## **Privacy Policy**

Wakita & Co., Ltd. (hereinafter the "Auctioneer") may require the private information of users of WIN Auction (hereinafter the "Auction") website.

The Auctioneer places a high priority on protecting the privacy of the users of the Auction and obeys the laws concerning the protection of personal information and pays the closest attention to the management of the personal information in the Auction.

#### 1. Definition of Personal Information

The term "Personal Information" refers to information about an identifiable individual, consisting of one or more of the data, including member ID, password, e-mail address, company's name, name of the person in charge, address, phone number, facsimile number, bank account number, history of activities in the Auction, purchase record and other information that personally identifies an individual.

## 2. Purpose of Use of Personal Information

Acquired personal information obtained from the users by internet, documents or by the phone call is used only for the purposes for which it was collected, or for reasonably related purposes, and only to the extent necessary for the conduct of related business.

- a) To provide the internet auction and related services to users.
- b) To execute business transaction with users.
- c) To identify and screen users.
- d) To execute various matters that are compulsory as a condition of the business license.
- e) To send our service information, product information, auction news and information related with transaction with users.
- f) To reply to and fulfill user's requests for our services, materials, auction information, etc.
- g) Other related activities which is required for conducting internet auction business.
- h) When it is necessary to cooperate with a government organization, local public body, or party commissioned by such an organization or body for the execution of legally prescribed matters, the Auctioneer may provide personal information to such an organization or body.

#### 3. Security management

The Auctioneer takes the necessary and appropriate measures to prevent illegal access, falsifications, deletings, leaks, losses & etc., as well as otherwise safely manage the personal information it handles.

## 4. Entrustment of the Handling of Personal Information to Third Parties

When contracting a third-party service provider to handle all or a portion of personal information, the Auctioneer conducts the necessary and appropriate supervision of the contracted service provider to ensure safe management of the personal information contracted to be handled.

# 5. Exemption from Responsibility

In the following cases, the Auctioneer is not responsible for a obtaining of the personal information by the third party.

- a) When users give their own personal information to a third party by using the Auction website or any other measures.
- b) When users identified the individual by the data in the Auctioneer's website service which input by users themselves.

#### 6. Amendment to Privacy Policy

Due to the revisions of laws and regulations, or due to conduct the necessary and appropriate measures for protecting personal information, the Auctioneer reserves the right to change this Privacy Policy in the future. In that case, the updated Privacy Policy will be posted on this website.

# 7. Contact

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