

PRIVACY POLICY

Ritzwell & Co. believes that it is our responsibility to protect all personal information in our possession. We have established the following privacy policy to carry out such social responsibility and hereby declare our compliance with the following.

Privacy Policy

1. Use of Personal Information

Ritzwell & Co. uses personal information for the following purposes. Except where permitted under the Personal Information Protection Law or any other relevant law or regulation, we will obtain an individual's prior consent when we use an individual's personal information for any purpose other than as listed below.

(1) Personal information of customers who purchase our products

- (i) For the purpose of shipping products purchased from our company.
- (ii) For the purpose of providing after-sale services related to (i).
- (iii) For the purpose of providing information related to our new products and services.
- (iv) For the purpose of ensuring proper and smooth transactions with customers.

(2) Personal information of customers visiting our facilities and events

- (i) For the purpose of offering explanation and support related to our facilities and events.
- (ii) For the purpose of responding to inquiries received at a later date.
- (iii) For the purpose of providing information related to our new products and services.

(3) Personal information of customers who sent inquiries to our company

- (i) For the purpose of responding to inquiries.

2. Provision to Third Parties

Except where permitted under the Personal Information Protection Law or any other relevant law or regulation, we will not provide an individual's personal information to third parties without that individual's prior consent.

3. Business Outsourcing

We may outsource the handling of personal information in whole or part to third parties who signed contracts, including a nondisclosure agreement with us, and disclose personal information to our subcontractors for the purposes described above. We set standards either equal or higher personal information protection standards under Article 20 of Personal Information Protection Law in terms of selecting subcontractors to conduct screening of these subcontractors. We will strictly supervise and manage the subcontractors.

4. Legal Compliance

We comply with the Personal Information Protection Law and other related laws and regulations.

5. Safety Control Measures

We take necessary and appropriate precautions for security control for the prevention of leaks, loss, and damage of

the personal information we handle by setting up internal rules and systems for the protection of personal information.

6. Request for Disclosure, etc.

We will respond appropriately and promptly to a request for disclosure, correction, and discontinuation of the use of personal data in our possession according to the procedures set by us.

7. Inquiries and our complaint reception desk

For requests the disclosure, correction, and discontinuation of use of personal information in our possession, inquiries in regard to the handling of personal information, and complaints, please contact our reception desk below:

Reception desk: General Affairs Department, Ritzwell & Co.

Telephone: +81-92-584-2240

E-mail: somu@ritzwell.com

8. Continuous Improvement

We pay attention to social conditions and industry trends related to personal information, our customers' requests, and the latest network technology trend to review internal rules and systems for the protection of personal information, as well as to review the appropriate operation of the system and on a timely basis to make continuous improvements.

As of September 1, 2015.

Toshiaki Miyamoto, President

Ritzwell & Co.