

## Privacy Policy

JVTA, Inc. (hereinafter referred to as "we") hereby establish this Privacy Policy (hereinafter referred to as this "Policy"), recognizing the importance of personal information and that it is our important social responsibility to protect and properly manage personal information.

### **Article 1 (General)**

- 1 In order to ensure the protection of personal information, we will comply with applicable personal information protection laws and other related laws and endeavor to handle and protect personal information properly.
- 2 We will acquire personal information properly and will not acquire it by deceit or other improper means.
- 3 We may establish a privacy policy for each of our individual services that are applicable to those services. In that case, if there is any inconsistency or conflict between that privacy policy and this Policy, the privacy policy applicable to that service shall prevail over this Policy.

### **Article 2 (Purpose of use)**

- 1 We will handle the personal information acquired through the provision and management of each service within the following purposes:
  - (1) Personal information acquired in relation to the provision of service in our courses
    - to conduct classes and provide other services
    - to provide guidance related to our services such as courses, etc.Please see here for details.
  - (2) Personal information acquired in relation to the provision of the learning management system we operate (JVTA Online)
    - to provide JVTA Online
    - to contact and respond to applicants and users, etc.Please see here for details.
  - (3) Personal information of our business partners (clients, partners)(other than (1) and (2))
    - to hold business meetings, execute contracts
    - to provide information about our business, etc.

- (4) Personal information regarding human resources and recruitment
  - for employment and HR management
  - to assist in obtaining necessary entry visas and work permits
  - to provide information to applicants and conduct recruitment activities such as hiring
- 2 We collect information to analyze the usage situation of our website or services by using Cookie and similar technologies. A Cookie is a text file placed on the user's computer and can identify user's browser, but does not identify the individual user. It is possible to disable the Cookie when the user changes the settings of the computer, but in such a case, there is a possibility that the user cannot use all or part of our website or services.

### **Article 3 (Provision to a third party)**

- 1 Except as permitted by law or provided in this Policy, we will not provide personal data (as defined in Article 16.3 of Act on the Protection of Personal Information of Japan; hereinafter the same shall apply) to a third party without consent of the data subject.
- 2 When we provide personal data to a third party under the consent of data subject, we will make and maintain records regarding the following matters:
  - (1) the fact that we have obtained prior consent;
  - (2) the name of the third party or other matters which can identify the third party;
  - (3) the name of the person who is identified by the personal data and other information which can identify the person; and
  - (4) the items of such personal data.

### **Article 4 (Entrusting)**

We may entrust all or part of handling of personal data to a third party to the extent necessary to achieve the purposes of use. In this case, we will exercise necessary and appropriate supervision over that third party to ensure that the personal data is managed by the third party in an appropriate and safe manner.

### **Article 5 (Provision to a third party in foreign country)**

We do not intend to provide personal data to third parties located in foreign countries other than Japan.

## **Article 6 (Information collection module)**

We may incorporate the following information collection module into our services or website to analyze the usage situation of services and website or effects of advertising. Accordingly, we may provide personal data to the following supplier of information collection module. The information collection module collects user's information without including personally identifiable information, and the collected information is managed in accordance with the privacy policy and other regulations of the supplier of information collection modules.

Name: Google Analytics

Supplier: Google Inc.

Privacy Policy: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)

## **Article 6 (Security Control)**

We will take necessary and appropriate measures for the security of personal data which we handle including preventing the leakage, loss or damage of such personal data.

## **Article 7 (Disclosure, etc.)**

For requests for disclosure, correction, delete or cease of use, etc. of retained personal data (as defined in Article 16.4 of Act on the Protection of Personal Information of Japan), please refer to "Guidance to application for disclosure, etc. of personal information." Provided, however, we may not disclose, etc. the personal data if we are not obliged to do so under the standard of the law of Japan.

## **Article 8 (Amendment of this Policy)**

- 1 We will review the status of operation regarding the handling of personal information from time to time and endeavor to improve it continuously, and may amend this Policy from time to time as necessary.
- 2 We will notify users of the revised Policy by posting on our website or JVTA Online or other appropriate means.

## **Article 9 (Inquiry)**

If there are any comments, questions, complaints, or other inquiries regarding the handling of personal information, please contact us at the address below:

JVTA Office: [seminar@jvta.net](mailto:seminar@jvta.net)

## Information Security Policy

### **1. Purpose of Information Security**

Japan Visualmedia Translation Academy, Inc. (“We”) engage in the business of school operation and translation of visual media. We recognize that our business is built on trust with our stakeholders (students, alumni, clients, partners) and have supported the students with the idea – people who dedicate their lives to mastering a language and wish to continue to do so will find jobs that allows them to make the most of their abilities - as our only mission. As a vocational training school specializing in training and supporting the employment of visual media translators, subtitle writers for barrier-free viewing and audio guide describer, we have produced many professionals in these fields who have gone on to accumulate many achievements.. Through running our business, we handle various corporate and personal information. In order to provide more valuable services and fulfill our social responsibility, we recognize that the proper handling of these information assets and their protection from any threats are important management issues, and so we have established this document to ensure the proper management and operation of our information security.

### **2. Establishment and implementation of a information security management system and continuous improvement**

We will establish an organizational structure for proper management and operation of information security, and establish, implement, maintain and continuously improve our information security management system which reflects the status of strategic risk management activities.

### **3. Compliance with legal, regulatory and contractual requirements**

We comply with security requirements under laws and regulations, national guidelines and other information security rules and contracts.

### **4. Conducting Training**

We will provide information security training to all project managers, employees, and employees of subcontractors who engage in our business that is relevant to their duties.

## **5. Business Continuity Management**

We will identify events that could cause interruption of our business and establish a process for recovery from disasters and accidents, etc., and ensure the continuity of the business.

## **6. Dealing with Information Security Incidents**

We will establish a system of accountability and a process for incidents regarding information security and take prompt and effective action.

July 29, 2020

Japan Visualmedia Translation Academy, Inc.

Representative Director Naoki Niira

- Please see here for the details of ISMS of JVTA (<https://www.jvta.net/tyo/isms/>)