

VERBEX PLATFORM PRIVACY POLICY

1. Introduction

Hishab Japan Inc. (hereinafter referred to as "company") has established the following privacy policy (hereinafter referred to as "this policy") regarding the handling of personal information, including the personal information of customers of the products and services (hereinafter referred to as "our services") that our company provides.

2. Company Name, Address and Name of Representative

Hishab Japan Inc., a leading innovator in its field, is headquartered at 1st Floor, Shoto Grand Hills, Kamiyamacho 25-2, Shibuya-ku, Tokyo 150-0047. The company operates under the leadership of its esteemed President and CEO, Mio Ahmed, who has been instrumental in driving its vision and growth.

3. Compliance with applicable laws and regulations:

Hishab Japan Inc. complies with all applicable laws and regulations of Japan, including but not limited to those governing the protection of personal information. Furthermore, it adheres to the guidelines issued from time to time by relevant authorities of Japan to ensure the proper and secure handling of personal data in accordance with Japanese law.

In any event, if any provision of this policy contradicts with any applicable laws of Japan, then the Japanese law shall prevail in respect of the clause in contradiction.

4. Acquisition and Use of Personal Information

When acquiring personal information, the Company will publicly announce or notify the purpose of use. When acquiring personal information directly from the individual through a contract or other document (including electromagnetic records), the Company will clearly state the purpose of use in advance and acquire the information through lawful and fair means.

The Company will use personal information appropriately in compliance with law and within the scope necessary to achieve the purpose of use. Furthermore, the Company shall ensure that all steps taken in acquiring, handling, and using personal information strictly adhere to the guidelines and requirements of the applicable laws and regulations of Japan.

5. Purpose of Use of Personal Information

The company uses the personal information it collects for the following purposes including but not limited to:

- i Customers using our services:
 - a. To communicate and facilitate the provision and operation of our services.
 - b. To respond to inquiries and requests from customers.
 - c. To verify identity and ensure authentication for service access.
 - d. To provide guidance and deliver our services.
 - e. To fulfill contractual obligations, including shipping products and delivering services.
 - f. To notify customers of important updates, maintenance, or changes related to our services.
 - g. To enable users to view, update, or delete their registered information and track usage status.
 - h. To generate anonymized statistical data for analysis.

- i. To provide information about events such as seminars and exhibitions hosted or attended by us.
 - j. To conduct surveys, such as customer satisfaction questionnaires.
 - k. To share newsletters and company updates.
 - l. For purposes incidental to the above-mentioned activities.
 - m. For any other purposes to which the customer has expressly consented.
- ii Business partners:
- a. To manage relationships with our business partners.
 - b. To facilitate communication essential for business operations.
 - c. To fulfill contractual obligations.
 - d. To support other business development and sales activities.
- iii Shareholders:
- a. To organize and manage shareholder meetings.
 - b. To handle stock-related affairs.
- iv Employees:
- a. To manage personnel and labor-related matters.
 - b. To process remuneration, social insurance, and employee benefits.
- v Individuals making inquiries:
- a. To respond effectively to their inquiries and requests.

6. Provision of Personal Data to Third Parties

The company handles personal data appropriately and only to the extent necessary to achieve the intended purposes. Except in the circumstances described below, the company shall not provide personal data to any third party without obtaining the prior consent of the individual concerned:

- a. When required by law or regulations, including ordinances;
- b. When it is necessary to protect an individual's life, body, or property, and obtaining prior consent is impractical;
- c. When it is necessary for public health or the sound growth of children, and obtaining prior consent is impractical;
- d. When it is necessary to cooperate with a national or local government agency or an entity entrusted by such an agency to perform legally prescribed duties, and obtaining consent may hinder the execution of those duties;
- e. When providing personal data to an academic research institution or equivalent organization, provided that the data is handled for academic research purposes and that it does not unjustly infringe on the rights and interests of individuals;
- f. When prior notification or public announcement of specific details has been made in accordance with the law.
- g. For reasons of national security.

In all cases, company will take necessary measures to ensure compliance with the applicable laws of Japan. Any disclosure will comply fully with applicable laws and guidelines to safeguard the rights and privacy of individuals.

7. Situations in Which the Recipient of Personal Data Does Not Fall Under the Category of a Third Party

- i Entrustment of Data Handling:
 - a. Purpose: When the company entrusts a third party with the handling of personal data, it will only be to the extent necessary to achieve the stated purpose of use, such as for processing, managing, or maintaining personal data etc. on behalf of the company.
 - b. Agreement: A formal data processing agreement will be executed between the company and the third party, outlining the data handling responsibilities of the third party, including confidentiality, security measures, and the requirement to comply with applicable laws of Japan. The company will ensure the third party implements adequate technical and organizational measures to ensure the protection of the personal data.
- ii Business Succession:
 - a. Purpose: Personal data may be transferred in the event of a business succession, including mergers, acquisitions, corporate restructuring, or other organizational changes.
 - b. Notification: In such cases, the company will notify the individuals concerned or make a public announcement, informing them about the transfer of their personal data and the intended purpose of its use. The personal data will continue to be used in line with the original purpose for which it was collected, unless new consent is obtained from the concerned individual(s).
 - c. Safeguards: The company will take necessary steps to ensure that the transfer and further processing of personal data during business succession comply with all applicable Japanese laws.
- iii Joint Use of Personal Data:
 - a. Purpose: Personal data may be used jointly with specific parties for legitimate business purposes.
 - b. Notification/Transparency: In these cases, the company will ensure that the following information is either notified to the individuals concerned in advance or made easily accessible:
 - The fact that personal data will be used jointly by the company and other specific parties.
 - The specific categories of personal data involved in the joint use.
 - The scope of the parties involved in the joint use, including their names or titles.
 - The purposes for which the joint users will use the personal data.
 - The name or title of the individual or entity responsible for managing the jointly used personal data.
 - c. Compliance: The company will ensure that all joint users adhere to the data protection regulations of Japan and implement appropriate security measures to prevent any misuse or unauthorized access to personal data.
- iv Additional Safeguards for Sensitive Data:
 - a. Purpose: If personal data involves sensitive categories, such as biometric data or data concerning children, the company will take additional precautions.

- b. Consent: Explicit consent will be obtained from the individual (or their legal guardian, where applicable) before collecting, processing, or disclosing sensitive data.
 - c. Security Measures: The company will apply enhanced security measures to protect sensitive personal data, including encryption, access controls, and audit trails, to ensure the data is not exposed to unauthorized access or misuse. These measures will comply with best practices in data security as required under applicable Japanese laws.
- v Cross-Border Data Transfers:
- a. Purpose: If personal data is transferred outside Japan for processing or storage, the company will ensure that the recipient complies with data protection standards in accordance with the laws of their local jurisdiction as well as the applicable Japanese laws.
 - b. Notification: Individuals will be informed transparently about the transfer of their data to countries outside of Japan, including the name of the recipient, the country to which the data is being transferred, and the measures taken to protect their data during the transfer process.
 - c. Compliance with Local and International Laws: The company will ensure that any data transfer outside of Japan complies with the applicable laws of Japan as well as the laws of the country where the data is stored. If the recipient country does not have adequate data protection laws, the company will take additional measures to ensure the protection of the transferred data, such as entering into standard contractual clauses with the recipient.

8. Matters concerning safety control measures:

The company will take necessary and appropriate safety control measures to manage personal data, including preventing leakage, loss, or damage. The company will also provide necessary and appropriate supervision to employees and contractors who handle personal data. The outline of the safety control measures is the formulation of basic policies, the implementation of organizational safety control measures, human safety control measures, physical safety control measures, and technical safety control measures, as well as understanding of the external environment. For specific details of the safety control measures, the company will respond without delay if you contact the company via the inquiry desk below.

9. Request for disclosure of personal information

In accordance with the applicable laws of Japan, when an individual makes a request to disclose, correct, add, delete, suspend the use, erase, suspend the provision to a third party, or request notification of the purpose of use of their personal data held by the Company, the Company will take the following steps to ensure compliance:

- i Verification of Identity:
 - a. The Company will verify that the person making the request is the individual concerned or a person authorized to act on their behalf. This will be done by following the prescribed procedures, including requesting appropriate identification or authorization documents.
 - b. The company will ensure that the verification process does not infringe on the individual's privacy or security.

- ii Handling of Requests:
 - a. Upon successful verification, the Company will respond to the request within a reasonable period and in accordance with the requirements of applicable laws, if any.
 - b. The Company will provide the individual with a clear response, including the results of the request (e.g., disclosure of personal data, corrections made, or reasons for any refusal).
 - c. In cases where the request is denied, the company will inform the individual of the reasons for refusal and the recourse available, including how to challenge or escalate the decision.

- iii Notification of Purpose of Use:

If a request is made to notify the individual of the purpose for which their personal data is being used, the Company will provide clear and easily accessible information about the purpose of use, unless there is a legal exception.

- iv Compliance with Legal Exceptions:

The Company will not fulfill a request where providing disclosure, correction, or other requests would violate the rights of other individuals or national security.

- vi Timeframe and Fees:
 - a. Unless otherwise stated in any applicable laws, the Company will respond to requests within a reasonable timeframe, generally within 30 days of receiving the request.
 - b. Any fees for processing requests, if applicable, will be communicated in advance, in line with the law.

The company is committed to handling all personal data requests in a timely, secure, and transparent manner, ensuring compliance with applicable laws and protecting the privacy of individuals.

10. Changes to this Privacy Policy

The Company will review its operations regarding the handling of personal information from time to time, strive for continuous improvement, and may change the contents of this Policy as necessary.

11. Contact Us

Hishab Japan Inc. Personal Information Protection Manager Please contact the company via the inquiry page.

Established on 27th January 2025

Hishab Japan Inc.

President and CEO Mio Ahmed

12. Use of Cookies

Some of the content on this company site uses cookies to improve our services and provide you with more tailored services.

i What are cookies?

Cookies are a mechanism for storing information about your visit to our company site on your computer (or on devices that can connect to the Internet, such as smartphones and tablets). Cookies allow the company to obtain information such as the date your computer visited the company site, the number of visits, and the pages visited. This also saves you the trouble of having to enter information on inquiry forms and other pages every time you access the company site. If a company obtains your personal information through cookies, that information will be treated as personal information. For information about how companies handle personal information, please refer to our privacy policy page. You can also disable the cookie function by changing your browser settings. Disabling the cookie function will not affect your use of our company site.

vii What do company use cookies for?

Company use cookies to understand how you use the content on our company site and to improve our company site. Some of the cookies company uses are session cookies, which last until you close your browser. Other cookies are persistent cookies that are stored on your computer for a longer period of time.

viii How to reject or delete cookies

If you wish to reject or delete cookies, you can set your browser to reject or block cookies set by you or by the company sites of third-party suppliers. Please consult the help function in your browser for further information on how to do so. Please refer to the manual for your mobile phone device for information on its use of cookies and how to reject or delete cookies. Please note that even if you reject the use of cookies, you may still visit our company site, but some functions may not function properly.