

Privacy Policy

Certified Nonprofit Organization CLACK (hereinafter referred to as "the Organization") establishes and adheres to the following privacy policy regarding the handling of information obtained from its members and users (hereinafter referred to as "Stakeholders").

Information Obtained from Stakeholders

In this privacy policy, "Information Obtained from Stakeholders" refers to information related to the identification of Stakeholders, behavioral history on communication services, and other information generated or accumulated on Stakeholders' devices such as smartphones and PCs, which the Organization collects based on this privacy policy.

(1) Information Provided by Stakeholders

The information provided by Stakeholders to use the Organization's services includes:

- Name (including nicknames and pen names)
- Age or date of birth
- Gender
- Occupation, work history, educational background
- Email address
- Phone number
- Address
- Photographs and videos
- Credit card information
- Other information entered by Stakeholders in forms specified by the Organization

(2) Information Provided by External Services with Stakeholder Consent

When Stakeholders permit linkage with external services such as social networking services while using the Organization's services, the Organization collects the following information from these external services based on the consent given at the time of permission:

- IDs used by Stakeholders on the external services
- Other information that Stakeholders have authorized to disclose to the linked services according to the privacy settings of the external services

(3) Information Collected by the Organization During Service Use

The Organization may collect information regarding access status and usage methods of its services. This includes:

- Device information
- Log information
- Cookies and anonymous IDs
- Location information

Purpose of Use

The Organization uses the information obtained from Stakeholders for the following purposes:

- To process registrations related to the Organization's services, and to verify and authenticate Stakeholders
- To manage Stakeholders' usage history of the Organization's services
- To process payments for service fees
- To analyze Stakeholders' behavioral history within the Organization's services to maintain and improve the services
- For market analysis and marketing
- To deliver, display, and measure the effectiveness of advertisements
- To provide information about the Organization's services
- To send information about affiliated businesses and services
- To respond to inquiries from Stakeholders
- To address violations of the Organization's terms or laws

- To notify changes, discontinuation, termination, or contract termination of the Organization's services
- For other purposes necessary for the provision, maintenance, protection, and improvement of the Organization's services

Management of Personal Information

The Organization shall take necessary and appropriate measures to prevent the leakage, loss (excluding the regular deletion of personal information, which shall not be considered as loss), or damage of personal information. Additionally, the Organization shall exercise necessary and appropriate supervision over its staff and other personnel to ensure the secure management of personal information.

Provision and Sharing of Information

The Organization will not disclose or provide personal information entrusted to it to any third party, except in the following cases:

1. When the consent of the individual (or their guardian) has been obtained
2. When required by laws or regulations
3. When it is difficult to obtain the consent of the individual, and the disclosure is necessary to protect life, body, or property
4. When information sharing is stipulated in joint projects with national or local governments, or with companies

Provision to Third Parties

The Organization does not provide personal data (as defined in Article 2, Paragraph 6 of the Personal Information Protection Law) obtained from Stakeholders to third parties (including those outside Japan) without prior consent, except when disclosure is permitted under the Personal Information Protection Law or other laws.

When providing or sharing information with third parties as indicated in this policy, the Organization enters into contracts including confidentiality clauses with the recipients and exercises necessary and appropriate supervision to ensure that personal information is handled safely by the recipients.

However, the following cases are exceptions:

- When the Organization outsources the handling of personal data, in whole or in part, within the scope necessary to achieve the purpose of use

- When personal data is provided due to business succession resulting from mergers or other reasons
- When jointly using personal data with business partners (specific details of joint use will be announced separately)
- When cooperation is necessary for national or local government agencies, or their contractors, to perform duties stipulated by law, and obtaining consent from the individual may hinder the performance of such duties
- When information is provided to information collection module providers as stipulated in the following section
- Other cases where provision to third parties is legally permitted

Information Collection Modules

The Organization's services may incorporate information collection modules provided by third parties (including those outside Japan). These modules collect information from Stakeholders without including personally identifiable information by using cookies and other means, and provide the information to the respective third parties. The collected and provided information is managed based on the privacy policies and other regulations of the respective module providers.

Changes to the Privacy Policy

The Organization may change the contents of this privacy policy as necessary. In such cases, the Organization will notify or announce the effective date and contents of the revised privacy policy through appropriate methods. However, if the changes require the consent of Stakeholders under laws, the Organization will obtain consent through prescribed methods.

Contact for Inquiries

With regard to the personal information held by the Organization, if the individual concerned makes any of the following requests, the Organization will verify that the request is made by the individual or their authorized representative and respond as described below. However, if the Organization is not obligated to disclose, correct, suspend use, or take other actions under the Act on the Protection of Personal Information or other applicable laws and regulations, this does not apply. Please direct such requests to the contact information listed below.

Disclosure of Personal Information Held by the Organization

When a stakeholder requests the disclosure of their personal information held by the Organization in accordance with the provisions of the Act on the Protection of Personal

Information, the Organization shall, after verifying that the request is from the individual themselves, disclose the information without delay (or notify the individual if such personal information does not exist).

Correction, Addition, or Deletion; Suspension of Use or Erasure; and Suspension of Provision to Third Parties

If a stakeholder makes any of the following requests pursuant to the Act on the Protection of Personal Information:

1. a request to correct, add to, or delete their personal information (collectively, a “Correction Request”) on the grounds that the information is inaccurate;
2. a request to suspend the use or erase their personal information (collectively, a “Suspension Request”) on the grounds that it is being handled beyond the scope of the purposes of use previously disclosed, or that it was obtained through deception or other wrongful means; or
3. a request to cease provision of their personal information to third parties (including those located outside Japan) on the grounds that such provision was made without the individual's prior consent;

the Organization shall, after verifying that the request has been made by the individual themselves or their authorized representative, promptly conduct the necessary investigation and take appropriate action based on the results. The Organization shall notify the Stakeholder of the outcome.

If the Organization determines, based on reasonable grounds, not to take the requested action, it shall notify the Stakeholder of the reason for such decision.

Other Erasure of Personal Information Held by the Organization

If a stakeholder requests the erasure of their personal information for reasons other than those listed in item (2) above, the Organization shall, if it determines that there is a need to respond to such a request, erase the relevant personal information and notify the individual accordingly. If the Organization decides not to carry out the requested erasure or other action based on reasonable grounds, it will notify the individual of such a decision.

Contact for Requests: info@clack.ne.jp

In such cases, we will verify your identity by requiring presentation of a driver's license or another method specified by the Organization.

Please note that a handling fee of 1,000 yen will be charged per request for information disclosure, regardless of whether or not the requested information is available.

Name of the Organization Name

Certified Nonprofit Organization CLACK

Address of the Business Operator

Yodogawa Base 2F, 4-1-5 Juso Higashi, Yodogawa-ku, Osaka-shi, Osaka 532-0023, Japan

Date of Establishment and Updates

Established: September 16, 2020

Updated: July 10, 2021

Updated: February 14, 2024

Updated: March 15, 2024