

# PRIVACY POLICY (JOB SEEKERS)

Value Shift Inc. ("Company"), headquartered in Fukuoka City, Fukuoka Prefecture, Japan, is committed to protecting Users' privacy and considers the protection of personal information a crucial responsibility. We comply with Japan's Act on Protection of Personal Information (Act No. 57 of 2003) and other relevant laws and regulations to ensure the protection of Users' privacy.

## 1. DEFINITIONS

Terms related to personal information are defined in accordance with Japan's Act on Protection of Personal Information.

## 2. USE OF PERSONAL INFORMATION

The Company collects personal information for the following purposes:

- (1) Information directly obtained from users of our services and systems
  1. To use information entered in membership registration forms for member registration, management, administrative communication, and provision of system functions
  2. To provide information entered during member registration to domestic and foreign businesses or companies partnered with the Company
  3. To introduce users to hiring companies and employment placement agencies in the Company's employment placement business
  4. To improve our services and develop new services
  5. To improve marketing and expand target audience
  6. To manage and promote Company events and seminars
  7. To advertise, promote, and conduct public relations for products of the Company and third parties
  8. To conduct surveys, campaigns, communications, and send prizes
  9. To distribute newsletters and other information
  10. To respond to inquiries and questions from users
  11. To maintain and service our provided services
- (2) Information acquired through service use
  1. When providing our services to recruitment agencies or hiring companies (collectively "Hiring Companies"), we may view, use, and disclose to Hiring Companies your personal information (gender, age, residence, work history, education, etc. provided to us), system browsing history of job postings, application data, and message opening status/sending-receiving history/content between users and Hiring Companies. This is done within the scope necessary for confirming contract performance between the Company and Hiring Companies, providing services to Hiring Companies, and system development, improvement, maintenance, service enhancement, and new service development.
  2. We may aggregate and analyze system usage records and personal information regarding company information and status management by Hiring Companies and users to present relevant job postings, scouts, and company names to users, and relevant user information to companies.
- (3) Information obtained from third parties

To achieve smooth service operation and usage, we may obtain additional user information from businesses to whom we have provided user personal information, including selection progress, job offer status, planned hiring company, planned start date, planned annual salary, and other service usage-related information.

## 3. VOLUNTARY NATURE OF INFORMATION PROVISION

While providing personal information to the Company is voluntary and based on your consent, please note that without necessary information, membership registration and use of various services/systems may not be possible.

## 4. DISCLOSURE OF PERSONAL INFORMATION

We may disclose personal information to third parties in the following cases. We may also provide personal information to third parties with your consent in cases not listed below. Unless otherwise specified, information is transferred via encrypted web systems, email, or physical documents.

- (1) We may provide personal information to domestic and foreign advertising providers for marketing improvement and expansion.

(2) We may disclose and provide acquired personal information to domestic and foreign businesses or companies (including headhunters and HR personnel) contracted or partnered with the Company for scouting and recruitment activities.

(3) We may provide personal information to foreign third parties to achieve the purposes stated in Section 2.

(4) We may provide personal information without user consent in the following cases:

1. When required by law
2. When necessary to protect life, body, or property and obtaining consent is difficult
3. When specially required for public health or child welfare and obtaining consent is difficult
4. When cooperating with government agencies and obtaining consent would hinder their duties

## 5. DISCLAIMER REGARDING THIRD-PARTY DISCLOSURE

The Company assumes no responsibility in the following cases regarding third-party acquisition of personal information:

(1) When users themselves reveal personal information to businesses, hiring companies, or other third parties through service functions or other means

(2) When third parties can identify users through their activity information or information posted related to service use

(3) When users provide personal information on external sites linked from our service and such information is used

(4) When someone other than the user obtains information that can identify the user (ID, password, etc.)

(5) When the Company is not at fault

## 6. OUTSOURCING OF PERSONAL INFORMATION

We may outsource the handling of personal information to service providers as necessary for our business operations. In such cases, we carefully select providers that maintain appropriate data protection controls and require them by contract to implement proper management practices to prevent user information leaks through appropriate management and confidentiality measures.

## 7. CROSS-BORDER TRANSFERS

We may disclose and provide your personal information to foreign businesses (including HR personnel at companies and headhunters) through our Meets Work service for scouting and recruitment activities within the scope described below. However, phone numbers and email addresses from your Meets Work registration will not be disclosed or provided unless you individually consent or apply to job postings yourself.

[Information regarding provision of personal data to foreign third parties]

Countries of Recipients:

25 countries (United States, United Arab Emirates, India, Indonesia, Ukraine, Australia, Canada, Cambodia, Singapore, Switzerland, Thailand, South Korea, Taiwan, China, Turkey, New Zealand, Philippines, Brazil, Vietnam, Hong Kong, Malaysia, Myanmar, Mexico, Laos, Russia)

\*Potential foreign business recipients are limited to these 25 countries.

Personal information protection systems in these countries:

Please refer to the Personal Information Protection Commission website ([link](#)), which contains "Information Documents" detailing each country's personal information protection systems.

Personal information protection measures taken by foreign businesses:

Our contract with businesses using Meets Work stipulates that third-party recipients must comply with their country's personal information protection systems and the OECD Privacy Guidelines' 8 principles when using Meets Work.

(OECD Privacy Guidelines 8 principles: source available [here](#))

## 8. PSEUDONYMIZED INFORMATION

We may create and use pseudonymized information based on collected information for:

- Improving our services

- Developing new services

## 9. CALL RECORDINGS

We may record and store telephone conversations to verify call content and improve service quality.

## 10. USE OF STATISTICAL DATA

We may create statistical data from collected personal information in a form that eliminates individual correspondence. We may use such statistical information without restriction.

## 11. SECURITY MANAGEMENT

### (1) Organizational Security Measures

We have appointed personnel responsible for personal data handling and established incident reporting procedures.

### (2) Human Resources Security Measures

We conduct training on personal data handling for all employees.

### (3) Physical Security Measures

We implement anti-theft measures for devices and electronic media containing personal data.

### (4) Technical Security Measures

- We implement access controls ensuring only essential personnel can access personal data
- We have systems protecting personal information systems from unauthorized access

## 12. IDENTITY VERIFICATION

We verify identity using identifying information (name, phone number, email address, password, etc.) for member registration, service use, and requests for personal information disclosure, correction, deletion, or suspension of use. We are not responsible if others obtain and use such identifying information.

## 13. COLLECTION AND USE OF PERSONAL-RELATED INFORMATION

We use cookies to protect privacy, improve usability, deliver advertisements, and collect statistical data. We may also use cookies, JavaScript, and similar technologies to collect user behavior data on our sites (such as accessed URLs, content, and viewing order). This behavioral data contains no personal information. While you can refuse cookies through browser settings, some system functions may be limited if cookies are disabled. We may freely use collected attribute information and behavioral data that cannot identify individuals.

## 14. PROCEDURES FOR DISCLOSURE, CORRECTION, AND SUSPENSION REQUESTS

Upon verifying your identity, we will promptly respond within reasonable bounds to requests for notification of purpose of use, disclosure, correction, addition or deletion, suspension of use, deletion, and suspension of third-party provision ("Disclosure etc.") of personal information we hold. However, this may not apply if such requests could harm the life, body, property, or other interests of other users or third parties, if we determine it would significantly interfere with our business operations, or if complying would violate laws or regulations. For detailed procedures regarding Disclosure etc. requests, please contact us at the inquiry address below.

## 15. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy as needed within the scope permitted by law.

## 16. PRIVACY INQUIRIES

For privacy-related inquiries, please contact:

Email: [privacy@valueshift.co.jp](mailto:privacy@valueshift.co.jp)

Disclosure of user information external transmission under the telecommunications business act

Pursuant to Article 27-12 of the Telecommunications Business Act and Article 22-2-29 of its Enforcement Regulations, we disclose the following information regarding user information transmitted by information transmission functions activated by information transmission command communications:

\*1 Transmission of programs etc. that activate information transmission functions of users' personal computers, smartphones, tablets, and other information terminals, specifically including transmission of code etc. that implements mechanisms to collect and externally transmit user information from user terminals. For websites, this includes but is

not limited to portions of source code written in HTML, CSS, JavaScript etc. that implement such mechanisms, and for applications, programs etc. that trigger information collection modules embedded in applications.

\*2 Functions that transmit user information recorded on users' personal computers, smartphones, tablets, and other information terminals to information terminals of persons other than the user.

[Information regarding external transmission details follows]

- (1) Google Analytics  
Recipient: Google LLC  
Information transmitted: Device and browser-related data and activity per user  
Purpose: Site usage analysis
- (2) Google Tag Manager  
Recipient: Google LLC  
Information transmitted: Device and browser-related data and activity per user  
Purpose: Site usage analysis
- (3) Ptengine  
Recipient: Ptmind Inc.  
Information transmitted: Device and browser-related data and activity per user  
Purpose: A/B testing
- (4) Visual Website Optimizer  
Recipient: Wingify  
Information transmitted: Device and browser-related data and activity per user  
Purpose: A/B testing
- (5) Yahoo! Tag Manager  
Recipient: LINE Yahoo Corporation  
Information transmitted: Device and browser-related data and activity per user  
Purpose: Site usage analysis
- (6) Microsoft Advertising  
Recipient: Microsoft Corporation  
Information transmitted: Device and browser-related data and activity per user  
Purpose: Site usage analysis
- (7) X Analytics  
Recipient: X Corp.  
Information transmitted: Device and browser-related data and activity per user  
Purpose: Site usage analysis
- (8) Tiktok Analytics  
Recipient: Bytedance Inc.  
Information transmitted: Device and browser-related data and activity per user  
Purpose: Site usage analysis
- (9) Criteo  
Recipient: CRITEO Inc.  
Information transmitted: Device and browser-related data and activity per user  
Purpose: Site usage analysis

Established: November 1, 2024

End of Privacy Policy