

Privacy Policy for General Areas

1. Purpose

The purpose of this policy is to communicate in a comprehensible manner the basic philosophy and guidelines concerning the protection of the “personal data” that Japan International Broadcasting Inc. (hereinafter referred to as the “Company,” “we,” “our” and “us”) handles in “general areas”^{*1} in accordance with our [Principles on Personal Data Protection](#) (in Japanese).

^{*1} The term “general areas” means areas outside of and not in any way pursued for the purposes of news reporting and writing, or in relation to subscription fees.

2. Name, Address and Representative of Us

Please see the following webpage for our company name, address and representative.
[Corporate Profile \(jibtv.com\)](#)

3. Definitions

- (1) In this policy, the meanings of the terms “personal information,” “pseudonymously processed information,” “anonymously processed information,” “information relating to an individual,” “personal data” and “retained personal data” will be the same as those set forth in the Act on the Protection of Personal Information (hereinafter referred to as the “APPI”).
- (2) In this policy, “personal data” will mean “information about a living individual,” consisting of “personal information,” “pseudonymously processed information,” “anonymously processed information” and “information relating to an individual” as defined under the APPI.

4. Application

- (1) This policy applies to the handling of the personal data we collect in the course of our operations in general areas. Any rules we have separately laid down for specific categories of personal data will also apply. If there is any inconsistency or discrepancy between the rules and this policy, the rules will prevail to the extent of such inconsistency or discrepancy.
- (2) The personal data we handle in accordance with this policy will include personal information, such as addresses, names, telephone numbers and email addresses as well as personal data about the users of the online services we provide to the general

public (hereinafter referred to as the "Online Services"), such as the browsing history of our websites (hereinafter referred to as the "User Information of the Online Services").

5. Compliance with Applicable Laws, Guidelines, etc.

We will handle personal data in a proper manner in compliance with the APPI and other applicable laws and guidelines, as well as our internal rules concerning the handling of personal data.

6. Collection of Personal Data

We will collect personal data in general areas by lawful and fair means in various instances, including:

- (1) When you directly provide personal data to us in writing, via the Internet or other media;
- (2) When you use our Online Services - We automatically collect your personal data in such instance; and
- (3) When we convert publicly available personal data into searchable ones.

7. Notification of the Handling of Personal Data

When we collect any personal information or User Information of the Online Services, we will provide notice or publicly announce the purposes of use and other matters relating to the handling of the personal data, at a suitable place and time that is easily recognizable for the persons concerned and in easy-to-understand language.

8. Viewing History Without Viewer Identification

- (1) There may be instances when we collect "Viewing History Without Viewer Identification."^{*2} Although Viewing History Without Viewer Identification is not personal information, we will handle it separately from other personal data out of consideration for the privacy of such information which allows us to identify what broadcast programs an individual watched.
- (2) We will handle any Viewing History Without Viewer Identification in a careful manner, duly announce its collection, and give the persons concerned the option to stop or take other actions against the collection.

^{*2} "Viewing History Without Viewer Identification" is information that relates to an individual and is collected during viewing (including online viewing; hereinafter the same applies in this policy). Viewing History Without Viewer Identification can be used to identify a broadcast program watched by an individual on a specific date and time, but

not the individual.

9. Purposes of Use

(1) We use personal data in general areas for specific purposes, including:

- (i) Surveys and analysis:
 - (i) -a. To understand and analyze how our broadcast programs are watched
 - (i) -b. To conduct polls and viewer surveys
 - (i) -c. To improve or produce our broadcast programs
- (ii) Programs and events with live audiences:
 - (ii) -a. To accept applications to view or take part in such programs or events, to confirm the eligibility of participants, to select viewers and participants by lottery, to send admission passes, to have a communication regarding program viewing or event participation
 - (ii) -b. To improve or develop programs or events with live audiences
 - (ii) -c. To conduct surveys about programs or events with live audiences
- (iii) In relation to the Online Services:
 - (iii) -a. To accept applications for services requiring login, identification of persons concerned, user verification
 - (iii) -b. To improve or develop the Online Services
 - (iii) -c. To stably provide the Online Services
 - (iii)-d. To figure out cause of and solve problems that happened on the Online Services
 - (iii) -e. To prevent unauthorized or unlawful use of the Online Services
- (iv) Business Communications:
 - (iv) -a. To have meetings, exchange information and make other business communications with our clients, prospective clients and business partners
- (v) Other purposes:
 - (v) -a. To conduct studies and research necessary for advances and developments in broadcasting and broadcasting reception
 - (v)-b. To procure goods and services
 - (v)-c. To accept applications for employment and select and contact applicants
 - (v)-d. To control access to and from facilities managed by us and maintain their security
 - (v)-e. To respond to inquiries concerning our operations and services
 - (v)-f. To establish, exercise or defend our legal rights

(v)-g. To discharge our legal obligations

- (2) We will not handle, without the consent of the persons concerned, any personal information beyond the scope necessary for achieving the specified purposes of use, excluding instances permitted under the APPI. The Users Information of the Online Services which does not constitute personal information will also be handled in a proper manner accordingly.
- (3) When analyzing personal data, we will exercise care not to infer the attributes or other characteristics of the persons concerned, except we have their individual consent.

10. Provision to Third Parties

We may provide personal data to third parties on your consent as described below.

Categories of personal data to be disclosed	Recipients	Purposes of disclosure (purposes listed in Section 9)
<ul style="list-style-type: none">• Responses to our polls and surveys• Opinions on our broadcast programs	<ul style="list-style-type: none">• Sponsors of our broadcast programs	(i)-c. To improve or produce broadcast programs
<ul style="list-style-type: none">• Company or organization• Business communication with us	<ul style="list-style-type: none">• Our affiliate company(ies)	(iv)-a. To have meetings, exchange information and make other business communications with our clients, prospective clients and business partners

We will ensure any personal data provided to third parties is handled in a proper manner in accordance with the APPI. Any User Information of the Online Services which does not constitute personal data will also be handled in a proper manner accordingly.

We may also provide personal data to other third parties by taking necessary and appropriate measures in accordance with the APPI.

11. Entrustment to Another Entity

When we entrust the handling of personal data to another entity, we will select a contractor that can handle the personal data in a proper manner and perform necessary supervision to ensure that it exercises proper security management. We will also perform proper

supervision regarding the User Information of the Online Services which does not constitute personal data.

12. Retention Period

We retain your personal data for specific periods we set as consistent with applicable laws or for as long as it is necessary for the purposes described in Section 9. When the specified period has expired or we no longer need your personal data, we will delete or anonymize it without delay in accordance with applicable laws and our established procedures.

13. Opt-out

We allow an individual to opt-out of the automatic collection of user information through our Online Services or delete the user information by a prescribed method.

14. Security Control Measures

- (1) We will take necessary and appropriate security control measures for managing personal data, including the prevention of leakage, loss or damage.
- (2) We will, in particular, take the following security control measures for personal data and non-viewer identifying viewing history (hereinafter referred to as "Personal Data, etc."):
 - (i) Establishment of rules concerning the handling of Personal Data, etc.:
 - Establish internal rules concerning the method of handling Personal Data, etc., responsible persons and persons in charge, and their responsibilities, etc.
 - (ii) Organizational security control measures:
 - In addition to appointing persons responsible for the handling of Personal Data, etc., establish a reporting system to the responsible persons for the event that a violation of the APPI or internal rules or any sign of such a violation is detected.
 - In addition to conducting regular self-inspections regarding the status of the handling of Personal Data, etc., the internal audit department conducts audits.
 - (iii) Human security control measures:
 - Clarify where responsibility lies for the handling of Personal Data, etc., and provide employees with necessary training and raise awareness to ensure the security control of Personal Data, etc., with respect to the proper handling of Personal Data, etc.
 - (iv) Physical security control measures:
 - Take measures to prevent theft or loss of equipment, electronic media, documents, etc. that process Personal Data, etc., and to ensure that personal data is not easily identifiable when such equipment, electronic media, etc. are carried, including when moving within the office.
 - (v) Technical security control measures:
 - Control access to Personal Data, etc., including limitation and confirmation of

access authority for Personal Data, etc., and storage of records of such access.

- Take necessary measures to prevent unauthorized access to Personal Data, etc. through telecommunication lines.

15. Requests for Disclosure of Retained Personal Data, etc.

Please contact below for a request for disclosure, rectification including addition and deletion, suspension of use including deletion and suspension of provision to third parties or notification of purpose of use of retained personal data in accordance with the APPI.

Personal Data Desk, Corporate Planning Division, Japan International Broadcasting Inc.

1-2-20, Shibuya First Tower, Shibuya, Tokyo, Japan

TEL +81-3-6805-1084

Open from Mon to Fri (Closed on national holidays, year end and new year holidays)

9:30AM~6:00PM (Closed from 12:00PM to 1:00PM)

You can also click on 'Contact us' to reach us at <https://www.jibtv.com/en/>

16. Point of Contact for Questions and Complaints

We accept questions and complaints concerning our handling of personal data at the contact point described in Section 15 above.

17. Update of this Policy

We will update this policy as necessary. If we update this policy, we will publicly announce the effective date and content of the updated policy by publishing it on our website or other appropriate means.

18. Application of Foreign Laws

If foreign laws apply to handling of personal data held by us, we handle the personal data in compliance with the foreign laws.

19. Additional Information for Residents in European Economic Area, United Kingdom, and Switzerland

For residents in the European Economic Area (EEA), the United Kingdom (UK), and Switzerland, we provide additional information in this section in accordance with the General Data Protection Regulation ("GDPR"). For the UK and Switzerland, please read this as referring to the relevant provisions of The Data Protection Act 2018 / UK GDPR and the FADP in Switzerland. Terms used in this section have the same meanings as those in the GDPR unless otherwise stated in

this section. If there is any inconsistency or discrepancy between this section and other sections of this policy, this section prevails for residents in the EEA, the UK and Switzerland to the extent of such inconsistency or discrepancy.

(1) Controller

We are the controller for the processing of personal data in the meaning of the GDPR.

(2) Categories of Personal Data We Collect and Use

We collect and use the following categories of personal data in instances described in Section 6 above.

- (i) Name, email address, zip code, address, country and phone number
- (ii) Company or organization and job title
- (iii) Survey participant (“Monitor”) ID
- (iv) Responses to our polls and surveys
- (v) Opinions on our broadcast programs and the Online Services
- (vi) Inquiries and subsequent interactions with us
- (vii) Business communications with us
- (viii) Interaction with the Online Services, including your browsing history, Internet Protocol address (IP address), location information and device information.

(3) Lawful Bases

We process your personal data for the purposes described in Section 9 above on the following lawful bases.

Purpose of Processing Your Data	Lawful Basis
(i) Surveys and analysis: (i)-a. To understand and analyze how our broadcast programs are watched	Legitimate interest of us: To understand and analyze how our broadcast programs are watched
(i)-b. To conduct polls and viewer surveys	Legitimate interest of us: To conduct polls and viewer surveys
(i)-c. To improve or produce broadcast programs	Legitimate interest of us: To improve or produce broadcast programs
(ii) Programs and events with live audiences:	Legitimate interest of us: To hold programs or events with live audience and carry out

(ii)-a. To accept applications to view or take part in such programs or events, to confirm the eligibility of participants, to select viewers and participants by lottery, to send admission passes, to have a communication regarding program viewing or event participation	related operations
(ii)-b. To improve or develop programs or events with live audiences	Legitimate interest of us: To improve or develop programs or events with live audiences
(ii)-c. To conduct surveys about programs or events with live audiences	Legitimate interest of us: To improve or develop programs or events with live audiences
(iii) In relation to the Online Services: (iii)-a. To accept applications for services requiring login, identification of persons concerned and user verification	Legitimate interest of us: To provide the Online Services to appropriate users
(iii)-b. To improve or develop the Online Services	Legitimate interest of us: To improve or develop the Online Services
(iii)-c. To stably provide the Online Services	Legitimate interest of us: To stably provide the Online Services
(iii)-d. To figure out cause of and solve problems that happened on the Online Services	Legitimate interest of us: To stably provide the Online Services
(iii)-e. To prevent unauthorized or unlawful use of the Online Services	Legitimate interest of us: To stably provide the Online Services
(iv) Business Communications: (iv)-a. To have meetings, exchange information and make other business communications with our clients, prospective clients and business partners	Legitimate interest of us: To have effective and smooth communications with our clients, prospective clients and business partners
(v) Other purposes: (v)-a. To conduct studies and research necessary for advances and developments in broadcasting and broadcasting reception	Legitimate interest of us: To improve and develop broadcasting and broadcasting reception

(v)-b. To procure goods and services	Legitimate interest of us: To procure goods and services
(v)-c. To accept applications for employment and select and contact applicants	To take steps prior to entering into an employment contract
(v)-d. To control access to and from facilities managed by us and maintain their security	Legitimate interest of us: To maintain security of our facilities
(v)-e. To respond to inquiries concerning our operations and services	Legitimate interest of us: To respond to inquiries concerning our operations and services
(v)-f. To establish, exercise or defend our legal rights.	Legitimate interest of us: To establish, exercise or defend our legal rights.
(v)-g. To discharge our legal obligations.	Compliance with legal obligations

Where the lawful basis of the processing is your consent, you can revoke at any time your consent with effect for the future. If you would like to revoke your consent, please contact us in accordance with Paragraph (9) below.

(4) Special Categories of Personal Data

While we usually do not collect special categories of personal data (also known as sensitive personal data), we may collect special categories of personal data in responses to our surveys or opinions from viewers. In such instances, we ensure that we process the special categories of personal data in accordance with the GDPR, including obtaining your consent.

(5) Disclosure to Third Parties

We may disclose certain categories of your personal data to third parties as below.

Categories of personal data to be disclosed	Recipients	Purposes of disclosure (purposes listed in Section 9)
<ul style="list-style-type: none"> • Responses to our polls and surveys • Opinions on our broadcast programs 	<ul style="list-style-type: none"> • Sponsors of our broadcast programs 	(i)-c. To improve or produce broadcast programs

<ul style="list-style-type: none"> • Company or organization 	<ul style="list-style-type: none"> • Our affiliate company(ies) 	(iv)-a. To have meetings, exchange information and
<ul style="list-style-type: none"> • Business communication with us 		make other business communications with our clients, prospective clients and business partners

(6) Cross-Border Transfer of Personal Data

Our disclosure of your personal data to our contractors (processors in the meaning of the GDPR) or third parties may constitute cross-border transfer of personal data. When we transfer your personal data to a country or region other than the EEA member countries or the UK, we rely on adequate decisions made by the European Commission or the UK government, use the Standard Contractual Clauses (SCCs) adopted by the European Commission, the International Data Transfer Agreement (IDTA) or the International Data Transfer Addendum to the European Commission's SCCs approved by the UK Parliament, or take other necessary measures to protect your personal data.

(7) Your Rights

You have the following legal rights set out in the GDPR with the processing of your personal data by us.

- Revocation of consent – You can revoke at any time previously given consent to our processing of your personal data.
- Right of access - You have the rights to make an inquiry, to review and to request for copies of your personal data we hold.
- Right to rectification - You have the right to request us to correct any of your personal data we hold which you believe is inaccurate. You also have the right to request us to complete your personal data we hold which you believe is incomplete.
- Right to erasure - You have the right to request that we erase your personal data, under certain conditions.
- Right to restrict processing - You have the right to request that we restrict the processing of your personal data, under certain conditions.
- Right to object to processing - You have the right to object to our processing of your personal data, under certain conditions.

If you would like to exercise any of these rights, or if you have any inquiries about your rights,

please contact us in accordance with Paragraph (9) below.

(8) Lodging Complaint with Data Protection Authority

You can lodge complaints about our way of processing your personal data with a data protection supervisory authority that has a jurisdiction over the region where you reside. Contact information of data protection supervisory authorities is available at the following URL.

- For EEA residents: https://edpb.europa.eu/about-edpb/about-edpb/members_en
- For UK residents: <https://ico.org.uk/>

(9) Point of Contact

Please contact our data protection representative for the purposes of GDPR by either of the following methods. Please read the Appendix for how to contact the representative.

Email: datarequest@datarep.com

Webform: www.datarep.com/data-request

Mail: Please mail your inquiry to the representative at the most convenient of the addresses in the second page of the Appendix.

Established: November 1, 2008,

Revised: November 1, 2023,

October 1, 2024

Japan International Broadcasting Inc., which processes the personal data of individuals in the European Union, European Economic Area and UK, in either the role of 'data controller' or 'data processor', has appointed DataRep as its Data Protection Representative for the purposes of GDPR* in the EU/EEA and The Data Protection Act 2018 / UK GDPR (as amended) in the UK, and FADP** in Switzerland.

If Japan International Broadcasting Inc. has processed or is processing your personal data, you may be entitled to exercise your rights under GDPR/FADP in respect of that personal data. For more details on the rights you have in respect of your personal data, please refer to the national Data Protection Authority in your country, the European Commission in the EU (https://ec.europa.eu/info/law/law-topic/data-protection/data-protection-eu_en) or the Federal Data Protection and Information Commission in Switzerland (<https://www.edoeb.admin.ch/edoeb/en/home.html>).

Japan International Broadcasting Inc. takes the protection of personal data seriously, and has appointed DataRep as their Data Protection Representative in the European Union and Switzerland so that you can contact them directly in your home country. DataRep has locations in each of the 27 EU countries, the UK, and Norway & Iceland in the European Economic Area (EEA) and Switzerland, so that Japan International Broadcasting Inc.'s customers can always raise the questions they want with them.

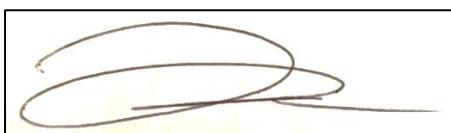
If you want to raise a question to Japan International Broadcasting Inc., or otherwise exercise your rights in respect of your personal data, you may do so by:

- sending an email to DataRep at datarequest@datarep.com quoting <Japan International Broadcasting Inc.> in the subject line,
- contacting us on our online webform at www.datarep.com/data-request, or
- mailing your inquiry to DataRep at the most convenient of the addresses in the subsequent pages.

PLEASE NOTE: when mailing inquiries, it is ESSENTIAL that you mark your letters for 'DataRep' and not 'Japan International Broadcasting Inc.', or your inquiry may not reach us. Please refer clearly to Japan International Broadcasting Inc. in your correspondence. On receiving your correspondence, Japan International Broadcasting Inc. is likely to request evidence of your identity, to ensure your personal data and information connected with it is not provided to anyone other than you.

If you have any concerns over how DataRep will handle the personal data we will require to undertake our services, please refer to our privacy notice at www.datarep.com/privacy-policy.

Signed on behalf of the Representative:



Tim Bell, Managing Director

* The General Data Protection Regulation, EU 2016/679

** Federal Act on Data Protection, AS 2022 491

Please ensure request is addressed to 'DataRep' and not Japan International Broadcasting Inc.

Country	Address
Austria	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
Belgium	DataRep, Rue des Colonies 11, Brussels, 1000
Bulgaria	DataRep, 132 Mimi Balkanska Str., Sofia, 1540, Bulgaria
Croatia	DataRep, Ground & 9th Floor, Hoto Tower, Savska cesta 32, Zagreb, 10000, Croatia
Cyprus	DataRep, Victory House, 205 Archbishop Makarios Avenue, Limassol, 3030, Cyprus
Czech Republic	DataRep, Platan Office, 28. Října 205/45, Floor 3&4, Ostrava, 70200, Czech Republic
Denmark	DataRep, Lautruphøj 1-3, Ballerup, 2750, Denmark
Estonia	DataRep, 2 nd Floor, Tornimäe 5, Tallinn, 10145, Estonia
Finland	DataRep, Luna House, 5.krs, Mannerheimintie 12 B, Helsinki, 00100, Finland
France	DataRep, 72 rue de Lessard, Rouen, 76100, France
Germany	DataRep, 3rd and 4th floor, Altmarkt 10 B/D, Dresden, 01067, Germany
Greece	DataRep, Ippodamias Sq. 8, 4th floor, Piraeus, Attica, Greece
Hungary	DataRep, President Centre, Kálmán Imre utca 1, Budapest, 1054, Hungary
Iceland	DataRep, Kalkofnsvegur 2, 3 rd Floor, 101 Reykjavík, Iceland
Ireland	DataRep, The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland
Italy	DataRep, Viale Giorgio Ribotta 11, Piano 1, Rome, Lazio, 00144, Italy
Latvia	DataRep, 4th & 5th floors, 14 Terbatas Street, Riga, LV-1011, Latvia
Liechtenstein	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
Lithuania	DataRep, 44A Gedimino Avenue, 01110 Vilnius, Lithuania
Luxembourg	DataRep, BPM 335368, Banzelt 4 A, 6921, Roodt-sur-Syre, Luxembourg
Malta	DataRep, Tower Business Centre, 2nd floor, Tower Street, Swatar, BKR4013, Malta
Netherlands	DataRep, Cuserstraat 93, Floor 2 and 3, Amsterdam, 1081 CN, Netherlands
Norway	DataRep, C.J. Hambros Plass 2c, Oslo, 0164, Norway
Poland	DataRep, Budynek Fronton ul Kamienna 21, Krakow, 31-403, Poland
Portugal	DataRep, Torre de Monsanto, Rua Afonso Praça 30, 7th floor, Algès, Lisbon, 1495-061, Portugal
Romania	DataRep, 15 Piața Charles de Gaulle, nr. 1-T, București, Sectorul 1, 011857, Romania
Slovakia	DataRep, Apollo Business Centre II, Block E / 9th floor, 4D Prievozská, Bratislava, 821 09, Slovakia
Slovenia	DataRep, Trg. Republike 3, Floor 3, Ljubljana, 1000, Slovenia
Spain	DataRep, Calle de Manzanares 4, Madrid, 28005, Spain
Sweden	DataRep, S:t Johannesgatan 2, 4th floor, Malmo, SE - 211 46, Sweden
Switzerland	DataRep, Leutschenbachstrasse 95, ZURICH, 8050, Switzerland
United Kingdom	DataRep, 107-111 Fleet Street, London, EC4A 2AB, United Kingdom