

Privacy Policy

Last updated: 2022.6.1

Cybozu, Inc. and Cybozu, Inc. Representative Office in Thailand (“we”, “us”, “our”, or “Cybozu”) will handle Personal Information in accordance with this privacy policy (“**Privacy Policy**”).

You can object to our collection, use and/or disclosure of your Personal Information based on your own decision. However, please note that if you object or fail to provide us the requested Personal Information in cases where we have to collect, use and/or disclose your Personal Information based on the legal or contractual necessity, you may not be able to use whole or parts of our cloud services, website or other services as a result of your objection or failure to provide us the requested Personal Information.

Please note that the details of the handling of Personal Information in our Recruitment Activities is separately provided.

1 Definition

As Used in this Privacy Policy, the following terms shall have the following meanings:

1. “Personal Information” means any identified or identifiable information about you as listed below.
2. “Customer” includes any individual and their officers, employees, staff and other personnel who are or will be approved to use our products and/or services.
3. “Potential Customer” includes visitors to our website.
4. “Reporter” means any individual who have reported vulnerabilities in our products and/or services, or information security incidents at Cybozu.
5. “PDPA” means the Thailand’s Personal Data Protection Act BE 2562

2 Information that we collect

In the course of conducting our business activities, Cybozu collects the following types of your Personal Information:

Name, address, place of employment, department, position, telephone/fax number, e-mail address, bank account details, credit card number, portrait, video, shareholder number and

Customer Information (as defined in the *cybozu.com Terms of Use*.) when using our products and/or services.

3 How we use your information

3.1 Depending on the nature of our relationship with you, Cybozu collects, uses and/or discloses your Personal Information on the legal basis of legitimate interests; entering into or performance of contract; legal compliance; vital interest; public interest; consent; or any other basis as permitted by applicable laws and regulations, as the case may be, to the extent necessary to achieve the respective purposes described below.

(1) Personal Information of our Customers and/or Potential Customers

We will use such information for the following purposes:

- a. to provide a range of information on our products and services (new products and services, new features, feature improvements, case studies, etc.);
- b. to provide information on, and to run, seminars and events;
- c. to manage Customer transaction information, such as subscription; applications for our products and services, changes to Customer Information, subscription renewals and cancellations, etc.;
- d. to estimate and/or bill for our products, services, and subscription fees;
- e. to send thank you letters for purchasing our products and services;
- f. to advise that we are conducting a survey on our products and services, as well as to notify winners, and to send out prizes;
- g. to provide information on our product and service maintenance, issues, etc.;
- h. to reply to inquiries received and to provide Customer support;
- i. to manage certification programs, user communities, and developer communities;
- j. to utilize as basic data to enhance and improve our products and services;
and
- k. to measure the effectiveness of marketing and Customer support initiatives.

(2) Personal Information of Cybozu's business partners

We will use such information for the following purposes:

- a. to manage business partner information;
- b. to engage in the necessary communications to enter into contracts and carry out transactions; and
- c. to carry out billing and payment operations.

(3) Personal Information of Reporters

We will use such information for the following purposes:

- a. to contact the Reporter;
- b. to pay a bounty if the Reporter is participating in a bug bounty program, and to administer the said program; and
- c. if the Reporter is participating in a bug bounty testing environment program, to provide the vulnerability verification environment and to administer said program.

(4) Personal Information of media representatives and other individuals:

We will use such information for the following purposes:

- a. to contact such person; and
- b. to provide information on, and to run, seminars and events.

3.2 In addition to the purposes set forth in Section 2.1, we may use your information without obtaining your consent for the following purposes:

- a. to comply with applicable laws and regulations;
- b. to exercise or defend Cybozu's legal rights; and
- c. in the event of a merger and acquisition or other similar transactions involving transfer of our business or assets.

3.3 Where we need to handle your Personal Information for a purpose where consent is required, we will obtain your consent for such purpose separately.

4 How long we keep your information

Cybozu retains your Personal Information to the extent reasonably necessary to fulfill the purposes as listed under this Privacy Policy and to comply with applicable laws and regulations. Cybozu may need to retain your Personal Information for a longer duration, as required and/or permitted by applicable laws and regulations.

5 How we share your information with third-parties

For the purposes as described under this Privacy Policy, Cybozu may provide your Personal Information to the following third parties:

- Our affiliated companies (including affiliated companies located outside Thailand) and our business partner;
- Suppliers or vendors that assist Cybozu (e.g., providers of a billing and/or payment collection service, consultants, financial auditors, financial institutions, banks, law firms, IT service providers, insurance company, insurance broker);
- Other companies that co-host a seminar or event with Cybozu; and
- Government authority, law enforcement agency, court, regulator, or other third party where Cybozu is required to disclose your Personal Information under applicable laws and regulations.

6 Outsourcing

Cybozu may outsource part of the processing of your Personal Information. When Cybozu outsources, we will select a vendor or contractor on the condition that the vendor or contractor has secured a sufficient level of Personal Information protection and will obtain contractual assurances from the vendor or contractor regarding protection of Personal Information where it is practicably possible. In addition, Cybozu will take necessary and appropriate measures to ensure that sufficient level of protection is afforded regarding the vendor or contractor's handling of Personal Information.

7 Your rights and how to make a request

7.1 In accordance with PDPA, you have the following rights:

- a. the right to ask us for access or obtain copies of your Personal Information or for the disclosure of the acquisition of your Personal Information that is obtained without your consent;
- b. the right to ask us to rectify information you think is inaccurate, incomplete, not up to date or misleading;
- c. the right to ask us to erase, destroy or anonymize your Personal Information;
- d. the right to ask us to provide your Personal Information in a structured, commonly used and machine-readable format, and transmit it to another organization;
- e. the right to object to how we collect, use and/or disclose your Personal Information in certain activities;
- f. the right to restrict us from using your Personal Information; and
- g. the right to withdraw consent for collection, use and/or disclosure of your Personal Information that is based on your consent at any time.

- 7.2 To exercise any of these rights, please contact us via our email address mentioned in Section 10 below. Cybozu will process the request promptly based on the conditions prescribed by applicable laws and regulations and after proper identification of you as the (i) Customer or Potential Customer, (ii) Cybozu's business partners, (iii) Reporter, or (iv) media representative or any other individual, as the case may be. There may be certain cases where Cybozu can reasonably and lawfully decline your request; for example, due to our legal obligation or a court order. If we decline your request, we will notify you of the reason.
- 7.3 If you believe our collection, use and/or disclosure of your Personal Information is in violation of the applicable data protection laws and regulations, you have the right to lodge a complaint to the competent data protection authority, where applicable. Cybozu would, however, appreciate the chance to deal with your concerns before you approach the authority, so please contact us in the first instance.

8 Security Measures

Cybozu maintain appropriate security measures, which includes administrative, technical and physical safeguards in relation to access control to protect the confidentiality, integrity, and availability of Personal Information against any accidental loss or unlawful or unauthorized access, use, alteration, correction or disclosure of Personal Information, in compliance with the applicable laws and regulations.

In particular, we have implemented access control measures and use of devices for storing and processing Personal Information which are secured and suitable for our collection, use and/or disclosure of Personal Information. We also have measures on restricting access to Personal Information and the use of storage and processing equipment by imposing users' access rights, users' permission rights to the authorized personnel, and users' duties and responsibilities to prevent unauthorized access, disclosure, perception or unlawful duplication of Personal Information, or theft of device used to store and process Personal Information. This includes measures on re-examination in relation to unauthorized access, alteration, erasure, or transfer of Personal Information, which are in accordance with methods and channels used to collect, use and/or disclose Personal Information.

9 Data transfer to foreign countries

Given Cybozu is a Japan-based company with various international branches, your Personal Information may be handled outside Thailand, especially by personnel of Japan headquarter as well as its foreign branches and affiliated companies. Also Cybozu may use Japan-based, U.S.A.-based or otherwise internationally renowned cloud computing services for its customer and

transaction management, in which your Personal Information may be handled. Some recipients of your Personal Information may be located in another country for which the Personal Data Protection Committee under the PDPA has not ruled that this country has adequate data protection standard.

When it is necessary to transfer your Personal Information to a third country with a level of data protection standards which may be considered lower than in Thailand, we will use our best endeavours to ensure an adequate degree of protection is afforded to the transferred Personal Information, or that the transfer is otherwise permitted in accordance with the applicable laws and regulations. We may, for example, obtain contractual assurances from any third party given access to the transferred Personal Information that such data will be protected by data protection standards which are equivalent to those required in Thailand.

10 Amendments to this policy

This Privacy Policy is subject to revision from time to time in response to changes in laws and regulations or changes in our business activities and we encourage you to regularly revisit or keep track of this Privacy Policy to be notified of any changes. We will notify you of any substantial changes and obtain your consent if we are required to do so by applicable laws and regulations. We hereby ask for your understanding in advance.

11 Contact us

For all inquiries regarding this policy, please contact us at:

Personal Information Inquiries Desk& Local Representative:

Cybozu, Inc. Representative Office in Thailand

E-mail: sales-sea@kintone.com

Phone: +66-(0)2-1-4-9237

Address: No.388 Exchange Tower, 29th Floor, unit 2901-2904, Sukhumvit Road,
Klongtoey Sub-District Klongtoey, District,Bangkok, 10110