Cloud Data Policy

Last Updated July 2, 2026

Cybozu, Inc. ("Cybozu") appropriately handles data generated through the use of our cloud computing services, Kintone ("Kintone"), excluding Customer Information, in accordance with the policy described below. Unless otherwise provided for, the terms used in this policy have the same meanings as those defined in the Kintone Terms of Use.

1. Classification of Data

Data generated through use of Kintone is classified as follows.

Data Type	Definition and Examples **The examples listed are illustrative and not exhaustive.*
Stored Data	Definition: Data, messages, files, documents and other content (excluding Customer Information) uploaded and stored on Kintone by Customers or Users. Examples: • Titles and contents of files uploaded by Users • Content uploaded by Users in messages or spaces • Titles and contents of emails sent and received by Users • Names of Users
Analytical Data	Definition: Data concerning the usage of Kintone (how and when Customers and Users use Kintone), includes log data and device information automatically collected by Cybozu through the use of Kintone, application and app configuration information and settings, and statistical data compiled and processed from such data. Examples: • History of browsing, searching, and other operations in each application • Type and version of Customer's device operating system • Type of Customer's device

	• Error logs and crash logs • Number of Users and number of configured organizations • Number of features used and data records created in each application or app • Configuration information and settings for each application • Whether applications have been customized and the number of customizations performed

2. Handling of Stored Data

(1) Service Providers

Cybozu will handle Stored Data using the services of the following third parties ("Service Provider").

① Infrastructure Services

Service Provider	Applicable Service/Feature	Purpose of Processing	Data Processing Location
Amazon Web Services Japan G.K.	Kintone Kintone AI	Cloud hosting provider	United States of America

② AI Services

Service Provider	Applicable Service/Feature	Service Provider Policy	Data Processing Location
Amazon Web Services, Inc.	Kintone AI	https://aws.amazon.com/ai/responsible-ai/policy/	United States of America

(2) Additional Information

Cybozu will handle Stored Data in accordance with the provisions of the Kintone Terms of Use.

3. Handling of Analytical Data

(1) Purpose of use

Cybozu uses Analytical Data only to the extent necessary to achieve the following purposes:

① To support Users' use of Kintone
Example: If a failure occurs in Kintone due to Customer's operation, analyzing and identifying the operation that triggered the failure helps resolve the issue.

② To provide, maintain, protect, improve, and develop Kintone
Example: Comparing and analyzing the frequency of use of each feature by customers helps determine which features should be prioritized for improvement.

③ To analyze, consider and implement appropriate marketing strategies for customers
Example: Comparing and analyzing the behavior of those who have contracted for Kintone and those who have not helps provide the most appropriate marketing communication.

④ To optimize the method, content, and timing of follow-up communications to customers
Example: Comparing and analyzing the behavior of those in trial or active use of Kintone helps optimize the method (telephone, e-mail, mail, etc.), content, and timing of follow-up communications.

⑤ To optimize Customer interviews
Example: Comparing and analyzing usage of Kintone helps identify the most suitable users to interview about how they use Kintone.

(2) Sharing of Analytical Data

Cybozu does not share Analytical Data with any third parties, except in the following cases:

① When the Customer agrees to disclose or share its Analytical Data with others.

② When Cybozu shares Analytical Data with its affiliated companies to the extent necessary to achieve the purposes outlined in this policy.

③ When Cybozu shares Analytical Data with third parties to which Cybozu outsources part or all of the handling of Analytical Data to the extent necessary to achieve the purposes outlined in this policy.*

④ When Customer has purchased Kintone through a partner, or has entered into an agreement with a partner regarding customization or other arrangements related to Kintone, and Cybozu shares Analytical Data with the relevant partner to the extent necessary to achieve the intended purpose of use (provided that such Analytical Data is aggregated or processed so

that the usage status of individual users cannot be easily inferred), except where the Customer has explicitly requested that such data not be shared with the partner.

⑤ When Analytical Data from multiple customer environments is aggregated or analyzed and processed so that the usage status of specific customers cannot be easily inferred.

⑥ When it is deemed necessary to protect the rights, property, or services of other customers or Cybozu due to Customer's violation of the Terms of Service.

⑦ When it is necessary to protect an individual's life, body, or property.

⑧ When required by applicable laws and regulations.

* Cybozu shall enter into outsourcing agreements with contractors that include confidentiality obligations and security requirements and shall disclose only the necessary Analytical Data within the scope required for the performance of the outsourced work. Cybozu prohibits the use of Analytical Data for purposes other than the outsourced work.

4. Amendments to this policy

This policy may be amended without notice in response to changes in laws and regulations, business activities, or other circumstances.