

Privacy Policy

At the Angel Group and its subsidiaries and affiliated companies (hereinafter collectively referred to as the “Company”), we take the utmost care in the protection of the personal information of our customers, transaction partners, and job applicants (hereinafter referred to as “Customers”). The policy discussed below will be applied universally to the personal information that is obtained on the Angel Group’s homepage (URL: <https://www.angel.co.jp/>) that is deployed on the Internet, the homepages of subsidiaries and affiliated companies, other homepages designated by the Company, and applications provided through services operated by application market operators (hereinafter collectively referred to as the “Official Websites etc.”) and to other personal information obtained through businesses related to the Company (defined in I. “Personal Information” below). This Privacy Policy and the Terms of Use and Membership Terms for the purpose of Customers’ use of the provision of various services will be applied for personal information obtained on the Official Websites etc. and other personal information obtained through the Company’s business.

I. Personal Information

1. The personal information that the Company obtains will be the information stipulated in each of the items below (hereinafter collectively referred to as “Personal Information”).

(1) The Customer’s name, address, telephone number, fax number, email address, workplace information (company name, department of affiliation, position, address, telephone number, fax number), mailing address, physical and medical-related information related to accommodation, dietary restrictions, and settlement information, including details of credit/debit cards or other payment methods.

(2) Real estate property information and agreement conclusion information (Agreement conclusion information is information, such as an overview of the property, the agreement date, and the agreement conclusion price, and it does not include the names of the seller, buyer, lessor, or lessee.)

(3) Information related to Company membership and use of subject services (customer number, member type, membership qualification, actual results of use of services, etc.)

(4) Information included in exchanges with the Customer, the content of inquiries, requests, and opinions (including the causes of and resolution methods for such exchanges).

(5) IT and system data that includes the situation of use of the Official Websites etc. and social media

(6) Information about how the Customer has used the Official Websites etc. and social media, including cookies and activity logs on websites (Details about the purposes of use of cookies are stated in the Cookie Policy.)

2. Excluding cases that are stipulated in a law or regulation and cases in which the Customer has agreed, the Customer's sensitive information on race, beliefs, social status, medical history, criminal history, or the fact of incurring damage because of a crime will not be obtained and used.

II. Handling of Personal Information

1. General provisions

At the Company, the Personal Information defined in Chapter I above is obtained and used for the purpose of smoothly conducting the Company's work. The Company is aware that proper protection of that Personal Information is an important responsibility, and in order to carry out that responsibility, we will handle Personal Information based on the policy below.

(1) We will comply with the Act on the Protection of Personal Information (hereinafter referred to as the "Personal Information Protection Act"), which will be applied to Personal Information, and with other related laws and regulations, conform to customary practices related to handling of Personal Information that are generally recognized as fair and proper, and appropriately handle Personal Information. We will also endeavor to improve handling when necessary.

(2) We will clarify regulations related to the handling of Personal Information and make employees thoroughly aware of those regulations. We will also ask our transaction partners to appropriately handle Personal Information.

(3) When Personal Information is obtained, we will specify the purposes of use and give notification of or publicly announce those purpose of use and then handle Personal Information according to those purposes of use.

(4) In order to prevent leaks, loss, and manipulation of Personal Information, we will implement the necessary measures and conduct appropriate management.

(5) We will accept requests for disclosure, correction, deletion, or cessation of use of Personal Information from the relevant Customer at the prescribed office (stated in 2. “Consultation office for Customers’ Personal Information” of VII. “Other Matters” below).

2. Clarification of the purposes of use of Personal Information

When Personal Information is obtained, the Company will clarify the purposes of use of that Personal Information. In addition, when a purpose of use will be changed, we will conduct the appropriate procedures stipulated in Article 18.3 of the Personal Information Protection Act and clarify the changed purpose of use.

3. Compliance with the purposes of use of Personal Information

Excluding cases in which the Customer agrees in advance and cases stipulated in Article 15.2 or Article 15.3 of the Personal Information Protection Act, the Company will comply with the scope of the purposes of use when using Personal Information.

4. Restriction of provision to third parties

If Personal Information will be provided to a third party, the Company will provide such information after conducting the appropriate procedures.

5. Supervision of consigned parties

If the Company will consign work that includes the handling of Personal Information to an external party, the Company will conduct supervision so that appropriate safety management measures will be implemented by the consigned party.

6. Ensuring the accuracy of Personal Information

The Company will endeavor to maintain accurate and up-to-date Personal Information within the scope that is necessary for the accomplishment of the purposes of use stipulated in VI of this Privacy Policy.

7. Implementation of appropriate safety management measures

The Company will implement the appropriate safety management measures for the handled personal data and endeavor to prevent such accidents as leaks, destruction, and damage.

8. Participation by the relevant person

The Company respects ownership by the relevant person to whom Personal Information belongs, and it will sincerely handle inquiries, consultations, and complaints made by that person.

9. Compliance with laws and regulations related to Personal Information

The Company will comply with laws and regulations related to the protection of Personal Information.

10. Continuous initiatives for personal information protection

The Company will continuously take initiatives for the protection of Personal Information from now on as well, and we will endeavor to quickly respond to technology developments and social changes.

III. Purposes of Use of Personal Information

1. The Company will receive Personal Information as provided by Customers and use Customers' Personal Information for the purposes stated in **VI**. "Purposes of Use" so that Customers will be able to smoothly and efficiently use the Company's services. When the Company obtains Personal Information, it will use an appropriate method to give notification or publicly announce the purposes of use.

2. Excluding cases in which the Customer agrees in advance and cases stipulated in Article 15.2 or Article 15.3 of the Personal Information Protection Act, the Company will not use (use for other purposes) the information beyond the scope that is necessary for accomplishment of the purposes of use stated in 1 above.

3. The Company will establish a person responsible for management; comply with laws and regulations related to Personal Information, industry guidelines, and internal regulations; and take meticulous care in the handling of Customers' Personal Information. The Company will also take efforts to maintain Customers' Personal Information in an accurate and up-to-date state and will conduct appropriate management so that unauthorized access, loss, destruction, manipulation, and leaks

related to Customers' Personal information will not occur. Examples of specific management measures that the Company will implement are as stated below.

- (1) The Company will continuously conduct internal education related to protection and appropriate handling of Customers' Personal Information.
 - (2) The Company will regularly conduct appropriate audits and reconsider management systems related to personal information protection.
4. Excluding cases that fall under any of the conditions below, the Company will not provide Customers' Personal Information to third parties.

(1) A case in which the relevant Customer has agreed; please note that if the Customer uses a credit card or other settlement means to purchase a product or use a service, the Company may, for the purpose of settlement of the price of that product or service, provide the number of the credit card or other card used for settlement, the Customer's name, and other necessary information to the credit card company or another financial institution. In such a case, it will be deemed that the Customer has agreed to the aforementioned information provision by the Company.

(2) A case based on a law or regulation

(3) A case in which it is necessary for the purpose of the protection of a person's life, body, or property and in which it is difficult to obtain the relevant person's agreement

(4) A case in which it is necessary for improvement of public health or promotion of the sound upbringing of children and in which it is difficult to obtain the relevant person's agreement

(5) In a case in which it is necessary to cooperate with a national government organization, a local government, or a party consigned by a national government organization or a local government that will execute clerical work stipulated in a law or regulation, when there is a possibility that obtaining the relevant person's agreement will cause hindrance to execution of that clerical work

5. Cases in which the handling of Personal Information will be consigned

If the Company consigns the handling of Customers' Personal Information to an external business operator, it may provide Customers' Personal Information to the

consigned external business operator within the minimum scope that is necessary and under the Company's strict management.

IV. About the Joint Handling of Personal Information

At the Company, Personal Information will be jointly used based on the provisions below.

(1) Subject companies that will conduct joint use

The Angel Group and the subsidiaries and consolidated companies stated in the Angel Group's securities report

(2) Items of Personal Information that will be jointly used

The information stated in I. "Personal Information" above

(3) Purposes of joint use

Joint use will be conducted within the scope that is necessary in order for the Company to work in a united manner to efficiently accomplish the purposes of use stated in **VI.** "Purposes of Use" below.

(4) Management system

Personal Information that will be jointly used will be managed at the liability of the company that obtained the relevant Personal Information, and for Personal Information obtained by the Angel Group, the manager of the Angel Group Corporate Headquarters will be the person responsible for management. Personal Information obtained by Angel Group's subsidiaries and affiliated companies will be appropriately managed at the liability of the relevant individual company's representative director.

V. About the Handling of Personal Information on Websites

1. About website cookies

On the Official Websites etc., a technology called cookies is incorporated so that Customers can use the websites with greater convenience and so that even better services will be provided. Cookies are a technology for identifying Customers' computers, but Customers and other individuals will not be identified. In addition,

Customers can restrict the use of cookies. In such a case, it may not be possible to use some services.

2. About website security

On pages on which we have Customers provide Personal Information on the Company's website, a mechanism called Secure Socket Layer (SSL) that encrypts and transmits data is used; therefore, even in the event that a third party intercepts transmitted data, there is no concern that the content will be stolen. In addition, for server data, a system called a firewall that prevents unauthorized access is used. We use these technologies to take all precautions for information management and protection so that Customers' registered Personal Information will not be leaked to external parties.

3. About website content

It is possible to access the Official Websites etc. from countries throughout the world that have different laws, but the laws of Japan shall be followed in relation to the content of the Official Websites etc. In addition, access from a region in which postings on the Official Websites etc. are illegal is prohibited.

4. Effects when information provision is refused on a website

A Customer can use the Official Websites etc. without registering or providing the Customer's Personal Information. However, in such a case, it may not be possible for the Customer to use specific services. In addition, if the ID or password is not entered, the ID or password may be requested frequently.

5. About the privacy policies and scope of liability on the Official Websites etc.

The Company believes that ensuring the safety of Personal Information is extremely important, and we take meticulous precautions when we receive Personal Information that is sent from a Customer's computer or mobile device to the Official Website etc. However, please understand that, in spite of the Company's best efforts, there are no perfect security measures or security measures for which there will be no leaks of information provided through the Internet.

The Company is unable to guarantee safety related to information that a Customer sends at the Customer's own liability or information that a Customer receives through an online service of the Company.

When an Official Website etc. is used, it will be deemed that the Customer has agreed to the Company's Privacy Policy. If you do not agree to that Privacy Policy, please refrain from using the Official Websites etc.

VI. Purposes of Use

1. Methods of acquisition

The methods by which the Company will obtain Personal Information are as stated below.

- (1) Receipt of a document obtained from the Customer
- (2) Receipt of electronic data obtained from the Customer
- (3) Registration on an Internet reservation site
- (4) Entry in a form on an Official Website etc.
- (5) Telephone, fax, or oral explanation with a party to a consignment agreement for which the Company is the consigning party, a contractor under a contracting agreement for which the Company is the ordering party, or a business operator to which the Company has consigned work
- (6) Acquisition from a real estate register, a housing map, a tax ledger, a telephone directory, a medium that is lawfully released to the public by being provided for general sale or access, a REINS (a real estate information computer network system) that is operated by a designated distribution organization (a real estate distribution organization that has received designation by the Minister of Land, Infrastructure, Transport and Tourism), or a private-sector property information site or advertisement

2. Means of use

Personal Information that the Company obtains will be used by the methods stated below.

- (1) Registration in a customer management system
- (2) Sending of products and prizes, price settlement, and personal authentication
- (3) Sending of postal items, including direct mail
- (4) Sending of email
- (5) Provision of information by NS service utilization
- (6) Direct contact by telephone or fax
- (7) Direct visits
- (8) Information provision to business operators to which the work of (1) through (6) above is consigned
- (9) Information provision to administrative agencies

3. Purposes of use

The reasons for the Company using the aforementioned means of utilization are as stated below.

- (1) For conducting the various forms of work below for the accommodation business of Angel inc., and Angel Forest Resorts Co., Ltd.
 - a. Contacting Customers for the purpose of reservation confirmation
 - b. Provision of services, products, and information to Customers
 - c. Marketing activities
 - d. Analysis for the purpose of improvement of services and products

e. Sending questionnaires for the purpose of service improvement at each of the companies stated in (1) above

f. For requesting compliance with the Terms of Use and conditions for services provided through the Official Websites etc.

g. For protecting customers and services provided through the Official Websites etc.

h. For creation, provision, and saving of the guest lists stipulated in laws and regulations

i. Provision of information about the services and products of individual group companies to Customers

j. For conducting other work that is necessary for the business of each of the companies stated in (1) above

(2) For conducting the various forms of work below related to the real estate management business of Angel inc., and Angel Forest Resorts Co., Ltd.

a. Work (including work for which the Company is consigning management to a third party) stipulated in a management consignment agreement or management terms and conditions concluded with a condominium management union that one of the companies stated in (2) above manages or with a unit owner of a vacation home

b. Performance of accounting work, revenue and expenditure work, provision of information about various types of construction, contact in times of an emergency, and other work related to management union operation

c. For provision of information about services (renovations, cleaning, etc.) and products in exclusive areas of a condominium that one of the companies stated in (2) above manages or in a vacation home area

d. For contact related to implementation or management of construction (repair work for common areas etc.) in a condominium that one of the companies stated in (2) above manages or in a vacation home area

e. For replying to requests, inquiries, and consultations by unit owners of condominiums that each of the companies stated in (2) above manage or by owners of vacation home areas

f. Provision of information about the services and products of individual group companies to Customers

g. For sending questionnaires for the purpose of further improvement of the services of each of the companies stated in (2) above

(3) For conducting the various forms of work below related to real estate business of Angel Real Estate Inc.; Angel inc.; and Angel Forest Resorts Co., Ltd.; the relevant individual company may consign to another company the handling of inquiries related to property information or services and sending of postal items, and in such a case, it will disclose only the information that is necessary for provision of services, and the use of information for other purposes is prohibited.

a. Searching for other parties for real estate sales agreements or lease agreements, sales, leases, and mediation

b. Conclusion of agreements (including joint guarantee agreements) related to the management of real estate and the provision of services based on agreements

c. Information provision related to real estate sales, leases, mediation, and management

d. For the provision of other information, within the scope that is necessary for improving the convenience of one of the forms of work of a through c above; to a party to an agreement with an individual company stated in (3) above; a party that wants to conduct a sale, purchase, or lease with an individual company stated in (3) above; a real estate broker appointed for the relevant individual transaction; a designated distribution organization, a party, organization, or advertising company that provides property information in documents or on the Internet; a financial institution related to financing or the release of seizure of security interests; a local government, a judicial scrivener, land and building investigator, or other expert; an affiliated mutual aid association; a casualty insurance company; a guarantee consignment company, an electricity, gas, or water supply company; a real estate management company (including condominium management, vacation home management, and lease management); an on-site front desk or management center; or an affiliated business

operator that conducts renovations or repairs; if property information will be provided to a designated distribution organization for the purpose of searching for a party to an agreement, or if an agreement will be concluded for a property that is registered in a designated distribution organization, we will use Personal Information as stated below.

(a) If an agreement is established, we will notify the designated distribution organization of the date of that establishment and the agreement conclusion price.

(b) The designated distribution organization will use property information and agreement conclusion information (agreement conclusion information consists of information, such as an overview of the property, the agreement date, and the agreement conclusion price, and it does not include the names of the seller, buyer, lessor, or lessee) for the designated distribution organization's work that is stipulated in the Real Estate Brokerage Act, such as providing such information, in the form of electronic data or a paper medium, to a real estate broker or public organization that is a member of the designated distribution organization.

*If a privileged and exclusive brokerage service agreement or an exclusive brokerage service agreement is concluded, the real estate broker will be obligated to conduct registration with the designated distribution organization and notification of agreement conclusion information, based on the Real Estate Brokerage Act.

(c) Statements will be made in a postal item, telephone call, or email for the purpose of providing the services and information of (a) and (b) above.

(d) Storage for the purpose of handling inquiries by Customers and for the purpose of accomplishing the purposes of d

e. Saving as ledgers and their materials, based on Article 49 of the Real Estate Brokerage Act and Article 18 of the Act on Advancement of Proper Rental Housing Management

f. Price assessment related to real estate sales, purchases, and leases; for agreement conclusion information that uses price assessment, provision may be made to a party that requests mediation, as the basis of opinion as stipulated in Article 34-2.2 of the Real Estate Brokerage Act.

g. Provision of property information requested by Customers

h. Handling of inquiries and consultations by Customers

i. Confirmation of and provision of information about services for which Customers apply

j. Provision of specific services (Angel Real Estate News, Angel Real Estate Resort Property Information, etc.)

k. Provision of information about services and products and property information for properties handled by each of the companies stated in (3) above

l. Other contact to Customers that becomes necessary for each of the forms of work stated above and all work that is incidental to that work

m. Provision of information about the services and products of individual group companies to Customers

(4) For conducting each of the forms of work below related to the construction business of Angel Construction Co., Ltd.

a. Sales activities for Customers, performance of agreements concluded with Customers, and execution of work that is related to or incidental to those matters (including after-sale services and consulting work)

b. Order placement and consignment to consigned parties for purposes of contracting (including order placement for work subcontracting) for civil engineering or construction work, investigation, plans, measurement, design, supervision, procurement of materials and equipment, or provision of services, and execution of sales, leases, maintenance, inspection, and after-sales service for machinery or equipment for civil engineering or construction work, electrical equipment, and furniture or home appliances and work that is related to or incidental to those matters

c. Execution of the work that is necessary for the Company's business activities for neighboring residents and landowners, such as explaining construction or business and obtaining agreements

d. Maintenance and management (including cleaning business) of buildings and structures, and execution of work that is related to or incidental to those matters

e. Execution of work that is related to or incidental to consignment for the purposes of recording and storing matters related to properties for which Angel Construction Co., Ltd., conducted work

f. Provision of information about the services and products of individual group companies to Customers

(5) For conducting each of the forms of work below related to the sake brewing business of Naeba-Syuzo Co., Ltd.

a. Contacting customers for the purpose of order confirmation

b. Provision of services, products, prizes, and information to Customers

c. Marketing activities

d. Analysis for the purpose of improvement of services and products

e. Sending of questionnaires for the purpose of improving the services of Naeba-Syuzo Co., Ltd.

f. For requesting compliance with the Terms of Use and conditions for services provided through the Official Websites etc.

g. For protecting customers and services provided through the Official Websites etc.

h. For introduction and provision of various types of products and services intended for members of the **Naebasan Friendship Society**, confirmation of applications for events and tours, and sending of information

i. Provision of information about the services and products of individual group companies to Customers

j. Other work related to the work stated in a. through i. above

(6) For conducting the various forms of work below related to the sightseeing bus business of **Angel Tourism Co., Ltd.**

a. For management of passenger lists in bus operation business

b. For replying to requests, inquiries, and consultations by Customers

c. Provision of information about the services and products of individual group companies to Customers

(7) For individual group companies' third-party provision of personal data to companies (including foreign corporations) that operate social media, for the purpose of delivering advertisements to those social media; of the third parties in foreign countries that include parties to which provision is made, country-specific information for the candidate countries for provision is as stated below.

(i) The United States of America

- Information concerning the relevant foreign country's personal information protection system

Please check the information that the Personal Information Protection Commission provides through the link below.

https://www.ppc.go.jp/enforcement/infoprovision/laws/offshore_report_america/

- Information concerning personal information protection measures implemented by third parties

For the handling of personal data, most of the parties to which provision is made implement measures at the same level as the measures required of Japan's businesses that handle personal information.

(ii) People's Republic of China

- Information concerning the relevant foreign country's personal information protection system

Please check the information that the Personal Information Protection Commission provides through the link below.

https://www.ppc.go.jp/enforcement/infoprovision/laws/offshore_report_china/

- Information concerning personal information protection measures implemented by third parties

For the handling of personal data, most of the parties to which provision is made implement measures at the same level as the measures required of Japan's businesses that handle personal information.

VII. Other Matters

1. About the court of jurisdiction

Limited to the matters stated in this Privacy Policy, if a dispute arises, the Tokyo District Court will be the court of jurisdiction in the first instance.

2. Consultation office for Customers' Personal Information

[Consultation Office for the Personal Information of Angel Group's Customers \(Customer Service Department\)](#)

3. About revision

At the Company, partial revision of the Personal Information Protection Policy may be conducted for the purpose of personal information protection or in order to handle changes of laws, regulations, or other standards. For particularly important changes, notification will be given by a method of posting on the Official Websites etc.

Date of most recent revision: September 1, 2023

Specific Personal Information Protection Policy

When conducting clerical work that involves the handling personal numbers or specific personal information (hereinafter referred to as “Specific Personal Information etc.”), the companies that operate the facilities posted on the Angel Group’s official website (<https://www.angel.co.jp/>), Angel Group, and its subsidiaries and affiliated companies (hereinafter collectively referred to as the “Company”) will comply with the provisions of the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures and endeavor to protect Specific Personal Information etc. based on the policy below.

1. Formulation of and compliance with regulations concerning handling of Specific Personal Information etc.

The Company will make its employees aware of the importance of protection of Specific Personal Information etc., formulate various types of regulations (including this policy, regulations for handling specific personal information, and other regulations and manuals) for the purpose of appropriately handling Specific Personal Information etc., and it will comply with the content of those regulations.

2. Purposes of use

The purposes of use of Specific Personal Information etc. for which the Company receives provision are as stated below.

(1) Specific Personal Information etc. of transaction partners

- a. Clerical work for creation of payment records for remuneration and fees
- b. Clerical work for creation of payment records for real estate usage fees
- c. Clerical work for creation of payment records for consideration for receiving transfer of real estate
- d. Clerical work for creation of payment records for anonymous associations’ distribution of profits

e. Work for creation of the statutory records stipulated in Article 225 of the Income Tax Act and other regulations

(2) Specific Personal Information etc. of shareholders

a. Clerical work for the creation of payment records for dividends, dividends from surplus funds, and fund interest

b. Clerical work for the creation of payment records for consideration for transfer of shares

(3) Specific Personal Information etc. of the Company's employees

a. Clerical work for notifications for employment insurance (*)

b. Clerical work for notifications for health insurance and employees' pension insurance (*)

c. Clerical work for creation of withholding tax statements for employment income and retirement income

d. Clerical work related to a company pension system with defined benefits

e. Clerical work related to an own company share investment association

(Clerical work marked with an asterisk (*) includes application, benefits, and subsidies.)

(4) Specific Personal Information etc. of spouses and dependent family members of the Company's employees

a. Clerical work for notifications for national pension Category 3 insured persons

3. Safety management measures

The Company will implement safety management measures that are organizationally, personally, physically, and technically appropriate and endeavor to prevent leaks, destruction, and damage of Specific Personal Information etc.

4. Handling of consignment

The Company may consign the handling of Specific Personal Information etc. to a third party. In such a case, the Company will conduct the necessary and appropriate supervision of the consigned party in accordance with laws, regulations, and the Company's rules.

5. Continuous improvement

The Company will endeavor to continuously improve the handling of Specific Personal Information etc.

6. Disclosure, correction, or cessation of use of Specific Personal Information etc.

When the relevant person requests disclosure, correction, or cessation of use of the that person's Specific Personal Information etc., the Company will reply without delay, excluding the cases of each of the items below.

- (1) Cases in which there is a possibility of harming the life, body, property, or other rights or interests of the relevant person or a third party
- (2) Cases in which there is a possibility of causing significant hindrance to proper implementation of the Company's work
- (3) Cases in which it will violate a law or regulation

7. Revision of this policy

If the Company revises the provisions of this policy because of a request based on a law or regulation or in order to further improve specific personal information protection, the Company will publicly announce that revised content on the Company's website.

8. Inquiries related to Specific Personal Information etc.

For a question about Specific Personal Information etc. that you have provided or a request for disclosure, correction, or cessation of use, please make an inquiry to the office for contact that is stated below. The office will provide information about the prescribed procedures that are necessary for disclosure, correction, or cessation of use.

Office for inquiries:

[Consultation Office for the Personal Information of Angel Group's Customers](#)
[\(Customer Service Department\)](#)