

WHISTLER, Inc. Privacy Policy

Last updated: June 1, 2024

The Personal Information Protection Policy of WHISTLER, Inc. (hereinafter referred to as "the Company") demonstrates respect for the dignity of individuals and the value of their information in its handling of personal information. The Company adheres to laws, regulations, and guidelines set forth by the Personal Information Protection Commission regarding the protection of personal information, and conforms to societal norms. The Company is also committed to protecting personal information through proper management in accordance with its internal rules and regulations.

1. Company, Address and Name of the Representative

WHISTLER Corporation

3-15 Kanda Nishiki-cho, Chiyoda-ku, Tokyo 101-0054, Japan

Representative: Hiroaki Yura

2. Compliance with Laws and Regulations and Management System

The Company abides by laws and regulations concerning personal information and manages personal data appropriately. It also establishes an effective internal system and rules for the protection of personal information, and strives for continuous improvement.

3. Acquisition of Personal Information

When acquiring personal information, the Company will publicly announce or notify the purpose of use. When obtaining personal information directly from customers in contracts or other documents, the Company will clearly state the purpose of use in advance, acquire the information by legal and fair means with the consent of the person concerned, and use the information within the scope necessary to achieve the purpose of use that has been clearly stated in advance.

4. Purpose of Using Personal Information

The Company will use personal information for the following purposes:

A. Customers' Personal Information

- ① To send and provide our products, samples, etc. by way of invitation letters, e-mails, etc., and to handle prescriptions within the limit of order processing to us, and to cooperate with medical care professionals or authorities
- ② To provide customers with product guidance, instructions on usage, and support
- ③ To respond to customers' consultations, inquiries, requests (Telephone recordings of customer calls will be deleted after 12 months.)

- ④ To conduct various campaigns and questionnaires and to send prizes, etc.
- ⑤ To register for membership services, to confirm registration, and to send information and personalized reminders about services requested by customers
- ⑥ To provide nursing care services (which may not be available depending on the country of residence) and to monitor progress
- ⑦ To gain a deeper understanding of our users' experiences, behaviors and choices so that we can use the aggregated data to develop and improve our products, technologies, algorithms, communications, apps and other services
- ⑧ To provide your information to third parties who provide your medical care provider, financial assistance, or consent
- ⑨ To confirm the customer's identity
- ⑩ For other purposes of use that have been individually agreed upon

B. Personal Information of Business Partners (including healthcare professionals)

- ① To make necessary business contacts, execute contracts, conduct business negotiations, etc.
- ② To manage business partner information
- ③ Sending and providing samples, etc. within the limits of order processing to the Company
- ④ To respond to consultations, inquiries, requests, etc., and to analyze the content
- ⑤ To register or confirm registration for membership services or events (e.g., e-Learning, webinars, seminars, etc.)
- ⑥ For other purposes of use that have been individually agreed upon

C. Collection and Use of Personal Information for Recruitment and Retiree Purposes

- ① To provide information and contact applicants for recruitment and recruiting activities, and for other uses related to recruitment and recruiting activities
- ② To provide information and contact retirees

D. Personal Information about Employees

- ① For business communication
- ② For payment of compensation, personnel and labor management, and provision of benefits
- ③ For employee health care

5. Limitations on Use of Personal Information

We will not use the personal information we have acquired beyond the scope of the purposes of use outlined in Section 3. If the Company intends to use personal information for purposes other than those stated above or to change the purpose of use, the Company will always notify the customer in advance. In addition, we will

promptly and appropriately delete or dispose of any personal information that is no longer needed in light of the purpose of use.

6. Disclosure and Provision of Personal Information to Third Parties

We will not disclose or provide personal information to third parties except in the following cases:

- ① If you have the consent of the person in question
- ② Disclosure or provision of statistical data, anonymized information, or other information in a form that does not allow identification of the person concerned
- ③ When required by law
- ④ When it is necessary for the protection of the life, body, or property of an individual and it is difficult to obtain the consent of the person in question
- ⑤ Use of personal information for public health and child welfare purposes
- ⑥ When it is necessary for the national or local government to conduct public affairs, and obtaining your consent may interfere with the performance of such affairs
- ⑦ When providing information to those listed in the scope of joint users as described in Section 8 below

7. Outsourcing the Handling of Personal Information

We may outsource part or all of the handling of personal information to a third party. In such cases, we will make every effort to appropriately supervise the contractor by, for example, entering into a contract with the contractor regarding the protection of personal information. The contractors include cloud computing services, payment processing software, and ERP software. We do not sell or otherwise share personal information with these third parties for any other use. We may also provide personal information to medical care providers and authorities for the provision of medical care, financial assistance, and approval of medical care, to the extent necessary to process orders placed with us.

8. Safety Control Measures for Personal Information

We will take necessary and appropriate security control measures to prevent leakage, loss, or damage of personal data. In addition, we will provide necessary and appropriate supervision of our employees and contractors who handle personal data.

9. Disclosure, Purpose Notification, Correction, Deletion, and Suspension of Personal Information

Requests for disclosure, correction, deletion, suspension of use, etc. of personal data held by the Company will be handled after confirming that the request is made by

the person in question or his/her representative. However, requests will not be accepted in the following cases (below). In such cases, we will notify you to that effect with the reason. Please note that we may not be able to provide services that meet your request if we delete or stop using all or part of the personal data we hold.

- ① Cases in which the identity of the person whose personal data is held cannot be confirmed
- ② If the authority of representation cannot be verified when a request is made by a proxy
- ③ If the claim form is incomplete
- ④ If the retained personal information cannot be identified by the information on the request form
- ⑤ If the subject of your request does not fall under the category of retained personal information
- ⑥ If there is a risk of life-threatening harm to the body, property, or other rights or interests of the person concerned or a third party
- ⑦ Cases in which the Company is obliged to retain the information in accordance with relevant laws and regulations
- ⑧ Other cases in which we are not obligated to correct or delete personal information in accordance with the Personal Information Protection Law Protection Act

A. How to File a Claim

You may withdraw your consent at any time without charge. You will not be disadvantaged by withdrawing your consent, but you will not be able to receive any related services or benefits after your withdrawal. Consent is a prerequisite for receiving eligible services (marketing consent is required to receive promotional materials, etc.). Withdrawal of consent does not affect the legality of the processing of information based on the consent provided prior to withdrawal. You may email us at info@whistler.co.jp or write to us at:

To: Personal Information Protection Officer, Administration
3-15 Kanda Nishiki-cho, Chiyoda-ku, Tokyo
101-0054

Phone: 03-5577-7602
Business Hours: Weekdays 10:00am ~ 6:00pm

B. Documents to be Submitted

i. If you are the applicant:

- a. Letter of withdrawal
- b. Identification documents *1

ii. If the applicant is a legal representative: *2

In addition to the documents listed above under "If you are the applicant", the following are also required:

- a. Documents to verify the identity of the applicant
- b. Documents confirming the existence of legal representation

iii. If the applicant is a voluntary representative:

In addition to the documents listed above under "If you are the applicant", the following are also required:

- a. Documents to verify the identity of the applicant
- b. Power of attorney naming the representative (please affix your personal seal)
- c. Certificate of seal registration (original) of the personal seal affixed to the power of attorney

*1 Identification Documents

- 1. A. Driver's license B. Certificate of Driving Record C. Passport
D. Basic Resident Register with Photograph E. Handbook for the Physically Disabled
F. Foreign Residence Card/Zairyu Card

A photocopy of one of these items with verifiable address, name, date of birth and photo

- 2. If any of the documents in the above section 1 cannot be obtained, you may provide one document from a) to d) below and one document from e) to g) below
 - a. Health insurance card (photocopy)
 - b. Pension book (photocopy)
 - c. A copy (extract) of family register (original)
 - d. Seal registration certificate (original)
 - e. Certificate of residence
 - f. Utility bill or receipt (photocopy)
 - g. Mail addressed to the individual (photocopy)

* c. d. e. f. is within 3 months of claim date

* 2 Documents Confirming the Existence of Legal Representation

- 1. One copy of a family register, certificate of registered matters, or other document verifying eligibility within 3 months of claim date

C. Method of Response

We will respond to your request within one month of receipt of the request documents by registered mail to the address indicated on the request form.

D. Notes on Requests for Disclosure, etc.

Applications may be submitted by telephone, e-mail, or mail. If you send your application by a method that does not leave a record of delivery (e.g., regular mail) other than registered mail or specified recorded mail, we cannot be held responsible for any loss.

E. Personal Information Use: Purpose in Application for Disclosure, etc.

The personal information acquired in relation to a disclosure request will solely serve the purposes of investigation, identification, and response, as required by the request. Documents requested will not be returned, but will be securely managed, stored, and promptly disposed of upon completion of the response.

10. Revisions

We may revise our Privacy Policy from time to time in order to more securely protect personal information or to comply with changes in laws and regulations.