

## Multi DRM Kit Privacy Policy

Nextscape Inc. (hereinafter called “Company”) establishes the Privacy Policy (hereinafter called the “Privacy Policy”) as follows and strives to protect the privacy of users who use Company’s services covered by this notification (hereinafter called “User”) in relation to Company’s handling of personal information (hereinafter called the “Personal Information”). The Personal Information of User living in the European Economic Area (hereinafter called “EEA”) and the United Kingdom (hereinafter called “UK”) is protected in accordance with the “General Data Protection Regulation” (hereinafter called the “GDPR”) in Europe.

### Article 1. Personal Information Collected by Company

Company acquires personal information provided by User to the extent necessary for Company to provide the Services to such User. Company appropriately acquires the personal information and does not acquire it by any fraudulent means or other unlawful methods. The personal information collected by Company from User who uses the Services are as follows:

- Name, e-mail address
- Access history information such as IP address and cookie information associated with access to the website

### Article 2. Purposes of Processing of Personal Information

Company uses the Personal Information obtained from User for the following purpose and to the extent necessary to achieve such purpose. If Company needs to change such purpose, Company notifies User of such change or publishes it on its website.

#### 1. Purposes of use of information provided by User for time of contract

- (1) Provision, maintenance, protection or improvement of the Services including acceptance of registration from User for the Services or identification of User;
- (2) Confirmation of usage situation of the Services by User (including in the case where User uses services provided by any service provider other than Company through the Services);
- (3) Announcement of information on the details of the Services, updated information, event or campaign information or information on any alteration of the terms of service, etc.;
- (4) Billing of the fees for the Services to User;
- (5) Notification to User or response to inquiries from User in relation to the Services;
- (6) Extraction of respondents to questionnaires on the Services;
- (7) Response to any breach of the terms of service or other regulations or rules of Company;

- (8) Improvement or expansion of the Services;
  - (9) Creation of statistical data on the use of the Services;
  - (10) Planning, formulation or implementation of new Services;
  - (11) Utilization for marketing activities.
2. Company may determine any specific purposes of use for any individual service in addition to the purposes of use set forth in the preceding paragraphs. Company announces in advance such purposes of use for each individual service on the website for such individual service or on the screen for such service after specifying such purposes as much as possible.

### Article 3. Provision or Deposit of Acquired Personal Information to or Joint Use of Acquired Personal Information with Third Parties

1. Company uses third parties (representative service providers or contractors, etc.) to provide the Services to User on behalf of Company or to give support to Company's provisions of the Services. In the course of performance of their services, such third parties may gain access to any personal information of User. In such case, Company authorizes such third parties to use or disclose such personal information of User only if such use or disclosure is limited to such services. In addition, Company sufficiently examines the eligibility or qualification of such third parties as service contractors and confirms the matters on confidentiality in executing service contracts with them and builds the system for appropriate management of such information. The purposes of Company's use of such third-party contractors include the following purposes:
  - (1) Service providers  
Company uses or disclose your personal information only in connection with our business for the purpose of providing and maintaining infrastructure and IT services, providing customer service, and processing and administering customer surveys and questionnaires.
  - (2) Compliance with Laws and Regulations  
Company may provide the Personal Information of User to third parties if Company considers that such provision is permitted by applicable laws and regulations or reasonably necessary for Company to comply with the laws and regulations at the request of any public, judicial or administrative agencies in or outside the country of residence of User, including its response to laws, regulations, legal proceedings, court orders, suits, warranties or other legal or regulatory procedures. In addition, Company may disclose the Personal Information of User to third parties if Company considers that such disclosure is reasonable for protection of Company's rights, investigation or prevention of any breach of the Terms of Service, fraud or misconduct or protection of Company's business or User.
2. Company does not provide the Personal Information obtained from User to third parties except in any of the following cases.

- (1) If User agrees to such provision;
  - (2) If User breaches any provision of the terms of service of Company and Company has any adequate grounds to determine that Company is forced to disclose the personal information of such User to protect the rights, properties, assets or services, etc. of Company;
  - (3) If such provision is based on the “Act on the Protection of Personal Information” of Japan or any other applicable laws and regulations;
  - (4) If such provision is needed to protect the life, body or property of any person and Company has difficulty in obtaining consent of such User to such provision;
  - (5) If Company is required to cooperate with any governmental agencies, local public agencies or their contractors for their performance of duties stipulated by laws and regulations and obtaining consent of User to such provision may interfere with such performance;
  - (6) If Company transfers or hands over its business including provision of personal information of User to any third party due to merger, company split, transfer of business or other event.
3. If Company requires any business partners who perform any services jointly with Company in providing the Services to User, Company may use the personal information of such User jointly with such business partners. In such case, Company uses such personal information jointly with such business partners after announcing to or notifying such User of in advance the purposes of use, name of such business partners, type of such information and name of its administrator.

#### Article 4. Disclosure, Correction or Suspension of Use of Personal Information

1. If Company reasonably considers that any disclosure of personal information of User is needed on the grounds that such disclosure is permitted by applicable laws and regulations or in order for Company to comply with applicable laws and regulations including compliance with court order, warrant, subpoena, other applicable laws, regulations, or legal or regulatory procedures, Company discloses such personal information without delay after confirming that such User requests such disclosure. For disclosure of personal information, Company may charge such User a fee for disclosure in accordance with the procedures separately designated by Company.
2. If User requests Company to correct the details of his/her personal information for the purpose of any regulation, tax, insurance, lawsuit or other legal requirements on the grounds that such personal information is not true or accurate, or if User requests Company to suspend the use of his/her personal information on the grounds that such information is handled beyond the scope of the purposes of its use announced to such User in advance or that such information is collected by any fraudulent means or other unlawful methods, Company makes necessary investigations of such request after confirming that such request is made by such User and corrects or suspends the

use of such personal information on the basis of the results of such investigations and notifies such User of such correction or suspension.

3. If User requests Company to delete his/her Personal Information and Company considers that it needs to respond to such request or such request meets the requirements set forth in the paragraph 1 or paragraph 3 of the article 17 of the GDPR, Company deletes such Personal Information without delay after confirming that such request is made by User him/herself and notifies User of such deletion.
4. Regarding the request set forth in the above each paragraph, User is required to send to Company the following details as well as other information and materials designated by Company.
  - (1) Name, e-mail address of such User
  - (2) Details of such request, its background and reasons; and
  - (3) Identification document of such User.

#### Article 5. Retention or Deletion of Personal Information

1. We do not retain personal data beyond the purposes for which it was collected or as required by applicable law.
2. Users of our site may request that we delete their personal data at any time. We will remove personal data when it is no longer necessary for the purposes for which it was collected or processed.

#### Article 6. User's Rights and Legal Grounds for Use of Personal Information

1. User's rights: User has the following rights relating to his/her Personal Information collected and processed by Company only if User visits Company's website or uses Company's services from or in EEA or UK or if applicable laws and regulations stipulate such rights.
  - (1) Acquisition of or access to personal information  
User may gain access to almost all of his/her personal information by logging in to his/her account. In addition, User may obtain necessary information from Company.
  - (2) Correction or deletion of personal information  
User may correct or completely delete his/her personal information by correcting or deleting his/her profile information, bicycle information or maintenance information or by deleting his/her account.
  - (3) Filing of objections  
If the requirements set forth in the GDPR are satisfied, User may file an objection against processing of his/her personal information. In such case, Company stops such processing unless Company has any justifiable reasons for continuing such processing or is required by applicable laws or regulations to conduct such processing.
  - (4) Refusal or withdrawal of consent

User may refuse to consent to any processing of his/her personal information or withdraw such consent at any time even if such User already expressed such consent in the past.

(5) Filing of complaints

The user has the right to lodge a complaint with the supervisory authority, in the EEA member states and, in the UK, where the place of residence, place of employment, or where the matter that is the subject of the complaint occurs.

2. Legal grounds for use of Personal Information: Under the GDPR, any organization who collects, uses, shares, or processes its users' information requires legal grounds for such acts. Company uses the Personal Information of User for its legitimate business purposes on the following legal grounds if such Personal Information is covered by the GDPR.

- (1) Company needs to collect and use the Personal Information of User in order to provide any services or functions requested by User. The services provided by Company are designed to provide support to bicycle theft deterrence or prevention or response to its loss by detecting movements of a bicycle equipped with the device, sounding an alarm, collecting location information of the bicycle, sending notice to the application, or displaying location information in the application, etc. Company may not provide major services to User or perform the Terms of Service if Company does not process User's information including location information.
- (2) Company collects and uses the Personal Information of User based on consent of such User. For example, if User uses maintenance functions, Company collects the information on maintenance of User's bicycle. Company processes the information provided by User based on User's consent if such User gives such consent to Company. User may withdraw his/her consent at any time and has the right to transfer his/her information.
- (3) Company uses the Personal Information of User to pursue its legitimate interests including improvement of its services, development, marketing or promotion of safety or security measures.
- (4) Company shares the Personal Information of User to fulfill its legal obligations in each country or region at the request of any law enforcement agencies in such country or region.

## Article 7. Data Administrator and Data Transfer

In EEA and UK, with respect to the Personal Information collected in connection with Company's applicable services, Company is a data administrator. Company provides its services to User and processes the Personal Information of User in Japan, EEA, and UK. Company may transfer the data to its business places located in Japan from EEA or UK. The Personal Information is transferred to

Japan on the basis of adequacy certificate for cross-border data transfer obtained by Japan or on the standard terms and conditions of contracts already executed by Company.

#### Article 8. Links

Any business operators or service providers other than Company may acquire personal information on their websites. In such case, this Privacy Policy of Company does not apply to such acquisition and Company does not assume any obligation or responsibility for handling or processing of such personal information by such business operators or service providers.

#### Article 9. Contract for Inquiries

Any User who has any opinions or questions on this Privacy Policy, any inquiries about Company's handling of personal information or any requests or claims under the Article 6 may send an e-mail to Company's contact e-mail address ([multidrm\\_support@nextscape.net](mailto:multidrm_support@nextscape.net)).

#### Article 10. Revision

If Company revises this Privacy Policy, Company promptly announces the date and details of such revision on its website. However, we will not use the personal data of the data subject in any new way without your consent.