

Higuchi Inc. Privacy Policy

Last Modified 14th September 2020

Your privacy is important to us. To better protect your privacy we provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used.

Please note that participation in the Higuchi Sites is primarily a public activity and much of the information you post to any Higuchi Sites (whether directly through our site or via links with other social networking websites) is instantly publicly viewable. Therefore, you should not submit information that you consider confidential. We maintain the privacy of your email address and password submitted to us in the registration process (unless you enter such information as your username or in the text of your entries to user areas), but other information you provide should be considered non-confidential and available for viewing by others.

Also, please note that information provided through facebook or other social networks, or for publication on fan pages, mobile apps or websites may be subject to different privacy policies which may vary materially from these terms applying to our web sites.

The Information We Collect

Any information gathered by us is used to customize the experience for you the user, and is not shared or sold to any third parties, except as expressly provided for in this Privacy Policy and our Terms of Service. However, we may in the future provide customized or targeted advertisements to you based upon your data (including usage statistics and characteristics), in which case we may allow third party applications to access such data for the purpose of customizing messages or advertising for you.

Our Commitment to Data Security

To prevent unauthorized access and maintain data accuracy, we use industry standard methods to safeguard and secure the information we collect online, although you recognize that data transmitted online or stored in a facility to which online access is provided cannot be made to be 100% secure. We believe in

protecting your information just as we would want our information protected.

In the event that personal information is compromised as a result of a breach of security, we will promptly notify those persons whose personal information has been compromised as may be required by applicable law.

Please note that information you enter for your user profile or in your posts may be accessed and viewed publicly and therefore you should not post information that you consider confidential or that you do not want distributed publicly. Although in some areas you will have the ability to edit or delete information, please note that even this information may have been cached on servers, cut and pasted or otherwise incorporated into other posts or for other uses, and so once information is posted you should consider that it may be publicly available perpetually, and in different locations and/or media than your original submission.

Notifications

It is our policy to provide notifications, whether such notifications are required by law or are for marketing or other business related purposes, to our users via email notice, written or hard copy notice, or through conspicuous posting of such notice on a Higuchi Site, as determined by us in our sole discretion. Notwithstanding the foregoing, we reserve the right to determine the form and means of providing notifications to our users.

Child Protection

We do not offer services to, or target, persons under the age of 13. In compliance with the Children's Online Privacy Protection Act, we will purge any information we receive from people we believe to be children under 13 from our database and cancel the corresponding accounts.

To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections. The main form of identity management is your email address. Please always use a valid and up-to-date email address.

Use of User Information

Information you provide to us about yourself, or that we collect and infer based

upon your entries and posts to a Higuchi Site may be used to improve your user experience, provide or suggest targeted services and to allow third party advertises and messaging to be tailored or targeted. We may use or provide to third parties aggregated data entered by users or inferred from usage. We may collect IP addresses and cookies for the primary purpose of assisting with ease of use by you. However, except as legally required, we will not sell or provide your email address, IP address, cookies, address or phone number to third parties for advertising or other purposes. In the future we may provide third parties with the ability to provide customizable or targeted advertising or messages and in such cases we may allow third party applications to access your user data in determining the messaging or advertising applicable to you.

Higuchi is a platform. By nature, our platform helps our customers create interactive marketing campaigns including contests and sweepstakes. By doing so our customers can collect Personal Information from users including name, email and user-generated content. If you participate in a campaign created by a Higuchi customer using the Higuchi Platform your information is bound by the privacy policy and terms of the Higuchi customer who created the campaign as well as Higuchi's policies. Our customers may choose to transfer your Personal Information into their systems.

Compliance

Access to your Personal Information. You have a right to access, modify, correct and request that Higuchi internally delete any Personal Information provided to or obtained by Higuchi. If you update, modify or correct any Personal Information, we may keep copies of your Personal Information prior to such update, modification or correction for uses provided for in this Policy. You may update, modify or correct your Personal Information via your account Preferences. Alternatively, you may contact specialtylamps@higuchi-inc.co.jp for updates, modifications and corrections to your Personal Information, or to request access to your Personal Information.

Retention of Your Personal Information. You may request internal deletion of your Personal Information at any time by contacting Higuchi in the manner provided on Higuchi. Higuchi will endeavor to respond to your request in a timely manner. Please note, however that Personal Information you have published on Facebook

or other social channels may remain available even if you request that such information be internally deleted by Higuchi. Once a request to delete a Higuchi user's Personal Information is received, it will be removed from our servers within 60 days. You may contact specialtylamps@higuchi-inc.co.jp to delete your account.

Protection of Your Personal Information. Any Personal Information that you provide to Higuchi will be protected in a commercially reasonable manner.

Notice of Breach of Security. In the event of a security breach that affects you Higuchi will notify you as soon as possible on both the nature of the breach and the actions taken to address it.

How to Contact Us

Should you have other questions or concerns about these privacy policies, please send us email at specialtylamps@higuchi-inc.co.jp