

## Privacy Policy

Effective Date: February \_\_, 2019

We, TsubameLabo, Inc., operate service platforms (the "Platforms"), including but not limited to the <https://tsubamepharma.com/>, SNS, applications, programs, order processes through emails, facsimile, telephones or face-to-face communication, etc., to provide our services.

Our services contemplated in the Platforms are designed not for individuals but for corporations and other equivalent entities, and we try to avoid collecting personal data through the Platforms without reasonable necessity.

Your personal data, however, may be handled through the Platforms in reasonable circumstances. Therefore, this page informs you of our privacy policy (this "Privacy Policy") regarding the collection, use, and disclosure of personal data and the choices you have associated with that data for such reasonable circumstances.

By using the Platforms, you agree to the collection and use of information in accordance with this Privacy Policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our General Terms and Conditions, accessible from <https://tsubamepharma.com/files/privacy.pdf>

### **Information Collection and Use**

We may collect several different types of information for various purposes to provide and improve the Platforms to you.

### **Types of Data Collected**

#### **Personal Data**

While using the Platforms, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personal Data may include, but is not limited to:

- First name and last name
- Phone number
- Address
- Email address
- Cookies and Usage Data

#### **Usage Data**

We may collect information on how the Platforms is accessed and used ("Usage Data"). Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of the Platforms that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other analytical data.

### **Tracking & Cookies Data**

We may use cookies and similar tracking technologies to track the activity on the Platforms and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze the Platforms.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions or functions of the Platforms.

Examples of Cookies we may use:

- Session Cookies. We may use Session Cookies to operate the Platforms.
- Preference Cookies. We may use Preference Cookies to remember your preferences and settings.
- Security Cookies. We may use Security Cookies for security purposes.

### **Use of Data**

We may use the collected data for various purposes:

- To provide our services, such as processing purchase orders and sales confirmations
- To provide and maintain the Platforms
- To notify you about changes to the Platforms
- To allow you to participate in interactive features of the Platforms when you choose to do so
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Platforms
- To monitor the usage of the Platforms
- To detect, prevent and address technical issues

### **Transfer of Data**

Your information, including Personal Data, may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Japan and choose to provide information to us, please note that we may transfer the data, including Personal Data, to Japan and process it in Japan.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

### **Disclosure of Data**

We may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of us
- To prevent or investigate possible wrongdoing in connection with the Platforms
- To protect the personal safety of users of the Platforms or the public
- To protect against legal liability

### **Opt-out, Correction or Deletion of Data**

You can opt-out your Personal Data and other related information from our use or handling, or ask us to correct incorrect parts of our personal Data or delete your Personal Data from our records, at any time by email to us.

### **Security of Data**

The security of your data is important to us, but remembers that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

### **Service Providers**

We may employ third party companies and individuals to facilitate the Platforms ("Service Providers"), to provide the Platforms on our behalf, to perform the Platforms-related services or to assist us in analyzing how the Platforms is used.

Service Providers may have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **Links to Other Websites**

The Platforms may contain links to other websites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy and other terms and conditions of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, terms and conditions or practices of any third party sites or services.

### **Changes to Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on the Platforms, and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

- By email: [info@tsubamelabo.com](mailto:info@tsubamelabo.com)