

# OCG Technology JSC – Privacy Policy

1. Basic policy regarding the protection of personal information
2. Policy on specific handling of personal information
3. Revision

## 1. Basic policy regarding the protection of personal information.

OCG Technology JSC. (hereinafter referred to as OCG Technology) is always fully aware of the social demands regarding the protection of personal information and believes that promoting the legitimate use of personal information is a crucial social responsibility.

OCG Technology is a reputable - trustworthy enterprise, that has always fulfilled these responsibilities, provided safe and confidential services, and continues to strive to promote the basic guidelines below to protect personal information.

[1] OCG Technology will endeavor to ensure thorough compliance (legal compliance), such as by properly handling personal information in accordance with the provisions of laws and regulations<sup>1</sup> related to the protection of personal information.

[2] OCG Technology clearly defines the purpose of use of personal information, etc., and handles personal information appropriately within the scope necessary to achieve the purpose of use. In addition, we will endeavor to keep personal information accurate and up-to-date.

[3] OCG Technology will establish a responsible system such as assigning an officer in charge of information security (Responsible person for Information Security Management) and a person in charge of personal information protection for proper management of personal information.

[4] OCG Technology will provide necessary education and training to those engaged in the business of handling personal information, etc., and will provide appropriate supervision. In addition, when the handling of personal information etc. is outsourced, we will manage and supervise it so that it will be handled properly even at the outsourced company by concluding a confidentiality agreement.

[5] OCG Technology will take necessary safety management measures while referring to various standards and guidelines to ensure the safety of personal information.

---

<sup>1</sup> Specific examples of laws and regulations related to the protection of personal information and specialized personal information

- (Vietnamese) Law on Cyber information Security No.86/2015/QH13
- (Vietnamese) Law on Information Technology No.67/2006/QH11
- (Japanese) Law Concerning Protection of Personal Information (Law No. 57 of 2003)
- (Japanese) Guidelines for the Law Concerning the Protection of Personal Information (General Rules, Pseudonym Processing Information/ Anonymous Processing Information, Confirmation/ Recording Obligation when Providing to a Third Party, Provision to Third Parties in Foreign Countries) (Personal Information Protection Committee, November 2016)

[6] OCG Technology will respond appropriately to the opinions and inquiries from customers regarding the handling of personal information, etc. in OCG Technology.

[7] OCG Technology will endeavor to continuously improve the management system, security management measures and other necessary measures in order to further promote the protection of personal information.

OCG Technology recognizes that it is important to protect not only personal information but also information about clients of corporations and other organizations equally and strictly. OCG Technology will handle this information as well as personal information.

## **2. Policy on specific handling of personal information.**

### (1) Method of obtaining personal information used by OCG

OCG Technology obtains customer's personal information <sup>2</sup> legally and fairly by oral, written, electromagnetic recording media, electromagnetic recording such as sending by e-mail/ web interface, audio recording, video recording and other input from email and web interface (Including cases where we acquire indirectly from customer, in addition to acquiring directly from the customer.)

In addition, when answering a call with a customer, we may record the call in order to accurately grasp the order, opinion, request, inquiry, etc., and to improve the service in the future.

### (2) Purpose of use

OCG Technology defines the purpose of use as follows when handling personal information acquired by the method described in (1) above.

#### [1] Provision of our services <sup>3 4</sup>

---

##### <sup>2</sup> Personal information

The personal information specified in the Law on Cyber information Security includes personal data and retained personal data. In addition, in the case of customers that are not individual customers, the personal information about the representatives, officers, employees, etc. of the customers will be used by OCG Technology when providing or selling services, etc., is included. However, this privacy policy does not include specialized personal information.

##### <sup>3</sup> Service

Refers to the following businesses (including contracts, contracts, and consignments) provided by OCG Technology.

- Provide Japanese value-added service to Vietnam
- a. Business of educational IT services: intelligent education, learning on mobile devices, editing educational content.
- b. Online game business: cloud games, mobile games, eSports
- Software development business

##### <sup>4</sup> Provision of service

In addition to providing services, maintenance (including troubleshooting), changes, abolition, etc. are included.

The following personal information used by OCG Technology is used to the extent necessary for the purpose of providing services, etc., as well as for customer identity verification, credit management, calculation and billing of services, contacting customers with these information and performing other contracts .

In addition, the information can be used if necessary for introduction of services, proposals and consulting, implementation of measures for quality improvement and CS (customer satisfaction) improvement of services, planning and development of new services, management/improvement of equipment necessary to provide services... and perform other service-related tasks.

In addition, even after the contract related to the service etc. with the customer is canceled, personal information may be used within the scope of the above purpose of use.

1. The name, content, date of application/ start of provision, etc. of the service that the customer applied for or used the service.
2. Customer's name, address, phone number, email address, date of birth, etc.
3. Location of services, etc.
4. Customer's contact information (name, address, phone number, email address, etc.).
5. Name, address, telephone number, etc. of the billing destination, account number and account name of the financial institution required for billing, credit card number, past billing and payment status, etc.
6. Failure response status, failure history information, equipment used information, etc.
7. Name, address, etc. of the recipient related to delivery, etc.
8. Items that correspond to personal information among the information described in the documents and electromagnetic records presented for the purpose of verifying the identity of the customer or the information legally obtained from a third party such as a public institution or a credit information institution.
9. Correspondence history information such as the contents of telephone calls with customers.
10. Items that correspond to personal information among information obtained from third parties with the consent of the person, such as introductions from customers.
11. Information acquired in connection with the provision of services, such as acceptance history of applications/ malfunctions, identification symbols of contractors or users, usage history of services, etc. Items that correspond to personal information among the information that OCG Technology will handle when making inquiries...

[2] Correspondence work such as customer consultation

OCG Technology will use it to the extent necessary to respond to opinions and requests about personal information that OCG uses when exchanging/receiving customers' opinions/requests at OCG's receiving point (including acknowledgement of incidents and requests for notification of personal information), and also use to the extent necessary to improve the quality of service based on customer's opinion and request and to develop new service.

1. The customer's name, address, telephone number, e-mail address, etc.

2. Other items that correspond to personal information among the contents of consultations and requests.

[3] Contract business

Personal information that OCG Technology will handle in carrying out the business entrusted by other businesses (sales, agency, etc. of products and services of other businesses).

(3) Provision of personal information associated with outsourcing to other businesses.

OCG Technology shall entrust all or part of the handling of personal information to other businesses for the following operations. In this case, OCG Technology will select a business operator, etc. that is recognized to handle personal information properly, and in the entrustment contract, there are provisions of safety management measures, confidentiality, conditions for sub-contracting and other matters necessary for proper handling of personal information.

[1] Provision of services, etc. listed in (2) [1] above

[2] Correspondence work such as customer consultation listed in (2) [2] above

[3] Entrusted business listed in (2) [3] above

(4) Basic concept regarding safety management measures (security policy)

When handling personal information, OCG Technology will endeavor to appropriately implement the following measures in order to manage personal information safely.

[1] Technical safeguards

We strive to prevent unauthorized access to personal information and leakage, loss, and damage of personal information by taking appropriate measures such as controlling access to personal information, restricting means of taking out, and preventing unauthorized access from the outside.

[2] Organized protection measures

- Each department that handles personal information will have a person in charge of personal information protection, and the responsibility and authority will be clearly defined.
- In order to manage personal information safely, we will establish internal rules, manuals, etc., make people engaged in the business of handling personal information to comply, and regularly and appropriately manage and supervise the compliance status.
- Strive to raise the awareness of each employee so that they can fully recognize the importance of personal information and handle it appropriately by regularly conducting appropriate education and training for those engaged in the business of handling personal information.
- When outsourcing the handling of personal information, we will supervise the outsourcing so that it will be handled properly by concluding a confidentiality agreement.

[3] Physical safeguards

We will take various measures such as entry/ exit control of buildings and floors that handle personal information, prevention of theft, and locking when taking out and storing systems and documents.

[4] Understanding the external environment

When handling personal information in a foreign country, such as storing it in a foreign country or

providing it to a third party in a foreign country, we will grasp the system regarding the protection of personal information in each country and take appropriate measures.

(5) Procedures for disclosure, correction

OCG Technology determines the following procedure for: notification of the purpose of use of personal information, request disclosure of the content of personal information provided to 3rd parties (hereinafter referred to as "disclosure, etc."), procedure for requesting deletion, suspension of use, or suspension of provision to a third party (hereinafter referred to as "correction, etc.") (hereinafter referred to as "request for disclosure, correction, etc.") is stipulated as follows:

[1] Request for disclosure / correction

contact@ocg.vn

[2] Procedures for disclosure, correction

a. Procedures for disclosure

- OCG Technology will respond to requests for disclosure, etc. by the method requested by the customer, such as the method of providing electromagnetic records, the method of delivering documents, or any other method specified by the Company. However, if we determine that it is difficult to disclose by the method requested by the customer, we will inform you of that fact and the reason, and will disclose it in writing. In either case, the customer 's request for disclosure, etc. shall be made by submitting a document in accordance with the format prescribed by OCG Technology.
- OCG Technology may not disclose part or all of the disclosure, based on the provisions of laws , even if there is a request for disclosure, etc. In this case, OCG Technology will inform that it will not disclose the information and the reason for it.
- If you would like to request disclosure, please contact the address mentioned in [1] above. We will inform you about the details of the procedure.

b. Procedures for correction

- When OCG Technology makes a request for correction, etc., it will investigate the content of the request. In this case, the request for correction, etc. shall be made by submitting a document in accordance with the format prescribed by OCG Technology.
- OCG Technology will make corrections when, as a result of the investigation, the content of personal information is not true, or when there is a risk that the rights or legitimate interests of the customer will be harmed, or when the handling of the personal information is found to be inappropriate.
- OCG Technology may not make any corrections, etc., in part or in whole, based on the provisions of laws, even if there is a request for corrections, etc. In this case, OCG Technology will inform you that it will not make any corrections and why.
- If you would like to make corrections, please contact the address listed in [1] above. We will inform you about the details of the procedure.

[3] Identity verification

When making a request for disclosure, correction, etc., a document that can confirm that the person

or his/ her agent is related to the target personal information is required. For details on the required documents, please contact the address listed in [1] above.

[4] Amount of fees related to requests for disclosure

- Fees: Free
- Shipping: Actual cost of mailing by registered mail

(6) For any questions and requests related to OCG Technology's use of personal information, please contact the address below: <mailto:contact@ocg.vn>

(7) Processing of acquired personal information

OCG technology may create pseudonym processing information and anonymous processing information based on the acquired personal information. In that case, we will take appropriate measures in accordance with the provisions of laws.

(8) Handling of personal information

OCG Technology refers to personal information (information about living individuals that does not fall under any of personal information, pseudonym processing information, or anonymous processing information, specifically, the browsing history and the location, etc.) is handled as follows.

[1] When OCG technology provides personally relevant information

OCG will not provide personal information to the 3rd party (If the third party is in a foreign country) without confirmation that the person knows the provision of such information.

[2] When OCG technology acquires personally related information as personal data

OCG Technology shall obtain the consent of the customer in advance when acquiring personal information as personal data. However, if the person who intends to provide the personal data has obtained the consent of the customer himself/ herself, it can be replaced with obtaining the consent in advance.

(9) Response to the provision of personal information or personal-related information to a third party in a foreign country

OCG provides personal information or personal related information to third parties in foreign countries (excluding countries that have a system for the protection of personal information that is considered to be at the same level as Japan in protecting the rights and interests of individuals). The procedure is as follows:

[1] Provision of personal information to third parties in foreign countries

① Method by obtaining consent

OCG Technology may provide personal information to third parties in foreign countries after notifying the customer of the following matters in advance and obtaining their consent.

- The name of the foreign country to which the service is provided
- System for protection of personal information in the foreign country
- Measures taken by the third party to protect personal information

② Method by establishing a system of a third party in a foreign country

In addition to ①, OCG Technology shall provide personal information to a third party in a foreign country after taking necessary measures to ensure the continuous implementation of appropriate measures by a third party in a foreign country.

[2] Providing personal information to third parties in foreign countries

① Method by obtaining consent

OCG Technology can provide personally relevant information to third parties in foreign countries in accordance with the provisions of (9) [1] above.

② Method by establishing a system of a third party in a foreign country

In addition to (1) above, OCG Technology confirms that it has obtained the consent stipulated in (9) [1] above (excluding the confirmation that the information in parentheses is provided). We may provide personal information to third parties in foreign countries after taking necessary measures to ensure the continued implementation of reasonable measures by a third party.

### **3. Modification**

OCG Technology may revise all or part of the content of this Privacy Policy. If it is revised, it will be announced by updating the content posted on this website.

Issued on 01 February 2024

CEO : Watanabe Akira