

# Privacy Policy

**Established:** March 26, 2025

**CyberGene Inc.**

CyberGene Inc. (hereinafter, the "Company," "we," or "our") hereby establishes this privacy policy (hereinafter, this "Policy") with respect to the protection of our customers' personal information and will handle personal information appropriately in accordance with this Policy.

The meanings of terms used in this Policy shall be in accordance with the Act on the Protection of Personal Information of Japan (hereinafter, the "Personal Information Protection Act").

## **1. Personal Information We Collect**

The Company collects the following categories of personal information regarding customers:

### **(1) Identification Information**

Name, nationality, address, postal code, gender, date of birth, telephone number, email address, SNS account information, and information related to official documents such as Individual Number Card, driver's licenses, health insurance card, and passport, etc.

### **(2) Transaction-Related Information**

Details of transactions, purchase history and the like.

### **(3) Payment Information**

Information regarding financial institution accounts, payment and payment methods, etc.

### **(4) Information Collected When Using the Service**

Online identifiers such as cookie IDs, device information, location information, browsing history, and other service usage information (including access logs, IP addresses, browser information, browser language settings, etc.).

### **(5) Medical Information**

Medical history, health examination results, treatment history, prescription details, medical information provided by medical institutions, information regarding physical and mental condition, and medical information necessary

for coordination and referrals with and to medical institutions.

#### **(6) Other Information**

Information contained in inquiries or communications from customers to the Company.

### **2. Purpose of Use**

The Company acquires and uses personal information within the scope necessary to achieve the following purposes (collectively, the “Purposes of Use”):

- (1)** To verify a customer’s identity when registering the customer for services and when the customer uses services, and manage customer information.
- (2)** To bill for products and services.
- (3)** To prevent and respond to fraudulent or improper activities.
- (4)** To maintain, operate, and manage services.
- (5)** To conduct research and analysis of marketing data and to consider and implement marketing strategies.
- (6)** To provide, solicit, advertise, or otherwise market the Company’s or third parties’ products and services, including by analyzing customer attributes and behavioral history in order to deliver content, advertisements, and other offerings tailored to customers’ interests and preferences, etc.
- (7)** To conduct campaigns, prize promotions, and surveys.
- (8)** To improve existing products and services and to plan, research, and develop new products and services.
- (9)** To respond to inquiries and otherwise contact customers.
- (10)** To provide personal information to third parties in the manner described in this Policy.

### **3. Provision to Third Parties**

- (1)** The Company will not provide personal information it handles to any third party without the prior consent of the customer, except in the following cases:
  - A) when required by laws or regulations;
  - B) when it is necessary for the protection of the life, body, or property of an individual and it is difficult to obtain the customer’s consent;
  - C) when it is particularly necessary for the improvement of public health or the sound development of children and it is difficult to obtain the

- customer's consent;
- D) when it is necessary to cooperate with a national government agency, a local government, or a person entrusted by such entities in performing affairs prescribed by laws and regulations, and obtaining the customer's consent is likely to impede the performance of such affairs; or
- E) in other cases permitted under the applicable laws and regulations.

(2) Notwithstanding the preceding paragraph, the Company may provide personal information it handles to third parties in the following case:

- A) when the Company provides information, in a format that does not identify any specific individual, to advertising distribution companies with which the Company has a partnership, for the purpose of delivering advertisements tailored to the customer's interests and preferences, confirming the results thereof, and providing related services.

#### **4. Joint Use**

The Company will jointly use personal information as set out below:

**(1) Items of Personal Information Subject to Joint Use**

The items listed in "1. Personal Information We Collect" above.

**(2) Purpose of Use by Joint Users**

The Purposes of Use set forth in "2. Purpose of Use" above.

**(3) Scope of Joint Users**

Medical Corporation Iseikai International General Hospital (please see the details [here](#))

Medical Corporation Tokushukai Group (please see the details [here](#))

**(4) Party Responsible for Management of Jointly Used Personal Information**

CyberGene Inc., Ebisu Collage 202, 4-7-15 Ebisu, Shibuya-ku, Tokyo, Japan

Representative Director: Taiyo Suzuki

#### **5. Security Management Measures**

The Company will take necessary and appropriate measures to prevent the leakage, loss, or damage of personal information it handles and to otherwise ensure the security management of personal information.

For inquiries regarding the security management measures implemented by the Company, please contact the inquiry desk set out in Section 9 below.

## **6. Requests for Disclosure, etc.**

The Company will respond to the following requests from customers : notification of the purpose of use, disclosure of personal information or records of provision to third parties, correction, addition or deletion, suspension of use, and suspension of provision to third parties (collectively, "Requests for Disclosure, etc.").

### **(1) Notification of Purpose of Use / Disclosure of Personal Information or Records of Provision to Third Parties**

- A) Customers may, within the scope permitted by the Personal Information Protection Act and in accordance with the procedures specified in item (4) below, request that the Company notify them of the purpose of use or disclose their personal information or records of provision to third parties. However, the Company may refuse such notification or disclosure if any of the following apply:where such disclosure is likely to harm the life, body, property or other rights and interests of the customer or a third party;
- B) where such disclosure is likely to significantly impede the proper execution of the Company's business operations;
- C) where such disclosure would result in a violation of laws or regulations; or
- D) where it is not possible to verify that the request for disclosure is made by the customer himself/herself.

Please note that when requesting notification of the purpose of use or disclosure of personal information or records of provision to third parties, a fee for handling the request will be charged as described in item (4) below.

### **(2) Correction, Addition, or Deletion**

Customers may request correction, addition, or deletion of their personal information by following the procedures specified in item (4) below. In such cases, the Company will promptly investigate within the scope necessary to achieve the Purposes of Use, and, based on the results, will correct, add, or delete the relevant personal information within the scope permitted by the Personal Information Protection Act.

### **(3) Suspension of Use or Provision to Third Parties**

Customers may request suspension of the use of their personal information or suspension of its provision to third parties by following the procedures specified in item (4) below. In such cases, the Company will respond

appropriately in accordance with the Personal Information Protection Act.

#### **(4) Procedures for Requests for Disclosure, etc.**

When making a Request for Disclosure, etc., please send the Company's prescribed request form (as set out in (A) below), duly completed, together with identification documents (as set out in (B) below), by post to the address designated in (C) below. In addition, with respect to requests for notification of the purpose of use and for disclosure of personal information or records of provision to third parties, a handling fee of JPY 1,000 per request will be charged. Please remit payment to the bank account designated on the request form. Please note that the specified handling fee will also be charged even in cases where notification or disclosure is not provided.

##### **A) Request Form**

Please download the prescribed request form from the link below:  
[“Request Form for Disclosure, etc. of Personal Information”](#)

##### **B) Identification Documents**

When submitting a photocopy of your health insurance card, please black out the insurer number and the insured person's symbol/number.

###### **■ If the request is made by the customer themselves:**

- One of the following identification documents of the customer: Individual Number Card (front side only), driver's license, health insurance card, or passport (copy).

###### **■ If the request is made through an authorized representative:**

In addition to the identification documents listed above for requests made by the customer himself/herself, the following documents are required:

- Power of attorney
- One of the following identification documents of the authorized representative: My Number Card (front side only), driver's license, health insurance card, or passport (copy).

###### **■ If the request is made through a legal representative:**

In addition to the identification documents listed above for requests made by the customer themselves, the following documents are required:

- A) Documentation confirming the authority of legal representation (such as a family register extract or certificate of adult

guardianship registration)

B) One of the following identification documents of the legal representative: My Number Card (front side only), driver's license, health insurance card, or passport (copy).

C) **Mailing Address**

Ebisu Collage 202, 4-7-15 Ebisu, Shibuya-ku, Tokyo, 150-0013, Japan  
CyberGene Inc. Personal Information Disclosure Request Desk

**7. Handling of Anonymously Processed Information** The Company creates and provides to third parties anonymously processed information as described below and may continue to create similar anonymously processed information and provide it to third parties in the future.

**(1) Items of Personal Information Contained in Anonymously Processed Information**  
Gender, year of birth, and purchase history.

**(2) Method of Provision of Anonymously Processed Information**  
Transmission via email, delivery of external storage media such as CD-ROMs or USB drives, or upload to a server.

**(3) Measures to Ensure Proper Handling of Anonymously Processed Information**  
The Company implements necessary measures to ensure the proper handling of security management measures for anonymously processed information, by preparing an internal "Anonymously Processed Information Handling Manual" and handling anonymously processed information in accordance with such manual.  
For inquiries regarding anonymously processed information, please contact the inquiry desk described in Section 9 below.

## **8. Handling of Cookies**

### **(1) Use of Cookies**

Our website uses cookies and other similar technologies for tracking or analysis (collectively, "Cookies") in order to provide services that are more appropriate for customers.

#### **A) Overview of Cookies**

Cookies are small files containing arbitrary characters that are exchanged between a web server and your internet browser when you

visit a website and stored on your device. By using Cookies, the Company may collect non-personally identifiable attribute information such as browsing history, service usage history, and location information.

You can configure your browser settings to display a warning when visiting a site that uses Cookies, or to refuse the use of Cookies or delete Cookies. Please note that if you refuse or delete Cookies, some functions of the website may become unavailable.

#### **B) Use of Third-Party Collection and Analysis Services**

The Company uses Google Analytics provided by Google LLC, analytics tools provided by Meta Platforms, Inc. (including but not limited to Meta Pixel), and Mieruca services (including but not limited to Mieruca SEO and Mieruca Heatmap) provided by Faber Company Inc.

The Company receives the results of analysis of your browsing history collected by these third parties based on Cookies set by the Company or such third party and uses such information to understand usage patterns and improve our services.

For details regarding how these third parties handle data, please refer to their respective websites:

- Google: <https://policies.google.com/technologies/partner-sites>
- Meta: [https://www.facebook.com/legal/technology\\_terms](https://www.facebook.com/legal/technology_terms)
- Faber Company Inc.: <https://mieru-ca.com/privacy-policy/>

### **9. Contact**

For opinions, questions, complaints, or other inquiries regarding the handling of personal information, please contact the following:

Ebisu Collage 202, 4-7-15 Ebisu, Shibuya-ku, Tokyo, 150-0013, Japan

CyberGene Inc.

E-mail: [concierge@cybergenemed.com](mailto:concierge@cybergenemed.com)