

CFN-GDPR Privacy Policy Addendum

EFFECTIVE DATE: [25, 05, 2018]

LAST REVIEWED/UPDATED on: [22, 03, 2021]

I. Our Privacy Statement.

The protection of your personal data is of great importance to DISCO Inc. (“Company,” “we,” “us,” “our”).

We process the personal data of customers, including candidates who use the CFN (Career Forum.Net) platform, the visitors of our website and the contact person of our client companies in the UK or the EEA, to whom those regulations apply (referred to as a “Customer” or “you” throughout this privacy policy addendum) in accordance with the applicable EU and EU Member States’ regulations on data protection, in particular the General Data Protection Regulation 2016/679 (the “GDPR”). This privacy policy addendum explains how we, as the data controller, obtain and process your personal data and your rights in relation to our processing including a right to object to some of the processing which we carry out. This privacy policy addendum also supplements our Privacy Statement available at: <<https://www.disc.co.jp/en/privacy/>> and prevails over any conflicting provisions therein.

II. Legal Bases for Processing / Categories of Personal Data Subject to Processing

We process the following categories of your personal data based on the legal bases provided for in the GDPR (Articles 6 and 7). Further, if we process your personal data of a sensitive nature, including your religious beliefs and health status, in accordance with special criteria provided for in the GDPR (Articles 9 and 10).

1. Categories of Personal Data Subject to Processing

We collect the following data directly from you when you sign up to use our services or visit our website or platform:

- Identity and Contact Data, including a real name, nickname, alias, current address, postal address, telephone number, login ID for CFN account, email address, Skype ID, Facebook ID, work permit/visa status.
- Profile, including the languages you speak, language skill and your characteristics such as age, sex, gender, and citizenship.
- Education Information, including educational information and educational backgrounds such as university name, major category, major, degree, graduation date, GPA.
- Employment Information, including employment information and employment history such as company name, type of business, position title, period at position, job category, career level, employment type, job description, current/most recent annual income, skills and qualifications.
- Internet or other similar network activity information, including internet protocol address, IMEI, Universally Unique Identifier, cookie data, browsing history or search history of our website, referrer URL, language preference, and other information

regarding your interaction with our websites and platforms. We collect most of this information through cookies and similar technology, you can find more information about this in the cookies section below.

- Events, including the events and job fairs that you are interested in and any information you provide to us when you make a reservation or attend one of our events and job fair.
- Direct marketing preference, your direct marketing preferences.
- Other information you provide in your resume, job applications, surveys and other similar correspondence in connection with your use of our websites and online services.

Provision of your personal data is mandatory in some cases. Without you providing the required data, we would not be able to provide our service to you. Where the provision of the information is mandatory we will make it clear to you at the time we collect it.

2. Legal Bases for Processing

We process this personal data for the following purposes:

- When processing is required for the pursuit of legitimate interests: We obtain and process your personal data for the following purposes because it is necessary to do so in order to pursue our legitimate interests (for details regarding the balancing test for legitimate interests, please inquire using the contact details at Section VIII. (Contact Details) of this privacy policy addendum).
 - To send and authenticate login IDs for CFN account and passwords;
 - To send information pertaining to employment, career change, and further education from the Company or individual companies, schools and organizations, etc. which entrusted such information to the Company, to the candidates who are interested in the said individual companies, schools or organizations, etc.;
 - To conduct studies and surveys pertaining to employment, career change, higher education and study abroad;
 - To provide information considered useful for preparing to work for a company as a freshman, or for career enhancement and skills improvement;
 - To verify the contact person of our client companies which use our products and services, to confirm the Company's standards for use of products and services, and to make other types of verifications/confirmations;
 - To reply to and contact persons who have made an inquiry, registered a complaint, or requested consultation;
 - To confirm the identity of persons who make an inquiry;
 - To perform and analyze the results of market surveys for the purpose of improving existing products and services and developing new products and services; and
 - To establish, exercise or defend legal claims.
- When processing is required for the performance of or entry into a contract with you to provide services to you: We obtain and process your personal data because it is necessary to do so in order to perform contractual obligations to provide services to you.

- To provide services to members of CFN platform in accordance with the membership agreement;
 - To verify your identity;
 - To process your payment details for participating in our events and providing products and services you requested;
 - To receive and confirm reservations;
 - To notify results of our lotteries;
 - To provide customer services;
 - To perform work within the scope of the work request received from the customer; and
 - To perform office procedures and billing operations necessary in connection with providing products and services.
- When your express consent is obtained in advance: We will obtain and process your personal data for the following purposes if we have obtained your express consent in advance.
- To make notification of upcoming events, etc. in connection with events organized or operated by the Company as well as other marketing communications we think you may be interested in; and
 - To place cookies or similar technologies on your device.

You have the right to withdraw your consent at any time by the method communicated to you by us at the timing of seeking your consent. However, your withdrawal of consent will not affect the legality of processing conducted based on your consent before its withdrawal. You have an absolute right to opt-out of direct marketing at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

We do not conduct any solely automated decision-making that produces any legal or similar material effect on you.

We will notify you separately, if the provision of personal data is a statutory or contractual requirement, as well as the possible consequences of failure to provide such data.

III. Sources of Personal Data

We obtain your personal data directly from you (with respect to both online and offline interactions you may have with us or our service providers including from the devices you use to access our websites, mobile applications, and online services) or indirectly through third parties such as those stated below.

- third parties, including third parties to which you have previously provided your information such as social media platforms (e.g., Facebook)

IV. Retention Period for Personal Data

We will retain your personal data for as long as necessary to fulfill the aforementioned purposes for obtaining and processing your personal data. Specific retention periods are decided based on the following considerations: the purpose for obtaining and processing the personal data; the nature of the personal data; and the necessity of retaining the personal data for legal or business reasons.

V. Sharing and Disclosure of Personal Data

We share and disclose your personal data to the following third parties in accordance with the GDPR for the purposes stated in this privacy policy addendum.

- DISCO International, Inc., as a processor for the Company (<https://www.disc.co.jp/en/about/profile/>)
- Recruiting/hiring companies to whom you apply through the CFN services
- Marketing and sales promotion service providers
- System development and maintenance service providers

As a result of the aforementioned sharing and disclosure, in some cases your personal data will be transferred to the following third countries outside the United Kingdom and the EEA:

- Japan
- the United States
- (if you are in the EEA) the United Kingdom

In such a case, we will implement appropriate safeguards by executing with the transferee the standard data protection clauses (Article 46(2)(c) and (5) of the GDPR) approved by the European Commission. If you wish to receive a copy of documentation related to these safeguards, please inquire using the contact details at the end of this privacy policy addendum.

VI. Your Rights

You have the following rights regarding personal data obtained and processed by us.

- Obtaining information regarding processing of data: You have the right to obtain from us all the requisite information regarding our data processing activities that concern you (Articles 13 and 14 of the GDPR).
- Access to personal data: You have the right to obtain from us confirmation as to whether personal data concerning you are being processed, and, if so, then access to the personal data and certain related information (Article 15 of the GDPR).
- Rectification or erasure of personal data: You have the right to have us rectify inaccurate personal data concerning you without undue delay and the right to have us complete any incomplete personal data (Article 16 of the GDPR). Also, if certain conditions are satisfied, you will have the right to have us delete personal data concerning you without undue delay (Article 17 of the GDPR).

- Restriction on processing of personal data: If certain conditions are satisfied, you will have the right to have us restrict processing of personal data concerning you (Article 18 of the GDPR).
- Objection to processing of personal data: If certain conditions are satisfied, you will have the right to object to processing of personal data concerning you (Article 21 of the GDPR).
- Data portability of personal data: If certain conditions are satisfied, you will have the right to receive personal data concerning you in a structured, commonly used, and machine-readable format and the right to transfer those data to another controller without hindrance from us (Article 20 of the GDPR).
- Not to be subject to automated decision-making: If certain conditions are satisfied, you will have the right not to be subject to solely data-based, automated decision-making (including profiling) that produces any legal or similar material effect on you (Article 22 of the GDPR).

These rights **may be limited**, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the local data protection laws. We will inform you of relevant exemptions we rely upon when responding to any request you make.

If you intend to exercise any of the aforementioned rights, please inquire using the contact details at the end of this privacy policy addendum.

You can lodge a complaint in relation to our processing of your personal data with the Data Protection Supervisory Authority of the Member State of your habitual residence, place of work or place of the alleged infringement.

VII. Amendment to this Privacy Policy Addendum

We amend this privacy policy addendum from time to time. We will contact you through this website and by e-mail if necessary, when we make any substantive or material amendments.

VIII. Contact Details

For questions or inquiries regarding this privacy policy addendum, please contact the data controller or representative set out below.

Data Controller

DISCO Inc.

9F Iidabashi First Bldg., 2-5-1 Koraku, Bunkyo, Tokyo 112-0004 Japan

privacy-madoguchi@disc.co.jp

Representative

gdprrrepresentative@careerforum.net