

Privacy Policy

This privacy policy governs the handling by Customer (as defined below) of Personal Information (as defined below) in connection with Customer's use of the bellFace service (hereinafter including the freemium bellFace service). bellFace, Inc. (hereinafter "**bellFace**") provides support to Customer in regard to the handling of Personal Information of End Users handled through the bellFace service.

Definition

1. Personal Information

"**Personal Information**" means information about a specific living individual, that can identify such individual by any of the following information contained therein (this includes any information that can be cross-checked against other information and thereby used to identify that specific individual): name, address, telephone number, gender, age, birthday, credit card number, email address, user ID, or password, or an integral matter stated, recorded, or represented using sound, motion, or other such method in written material, photograph, film, storage such as hard disk drive, or other type of device such as optical disc drive.

2. Customer

"**Customer**" means the Customer prescribed in Article 1, item 3 of the bellFace Terms and Condition or Article 1, item 3 of the freemium Terms and Condition, and means a person who enters into an agreement with bellFace regarding provision of the bellFace service and receives such provision from bellFace.

3. User

"**User(s)**" means the User prescribed in Article 1, item 4 of the bellFace Terms and Condition, and means a person who uses the bellFace service designated by Customer.

4. End User

"**End User**" means the End User prescribed in Article 1 item 6 of the bellFace Terms and Condition or Article 1, item 5 of the freemium Terms

and Condition, and means a person with whom Users conduct business web conferencing using the bellFace service.

Purposes of Using Personal Information

1. In the bellFace service, bellFace uses Personal Information of End Users only for the following purposes and will not use it for any other purposes. Collection of Personal Information includes the information that is registered by the Users who sign up with bellFace and any sounds, images, or the like that are generated when each End User uses the bellFace service, as well as the results of analysis and the like of such information:
 - (i) to provide the bellFace service* and to enable Customer's use of the results thereof for Customer's business;

* The bellFace service is a cloud-based business conference service and service for analyzing the data that Customer can obtain through its use of such service. The bellFace service provides a variety of analytical functions to utilize data smoothly, such as converting speech into text, searches of text and video, and visualization of processes. Please refer to the web site of bellFace for detailed information about its functions. <https://bell-face.com>

(The freemium bellFace service does not include analytical function.)
 - (ii) to improve and upgrade the bellFace service and develop new similar services and supplemental services;
 - (iii) to maintain and inspect the bellFace service in terms of its security or the like; and
 - (iv) to respond to contacts and inquiries from End Users.
2. Notwithstanding Paragraph 1, bellFace may use information (analysis results and statistics) that has been processed in such a way as to prevent specific individuals from being identified.
3. If any of the following apply to bellFace, it may use Personal Information beyond the scope necessary to achieve the purposes of use:
 - (i) when it is authorized to do so by law or regulation;
 - (ii) when it is necessary in order to protect the life, person or property of an individual and it is difficult to obtain the consent of the individual to whom the personal information pertains (hereinafter, the "**Data Subject**");

- (iii) when it is particularly necessary in order to improve public health or promote sound child development and it is difficult to obtain the Data Subject's consent; or
- (iv) when it is necessary in order to cooperate with statutory administrative duties being conducted by a national government organ, a municipal government, or a contractor of either of the foregoing, and obtaining the Data Subject's consent is likely to interfere with such conduct of administrative duties.

Provision of Personal Information

Unless bellFace has obtained consent from an End User or any of the items prescribed in Paragraph 3 of the Purposes of Using Personal Information apply, bellFace will not provide Personal Information to any third parties.

Disclosure of Personal Information

If bellFace receives from a Data Subject a request for confirmation or modification of Personal Information retained by bellFace, or a request for correction or deletion of Personal Information retained by bellFace that contains an error, bellFace will address the request without delay.

Name of Business Handling Personal Information

bellFace, Inc.

Shibuya Scramble Square 2-24-12 Shibuya, Shibuya-ku, Tokyo, 150-6139

TEL: 03-4400-1826 FAX: 03-6701-1574

E-mail: info@bell-face.com

Outsourcing of Handling Personal Information

bellFace may outsource to an outsourcing company all or part of the operations involving the handling of Personal Information within the extent necessary to achieve the purposes of use. In that case, bellFace will carefully examine the suitability of such entity as an outsourcing company, include provisions regarding confidentiality in the outsourcing agreement, and develop systems such that information is managed appropriately.

Contact Information for Disclosure, Etc. of Personal Information and Complaints or Inquiries

Please contact the bellFace support desk for requests for disclosure, etc. of Personal Information and to make complaints or inquiries.

Established on May 1, 2015
Amended on June 1, 2016
Amended on February 9, 2018
Amended on February 4, 2020