

# GDPR Privacy Notice

This privacy notice shall be read and construed in conjunction with the other provisions of our [privacy policy](#). We process any personal data of customers in accordance with the General Data protection Regulation (Regulation (EU) 2016/679 of 27 April 2016) (hereinafter referred to as "GDPR"). For purposes of this notice, the terms defined under the GDPR have the meanings ascribed to them under the GDPR.

**This Notice is applicable only to personal data concerning data subjects ("you" or "your") in the member states of the European Union and the three EEA/EFTA states - Iceland, Liechtenstein and Norway (collectively, the "EU") [and the UK].**

## Contact Information

LoiLo Inc. is responsible for your personal data as a data controller. If you have any question or would like to uphold your rights, please contact us at [global@loilo.tv](mailto:global@loilo.tv)

## Collection of Personal Data

The Company collects the User's personal data in the following cases:

- When the User visits our Website, registers for the Service or otherwise voluntarily submits information to the Company through the Website (such as through completing and submitting User inquiry forms);
- When the User posts "User-Generated Content" (defined as any form of User-generated information including text, audio, music, image, video, software, program, and code) on the Service;
- When the User uses the Service;
- When the User agrees to a linkage between the Service and other services provided by third parties such as Google (<http://www.google.com/>);
- When the Company receives inquiries or requests from the User that relate to the Service; and
- When the collection of personal data is otherwise necessary in connection with the above-listed activities.

The Company collects (both by itself and through third-party services) the following types of personal data from Users visiting the Website:

- Contact Information: Name, phone number and email address(es).
- Payment Information: Bank information, billing information, product information.
- School Affiliation: The organization or school to which the User belongs.

- Visit Details: Details of Users' visits to our Website, including traffic data, location data, logs, and other communication data and the resources that Users access and use on the Website.
- Computer and Connection Information: Information about Users' computer and internet connection, including Users' IP address, operating system, and browser type.

The Company collects the following types of information from Users using the Service:

- Name.
- Email Address.
- The organization or school to which one belongs.
- Class or lesson information to which one belongs.
- User-Generated Content such as:
  - Photos, audio, videos, etc.;
  - Evaluations and grades for students;
  - Attendance information.
- Access log (IP address, type of browser, type of OS, date and time).

The Company does not use or collect Users' precise geographic location.

You are required to provide us with certain personal data when you sign in / use our Services. Personal data that is mandatory is indicated in the relevant forms. We are not able to provide our Services to you if such data is not provided.

## How we use your personal data

We use personal data for the following purposes:

- a. to take and handle orders, deliver products and services and process payments. The lawful basis for these uses is to perform our contract with you.
- b. to communicate with you about orders, products and services. The lawful basis for these uses is to perform our contract with you, to comply with our legal obligations or to pursue our legitimate interests in improving our Services and giving our users the best experience.
- c. to decide which information to show you, where you give us your consent. The lawful basis for this use is your consent.
- d. to protect our customers from fraudulent, unauthorized or illegal activity on our Services and to respond to requests by the government or law enforcement authorities conducting an investigation. The lawful basis for these uses is our legal obligations.

## How we share your personal data

We share your personal data with the following recipients

- a. Our Group Companies; and
- b. Our service providers that provide services on our behalf, such as tech vendors who support our websites and other business systems, operational companies such as delivery couriers, and payment service providers who help us process your payments.

We may also disclose your personal data (i) where required by the applicable laws or regulations, (ii) in connection with corporate activities such as mergers, and (iii) when defending ourselves in an administrative or judicial proceeding.

## Transfer to the Third Party Countries outside the EEA

Your personal data may be transferred to Third Party Countries outside the European Economic Area with or without an adequate decision by the European Commission. In the case of any transfer of personal data to a country that does not have an adequate level of data protection in light of the standards under the GDPR, we will ensure such transfer will be made through the Standard Contractual Clauses adopted in accordance with the GDPR.

## Data retention

We will retain your personal information for so long as necessary to fulfill the purposes for which we process your personal information.

If your school or authority has purchased the Service and the school or district ends their contract with us and requests deletion of accounts, we will deal with all such accounts in accordance with applicable laws and regulations.

We may keep your personal information for a longer period of time where we reasonably believe necessary under the applicable laws and regulations or in order to protect our interests.

## Your rights

Under the GDPR you have the right to ask us: for a copy of your personal data: to correct or delete your personal data: to restrict (stop any active) processing of your personal data; and to send you a copy of your personal data you have provided to us in a structured, machine readable format. In addition, you can object to the processing of your personal data under certain conditions (for further information. see the section below entitled "Your right to object to processing". Please note that these rights are subject to the exceptions under the GDPR and applicable local laws. To exercise any of these rights, please contact us at the email address listed in Contact Information above.

## Your right to object to processing

You may object to processing of your personal data where our processing is based upon the exercise of our official authority or our legitimate interests or for direct marketing purposes.

To exercise this right, please contact us at the email address listed in Contact Information above.

## Withdrawing consent

You may withdraw your consent at any time to the processing of your personal data that we have collected about you. Such withdrawal does not affect the lawfulness of any processing performed pursuant to the consent given prior to the withdrawal.

To exercise this right, please contact us at the email address listed in Contact Information above.

## Your right to complain

You may lodge a complaint with a supervisory authority, in particular, in the member state of the EU [or the UK] where you have a habitual residence or place of work or where the alleged infringement of the GDPR took place.

# Privacy Policy

We, LoiLo Inc. (hereinafter referred to as "the company"), are serious about protecting the privacy of teachers, parents and children in all services related to LoiLoNote School (hereinafter referred to as "the service") as follows.

Please note, customers in the United States are subject to the LoiLoNote School Privacy Policy for U.S. Users (<https://n.loilo.tv/en/privacy>).

**In the event that there are discrepancies or inconsistencies between the Japanese version of this policy and its translation, the Japanese version will prevail.**

## 1. Information Collected and Its Use

The Company collects and uses the User's personal information (which refers to "Personal Information" as defined in Article 2, paragraph 1, of the Act on the Protection of Personal Information) in an appropriate manner in accordance with the provisions of this Policy. (This is a Japanese law. The unofficial full English translation of the Act on the Protection of Personal Information can be viewed online at <http://www.cas.go.jp/jp/seisaku/hourei/data/APPI.pdf>)

## 2. Collection of Personal Information

The Company collects the User's personal information in the following cases:

- When the User registers for the Service;
- When the User posts Content (any form of information including text, audio, music, image, video, software, program, and code);
- When the User uses the Service;
- When the User agrees to a linkage between the Service and other services provided by third parties such as Google (<http://www.google.com/>);
- When the Company receives inquiries or requests from the User that relate to the Service; and
- When the collection of personal information is otherwise necessary in connection with the activities

Please note that during phone interactions with customers, calls may be recorded for the accurate understanding of inquiries and to improve the quality of future support.

※ For information about the external transmission of user information, please see [here](#).

### 3. Use of Personal Information

The Company uses Personal Information only to the extent necessary for the following purposes unless otherwise expressly permitted by the User's consent or under applicable law:

- To provide the Service;
- To ensure the safety and smooth use of the Service;
- To avoid unauthorized use;
- To prepare statistical data on the use of the Service;
- To carry out surveys on users' opinions of the Service currently provided and/or of the Service intended to be provided in the future;
- To plan and offer new services for the Service;
- To provide payment and logistics services;
- To run lotteries for promotional purposes, or to send prizes associated with such promotions or other merchandise;
- To carry out maintenance of systems and deal with their problems;
- To respond to inquiries and requests related to the Service;
- To publish information posted by users;
- To send important notices such as notices of changes to these Terms, other terms and conditions or policies;
- To provide personal information to third parties in accordance with the provisions of Article 6 hereof entitled "Disclosure of Personal Information to Third Parties"; and
- To fulfill purposes incidental to the purposes listed above.

### 4. Registration and Information to Be Registered

4.1. In order to ensure smooth use of the Service, the User may be required to register his/her profile information (such as display name, icon image or messages to be used for the Service) and/or his/her full name, email address, etc. For the avoidance of doubt, the User's profile information displayed on the Service may also be accessible by other users within the school, but will not be opened to the public. Registration of such information is optional for the User; however, in the absence of such registration, the Service or some parts of the Service may not be available.

4.2. Provision or registration of personal information and other information is optional for the User; however, in the absence of such provision or registration, the Service or some parts of the Service may not be available. When the User has closed his/her account for the Service, the Company will dispose of the information previously provided or registered by the User in accordance with the Company's regulations.

4.3. In order to investigate and respond to inquiries from the User or to confirm the User's identity, the User's telephone number(s), email address(es), terminal device model(s), operating system version(s) may be collected.

4.4. The Company may ask for the User's credit card information when the User purchases a product or uses a paid service or is otherwise required to make any payment to the Company. Payment will be processed through a payment processing service and the Company does not store any credit card information.

4.5. To improve the Service, the Company may use cookies for the purposes of saving certain entries made by the User in order to make the use of the Service more convenient, to maintain and protect the User's sessions for security reasons, or to recognize the number of the User's visits to the Service, the manner in which the User uses the Service, or the size of the User. The User may choose not to allow cookies to be used; however, if the User does not permit cookies to be stored, the User may not be able to use some parts of the Service such as those which require the User to log in.

4.6. When the User uses the Service, certain information such as the User's IP address, browser type and browser language is automatically collected and stored. Such information will be used to analyze user environments for the purpose of improving the Service or to prevent unlawful activities that may affect the proper operation of the Service.

4.7. Some parts of the Service will be provided using location information transmitted through mobile phones. If the User uses such parts of the Service, the Company uses the location information to the extent necessary for the provision of that Service. If a mobile phone is not set to send location information, no such location information will be transmitted.

4.8. The Company may collect information about the equipment the User uses (including the operating system version, identification of terminal device and computer name). Such information will be used to improve the Service, to confirm the identity of the User, or to prevent unlawful activities that may affect the proper operation of the Service.

## 5. Changes to Registration Information

To facilitate smooth continued use of the Service, the User should notify the Company of any changes to his/her email address or other registered information in the manner specified by the Company.

## 6. Disclosure of Personal Information to Third Parties

6.1. The Company will not disclose any personal information of the User to any third party except in cases where:

- The User gives consent to the disclosure;
- The disclosure is required or authorized by law;
- The User violates these Terms or any Individual Terms of Use applicable to the Service and the Company determines based on sufficient evidence that in order to protect its interests, property and services, disclosure of the User's personal information is necessary.
- While disclosure is necessary to prevent loss of life, personal injury or property damage, it is difficult to obtain the User's consent to the disclosure;
- While disclosure is particularly necessary for the improvement of public health or the promotion of children's healthy development, it is difficult to obtain the User's consent to the disclosure;
- While it is necessary for the Company, in performing the duties prescribed by law or regulation, to cooperate with a state organ, a local government, or any person acting on their behalf, there is a risk that the obtaining of the User's consent may affect the proper performance of such duties;
- A transfer of the Company's business including personal information occurs as a result of merger, consolidation, demerger or other similar transaction;
- All or part of the Company's operations are delegated to third party/ies;
- The personal information is disclosed to a person who is under a confidentiality obligation to the Company; or
- The disclosure is necessary for the Company to exercise its rights.

6.2. In cases other than those specified in paragraph 6.1, the Company may provide third parties including financial institutions, credit card companies or collection or processing agencies (e.g. Paypal) with certain information for the purpose of processing the service usage payment, such as the User's name, credit card number and its expiration date; however, the User may request the Company, in a manner specified by the Company, not to provide such information to third parties.

## 7. Secure Management of Personal Information

To ensure safe management of personal information, our company implements and trains our employees to take measures to prevent the leakage, loss, or damage of personal information.

Specifically, we have implemented the following measures:

### (1) Establishment of Basic Policies



To ensure the proper handling of personal information, we have established a basic policy on personal information protection, which includes compliance with relevant laws and guidelines and the establishment of a "Contact Point for Questions and Complaints."

## (2) Development of Discipline Regarding Personal Information Handling

We have established internal rules that specify the handling methods for personal information at each stage, including acquisition, utilization, retention, provision, deletion, and disposal, as well as the roles and responsibilities of personnel involved.

## (3) Organizational Security Measures

We have appointed a manager responsible for the management of personal information handling and clarified the scope of personal data processed. We have also established a reporting and communication system to the responsible party in case of breaches of internal rules, incidents of personal information leakage, loss, or any related breaches, including early signs. We conduct regular audits of personal information handling.

## (4) Human Resource Security Measures

We provide regular training to all employees on matters related to the handling of personal information and information security, as well as confirming their understanding. We have contracts in place with employees to maintain the confidentiality of personal information.

## (5) Physical Security Measures

We implement access control for employees in areas where personal information is handled. We also take measures to prevent theft or loss of equipment, electronic media, documents, etc., related to personal information and implement measures to minimize the impact in case of theft or loss, such as encryption.

## (6) Technical Security Measures

We limit the employees who handle personal information and the scope of personal information they handle.

## (7) External Environment

When handling personal data in foreign countries, we ensure awareness of the protection systems related to personal information in those countries and take necessary and appropriate measures for security management.

## 8. Linkage with External Services

Subject to the User's consent, the User's account for the Service may be linked with other accounts that are used for external services provided by third parties. In this case, it should be noted that the information provided by the User to such external service providers is not under the control of the Company and will be subject to the terms of use and privacy policy of each of the Company/ies and the external service providers.

## 9. Use of Statistical Information

In order to provide users with useful information or to identify the Company's services or websites users are most interested in, the Company may collect from its users statistical information from which individuals cannot be identified. Statistical information is not considered to be personal information for the purposes of this Privacy Policy.

## 10. User's Rights

10.1. The User has the right to confirm or correct his/her email address, password and other registration information, or delete his/her account, at any time on the website of the Service.

10.2. The User has the right to request the Company to disclose his/her personal information that cannot be confirmed on the Service's website, in a manner specified by the Company, except in cases where:

- The disclosure is likely to cause harm to the life, body, property or other rights or interests of the User;
- The disclosure is likely to affect significantly the proper operation of the Company's business;
- The disclosure is not consistent with applicable law; or
- The Company is unable to confirm whether the request for the disclosure has been made by the User.

10.3. If the User determines that the personal information so disclosed is not correct, the User may request the Company, in a manner specified by the Company, to correct, add

to, or delete the personal information. Upon receipt of the request, the Company will make a prompt investigation to the extent necessary for the purpose of using the personal information and will make requested corrections, additions or deletions based on the results of such investigation.

10.4. If the User requests disclosure of his/her personal information that cannot be confirmed on the Service's website, the User may be required to pay a disclosure fee (1,500 yen for each request) in a manner specified by the Company.

10.5 The User should keep his/her password and other account information confidential. The User should contact the Company immediately in the event of unauthorized access to his/her account.

## 11. User's Information after Withdrawal

If the User has closed his/her account, the User's information will be disposed of appropriately in accordance with applicable laws and regulations and the Company's internal rules.

## 12. Continuous Improvement

The Company shall appropriately review and make continuous improvements to operations regarding the management of personal information, and reserves the right to modify this Privacy Policy as necessary. In the event of modifications to this Privacy Policy, the User shall be notified of the effective date and specifics, etc. of such modifications via email to the user, posting on the Company's website, or by other means. The modified Privacy Policy shall be applied if the User uses the Company's products or accesses the Company's website after notification of such modifications has been made.

## 13. Means of Communication and Contact for Inquiries

13.1. Communications from the Company to the User relating to the Service will be posted in a relevant location on the website operated by the Company or will otherwise be made in a manner that the Company deems appropriate.

13.2. All communications from the User to the Company relating to the Service, including offers to disclose personal information, opinions, questions, complaints, or inquiries about the handling of personal information shall be made by sending the inquiry form available in a relevant location on the website of the Company or shall otherwise be

made in a manner specified by the Company. When the User sends an inquiry or other communication to the Company, the User may be required to enter his/her name, email address and password to confirm his/her identity.

If you are concerned about information about you or another User that has been provided to the Company or if you have questions about anything in the above Policy, please contact us at [loilo@loilo.tv](mailto:loilo@loilo.tv)