the EU, and the Company shall take steps regarding the User's personal data in accordance with the Applicable Privacy Laws, by means such as execution of standard contractual clauses under GDPR.

8.3 Upon the User's agreement to this Privacy Policy, the User shall be deemed to have given a voluntary and express consent to the transfer of personal data to third countries set forth in this Section 8.

8.4 Japan, to which the transfer stipulated in this Section 8 is made, has obtained an adequacy decision by European Commission.

9. Storage Period

The Company shall store the personal data of the Users to the extent necessary for the purpose of processing thereof,

and delete the personal data when the storage becomes unnecessary for such purpose.

10. Cookies

Cookies or similar technologies may be used in the Company's service. Such technologies help the Company to recognize the status of use of the Company's service, etc. and contribute to improvement of the service. When a User intends to disable cookies, the User may disable cookies by changing the web browser's settings. Please note that when cookies are disabled, a part of the service may be unavailable.

11. Disclosure, Modification, Deletion, etc. of Personal Data

- 11.1 If a User that is the subject of the personal data requires any of the following, please notify the contact address of the Company of that effect. The Company will properly respond to that request pursuant to the User's right under the Applicable Privacy Laws.
- (1) Access to personal data
 - (2) Modification of personal data
 - (3) Deletion of personal data
 - (4) Restriction on processing of personal data
 - (5) Objection to processing
 - (6) Exercise of right to data portability
- 11.2 For the request under Section 11.1, please submit the following documents by mail or email.
- (1) Request form specified by the Company
 - (2) Document for identification of the User as specified by the Company
 - (3) Document for identification of the representative of the User as specified by the Company
- 11.3 To avoid undue modification, divulge, etc. of the personal data of the User by a third party, the Company will respond to the request by mail or email, only if the identity confirmation is made by the submitted documents. Although the Company will make effort to promptly respond, please note that it may take time until response, for the confirmation of the applicable registered personal data and for assuring accuracy.
- 11.4 The Company will not return the request form or identification documents received from the User or its representative. Please understand that the Company will keep the request form properly, and delete the identification documents in an appropriate manner when the purpose of use thereof is achieved.

12. Withdrawal of Consent

For the processing of the personal data based on the User's consent, the User shall have the right to withdraw the consent for the personal data at any time.

13. Lodgment of Complaint with Supervisory Authority

In addition to the aforementioned rights, the User may lodge a complaint with a supervisory authority at any time. However, the Company appreciates a notification to the Company prior to contacting the supervisory authority, so that the Company may have the opportunity to respond to the complaint of the User.

14. Necessity of Provision of Personal Data

Since the personal data to be provided by the User are necessary for the Company to provide the Service, the Service may be unavailable to the User that does not provide the data.

15. Behaviour Targeting

Upon the Users agreement to this Privacy Policy, the User shall be deemed to have given a voluntary and express consent to the profiling for targeting advertisement.

16. Inquiries

For questions or complaints, or for the exercise of the rights under Sections 11 and 12, please contact the following contact addresses.

Lowp 305 Sanaicho 5, Ichigaya, Shinjuku-ku, Tokyo, 〒162-0846

E-mail : info@eventhub.jp

(The hours for inquiries are from 10AM to 6PM on weekdays (excluding Saturday, Sunday and holidays) Japan time and calendar)

17. General Provisions

- 17.1 The Company shall retain the right to regularly amend this Privacy Policy. The User shall regularly check and confirm the applicable provisions at its responsibilities.
- 17.2 In the event of conflict between the Applicable Privacy Laws and any provision of this Privacy Policy, the provision shall be deemed replaced by a provision of the same meaning that reflects the original intention, to the maximum extent permitted by laws. In that case the remaining provision hereof shall continue to be applied without change.

18. Handling of Personal Data Provided on the Basis of an Adequacy Decision

In addition to the provisions of the laws of Japan and the EventHub Co., Ltd. Privacy Policy (https://eventhub.jp/privacy_policy/jp.pdf), the following provisions shall apply to personal data provided on the basis of an adequacy decision by European Commission under Article 45 of GDPR (the “Adequacy Decision”), and the provisions of this paragraph shall prevail if there is a conflict between the provisions of this paragraph and those of such policy.

- 18.1 In the event that personal data provided from the EU region on the basis of the Adequacy Decision contains information on sex life, sexual orientation, or trade union membership, as defined in the GDPR as “Special Categories of Personal Data”, such information shall be treated as special care-required personal information under the Act on the Protection of Personal Information, the law of Japan (the “the Personal Information Protection Law”).
- 18.2 Personal data that the Company has received from the EU region on the basis of the Adequacy Decision shall be treated as retained personal data as set forth in Article 2, paragraph 7 of the Personal Information Protection Law, regardless of the period within which such information shall be deleted, unless such data falls under the category of “those prescribed by cabinet order as likely to harm the public or other interests if their presence or absence is made known” as set forth in the said paragraph.
- 18.3 When the Company receives personal data from the EU region on the basis of the Adequacy Decision, the Company shall confirm and keep a record of the circumstances under which the said personal data was acquired, including the purposes of processing specified at the time when personal data are obtained under the provisions of Article 26, paragraphs 1 and 3 of the Personal Information Protection Law.
- 18.4 In the event that the Company receives the personal data from another personal information handling business operator (as set forth in the Personal Information Protection Law) that has received the personal data provided from the EU region on the basis of the Adequacy Decision, the Company shall confirm and keep a record of the circumstances under which such personal data was acquired, including the purposes of processing specified at the time when personal data are obtained based on the provisions of Article 26, paragraphs 1 and 3 of the Personal Information Protection Law.
- 18.5 With respect to personal data that has been confirmed and kept record of in accordance with 18.3 or 18.4, the Company shall specify the purposes of processing within the scope of the purposes of processing specified at the time of initial or when personal data are obtained and shall use such personal data within the scope of the purposes of processing.
- 18.6 In providing personal data provided from the EU region on the basis of the Adequacy Decision to a third party in

a foreign country, the Company shall obtain the User's prior consent to the effect that he or she approves the provision to the third party in a foreign country on the condition that the company provides information on the status of the receiving party necessary for the User to make a decision concerning the consent under Article 24 of the Personal Information Protection Law.

- 18.7 Personal data provided from the EU region on the basis of the Adequacy Decision shall be deemed to be the anonymously processed information provided in the Personal Information Protection Law provided that such personal data are processed not to be able to restore the personal information by deleting processing method information (individual identification codes deleted from personal information used to produce the anonymously processed information, individual identification code, and information on the processing method carried out pursuant to the provisions of Article 36, Paragraph 1 of the Personal Information Protection Law (limited to information that can be used to restore the personal information)).