

Privacy Policy

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1. Introduction

Your rights to privacy and to protect your personal information are important to Business Consultants, Inc. (“BCon Japan”) and each member of its affiliate companies ([which are listed in “Overseas Office” here](#); individually or collectively with BCon Japan, “BCon” or “we”). We recognize that when you provide us with information about yourself, you trust us to act in a responsible manner. BCon will collect and process your personal data in the context of our services including, but not limited to, diagnostic services and any other products and services with which we provide you through our websites (“Services”) in accordance with this Privacy Policy (this “Policy”).

Although our websites may contain links to third-party websites, BCon is not responsible for the privacy practices followed by non-affiliated companies.

2. Definition of “Personal Data”

“Personal Data” as used in this Policy means any information relating to an identified or identifiable natural person. Personal Data includes for example your name, your mailing address, your telephone number, your e-mail address or other

information that identifies you or makes you identifiable.

3. Information We Collect

We collect your Personal Data when (i) you are browsing our websites, (ii) you submitted forms, (iii) you created a user account and (iv) we received it from other members of BCon. For each different type of activity, we collect and store different types of data for the following reasons. Further, when we use cookies, [Cookie Policy](#) shall be part of this Policy.

(i) Browsing

When you are browsing or navigating through our websites, we automatically collect information about your computer and the pages you visit on our websites. This information may include, but is not limited to, browser and device information (i.e. IP Address), data collected through automated electronic interactions, application usage data (i.e. Session ID and User Agent), content information based on your individual interests, demographic information, geographic or geo-location information, statistical and aggregated information.

The purposes of BCon's use of the Personal Data shall be as follows:

To create research, an analysis or a report by us to enable us to improve the navigation and structure or the contents of our websites so that we can provide more value when a visitor finds information more quickly or when they find what they are searching for on our websites. The lawful basis for these uses is your consent or, where permitted by law, to pursue our legitimate interests in improving our Services and giving you the best experience.

The provision of such Personal Data is not a legal requirement and you are not obligated to provide it; however, if required information, like browsing history, has not been provided, this may lead to an inability to provide, in whole or in part, our Services provided on our websites. For details of information collection, please refer to our Cookie Policy.

(ii) Submitting Forms

Specific pages of our websites include an exclusive form by which you provide contact information such as name, phone number and e-mail address. In particular, when we provide you or your organization with our diagnostic services, you may be required to provide us with your IP Address, Strictly Necessary Cookies, your answers to the questions and some relevant information including, but not limited to, department, position and sex.

The purposes of BCon's use of the Personal Data shall be as follows:

1. To provide you or your organization with our Services, in particular, diagnostic services in which we statistically analyze your answers to the questions and provide the result to you or your organization;
2. To enable you to transmit inquiries, information and feedback concerning our Services;
3. To meet your request for free consultation;
4. To enable you to receive survey result; and
5. With your consent, to provide you with various kinds of information related to our business, which aims to be of interest to you and your organization (including marketing information).

The lawful basis for these uses is to perform our contract with you, to comply with our legal obligations, to pursue our legitimate interests in improving our Services and giving you the best experience (in our diagnostic services, this applies to your IP Address, Strictly Necessary Cookies), or your consent (in our diagnostic services, this applies to your name, e-mail address, your answers to the questions and some relevant information including, but not limited to, department, position and sex).

Whether to provide the required information or not will be absolutely left to your determination. The provision of such Personal Data is not a legal requirement and you are not obligated to provide it. However, if the required information has not been provided, this may lead to an inability to provide, in whole or in part, our Services (such mandatory information is indicated in the relevant forms).

BCon keeps all information directly collected confidential and will use the information only for the particular purpose stated at the point of collection. BCon will seek your specific permission for any additional use. You may also unsubscribe from mailing lists on any of our site anytime. To unsubscribe from our mailing lists, please contact us at crm@bcon.co.jp. BCon will never barter, trade, or sell access to your information without your specific consent.

(iii) Creating a User Account

When setting up an account on our websites, BCon may request the provision of Personal Data such as name, e-mail address and phone number. Furthermore, BCon may request entry of payment method details and an accurate address.

The purposes of BCon's use of the Personal Data shall be as follows:

1. To manage your information when you take part in an event to be held by BCon or its business partners and to provide their products and services upon the request of the visitor;

2. When you purchase our Services, to appropriately provide or deliver the said Services or to conduct a billing operation;
3. To contact you with respect to the account or a transaction with BCon and to transmit any changes in BCon's policy including this Policy;
4. To provide support such as product updates, a change of service or any other similar information; and
5. With the visitor's consent, to convey information relating to the function of our websites, the release of a new product and service development, or to advertise our Services

The lawful basis for these uses is to perform your contract with you or your consent.

The provision of some of the above information is a requirement necessary for concluding a contract, by which BCon will provide Services to you. If the required information has not been provided, this may lead to an inability to provide, in whole or in part, our Services (such mandatory information is indicated in the relevant forms).

Any User Account data will be stored only until you decide to terminate your User Account. In case we are obliged to further store your Personal Data due to statutory retention requirements, your Personal Data will be barred from further use by BCon and will be stored only until such retention periods expire.

(iv) BCon Intercompany Transfer

When each member of BCon provides you or your organization with our diagnostic services, it provides BCon Japan with your Personal Data such as answers to the questions, name, e-mail address, department, position and sex.

The purposes of BCon's use of the Personal Data shall be as follows:

To provide you or your organization with our diagnostic services in which BCon Japan, as an analytics vendor, statistically analyzes your answers to the questions and/or generate individual reports for each respondent, on behalf of other members of BCon, and provide the result to you or your organization. The lawful basis for these uses is to perform our contract with you, to comply with our legal obligations, to pursue our legitimate interests in improving our Services and giving you the best experience, or your consent.

BCon Japan is located in Japan, which is recognized by the European Commission as providing an adequate level of data protection.

4. How We Treat Your Information

BCon understands the need for user privacy and maintains reasonable and appropriate security procedures to protect your information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the Personal Data. The access given to employees is restricted to their need for such information for business purposes.

In addition to the intercompany transfer referred to in the Section 3. (iv) above, we share your Personal Data with third-party vendors, consultants and other service providers (for example analytics vendors who support our provision of diagnostic services) to perform tasks on our behalf within the scope and extent as described in the Section 3 above. All of our service providers are located in Japan, which is recognized by the European Commission as providing an adequate level of data protection.

(i) Data Retention Policy

BCon deletes the Personal Data in principle within one (1) year after the Services are completed. We may retain Personal Data for longer than the duration as the purpose of the collection reasonably and appropriately requires should we need to retain it to protect ourselves against legal claims, use it for analysis or historical record-keeping, or comply with our information management policies and schedules when laws applicable to BCon require. If you request that we delete your Personal Data, BCon will make reasonable attempts to delete all instances of the information in its entirety. For requests for access, corrections, or deletion, please refer to the “Contact Us” section of this Policy.

(ii) User Forums

You should be aware that whenever you publicly disclose information online, information could be collected and used by others. BCon is not responsible for any action or policies of any third parties who collect information that users publicly disclose in any such forums on our websites.

(iii) Minor Protection

In case that personal information of a minor whose age is not more than 20 years old is required to be collected or maintain, BCon shall seek consent from a person who exercising parental power as it deems appropriate.

5. Rights of Users who are in the member states of the EU and the three EEA/EFTA states – Iceland, Liechtenstein and Norway (collectively, the “EU”)

Under the EU General Data Protection Regulation (“GDPR”), if you are in the EU, you shall have the following rights:

1. Right of access

You shall have the right to obtain from BCon access to your Personal Data and relevant information such as their purpose of the processing, the categories of the Personal Data concerned, the recipients to whom the Personal Data have been or will be disclosed, the envisaged period for which the Personal Data will be stored, etc.

2. Right to rectification and right to erasure

You shall have the right to obtain from BCon the rectification of inaccurate Personal Data or the erasure of your Personal Data under certain conditions.

3. Right to restriction of processing

You shall have the right to obtain from BCon restriction of processing under certain conditions.

4. Right to data portability

You shall have the right to receive your Personal Data in a structured, commonly used and machine-readable format and shall have the right to transmit the said data to another controller under certain conditions.

5. Right to object

You shall have the right to object against BCon, at any time, to the processing of your Personal Data.

6. The right to lodge a complaint with a supervisory authority

You shall have the legal right to lodge a complaint with a data protection authority, in particular in the member states of the EU where you have a habitual residence or place of work or where the alleged infringement of the GDPR took place.

As above, you have the right to object at any time to the processing of your Personal Data which is based on our legitimate interests, including “profiling” (i.e. analyzing or predicting your behaviour based on your information). When we process your Personal Data for direct marketing purposes, you have an absolute right to opt out of such processing.

To help protect your privacy and security, we will take reasonable steps to verify your identity before responding to your request. We will make reasonable attempts to promptly investigate, comply with, or otherwise respond to your requests as may be required by applicable law. Different laws may prevent us from providing your

Personal Data or otherwise fully complying with your request depending upon the circumstances and the request, such as, for example, where producing your information may reveal the identity of someone else. BCon reserves the right to charge an appropriate fee for complying with your request where allowed by applicable law, and/or deny your requests where they may be manifestly unfounded, and/or excessive, or otherwise objectionable or unwarranted under applicable law.

You shall also be entitled to revoke, at any time toward the future, the consent you have given to BCon concerning the processing of Personal Data.

If you would like to exercise any of your rights stated above, please contact us at crm@bcon.co.jp.

6. Privacy Policy Updates

If we make material changes to this Policy that increase our rights to use Personal Data that we have previously collected about you, we will notify you of such changes either through an e-mail to your registered e-mail address or by prominently posting information about the changes on our sites.

7. Contact Us

If you have any questions about our Privacy Policy and Cookie Policy, please contact us.

Data controller:

Business Consultants, Inc.

Global Network Division

8F, Akihabara Center Place Bldg 1 Kanda-aioimachi,

Chiyoda-ku, Tokyo, JAPAN 101-0029

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