

Information regarding personal data protection in the EU (or EEA)

Privacy Policy

1. Purpose of Processing EU Personal Data Acquired from Customers and Other Subjects Concerned

GMO Brights consulting Inc. (hereinafter referred to as "Company", "we", "our" and "us"), as a Domain name, trademark and other intellectual property service businesses company processing EU personal data, in accordance with the General Data Protection Regulation (effective on May 25, 2018) prescribed by the European Commission, we shall process customers' EU personal data only within the scope necessary for the intended use that is specified and publicized in advance. However, in the case where it is required by laws and regulations, we may process EU personal data of customers and other subjects beyond the scope necessary for achieving the intended use specified and publicized in advance. Moreover, providing EU personal data is indispensable for fulfilling contractual agreement, and therefore if EU personal data cannot be provided at each customer's own discretion, providing services to such customer may be hindered.

Please refer to " Appendix: List of Commercial Services that Process EU Personal Data"

2. Rights of Customers and Other Subjects Concerned

Each customer or the other subject concerned has the following rights regarding EU personal data about himself or herself.

- (1) Right to access to his or her own EU personal data and other information relating to its personal data.
- (2) Right to rectify inaccuracies of his or her EU personal data without undue delay
- (3) Right to erase his or her EU personal data without undue delay
- (4) Right to restrict processing of his or her EU personal data
- (5) Right to receive EU personal data provided by customer or other concerned subject by himself or herself in a general format that is readable on computers, and right to transfer (i.e. data portability) the EU personal data to other organizations in order for them to manage without hindering transferring process.
- (6) Right to object to public interest; processing for the interests of Company, a third

party or both; and processing for direct marketing for EU personal data of customers and other subjects concerned.

- (7) Right not to be subjected to assessments conducted or decisions made through automatic processing such as profiling that have serious impact including legal effects on individuals.

Note: We do not perform profiling.

- (8) Right to lodge a complaint with a supervisory authority

3. Conditions for Processing of EU personal data

We may process EU personal data when any one of the following cases is applicable, even if we have not obtained consents from customers and/or others concerned.

- (1) When the processing is necessary for the execution of the contract where a customer or other subject concerned himself or herself is the contracting party. Or when processing is necessary in accordance with request from a customer or other subject concerned at the stage when the contract is not concluded yet.
- (2) When the processing is necessary to comply with the legal obligation that we shall abide by; for example, when following information disclosure orders based on laws and regulations from government agencies etc.
- (3) When the processing is necessary to protect serious interests of customers, other subjects concerned, or both.
- (4) When it is deemed appropriate to investigate, prevent, or take measures against illegal acts or suspicious acts.
- (5) When the processing is necessary for legitimate interests pursued by a third party or us to the extent that its processing does not infringe right, profit, and freedom concerning the privacy of a customer or other subject concerned.

4. Special Types of EU Personal Data

In principle, in order to conduct various procedures concerning the services providing, we shall obtain prior consent from customers and other subjects concerned.

Moreover, we will not collect, use and transfer special types of EU personal data belonging to customers and other subjects concerned such as health conditions and physical characteristics.

5. International Transfer of EU Personal Data

EU personal data is transferred to our group companies and outsourcing contractors such as Domain registrar, patent office, and Patent Office of filing country located in Japan,

Vietnam, or both; and may be stored in servers located in those respective country. Japan, and Vietnam have not been recognized and determined as countries providing adequate data protection by the European Commission, however we manage EU personal data of customers and other subjects concerned appropriately.

6. **Safeguards**

In order to appropriately manage EU personal data of customers and other subjects concerned and prevent leakage, loss and damage of those EU personal data, including other safety management approaches, we carry out technical, physical, organizational and human related safeguards.

7. **Joint Control**

We jointly control EU personal data customers and other subjects concerned that we hold with our group companies in order to promote activities such as service development and service guidance; and communication with customers and other subjects concerned.

In addition, when we jointly control EU personal data with our group companies, the scope of responsibility relating to the processing of the personal data of customers and other subjects concerned, and the contact point for inquiries shall be clearly defined among us and group companies.

Items of EU personal data that we jointly control are stated as follows:

- ◇ Name;
- ◇ Address;
- ◇ Email address;
- ◇ Phone number;
- ◇ Contract details;
- ◇ Any other items necessary in accordance with the purpose of use (*)

* For details, please refer to the above section 1, “Purpose of Processing EU Personal Data Acquired from Customers and Other Subjects Concerned”.

The joint controllers are the group companies of us that are listed on:

<https://www.gmo.jp/en/company-profile/groupinfo/>

Note: Group companies may be changed in the future due to new establishment, consolidation, abolishment and other reasons.

8. Transfer of EU Personal Data

EU personal data belonging to customers and other subjects concerned are transferred to our group companies and outsourcing contractors such as cloud provider and IT service vendor to which we have subcontracted our business operation to the extent necessary for service provision.

In addition, we request appropriate processing of the transferred EU personal data to those outsourcing contractors, and manage EU personal data of customers and other subjects concerned appropriately.

9. Archiving, Deletion, Disposal of EU personal data

Except where otherwise specified by laws and regulations, we define the retention period of EU personal data of customers and other subjects concerned within the scope necessary for the purpose of use.

After the defined retention period has expired or the purpose of use has been achieved, we erase EU personal data of customers and other subjects concerned without delay.

10. About Cookies and Other Similar Technologies.

We use cookies on this site with a view to increasing the usability. When you re-visit this sites cookies are used for user tracking, re-targeting advertisement, affiliate advertising and retaining login information of registered users, users can view this site more conveniently.

A cookie is an information used to transmit information from this site to your browser.

When you, as a customer or other visitor, visit this site again, the cookie helps you to use this site more conveniently and is stored in your personal computers/devices.

Furthermore, the stored information does not include information such as your name, your residential address, your phone number and your email address which can be used to identify an individual.

Cookie does not also have negative effects on your computers/devices.

Cookie information that is collected from customers and other visitors will be transmitted to and stored in servers at Google LLC, Adobe Systems Incorporated and some other entities from our web servers.

We also obtain statistical data concerning access information such as the number of accesses and stay period for this site from stored data by using Google Analytics service, Adobe Analytics that is provided by Adobe Systems Incorporated and some other services.

It is possible to block cookie, if you, as a customer or other visitor, change the setting of your web-browser. In such cases, you will not have a trouble viewing this site except for some functions. Please make contact with the developer and/or distributor of the web-

browser that you are using for its setting procedure.

11. Group-wide Data Protection Officer and Group-wide Representative for EU Personal Data

<Group-wide Data Protection Officer for EU Personal Data (G-DPO)>

GMO Internet, Inc.,

Cerulean Tower 4-14F, 26-1 Sakuragaokacho, Shibuya ku, Tokyo, 150-8512, Japan.

Email address: dpo@gmo.jp

<Group-wide Representative for EU Personal Data>

GMO GlobalSign Ltd.

Springfield House

Sandling Road, Maidstone, Kent

ME14 2LP, United Kingdom

E-mail address: dpo@gmo.jp

12. Claims and Inquiries

For inquiries regarding this privacy policy, please make contact to the following contact point.

URL: <https://secure.gmo.jp/en/gdprform/>

13. Disclosure and other requests of EU personal data

Requests for Disclosure, correction, addition, deletion, suspension of use, suspension of provision of third party, transferring (data portability) shall be dealt with in the following manner.

Please be aware that we will not accept requests by telephone, fax, email, verbally or by any method other than that laid out below.

Please print out our prescribed form and fill in necessary information.

After filling in, please enclose the necessary documents, and send them to the following address by certified mail.

Address:

GMO Internet, Inc.,

Cerulean Tower 4-14F, 26-1 Sakuragaokacho, Shibuya ku, Tokyo, 150-8512, Japan.

Disclosure and Other Requests Form is below,
[Disclosure and Other Requests on EU Personal Data](#)

Appendix: List of Commercial Services that Process EU Personal Data

Customers and other subjects concerned using domain services	Business communication, billing request processing, disclosure as registration information to registrar etc
Customers and other subjects concerned using trademark service	Business communication, request processing, disclosure to national patent offices through patent attorney etc.
Customers and other subjects concerned using search service on uniqueness as brand name on target character string	Business communication, request processing, disclosure to national patent offices through patent attorney etc.

Published on 30 October 2018

Section 4: Details of representative (If the person requesting information appoints representative, please put a tick the appropriate box and describe the information of the representative.)

I hereby designate the following person as my representative and delegate all negotiations concerning this request and my counterpart for this request.

Name		
Address		
Phone number		
Email address		
Proof of Identity for representative A: Required in case of Lawyer B: One of these stated in the right column in case representative is not a lawyer	A	<input type="checkbox"/> (In case of lawyer) Proof of Identity such as CCBE card
	B	<input type="checkbox"/> National ID card <input type="checkbox"/> Passport <input type="checkbox"/> Photo Driving License <input type="checkbox"/> Utility Bill <input type="checkbox"/> Birth Certificate <input type="checkbox"/> Other Proof of Identity

Please fill in the above details in the case of claim by the representative. (Description is unnecessary if the representative is not applicable.)

Requested data will be disclosed to, or result of the request other than disclosure will be notified to the above.

Section 5: Important Points for Disclosure and Other Requests.

- Please specify the subject service to be requested accurately. If there is a mistake in specifying the subject service, even if we, GMO Internet, Inc., have personal data at our service other than those specified, please acknowledge it beforehand because we may answer that the applicable personal data does not exist by the circumstances of our survey within our company.
- Regarding requesting for multiple services, please send one request form for each subject service. However, only one set of proof of identities is required for each person concerned.
- When sending this request form for disclosure and other requests, please make sure to enclose a photocopy of the Proof of Identity selected in 1, 3, 4, and send it to our designated address by recorded postal mail that allows us to check the delivery record of the third party involved.
- In case of using delivery method other than the above, we will not be responsible for any accidents such as lost in the mails before arriving at our company by any chance.
- For documents with expiration date, please send us a photocopy within the validity period at the time of the request, and for documents without expiration date, send us a photocopy made within one month time since the date of requesting.
- If there are incompleteness in proof of identity, we may ask for re-submission.
- Regarding the implementation of the measures concerning this request, in principle we will respond to you for free of charge. However, please acknowledge it beforehand that we may charge a non-excessive fee, taking into account the administrative expenses and other administrative expenses incurred in response depending on the content of the request. The fee shall be determined by our company according to individual request details, we shall notify the data subject or representative without delay.
- When the content of the request is obviously unfounded or excessive, especially if it is due to the nature of repetitive, we may not be able to deal with it. In that case, we shall notify the requesting data subject or the representative without delay as to why we cannot respond and it is possible to appeal to supervisory authorities to request legal remedy.
- Upon this request, the newly acquired personal data we received shall be handled only to the extent necessary for the implementation of the measures pertaining to this request and will not be returned. Documents, including photocopies, supplied will be kept for six months after the implementation of the measures pertaining to this request and, once the six months have passed, they will be disposed.

Date: _____

Signature of the Data Subject stated in Section 1 above: _____