Handling of Personal Information

The Company has stipulated this "Handling of Personal Information/Privacy Policy" for the purpose of taking initiatives, as an organization, for ensuring proper handling of personal information based on the "Act on the Protection of Personal Information" (Act No. 57 of 2003; hereinafter referred to as the "Personal Information Protection Act").

1. Compliance with related laws, regulations, and guidelines

The Company will properly handle personal information by complying with the Personal Information Protection Act, other laws and regulations, guidelines by the Personal Information Protection Commission, and other guidelines.

2. Personal information

Personal information means information that is related to an individual and by which it is possible to identify that individual by the name, address, telephone number, e-mail address, or other statements that constitute that information. Personal information also includes information for which, even if it is not possible to identify the individual by using that information alone, it is possible to easily compare it with other information and identify the relevant individual as a result.

3. Acquisition and use of personal information

When the Company obtains personal information, we will publicly announce or give notification of the purposes of use, and if we will directly obtain a customer's personal information that is stated in a contract or another document (including electromagnetic records), we will clearly indicate the purposes of use in advance and obtain the information through legal and fair means.

The Company will use obtained personal information appropriately and within the scope of the purposes below.

4. Purposes of use of personal information

The Company will use personal information for the purposes below. The Company will obtain information such as cookies, IP addresses, advertising identifiers, device identifiers, and behavioral history from third parties other than the Company, link that information to customers' personal information, and use that information for the purposes below.

(1) Purposes of use of personal information related to customers

- For customers' identity verification and personal authentication
- For acceptance of applications provision, and contact related to the Company's services, etc.
- For guidance, operation, and management for various events and campaigns, provision of various types of information, and implementation of questionnaires
- For handling, confirming, and recording customers' inquiries, consultations, complaints, repairs, and support
- For improving and enhancing product development and other services
- For improving and enhancing customers' experiences on digital services (websites, mobile apps, etc.) provided by the Company
- For providing information such as e-mail newsletters, direct mail, notifications, and advertisements related

- to the Company's services *1
- Distribution of behavior-targeting advertisements using advertisement distributors such as Google and Yahoo
- For analyzing obtained information such as browsing history and application history and delivering advertisements related to new products and services that match customers' interests and preferences *1
- For preventing and investigating actions that are prohibited or that may be prohibited under the Terms of Use for this service and conducting appropriate handling based on such prevention and investigation
- For other matters that are incidental to or related to any of these items
- *1: Please see 13. "Use of cookies and other technologies" below.

(2) Purposes of use of personal information at the Company's subcontractors and transaction partners, etc.

- For the necessary work-related contact, performance of contracts, and business negotiations, etc.
- For managing transaction partner information

(3) Purposes of use of personal information of people who apply for employment at the Company

- For information provision, contact, and notifications made to employment applicants
- For hiring selection (including reference checks and other confirmation procedures)
- For assistance with obtaining the necessary work permits and visas for entering Japan
- For purposes that are incidental to hiring activities, such as statistical use for future hiring plans

(4) Purposes of use of the Company's employees' personal information

- For work-related contact to employees
- For payment of remuneration (wages, bonuses, allowances, etc.) to employees and performance of personnel and labor management
- For providing employee benefits
- For employee health management

5. Joint use of personal information

If personal information is jointly used with a third party or if handling of personal information is consigned to a third party, we will conduct supervision of the other party or third party conducting joint use so that the personal information will be used properly.

Matters related to electric power retail business (including services provided together with electricity supply services)

(1) Scope of the parties that will conduct joint use

The Company may share customers' personal information with the parties below. *1

- Electricity retailers *2
- General electricity transmission and distribution utilities *3
- The Organization for Cross-regional Coordination of Transmission Operators
- Parties to demand suppression contracts *4
- Brokers *5

(2) Purposes of joint use

The Company will jointly use customers' personal information, for the purposes of each of the items below, with the "parties that will conduct joint use" of (1) above.

- 1. For conclusion, change, or cancellation of a wheeling service contract, electric power adjustment contract, or power generation adjustment and supply contract (hereinafter referred to as the "Wheeling Service Contract")
- 2. For agency for abolition of a retail supply contract (a contract related to remote island supply or last resort supply) or an electricity receipt contract (hereinafter referred to as the "Retail Supply Contract") *6
- 3. For confirming information about the supply (electricity reception) point
- 4. For reading electricity meters, maintaining, inspecting, and replacing facilities, investigating facilities when there is a power outage or disaster, and other performance of work by a general electricity transmission and distribution utility, based on the Wheeling Service Contract
- 5. For performing work related to negawatt transactions
- 6. For complying with revision of laws and regulations or revision of the electric power business system or the electricity business system

(3) Items of information that will be jointly used

The Company will jointly use the information of each of the items below with the "parties that will conduct joint use" of (1) above.

- 1. Basic information: Name, address, telephone number, and the contract number of the Retail Supply Contract
- 2. Information concerning the supply (electricity reception) point: Supply area of the general electricity distribution utility that concludes the Wheeling Service Contract, the subject of the Terms and Conditions for Remote Island Supply, the specific number of the supply (electricity reception) point, information about the amount of the Wheeling Service Contract, the maximum value for the electric current, the connection transmission service menu, the power factor, the supply method, the method of determining the Wheeling Service Contract, meter information, the service pole number, the existence or non-existence of grid connection facilities, change of the Wheeling Contract date, the meter reading date, the contract status, and the decommissioning method
- 3. Information concerning negawatt transactions: The amount of transmission sales, the amount of demand procurement, demand suppression use, and the baseline

(4) Parties responsible for management of joint use

The parties responsible for the management of each item below for joint use are as stated below.

- 1. Basic information: The electricity retailer that has concluded the Retail Supply Contract (Provided, however, that for basic information concerning customers receiving remote island supply or last resort supply, this will be the general electricity transmission and distribution utility.)
- 2. Information concerning the supply (electricity reception) point: The general electricity transmission and distribution utility that uses the supply (electricity reception) point as the supply area
- 3. Information concerning negawatt transactions: Party to a demand suppression contract

- *1: The Company will jointly use customers' personal information only with a limited number of business operators within the scope that is necessary for the purpose of joint use, and we will not necessarily jointly use customers' personal information with all electricity retailers, demand suppression companies, and general electricity transmission and distribution utilities.
- *2: Electricity retailer means a business operator that does not fall under a reason for refusal of registration stipulated in Article 2-5.1 of the Electricity Business Act (Act No. 170 of July 11, 1964) and that has been registered as an electricity retailer by the Minister of Economy, Trade and Industry (including a business operator deemed to be registered as an electricity retailer based on the supplementary provisions of the Act for Partial Revision of the Electricity Business Act, etc. (Act No. 72 of 2014). (For the business operator's name and location, please refer to the Agency for Natural Resources and Energy's website.)
- *3: General electricity transmission and distribution utility means Hokkaido Electric Power Co., Ltd., Tohoku Electric Power Co., Ltd., TepCO Power Grid, Incorporated, Chubu Electric Power Co., Ltd., Hokuriku Electric Power Company, Kansai Electric Power Co., Inc., Chugoku Electric Power Company, Incorporated, Shikoku Electric Power Company, Incorporated, Kyushu Electric Power Company, Inc., or Okinawa Electric Power Company, Incorporated.
- *4: Party to a demand suppression contract means a business operator that has concluded a demand suppression adjustment supply contract with a member that is a general electricity transmission and distribution utility (including a business operator that has obtained a business operator code before concluding the contract) (for the business operator's name and location, please refer to the Organization for Cross-regional Coordination of Transmission Operators' website (https://www.occto.or.jp/privacy/negawatt-jigyousya.html)).
- *5: Intermediary means a party that has concluded a brokerage agreement with the Company as a party that conducts business for conclusion of retail supply contracts.
- *6: "Agency for abolition of a retail supply contract" means a business operator that has newly received an application for a Retail Supply Contract from a customer making, on behalf of that customer, an application for cancellation of the Retail Supply Contract to the existing business operator.

Matters related to gas agency business

(1) Scope of the parties that will conduct joint use

The Company may jointly use customers' personal information with the parties below. *1

- Gas retailers *2
- General gas pipeline service providers *3
- Intermediaries *4

(2) Purposes of joint use

The Company will jointly use customers' personal information, for the purposes of each of the items below, with the "parties that will conduct joint use" of (1) above.

- 1. For conclusion, change, or cancellation of the Wheeling Service Agreement
- 2. For provision of information related to the safety of gas appliances, etc. in association with agency for abolition of a retail supply plan (including contracts related to last resort supply) *5 or switching of suppliers
- 3. For confirmation of information related to the supply point
- 4. For meter reading for gas usage, maintenance, inspection, and replacement of equipment, handling when there is a gas leak or another emergency, and performance of other duties of a general gas pipeline service

- provider based on the wheeling service contract
- 5. For notification of the results of the investigation of gas appliances that is stipulated in Article 159.4 of the Gas Business Act *6

(3) Items of information that will be jointly used

The Company will jointly use the information of each of the items below with the "parties that will conduct joint use" of (1) above.

- 1. Basic information: The customer's name, address, and telephone number, and the contract number of the retail supply contract
- 2. Information concerning the service point: The service point identification number, meter information, presence/absence of load meters, inner pipes, meter gas valve location information, meter reading information, supply pressure, information about change of the wheeling agreement, and building information
- 3. Information concerning the safety of gas appliances, etc. related to the service point: Information related to the notification stipulated in Article 159.4 of the Gas Business Act *6

(4) Parties responsible for management of joint use

The parties responsible for the management of each item below for joint use are as stated below.

- 1. Basic information: The gas retailer that has concluded a retail supply contract (Provided, however, that for basic information concerning a consumer that is receiving last resort supply, this is the general gas pipeline service provider that uses the supply point as the service area.)
- 2. Information concerning the service point: The general gas pipeline service provider that uses the supply point as the service area (including service points for specified gas pipeline service business conducted by general gas pipeline service providers)
- 3. Information concerning the safety of gas appliances, etc. related to the service point: The gas retailer that has concluded a retail supply contract (Provided, however, that for basic information concerning a consumer that is receiving last resort supply, this is the general gas pipeline service provider that uses the supply point as the service area).
- *1: The Company will jointly use customers' personal information only with a limited number of business operators within the scope that is necessary for the purposes of joint use, and we will not necessarily jointly use customers' personal information with all gas retailers and general gas pipeline service providers.
- *2: Gas retailer means a business operator that does not fall under a reason for refusal of registration stipulated in Article 6.1 of the Gas Business Act *6 and that has been registered as a gas retailer by the Minister of Economy, Trade and Industry (including a business operator deemed to be registered as a gas retailer based on the supplementary provisions of the Act for Partial Revision of the Electricity Business Act, etc. (Act No. 47 of June 24, 2015). (For the business operator's name and location, please refer to the Agency for Natural Resources and Energy's website.)
- *3: General gas pipeline service provider means a business operator that has received the license of Article 35 of the Gas Business Act (*6) (including a business operator deemed to be licensed as a general gas pipeline service provider under the supplementary provisions of the Act for Partial Revision of the Electricity Business Act, etc. (Act No. 47 of June 24, 2015)). (For the business operator's name and location, please refer to Japan Gas Association's website.)
- *4: Intermediary means a party that has concluded a brokerage agreement with the Company as a party that conducts business for conclusion of retail supply contracts.
- *5: "Agency for abolition of a retail supply contract" means a business operator that has newly received an application for

a retail supply contract from a customer making, on behalf of that customer, an application for cancellation of the retail supply contract to the existing business operator.

*6: The Gas Business Act means the Gas Business Act (Act No. 51 of March 31, 1954) after revision based on Article 5 of the Act for Partial Amendment of the Electricity Business Act, etc. (Act No. 47 of June 24, 2015).

6. Provision of personal information to third parties

The Company will not provide the personal information that we receive to third parties. Provided, however, that the cases below are excluded.

- Cases in which we have obtained prior consent from the customer concerning the provision stated above
- Cases in which we provide information to a subcontractor within the scope that is necessary for achieving a purpose of use
- Cases in which we are required to provide information, based on a law or regulation
- Cases in which it is necessary in order to protect a person's life, body, or property, and it is difficult to obtain the customer's consent
- Cases in which it is particularly necessary for the purpose of improving public health or promoting the sound growth of children, and it is difficult to obtain the customer's consent
- Cases in which it is necessary to cooperate with the national government or a local government in executing clerical work that is stipulated by a law or regulation, and obtaining the customer's consent may interfere with the execution of those duties
- Cases in which we provide information to a party stated in the scope of joint users in 5 above
- Other cases that are permitted based on the Personal Information Protection Act

Excluding cases that are allowed under the Personal Information Protection Act, such as cases in which the customer's consent is obtained, the Company will not provide personal information to third parties that are located overseas.

7. Provision of information related to personal information to third parties

The Company may provide information related to personal information (this means the information defined in Article 26-2.1 of the Personal Information Protection Act, and it includes, for example, browsing history, location information, cookies, etc., that cannot be used to identify specific individuals) to third parties such as advertising platforms.

In the event that, at the time of the aforementioned provision, the Company assumes that the relevant third party will obtain personal data (this means the personal data defined in Article 2.6 of the Personal Information Protection Act) by comparing the aforementioned information related to personal information with information that identifies the relevant customer, we will conduct provision after performing the obligations that are required under the Personal Information Protection Act.

If you agree to this Privacy Policy and use this service, it will be deemed that you also consent to the aforementioned third parties' acquisition, as personal data, of your information related to personal information.

8. Method of handling requests for disclosure, deletion, elimination, or cessation of use of personal

information from the person related to that personal information

If the Company receives a request for disclosure, deletion, elimination, or cessation of use of personal information, we will use the prescribed procedures to confirm that the person who made the request is the person related to that information and then promptly handle that request. If you have any questions about this Privacy Policy or wish to exercise your rights, please contact us at the contact point stated in 15 below.

9. Security management measures

In order to prevent leaks, loss, or damage of personal information and to otherwise safely manage personal information, the Company is using appropriate and reasonable methods to implement security management measures as stated below.

1. Formulation of a basic policy

In order to ensure proper handling of personal information, in addition to the Privacy Policy we have also formulated a basic policy on information security, including personal information.

2. Organizational safety management measures

The situation of handling of personal information is regularly checked, and based on the results of the checks, rules are reviewed and guidance is provided as necessary. In preparation for the occurrence of a leak or other incident, we have also established guidelines for handling personal information leaks.

3. Human safety management measures

We regularly conduct in-house education such as training concerning information security, including personal information, and strive to raise and improve employees' awareness about protection of personal information.

4. Physical safety management measures

We use security cards to manage entry and exit to and from office floors, and we manage the areas where personal information is handled.

5. Technical safety management measures

We have introduced mechanisms that protect information systems that handle personal information from malicious software or unauthorized access by external parties.

10. Supervision of employees and contractors

The Company regularly conducts in-house education related to security and protection of personal information, and we strive to raise and improve employees' awareness about protection of personal information.

In addition, there are cases in which the Company consigns all or a portion of handling of personal information for various types of work, and in such cases the Company selects a party that is recognized as properly handling personal information, uses a consignment agreement to properly stipulate safety management measures, confidentiality, conditions for re-consignment, and other matters concerning handling of personal information, and conducts the necessary and appropriate supervision.

11. Security measures

The Company takes reasonable safety measures in order to protect obtained personal information and conducts protection both online and offline. We use firewalls, intrusion detection, SSL, and other technologies to ensure that personal information is handled with the utmost care, and we only allow access to personal information by

the people who have been given the authority that is necessary for work.

12. Use for other purposes

The Company will not, without your consent, use your personal information beyond the scope of the purposes of use stated in our Privacy Policy at the time of acquisition of that information. Provided, however, that this does not apply to cases that fall under a reason permitted under the Personal Information Protection Act.

13. Use of cookies and other technologies

(1) Use of cookies

In order to measure the effectiveness of advertisements, this site may obtain information about advertisements on which clicks were made before this site was visited (the dates when the clicks were made, the sites that have the posted advertisements, etc.) from third parties and compare that information with application information.

In addition, we may use, in conjunction with customers' personal information that the Company already possesses, information such as customers' interests, preferences, and browsing history that is obtained from third parties other than the Company. In such a case, we will obtain consent from the customer in advance and use the information within the scope of the purposes of use stated in 4. "Purposes of use of personal information" above.

(2) Classification of cookies

Cookies are classified into the following categories.

- Required cookies
- Statistics cookies
- Marketing cookies
- Required cookies are necessary in order for the website to function properly, and therefore they cannot be switched off within the user's system. It is possible to block these cookies, but parts of the website will stop functioning. These cookies do not save any information by which it is possible to identify an individual.
- Statistical cookies use Google Analytics, which is a service provided by Google LLC, in order to ascertain customers' visits to the Company's website. When Google Analytics is used on the Company's website, Google collects, records, and analyzes customers' history of visiting the Company's website, based on cookies that the Company issues. We receive the results of that analysis from Google LLC and ascertain the situation of customers' visits to our website. Customers' information that is collected, recorded, and analyzed by Google Analytics does not contain any information that identifies specific individuals. Such information will be managed by Google LLC, based on its privacy policy.

Google Analytics Terms of Use

- Marketing cookies are used to track users throughout the website and display ads that are relevant and interesting to those users.
- Google Ads
- Yahoo Ads

(3) Procedure for opting out of (disabling) cookies

There are several ways to opt out of (disable) cookies.

If you have confirmed the cookies stated in this Privacy Policy and there are cookies that you want to opt out of

(disable), please use your browser settings to make a setting to disable cookies or execute opting out (disabling) on the opt-out page provided by some senders.

1. Browser settings

Most browsers are set to allow cookies by default, but it is possible to conduct settings to disable or enable all cookies as necessary. It is also possible choose which cookies to allow from each sender.

Cookie settings vary from browser to browser, so please check the individual browser's setting method for details.

 $Safari^{TM}$

Google ChromeTM

 $Firefox^{TM}$

Microsoft EdgeTM

- * Please understand in advance that if you disable cookies, you may become unable to use some of this website's functions, some pages may not be displayed correctly, or you may become unable to use some of the Company's services.
- 2. (Some) cookie senders' privacy policies and opt-out pages

Google LLC

- Privacy Policy
- Opt out

LY Corporation

- Privacy Policy
- Opt out

14. The Company's name, address, and representative's name

Looop Inc.

For information about the Company's address and representative, please refer to the following.

https://looop.co.jp/company/about

15. Inquiries

If you would like to make a request for disclosure, an opinion, a question, a complaint, or another inquiry concerning handling of personal information, please contact us at the following contact point.

> <u>Inquiries concerning our privacy policy</u>

16. Continuous improvement

The Company shall appropriately review the situation of operation related to handling of personal information and strive to make continuous improvements, and it may change this Privacy Policy as necessary. If this Privacy Policy is changed, we will notify customers by a method such as notification on our website or sending an email.

Supplementary provisions

Revised on March 31, 2022 (effective on April 1, 2022)

Revised on May 23, 2022 (effective on May 25, 2022)

Department in charge: System Management Department