

## **Japan Privacy Policy**

ComPsych in partnership with WorkWay Inc. complies with laws and regulations regarding the protection of personal information, and the handling of information appropriately. We will appoint an information management manager for the purpose of protecting personal information, and will endeavor to properly handle personal information.

### **Article 1: Acquisition and use of personal information**

Regarding the acquisition and collection of personal information, after clarifying the purpose of use and obtaining the consent of the individual, we will acquire personal information as necessary to achieve the purpose of use. In addition, we will not use personal information for other purposes or provide or disclose it to a third party without the consent of the person, and we will take measures for that purpose.

### **Article 2: Compliance with laws and norms regarding personal information protection**

We will comply with applicable laws and regulations regarding the personal information we hold, guidelines set by the government, and other norms.

### **Article 3: Management and protection of personal information**

We will take reasonable safety measures against risks such as unauthorized access, loss, destruction, falsification, and leakage of personal information, and regularly review and correct them.

### **Article 4: Response to complaints and consultations**

If the person requests notification, disclosure, correction, addition, deletion, use or suspension of personal information, or if a complaint or consultation is received, it is necessary to follow the procedures prescribed by the Company.

### **Article 5: Continuous improvement of personal information protection management system**

We will identify the person in charge of protecting personal information, carry out in-house education and continuously review and improve the management system.

### **Contact for inquiries regarding personal information protection policy and complaints / consultation regarding personal information**

1-7-8 Sendagaya, Shibuya-ku, Tokyo 151-0051 Japan

**WorkWay** Inc. Complaint Contact Window.

Email : [support@workway.co.jp](mailto:support@workway.co.jp)

## **Purpose of use of personal information**

Purpose of use when personal information is directly obtained from the person himself / herself.

- Personal information of our EAP service users is for counseling at our contract counselors / consultants and affiliated counseling organizations, and for providing information on user support.
- To answer inquiries.
- Business management, health management, security management, etc.
- For the implementation of stress check diagnosis work entrusted by our company.
- For education and advice to our employees, our contract counselors and consultants.

## **Dissemination of Personal Data**

### **1. Personal information protection manager**

CEO Shinya Hanada

Email : support@workway.co.jp

### **2. Purpose of use of personal data**

Personal information of our EAP service users is for counseling at our contract counselors / consultants and affiliated counseling organizations, and for providing information on user support.

### **3. Where to make complaints regarding the handling of retained personal data**

For inquiries regarding retained personal data, please contact the following:

1-7-8 Sendagaya, Shibuya-ku, Tokyo 151-0051 Japan

**WorkWay** Inc. Complaint Contact Window.

Email : support@workway.co.jp

## **Procedures Regarding Disclosure of Personal Data**

Regarding retained personal data, you can request notification of purpose of use, disclosure, correction, addition or deletion of content, suspension of use, erasure, and suspension of provision to third parties (disclosure, etc.). We will respond to requests for disclosure of personal information, etc. by the following procedure.

### **1. Accepting requests for disclosure, etc.**

(1) Please contact the following address. We will send you a "prescribed form" by mail. Please attach the necessary materials to the address below.

1-7-8 Sendagaya, Shibuya-ku, Tokyo 151-0051 Japan

**WorkWay** Inc. Complaint Contact Window.

Email : support@workway.co.jp

(2) Method of confirming that the person requesting disclosure, etc. is the person or his / her agent.

A) Confirmation that the person requesting disclosure, etc. is the person himself / herself will be confirmed by the person in charge of the complaint consultation counter using the documents for confirming the person specified below.

B) Confirmation that the person requesting disclosure, etc. is an agent is in addition to the documents confirming the person requesting disclosure, etc. The person in charge of the complaint confirms with the documents certifying the relationship between the person subject to disclosure and the agent and the documents confirming the agent himself / herself.

C) Documents confirming the identity of the person and the agent shall be a copy of the certificate issued by the public institution with the example photo below.

- a) Driver's license
- b) Passport
- c) My number card (front side)
- d) Residence card or Special Permanent Resident Certificate

D) Documents certifying the relationship between the person to be disclosed and the agent are as follows.

a) In the case of a voluntary agent: A power of attorney stating that "the authority to receive the results of disclosure, etc. is delegated"

b) For underage guardians: A copy of the family register or a certificate of registered information (both within 6 months from the date of issue)

c) For adult guardians: Certificate of registration (within 6 months from the date of issue)

d) For parental authority: A copy of the family register or resident's card (both within 6 months from the issue date)