

Privacy Policy

This Privacy Policy describes our collection, use, and disclosure of personal data. This Privacy Policy applies to KADOKAWA CORPORATION, and its subsidiaries and affiliates (“KADOKAWA”). Our “services” in this Privacy Policy include our customer-facing websites, apps, and other products. This Privacy Policy applies to our services that display or reference this Privacy Policy, but does not apply to services that display or reference a different Privacy Policy.

In some cases, in providing these services, we process personal data of consumers or end users at the direction of our business customers. In such cases, we act as a service provider or “processor” for those organizations, but we do not control the privacy practices of those organizations. This Privacy Policy does not apply to personal data that we process on behalf of our business customers as a service provider or data processor. If you are a consumer or end user of any of these organizations, please read their privacy policies and direct any privacy inquiries to them.

We do not knowingly collect personal data from children under the age of 16. In the unlikely event that we learn that we have collected personal data from a child under the age of 16 without parental consent, we will delete that information as soon as possible. If you believe that we may be in possession of information about a child under the age of 13, please contact us.

1. PROCESSING OF PERSONAL DATA

1.1. PERSONAL DATA WE COLLECT

The personal data we collect depends on how you interact with us, the services you use, and the choices you make. We collect information about you from different sources and in various ways when you use our services, including information you provide directly, information collected automatically, information from third party data sources, and data we infer or generate from other data.

When you are asked to provide personal data, you may decline. And you may use web browser or operating system controls to prevent certain types of automatic data collection. But if you choose not to provide or allow information that is necessary for certain services or features, those services or features may not be available or fully functional.

1.1.1. INFORMATION YOU PROVIDE DIRECTLY

We may ask you to provide us with your Personal Data by operating your device and entering information or via a document or other mediums.

The foregoing Personal Data includes, for example:

- Names
- E-Mail Address
- Date of birth
- Responses to Questionnaire

1.1.2. INFORMATION WE COLLECT AUTOMATICALLY

We will collect information related to your activities when using our services and information related to your devices and how you are using those devices.

The foregoing Personal Data includes, for example:

- Identifiers
- Information related to apps, browsers and devices

1.1.3. INFORMATION WE CREATE OR GENERATE.

We infer new information from other data we collect, including using automated means to generate information about your likely preferences or other characteristics (“inferences”).

The foregoing Personal Data includes, for example:

- Information used for security purposes
- Marketing preferences

1.1.4. INFORMATION WE OBTAIN FROM THIRD PARTY SOURCES

We may collect Personal Data from third parties.

The foregoing Personal Data includes, for example:

- Personal Data collected from group companies
- Personal Data collected from partner companies that operate services linked to our services
- Personal Data uploaded by other users
- Personal Data from public information

1.2. OUR USE OF PERSONAL DATA

1.2.1. PURPOSE OF USE

We use the personal data we collect for purposes described in this Privacy Policy or as otherwise disclosed to you. For example, we use personal data for the following purposes:

Purpose	Example	Categories of Personal Data
Provision and maintenance of our services.	<ul style="list-style-type: none"> ▪ To smoothly provide, maintain, and improve the Service, including notifications, communications, and other communication functions to other users ▪ To notify or provide new services related to the Services ▪ To respond to information, inquiries, etc. regarding the Services ▪ To notify users of changes to the Terms of Service or this Policy, suspension, discontinuation, or termination of the Service, and other important notices related to the Service 	<ul style="list-style-type: none"> ▪ Identifiers ▪ Commercial information (including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.) ▪ Internet or other electronic network activity information ▪ Audio, electronic, visual, thermal, olfactory, or similar information ▪ Inferences
Development and improvement of our services.	<ul style="list-style-type: none"> ▪ To conduct questionnaires, etc. for users regarding our services ▪ To analyze advertising effectiveness, market analysis, and marketing 	<ul style="list-style-type: none"> ▪ Identifiers ▪ Commercial information ▪ Internet or other electronic network activity information ▪ Audio, electronic, visual, thermal, olfactory, or similar information ▪ Inferences
Security and prevention of unauthorized use.	<ul style="list-style-type: none"> ▪ To verify your identity and prevent unauthorized use of our services 	<ul style="list-style-type: none"> ▪ Identifiers ▪ Commercial information ▪ Internet or other electronic network activity information ▪ Audio, electronic, visual, thermal, olfactory, or similar information ▪ Inferences

Provision of Services optimized for you.	<ul style="list-style-type: none"> ▪ To provide affiliated services and to display advertising information that matches the needs, interests, and concerns of users. 	<ul style="list-style-type: none"> ▪ Identifiers ▪ Commercial information ▪ Internet or other electronic network activity information ▪ Audio, electronic, visual, thermal, olfactory, or similar information ▪ Inferences
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1.2.2. LAWFUL BASES

Purpose	Lawful bases
Provision and maintenance of our services.	<ul style="list-style-type: none"> ▪ Consent ▪ Contract ▪ Legitimate interest
Development and improvement of our services.	<ul style="list-style-type: none"> ▪ Consent ▪ Contract ▪ Legitimate interest
Security and prevention of unauthorized use.	<ul style="list-style-type: none"> ▪ Consent ▪ Contract ▪ Legitimate interest
Provision of Services optimized for you.	<ul style="list-style-type: none"> ▪ Consent ▪ Contract ▪ Legitimate interest

1.3. DISCLOSURE OF PERSONAL DATA

1.3.1. DATA PROCESSORS

We may outsource the handling of all or part of the personal data obtained from users to a processor. In such cases, we will enter into a confidentiality agreement with the party to which the information is entrusted in accordance with this Privacy Policy in advance, and will provide necessary and appropriate supervision to ensure that the party to which the information is entrusted manages the information appropriately and safely.

1.3.2. OTHERS

1.3.2.1. PUBLIC DISCLOSURE BY USERS THEMSELVES

Public information can be viewed by third parties other than users. The foregoing information may be copied, stored or spread by the viewer, and accessed by an unintended third party, due to the nature of digital data. When setting your profile information or posting on our services, please pay attention to the contents and scope of disclosure of such post. Please note that we may provide public information about you to third parties. Public information provided by us to a third party may be posted on the third party's services, etc. We confirm that such third parties comply with the policies related to the protection of personal data where they are located.

1.3.2.2. SHARING OF PERSONAL DATA AMONG GROUP COMPANIES

To the extent permitted by applicable laws, we may share personal data among our group companies (<https://group.kadokawa.co.jp/company/group.html>) under the following conditions.

- **the details of that data**
Personal data as indicated in “1 PROCESSING OF PERSONAL

DATA.”

- **the users' purpose of use**

Purposes of use described in “1.2.1 PURPOSE OF USE” (“we” shall be deemed to be replaced with “our group companies” and “services” shall be deemed to be replaced with “services provided by our group companies”)

- **the name and address of the person responsible for managing the personal data**

KADOKAWA CORPORATION
2-13-3 Fujimi, Chiyoda-ku, Tokyo, 102-8177
Japan

- **if the user is corporation, the name of its representative**

Takeshi Natsuno, Representative Director and CEO

1.3.2.3. SUCCESSION OF BUSINESS

If there is any transaction between companies pertaining to our business to which this Privacy Policy is applicable, such as acquisition, merger or change of business entity, Personal Data may also be transferred to the successor of the business to the extent permitted by Applicable Laws.

1.3.2.4. COMPLIANCE AND COOPERATION WITH PUBLIC AGENCIES

If we receive a request pursuant to legal proceedings such as a warrant, or if there is imminent danger to someone’s life or property such as a suicide threat or a bomb threat, we may disclose personal data to third parties including law enforcement agencies such as the police, or the court, pursuant to Applicable Laws.

1.4. RETENTION OF PERSONAL DATA

We collect and retain personal data to provide our services according to your request, fulfill any of the applicable purposes of use described in this Privacy Policy, or to comply with applicable laws.

Unless you request the deletion of your account, in principle, we will retain most of your personal data. Once your account is deleted, we will process your personal data properly according to applicable laws and our internal rules after retaining such personal data for a given period of time for the following purposes:

- to reply to inquiries
- to resolve disputes or collect fees
- to detect and deter fraudulent use of, or abuse of, our services; or
- to comply with Applicable Laws.

1.4.1. SECURITY OF PERSONAL DATA

In order to prevent leakage, loss, or damage of personal data and to protect personal data, we take necessary and appropriate measures for the safe management of personal data, such as restricting access to personal data files, recording access logs, and installing security software to prevent unauthorized access from outside. We take necessary and appropriate measures for the safe management of personal data. If you would like to know more about the details of security control measures we take, or if you believe that there has been a leakage of personal data, please contact us at the contact information below.

The representative director of the company is responsible for the management of personal data, and the company will implement appropriate management and continuous improvement of personal data.

1.4.2. LOCATION OF PERSONAL DATA

If necessary, we may transfer personal data outside of the user's location. In such cases, we will comply with applicable laws and ensure that appropriate

safeguards are in place. Please contact us for more information. If necessary, our data processors may share personal data outside of your location. In doing so, we will ensure that appropriate safeguards are in place and that applicable laws are followed. For more information, please contact us.

2. YOUR RIGHT

2.1. DATA PROTECTION RIGHTS

To the extent permitted by applicable law, you have the rights with respect to your personal data that we process. For example, you may have the following rights. If you wish to exercise any of your rights, please contact us at “3.1 HOW TO CONTACT US”.

- **Your right of access**
You have the right to ask us for copies of your personal data.
- **Your right to rectification**
You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure**
You have the right to ask us to erase your personal data in certain circumstances.
- **Your right to restriction of processing**
You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- **Your right to object to processing**
You have the right to object to the processing of your personal data in certain circumstances.
- **Your right to withdraw consent**
When we use consent as our lawful basis you have the right to withdraw your consent. You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you. To make a data protection rights request, please contact us at the contact information below.

2.2. HOW TO COMPLAIN

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice. You also have the right to lodge a complaint with a supervisory authority, but we encourage you to first contact us with any questions or concerns.

3. OTHERS

3.1. HOW TO CONTACT US

If you have any comments, questions, requests, complaints, or other inquiries regarding our handling of personal data, please contact us at the following address.

2-13-3 Fujimi, Chiyoda-ku, Tokyo 102-8177, Japan
KADOKAWA Corporation
Personal Information Inquiry Section

3.2. CHANGES TO THIS PRIVACY STATEMENT

We will update this privacy statement if necessary to reflect changes in our services, how we use personal data, or the applicable law. When we post changes to the statement, we will revise the “LAST UPDATED”. If we make material changes to the statement, we will provide notice or obtain consent regarding such changes as may be required by law.

3.3. LAST UPDATED

July 2024