

# Privacy policy

## Introduction

Koeru Global Inc. (hereinafter referred to as "Koeru Global") attaches great importance on the protection and security of your personal data, sensitive (special categories) personal data and non-personal data.

Therefore, Koeru Global strives to devote its attention to and protect the privacy of each data subject. Staying worthy of the trust of a data subject in Koeru Global is what Koeru Global ought to achieve as a matter of its responsibility by putting utmost efforts on a daily basis to yield the trust.

The steps taken by Koeru Global in the field of privacy, the state of compliance with the Act on the Personal Information Protection (Year 2003 Law No.57)(hereinafter referred to as the "Personal Information Protection Law") and other applicable laws in and outside of Japan, and important information that a data subject needs to know when using the platform, solution, systems, services and websites of Koeru Global.

## Definitions No. 1

"Koeru group of companies" / "Koeru " all references in this Privacy policy to Koeru Global include Koeru Global and its parent, subsidiary and affiliated companies. All references to "us" or "we" refer to Koeru, including but not limited:

Koeru Inc. (Koeru), a company incorporated and operating pursuant to the legal

Koeru Global Inc. (Koeru Global), a company incorporated and operating pursuant to the legal

Koeru LLC. (Koeru Vietnam), a company incorporated and operating

"Koeru systems and platforms" means all the Koeru systems and platforms and services which are provided by Koeru, to natural or legal persons, i.e. clients, users, respondents, panellists, website visitors, other parties, third-parties and etc.

"Services" means services of Koeru systems and platforms which are provided by Koeru to natural or legal persons, i.e. clients, users, respondents, panellists, website visitors, other parties, third-parties, etc.

"Day" means any business day, which is not Saturday or Sunday or national holiday.

## Definitions No. 2

"Personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or

indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Special categories of personal data” means sensitive personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

“Non-personal data” means any information and data which is not personal data, and from which it is not possible to identify a data subject.

“Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Data subject” means an individual person whose personal data and special categories of personal data was processed / is processed / will be processed by a data controller and / or data processor.

“Data controller” means:

Koeru or any of company which belongs to Koeru indicated in Section “Definitions No. 1” in definition “Koeru”;

Natural or legal person, which orders services of Koeru systems and platforms, and which, alone or jointly with others, determines the purposes and means of the processing of personal data, and who receives and processes personal data in Koeru systems and platforms in individual cases when Koeru helps / doesn` t help to process personal data.

“Data processor” means:

a natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller (Koeru). Currently Koeru uses below indicated data processors which help to process personal data:

Amazon (AWS) <https://aws.amazon.com/> (server provider)

Interneto vizija <https://klientams.iv.lt/> (server provider)

Google <https://www.google.com/> (service provider)

Microsoft <https://www.microsoft.com/> (service provider)

Koeru or any of the company which belongs to Koeru indicated in Section “Definitions No. 1” in definition “Koeru” which processes personal data on behalf of the data controller, when the data controller orders services of Koeru systems and platforms.

“Consent of the Data subject” means any freely given, specific, informed and unambiguous

indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

"Personal data breach" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

"General data protection regulation" means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR").

### **Information we collect**

When a data subject visits Koeeru websites, Koeeru collects and stores information about the data subject, data subject's computer and / or device. More about this you can read in Cookies policy on <https://www.Koeeruintcdn.com/cookies-policy/>. Basically, Koeeru collects: IP address, the website from which you access our website, http answer code, data and time of access, etc.

Personal data about Koeeru employees: e-mail, telephones No., name, surname, postal code, date of birth, country, address, gender, bank account details, wage, CV (curriculum vitae), photos, payments details, education data, holidays, etc. Personal data about data subjects, who apply to open positions in Koeeru (<https://www.Koeeruintcdn.com/job-career/>): e-mail, telephones No., name, surname, postal code, date of birth, country, address, gender, CV (curriculum vitae), motivational letter, education data, experience data, hobbies, other skills, etc.

Non-personal data – metadata (data / information that provides information about other data), when the data subject uses Koeeru websites or services, such as: status, creation date and time, last modification date and time, files names, type, size, various identifiers, etc.

Personal data when data subject contacts Koeeru: name, e-mail, request, message content, consents, etc.

When Koeeru conclude business (cooperation) relations, orders or agreements, Koeeru processes: company name, address, registration number, e-mail, bank account details, telephone No., VAT No., addresses of company's websites, details of payments, data on services provided, name and surname of authorized representative, signatures, etc.

When a data subject (if it is legal person) creates an account (including cases when Koeeru creates an account by data subject request) to use services of Koeeru systems and platforms or apply for the provision of other services, Koeeru might collect: e-mails, telephone No., user

names, passwords, company's name, addresses, registration number, bank account details, VAT No., addresses of company's websites, details of payments, data on services provided, postal code, data about company's employees, contact data of company's data protection officer, contact data of company's representative, signatures, etc.

When a data subject (if it is natural person) creates an account (including cases when Koeeru creates an account by data subject request) to use services of Koeeru systems and platforms or apply for the provision of other services, Koeeru might collect: e-mail, telephone No., user name, password, name, surname, postal code, date of birth, country, address, gender, bank account details, etc.

Personal data when data subjects (such as panellists, respondents and others users and members), register to participate in Panels, Surveys, market research, public opinion polls and other market research activities: user name, password, e-mail, gender, age, postal code, country, phone number.

Personal data and special categories of personal data when data subjects (such as panellists, respondents and others) respond to Koeeru questionnaires: region where work, type of work, shopping habits, travels, data about education, political view, religion view, health, languages, etc.

When data subject participates in rewards systems and intends to get rewards, Koeeru processes: e-mail, name, surname, bank details, user name, passwords, number of projects that they participated in, etc.

Information about the operations and services performed with Koeeru systems and platforms and other Koeeru products, such as: what services have been used, how much time, for what purpose, etc.

### **Purposes for which we process information**

Koeeru processes personal data, sensitive (special categories) personal data and non-personal data for purposes of:

Market and public opinion research;

Customers and consumer's insights;

Loyalty and rewards programs;

Provide statistical information;

Provide data collection, processing and reporting solutions;

Submitting the best deals and get acquainted with Koeeru services;

Administer and manage agreements, orders, projects, other documents, services, etc.;

Implementation the requirements and provisions of the legislation;

Quality control purposes of performed services by Koeeru.

### **Period of storage of information**

Koeruru stores your personal data, sensitive (special categories) personal data and non-personal data for no longer than it is required by the data processing goals or is stated in legal regulations if there is a longer data duration provisioned. We aim not to store outdated or irrelevant information and ensure that personal data and other information would be updated consistently and correctly.

The term of data storage may be from 1 (one) to 10 (ten) years, unless the law specifies and / or is agreed otherwise.

For example:

Koeruru stores personal data about data subjects, who apply to open positions up to 1 (one) year, unless agreed otherwise;

Koeruru stores personal data about Koeruru employees up to 10 (ten) years, unless agreed otherwise;

When data subject creates an account to use services of Koeruru systems and platforms, Koeruru stores this data usually 3 (three) years, unless agreed otherwise, etc.

Koeruru periodically reviews all stored data and makes sure that inaccurate or out-of-date data is not processed.

### **Use of personal data of minors**

The website of Koeruru, the services of systems or platform and other services of Koeruru are not intended for persons under 16 years of age.

Koeruru complies with the Act on the Personal Information Protection and other laws of Japan and, to the extent necessary, the General Data Protection Regulation.

Therefore, according to the position taken by Koeruru, persons who are under 16 years of age are not permitted to have access to the website of Koeruru or use the services of Koeruru.

At Koeruru, the information and data from/about persons under 16 years of age are not collected. Those persons under 16 years of age who wish to have access to the website of Koeruru or wish to use the services or other activities of Koeruru must present the consent and permission of their guardians and fulfill the other requirements stipulated in the Act on the Personal Information Protection ( and, to the extent necessary, the General Data Protection Regulation).

In the event of the revelation that a person under 16 years of age has inappropriately provided information to Koeruru, the incident will be notified from Koeruru to the guardians or legal representatives of such person under 16 years of age, and the personal information of the person under 16 years of age will be deleted from the records of Koeruru.

## **Legal grounds for using your personal data**

Koeeru shall use your personal data only where we have a legal ground to do so. We determine the legal grounds based on the purposes for which we have collected and used your personal data. In every case, the legal ground will be one of the following:

"Consent by data subject: for example, where you have provided your consent to create an account to use services of Koeeru systems and platforms. You can withdraw your consent at any time.

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Legitimate interest of Koeeru: A case in point is when any need arises to ascertain the quality of the services. For instance, we have a legitimate interest for an analysis of which services are used by the data subjects. Koeeru has a legitimate interest to determine which of the services is likely to catch the attention of the clients or the customers, etc. Also, in order to comprehend the ways the website of Koeeru is used, Koeeru analyzes which ones of the contents of its website are looked at.

Performance of a contract / agreement with you (or in order to take steps prior to entering into a contract with you): for example, Koeeru offers services and you are going to pay fees for services. For this we need to use your contact details, etc..

Implementing other contracts and agreements under which personal data are processed.

Compliance with law: in some cases, we may have a legal obligation to use or keep your personal data.

## **Principles of data processing**

Koeeru ensures that personal data, sensitive (special categories) personal data and non-personal data shall be:

processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

"collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation');

accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

kept in a form which permits identification of data subjects for no longer than is necessary for

the purposes for which the personal data are processed ('storage limitation'); processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

### **Implementation procedure of data subject rights**

Koeeru ensures that according to the General data protection regulation would be implemented all rights of data subjects:

Right to be informed (General data protection regulation Art. 13 and 14);

Right to access (General data protection regulation Art. 15);

Right to rectification (General data protection regulation Art. 16);

Right to erasure (Right to be forgotten) (General data protection regulation Art. 17);

Right to restriction of processing (General data protection regulation Art. 18);

Notification obligation (General data protection regulation Art. 19);

Right to data portability (General data protection regulation Art. 20);

Right to object (General data protection regulation Art. 21);

Automated decision – making (General data protection regulation Art. 22).

"If you would like to implement any of these rights, or if you think that we process incorrect personal data about you, or you have any other questions regarding your rights, please contact by e-mail [data-protection@koeeru.com](mailto:data-protection@koeeru.com).

We will deal with your request within 30 days. If your request is complicated or if you have a large number of requests, it may take us longer. We will let you know if we need longer than 30 days to respond. If you ask us to delete your personal data or restrict how it is used, there may be exceptions to the right to erasure for specific legal reasons which, if applicable, we will set out for you in response to your request. We also have to inform, that we need specific information from you to help us confirm your identity, so please fill in all required information about you and submit your request as clearly and understandable as possible."

If you are unable to resolve the issues with Koeeru and if Koeeru engagement or a lack there of worries you that this privacy report or legal regulations requirements are not being adhered to, you have the right to contact State data protection inspectorate of the Republic of Lithuania (supervisory authority) or other institutions which are responsible for the supervision and control of legal acts which regulate personal data protection and implementation of data subjects rights.

## **Security of your personal data**

Koeeru has implemented appropriate technical and organisational controls to protect your personal data against unauthorised processing and against accidental loss, damage or destruction.

But we must inform, that you are responsible for choosing a secure password when we ask you to set up a password to access parts of our sites, Koeeru systems and platforms. You should keep this password confidential and you should choose a password that you do not use on any other site. You should not share your password with anyone else, including anyone who works for us. Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data once with us.

If you suspect that passwords have been compromised, please inform about this immediately by e-mail [info@Koeeruint.com](mailto:info@Koeeruint.com) and / or [data-protection@koeeru.com](mailto:data-protection@koeeru.com).

## **International data transfers**

"Data we collect may be transferred to, stored and processed in any country or territory where any of Koeeru companies exist or service / servers providers (data processors) are based or have facilities. While other countries or territories may not have the same standards of data protection, Koeeru will continue to protect personal data that we transfer in line with this privacy policy and other procedures by Koeeru.

Whenever we transfer your personal data out of the European Economic Area (EEA), we ensure similar protection and put in place at least one of these safeguards:"

We will only transfer your personal data to countries that have been found to provide an adequate level of protection for personal data;

We may also use specific approved contracts with our service providers, servers' providers, data processors, data sub-processors, that are based in countries outside the EEA. These contracts give your personal data the same protection it has in the EEA;

We have informed the supervisory authorities about these transfers if applicable;

We have received all necessary permissions and consents for transferring of personal data.

Koeeru informs you that for proper provision of services, your personal data may be accessed by the Koeeru companies having respective data processing agreements in place between the companies..

In most cases, Koeeru only provides non-personal data to other countries.



### **Who we share your personal data with**

Depending on where you live, we may share your personal data but just in exceptional cases. We do not share your personal data with other people or organisations that are not directly linked to us except under the following circumstances:

We may reveal your personal data to any law enforcement agency, court, regulator, government authority or other organisation if we are required to do so to meet a legal or regulatory obligation, or otherwise to protect our rights or the rights of anyone else;

We may reveal your personal data to any other organisation that buys, or to which we transfer all, or substantially all, of our assets and business. If this sale or transfer takes place, we will use reasonable efforts to try to make sure that the organisation we transfer your personal data to uses it in line with our privacy policy;

We may share your personal data in other specific cases, when we have the right to provide this data, and the other party has the right to receive this data;

We will not share your personal data with anyone else in other cases unless we have your permission / consent to do this.

### **Concepts and meanings of your consents**

In Koeeru systems and platforms and services, you can see the consents and permissions which we ask you to mark.

In below we provide a broader and more detailed explanation of these consents and permissions:

“I agree to the Privacy Policy and Terms and conditions” and “By clicking “Register” I agree to the Privacy Policy, Security Policy, Cookies Policy, DPO, Quality documentation and Terms of Use and I confirm that before I have read all these documents“ means that you have read all these documents and you agree with the content and conditions set in these documents.

“I agree to participate in surveys and other market research activities” means that you freely and indecently agree to provide your opinion, personal data, answers to various questions which we ask in surveys and questionnaires and you can get a reward for it.

“I agree to the collection and / or sharing of my mobile advertising identifiers or other identifiers” means you agree to help us analyse your information better, more detailed, clearly understand your answers and provide better services.

“I agree to the use of third-party cookies for market research purposes” means you agree to get more special targeted and relevant surveys which should be more interesting for you.

“I agree to share my profile information with third-parties for market research purposes”

means you agree to get more surveys from our partners, from other parties, and also it means that you might get more rewards for this. When profile data can be shared, then the surveys should be more relevant to you.

“I agree to share my sensitive data for market research purposes” means you agree that in surveys there could be questions about your special categories of personal data. In this case, surveys would be more adapted for you and more informative for us. It is likely that you will receive more surveys that are relevant to you.

“I agree to get newsletters and notifications” means you agree to get information from us about our services, offers, suggestions, news and changes.

Most of your consents can easily be revoked at any time by writing an email to [data-protection@koeeru.com](mailto:data-protection@koeeru.com), or you can easily revoke most of your consents in Koeeru systems and platforms by yourself.

#### **Data protection officers (DPO)**

In adherence to the General Data protection regulation, Koeeru has assigned the following Data protection officers:

Soji Nagano (CEO)

If you would like to contact Koeeru Data protection officers, you have questions related to the processing of your personal data, the protection of personal data, or other matters related to personal data, please contact us by e-mail [data-protection@koeeru.com](mailto:data-protection@koeeru.com)

#### **Applicable law and changes**

This Privacy policy is governed by the laws of the Japan.

Any dispute, controversy, discrepancy or claim arising out of or in connection with this Privacy Policy, as well as any matters of failure of compliance with the Privacy Policy, termination or validity or invalidity of contracts shall be resolved by mutual consultation.

Revised Date: October 2, 2023