

Privacy Policy

Personal Information Protection Policy

HULFT Inc is a wholly owned subsidiary of Saison Information Systems Co., Ltd. Saison Information Systems Co., Ltd., and its group companies: APPRESSO K.K., HULFT China Co., Ltd., HULFT, Inc. and HULFT Pte. Ltd. (hereinafter, collectively "the SIS Group") manages various types of data for its business. The SIS Group recognizes that personal information is an extremely important part of this data, which needs to be handled with care. A problem such as an information leak from the SIS Group would not only cause a lot of inconvenience to the persons involved, but would also infringe on your rights as the owner of your personal information. Therefore, the SIS Group has placed the highest priority on the protection of personal information. The SIS Group has established the following provisions for handling personal information, and is striving to properly protect personal information through the implementation of these provisions.

EU-US Privacy Shield

HULFT, Inc. participates in the EU-US Privacy Shield frameworks. See below to learn more.

"Personal information acquisition, use and provision"

The personal information which the SIS Group may collect from you include your name, address, zip code, telephone number, e-mail address, place of work, company name, department name, business title and other contact information, Cookie, Prometric ID, and test result of HULFT Basic Engineer/HULFT Advanced Engineer certification test, your responses of customer satisfaction survey and other surveys, etc.

The SIS Group shall obtain personal information through proper methods and will process your personal information for the purposes of use set forth in "Purposes of use for personal information acquired" below (the "Purposes of Use"). Moreover, it shall use the personal information within the scope of the Purposes of Use only for the period necessary to achieve such purposes, and shall not provide the information to other parties without the prior consent of the individuals concerned.

"Secure management of personal information"

The SIS Group shall establish an administrator responsible for information security, and shall implement security management measures to prevent unlawful access to, unauthorized use or provision, loss, destruction, alteration, or leakage of personal information. In the event of consignment of personal information handling to another party, the SIS Group shall carry out the necessary and proper supervision of the consignee concerned.

"Obeying laws, ordinances and other standards"

The SIS Group shall establish an administrator responsible for information security, and shall implement security management measures to prevent unlawful access to, unauthorized use or provision, loss, destruction, alteration, or leakage of personal information. In the event of consignment of personal information handling to another party, the SIS Group shall carry out the necessary and proper supervision of the consignee concerned.

"Continual improvement"

The SIS Group shall periodically revise these provisions, in order to prevent this Privacy Policy from becoming outdated due to changes in the business environment, and to counter any new threats that may arise.

Prepared: July 5, 1999

Last Revised: January 4, 2019

Kazuhiro Uchida

President and Representative Director

Disclosure Items based on the Personal Information Protection Law

"Purposes of use for personal information acquired"

The purposes of use for personal information acquired by the SIS Group shall be as follows.

Type of Personal Information	Purpose of Use
1. Customers	<ul style="list-style-type: none"> • To provide the SIS Group's products and maintenance services to the customer, based on a contract. • To contact the customer as necessary as part of the business, based on a contract. • To provide any kind of notification relating to exhibits or seminars, etc. held by the SIS Group. • To conduct questionnaire surveys relating to the SIS Group's products and services. • To respond to inquiries or requests from the customer.
2. Shareholders	<ul style="list-style-type: none"> • To send confirmation or other materials to the shareholder based on the Commercial Code.
3. Investors and analysts	<ul style="list-style-type: none"> • To notify the investor or analyst of business results briefings or other information.
4. Employment applicants	<ul style="list-style-type: none"> • To check out the applicant relating to hiring activities, to contact the applicant for an interview, to notify the applicant of the interview results, and to contact the applicant regarding employment preparations.
5. Dispatched workers	<ul style="list-style-type: none"> • To employ workers based on the Law for Securing the Proper Operation of Worker

Type of Personal Information	Purpose of Use
	Dispatching Undertakings and Improved Working Conditions for Dispatched Workers.
6. Personal information received as part of consignment handling	<ul style="list-style-type: none"> • To implement information processing services (including total outsourcing services for personnel payroll management) based on a consignment agreement with a consignor.

Items 1 through 5 are personal information belonging to the SIS Group

"Legal basis for use of personal information of EEA residents, etc. (applicable to EEA residents only)"

Where you reside inside of the European Economic Area (the "EEA"), the SIS Group will process your personal information for achieving the Purposes of Use based on your consent to this Privacy Policy. The SIS Group will also process Personal Data for achieving the Purposes of Use if the processing by the SIS Group meets any of the following requirements: (1) such processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract; or (2) such processing is necessary for the purposes of the legitimate interests pursued by the SIS Group or by a third party (including but not limited to the interests of the provision of a service by the SIS Group, consideration on a selection of employment applicants and labor management).

Where provision of your personal information is mandatory and you choose not to provide such data, then the SIS Group will not be able to provide you with the relevant services.

You may withdraw your consent from the contact details provided below. The consent which you provide for the collection, use and disclosure of your personal information will remain valid until such time it is being withdrawn by you.

"Sharing of personal information of Non-EEA residents (applicable to Non-EEA residents only)"

The SIS Group shall not provide your personal information to any third party without your prior consent, unless any of the following applies or otherwise permitted by laws or regulation:

- Such provision is based on laws or regulations;
- Such provision is necessary for the protection of life, body, or property of any individual or entity, and it is difficult to obtain your consent;
- Such provision is specifically necessary for improving public health or promoting the sound growth of children, and it is difficult to obtain your consent; or
- Such provision is necessary for cooperating with a state organ or a local government, or its third-party service provider in executing the affairs prescribed by laws or regulations, and it is likely that obtaining your consent should impede the execution of such affairs.

"Outsourcing of processing of personal information of Non-EEA residents"

The SIS Group may outsource the processing of your personal information to third-party service providers within the scope of the Purpose of Use. In outsourcing such processing, the SIS Group shall use only third-party service providers who fulfill the SIS Group's internal standards concerning third-party service providers, and shall exercise necessary and appropriate supervision over such providers.

"Sharing of personal information of EEA residents (applicable to EEA residents only)"

Where you reside inside of the "EEA", some companies of the SIS Group may share your personal information with the other companies of the SIS Group, to implement the Purpose of Use. Any of the companies of the SIS Group to whom the SIS Group may disclose personal information may be located outside of the EEA (including, without limitation, Japan and the U.S.), and you agree to the following matters by consenting to this Privacy Policy:

- **1.**In the case that the country in which the recipient of personal information is located is outside of the EEA, such country does not have the same data protection laws as the EEA, i.e., many of the rights provided to data subjects in the EEA are not given;

- **2.**your personal information will be provided and processed for the Purpose of Use described above by any of the recipient of personal information ; and
- **3.**your personal information will be provided to the recipient of personal information y located outside of the EEA.

“Retention period of personal information”

The SIS Group will retain personal information, where you have entered into any contract with the SIS Group concerning the SIS Group's products and maintenance services, etc., for 5 years after the termination of such contract, or otherwise for 5 years after completion of the last communication between you and the SIS Group, unless a longer retention period is required or permitted by a law, a contract and others.

"Procedures for handling disclosure, etc. requests (applicable to Non-EEA Residents only)"

Where you reside outside of the EEA, the SIS Group shall sincerely respond to any request you might make concerning the disclosure, revision, or suspension of use of your personal information, or an inquiry concerning Purposes of Use. The procedure is as follows.

- **1.**Contact the SIS Group's department handling public inquiries and complaints.
- **2.**Fill out and mail in the prescribed documents as required. Also include a copy of your driver's license or other identification to confirm your identity (if you are making the request as a representative of an individual concerned, include a document to certify your representation rights, a copy of your driver's license, etc., and a copy of the driver's license of the individual concerned).
- **3.**After confirmation of your request, the SIS Group shall reply either in writing or by e-mail.

“EU Rights (applicable to EEA Residents only)”

Where you reside inside of the EEA, you have the right to ask the SIS Group for a copy of your personal information; to correct, delete or restrict (stop any active) processing of your personal information; and to obtain the personal information you provide to the SIS Group for a contract or with your consent in a structured, machine readable format.

In addition, you can object to the processing of your personal information in some circumstances (in particular, where the SIS Group is using the information for direct marketing).

These rights may be limited, for example if fulfilling your request would reveal personal information about another person, where it would infringe the rights of a third party (including the SIS Group's rights) or if you ask the SIS Group to delete personal information which the SIS Group is required by law to keep or has compelling legitimate interests in keeping. Relevant exemptions are included in applicable laws on privacy. The SIS Group will inform you of relevant exemptions the SIS Group relies upon when responding to any request you make.

To exercise any of these rights, you can get in touch with the SIS Group from the contact details provided below. If you have unresolved concerns, you have the right to complain to an EU data protection authority where you live, work or where you believe a breach may have occurred.

"Department handling public inquiries and complaints"

Contact the following office to discuss or make a complaint about the handling of your personal information:

Security and Quality Assurance Office, Saison Information Systems Co., Ltd.

Telephone: 03-3988-2020

* Office hours: Monday to Friday, 10 a.m. to 5 p.m. (closed public and New Year holidays)

About SSL

Information provided by visitors to this website is encrypted via SSL (Secure Socket Layer) transmission encryption methodology. The use of SSL prevents important user information from being stolen or maliciously modified.

What is SSL (Secure Socket Layer)

SSL (Secure Socket Layer) is a transmission protocol designed to encrypt transmission details. This technology is used to prevent users from having their personal information stolen or modified when input into a website and transmitted over the Internet.

<http://www.saison.co.jp/english/company/privacy.html>

EU-US Privacy Shield

HULFT, Inc. complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of all personal information transferred from the European Union to the United States. HULFT, Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

Personal Information Collected and Purposes of Use

As explained in "**Personal information acquisition, use and provision**" above, the personal information which HULFT, Inc. may collect from you includes your name, address, zip code, telephone number, e-mail address, place of work, company name, department name, business title and other contact information, Cookie, Prometric ID, and test result of HULFT Basic Engineer/HULFT Advanced Engineer certification test, your responses of customer satisfaction survey and other surveys, etc.

The purposes of use for such personal information are the Purposes of Use as explained in "Purposes of use for personal information acquired" above.

Third Party Transfer

As explained in "**Sharing of personal information of EEA residents (applicable to EEA residents only)**" above, HULFT, Inc. may share your personal information with the other companies of the SIS Group, to implement the Purpose of Use. If HULFT, Inc. transfers personal information received under the Privacy Shield to the other companies of the SIS Group, HULFT, Inc. will still remain liable for their access, use, and disclosure of such personal information.

Your Rights

Individuals in the EU have the right to access to, and limit the use and disclosure of your personal information. To exercise any of these rights, please get in touch with HULFT, Inc. from its contact provided below.

Dispute Solution, etc.

In compliance with the Privacy Shield Principles, HULFT, Inc. commits to resolve complaints about our collection or use of your personal information. Individuals in the EU with inquiries or complaints regarding this policy should first contact HULFT, Inc. at: policy@hulftinc.com.

HULFT, Inc. has further committed to refer unresolved Privacy Shield complaints to the panel established by the EU data protection authorities (the “DPA Panel”). If you do not receive timely acknowledgment of your complaint from HULFT, Inc., or if it has not resolved your complaint, please contact or visit the DPA Panel (to do so, you should contact the national data protection authority in the jurisdiction where you live) for more information or to file a complaint. The services of the DPA Panel are provided at no cost to you.

If neither HULFT, Inc. nor resolves your complaint, you may pursue binding arbitration through the Privacy Shield Panel. To learn more about the Privacy Shield Panel, visit <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>

HULFT, Inc. is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC), the Department of Transportation or any other US authorized statutory body. HULFT, Inc. may be required to disclose personal information that it handles under the Privacy Shield in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.