

Privacy Policy

SPLYZA Inc. (the “Company”) sets forth this Privacy Policy (the “Policy”) regarding the treatment of information of the person (the “User”) wishing to use the services provided by the Company under the name Clipstro (the “Services”) or using the Services, including, but not limited to personal information, during the performance of the Services, as follows:

1 User's Information to be Collected and Method of Collection

For purposes of this Policy, “User's Information” means information that identifies the User, history of actions of communication services and other information created or accumulated on the User's smartphone or personal computer in relation to the User or User's devices, which shall be collected by the Company pursuant to this Policy. Depending on the method of collection, User's Information that we may collect in relation to the Services includes the following information:

(1) information collected by the Company for the use of the Services by the User

The Company may collect information upon access to or use of the Services, including:

- terminal information;
- log information;
- cookies and anonymous ID; and
- location information.

2 Purpose of Use

2.1

User's Information may be used not only for provision of the Services as provided in Section 2-2, but for other purposes as provided in Section 2-3.

2.2

Specific purposes of use of User's Information in relation to the provision of the Services shall include the following:

- (1) provision, maintenance, protection and improvement of the Services including, but not limited to, acceptance of the registration for the Services, identification of individuals, computation of use fees and disclosure to outside services which is necessary to provide the Services;
- (2) analysis of the User's preference and needs for the purpose of providing appropriate contents in the Services;
- (3) confirmation of use of the Services and confirmation or correction of User's Information by the User;
- (4) identification of the User and confirmation of use of the Services;
- (5) guidance or response to inquiries relating to the Services;
- (6) handling of a violation of rules, regulations or policies relating to the Services (the “Rules”);
- (7) notice of any modification to the Rules; and
- (8) any other purposes associated with the foregoing purposes.

2.3 Purposes other than those specified in Section 2.2 above shall include the following:

- (1) creating statistical data relating to the Services, in a form in which an individual cannot be identified;
- (2) delivering or displaying advertisements of the Company or third parties;
- (3) consideration of the Company's new service; and
- (4) other marketing.

3 Permission

The Company shall obtain consent from the User before collecting the following User's Information:

- (1) terminal information; and
- (2) location information.

4 Provision of Personal Information to Third Parties

Unless required by the Act on the Protection of Personal Information or other applicable laws and regulations, the Company shall not provide personal information contained in the User's Information to any third party without prior consent of the User; provided, however, that:

- (1) the Company authorizes such third party to handle such personal information in whole or in part to the extent necessary to accomplish the purpose of the use;
- (2) such personal information is provided through a business transfer by way of merger or other similar transactions;
- (3) the Company is required to cooperate with state or local governmental organizations or their agents to perform their duties or obligations pursuant to applicable laws and regulations, and such performance is likely to be precluded if the Company obtains the User's consent; or
- (4) the Company is entitled to disclose such personal information pursuant to the Act on the Protection of Personal Information or other applicable laws and regulations.

5 Disclosure of Personal Information

Upon request from the User for disclosure of its personal information under the Act on the Protection of Personal Information, the Company shall disclose such information to the User without delay after confirming such User's identity or notify such User of the non-existence of such personal information. Provided, however, that the Company shall not disclose such personal information if the Company is not obligated to disclose pursuant to the Act on the Protection of Personal Information or other applicable laws and regulations.

6 Correction and Suspension of Use of Personal Information

6.1 If the Company is requested by the User to (1) correct the content of personal information under the provisions of the Act on the Protection of Personal Information because such information is false, or (2) suspend use of personal information because such information is being handled beyond the scope of the purpose of use previously made public, or has been collected in a fraudulent or otherwise illicit manner, then the Company shall conduct an appropriate investigation without delay after confirming such User's identity, and based upon the

results thereof, correct the content or suspend the use of such personal information, and notify the User of such correction or suspension. If the Company determines not to correct or suspend the use of such information based on reasonable grounds, the Company shall notify the User of such determination.

6.2 In the event that the Company is requested by the User to delete its personal information and determines that it is necessary to accept such request, the Company shall delete such personal information upon confirming such User's identity and then notify the User of such deletion.

6.3 If the Company is not be obligated to correct, or suspend use of personal information pursuant to the Act on the Protection of Personal Information and other applicable laws and regulations, the preceding paragraphs 6.1 and 6.2 shall not apply.

6.4 If the User specifies a certain setting, the User is entitled to require the Company to, and the Company shall promptly, discontinue use of any or all of the User's Information, in accordance with the rules as prescribed by the Company. If such collection or use is necessary for the Services depending on the type of the User's Information, the Company may not discontinue such collection unless the User withdraws from the Services pursuant to the procedures as prescribed by the Company.

7 Inquiries

Any suggestions, questions, complaints, or other inquiries on handling of User's Information must be submitted to:

SPLYZA Inc.

Clipstro Support Team

2-12-35 Nunohashi, Naka-ku, Hamamatsu City, Shizuoka 432-8012 Japan

clipstro.support@splyza.com

8 Procedure to Amend this Privacy Policy

The Company shall from time to time review how User's Information is being handled and use its best efforts to continuously improve the operation. The Company may make modifications to this Privacy Policy as may be necessary. Any modification to this Privacy Policy shall be provided to the User by posting notices on the Company's website; provided, however that if the User's consent is required pursuant to applicable laws and regulations, such consent shall be obtained subject to the procedures as separately prescribed by the Company.

This Policy shall be executed only in the Japanese language. Japanese shall be the governing language and any translation of this Policy into any other language is for convenience of reference only and shall not bind the Company and User hereto.