

Handling of Personal Information

ALC PRESS INC.
ALC EDUCATION INC.
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ALC PRESS INC. and ALC EDUCATION INC. (hereinafter referred to as the ALC Group) shall handle received personal information as follows. Please read and confirm the contents below. If you are unable to consent or if you have any questions, please inquire to the Personal Information Complaints and Consultation Service.

1. Purpose of Use of Personal Information

(1) The ALC Group shall handle personal information that is directly and personally provided by our customers within the scope of the following purposes of use, with the exception of cases permitted by law.

Website Registration

- For the purpose of free services aimed at customers, information provision, and introducing the ALC Group's products and services.

Applications

- Provision or execution of products or services applied for.
- Customer management and contacting members or other customers, for the purpose of smooth administration of education, publishing, domestic training, overseas training, and study abroad programs.
- Performing statistical data analysis for the improvement of various services (including the use of such analysis in marketing activities, in a format in which individuals cannot be identified).
- Providing continuous information about various services.
- Introducing products and services handled by the ALC Group, recruitment information, and the hosting of various campaigns (including providing information via email).

Inquiries

- Appropriately responding to and managing various types of inquiries.

Implementing Campaigns and Questionnaires

- Implementing various types of campaigns.
- Implementing various types of questionnaires, for the purposes of product development, service improvement, recruitment, etc.
- Selecting and notifying prizewinners, and sending prizes and rewards that were applied for.

Common Issues

- Problem-solving in relation to issues that occur in education, publishing, domestic training, overseas training, and study abroad programs.

Others

- The ALC Group may compile statistical data, processed into a format in which individuals cannot be identified, on the basis of personal information provided to us. The ALC Group shall be able to use such statistical data, in which individuals cannot be identified, without any restrictions.
- Audio data provided to the ALC Group through the use of TSST, etc., shall be subject to analysis and research, limited to audio content that does not include personal information, for the purposes of improvement of the relevant service and contribution to academic research.
- For the purpose of performing other tasks incidental or related to those listed above.

Furthermore, the scores (including "abilities measured") of users of "ALC's TOEIC® TEST Yutai Juken" shall be used in the development of the ALC Group's teaching materials, verification of learning outcomes, data analysis, and marketing activities in a format in which individuals cannot be identified.

(2) Personal information provided to the ALC Group by customers shall be done so in accordance with customers' judgment. However, please be aware that if the necessary personal information is not provided, the relevant contract may not be entered, or the relevant service may not be received.

(3) In the following cases, excluding those provided in each paragraph of Section 1 of this document, the ALC Group shall be indirectly provided with the personal information of customers, and shall handle such information within the purposes of use provided in each paragraph of Section 1 of this document.

- i) Applications to take courses made by corporations or organizations (cases where the customer's application to take a correspondence course or training (including "ALC Online Eikaiwa") is made through a corporation or organization)
- ii) Applications for the ALC Group's products, services, or various campaigns, that are made in person by telephone

2. Provision of Personal Information to Third Parties

The ALC Group shall not provide customers' personal information to third parties without receiving the individual's consent, with the exception of the following cases, and cases required by law.

(1) When applications to take courses are made by corporations or organizations, by means of the customer's application to take a correspondence course or training (including ALC Online English), the ALC Group shall deem that the customer has consented to the disclosure of personal information (their name, course name, attendance status, completion status, etc.), which is required for the ALC Group to operate the correspondence course or training, to the corporation or organization's staff in charge of applications; or, the handling or transfer of the information between jointly participating correspondence education organizations.

***Handling of grade transcripts and completion certificates for overseas training**

Please be aware that grade transcripts, completion certificates and other documents issued by schools upon completion of the ALC Group's overseas training, as either originals or photocopies, shall in principle be delivered to the corporation or organization's staff in charge of course applications, or the staff in charge of training, via the ALC Group.

(2) Pertaining to applications to overseas training and study programs at ALC Study Abroad Center, personal information will be provided as necessary to affiliated travel companies facilitating visa application procedures and airline ticket arrangement, and to affiliated insurance agents facilitating (voluntary) applications for overseas travel accident insurance.

Purpose of Provision: Airline ticket arrangement, or receiving applications for overseas travel accident insurance

Items of Personal Information: Names, addresses, telephone numbers, email addresses, nationalities, passport numbers, etc.

Means of Provision: Paper, electronic data

Scope of Provision: JTB Business Network, Inc., Yusen Travel Co., Ltd., World Link, Inc., STA Travel Japan, I.F Create Co., Ltd.

(All of the above have entered into Agreements on Handling Personal Information)

(3) Pertaining to applications to overseas training and study programs at ALC Study Abroad Center, personal information entered in English-language application forms designated by the affiliate overseas school and other specified documents (contents and formats may differ between schools) will be provided directly to the school in document form (these may include records created in formats that are not recognizable to human senses, such as electronic and magnetic formats. The same applies hereafter). Such personal information will not be used for purposes other than submission to the participating school.

Furthermore, pertaining to overseas training, when the accommodation is a homestay, information about medical problems (dietary restrictions, allergies, etc.) in addition to the participant's name, sex, and date of birth, will be provided directly to the host organization and the host family in document form.

Additionally, pertaining to overseas training, for the purpose of arranging travel, information including the participant's name, address, date of birth, passport information, itinerary and schedule, site of training, and accommodation will be provided directly to travel companies under contract with the ALC Group, in document form.

(4) For the purpose of receiving applications for taking certification examinations organized by third parties, and for sales purposes, necessary personal information will be provided to the following certification examination organizations and agencies.

Purpose of Provision: Receiving applications for taking certification examinations organized by third parties, and for sales and introduction of the above

Items of Personal Information: Names, addresses, telephone numbers, etc.

Means of Provision: Paper, electronic data

Scope of Provision: Institute for International Business Communication (IIBC), Japan Association of Overseas Studies (JAOS), Manabi-UP Communications, Co., Ltd., Casio Computer Co., Ltd.

(5) For the purpose of providing documents and receiving applications related to study abroad services organized by third parties, necessary personal information will be provided to the prospective study abroad agent that provides the said documents or receives the customer's applications, and agencies of the above.

Purpose of Provision: Providing information and receiving applications related to study abroad services organized by third parties, and introduction of the above

Items of Personal Information: Names, addresses, telephone numbers, etc.

Means of Provision: Paper, electronic data

Scope of Provision: Prospective study abroad agent that provides documents or receives the customer's application, and agencies of the above

(6) Joint Use in "PK course"

Pertaining to the provision of services and execution of the product "Elementary School English Instructors' J-SHINE Certification: Preparatory Professional Training Course", personal information will be jointly used as follows.

Purpose of Provision: Internship execution and provision of the product "Elementary School English Instructors' J-SHINE Certification: Preparatory Professional Training Course"

Items of Personal Information: Names, addresses, telephone numbers, email addresses, nearest train stations, etc.

Scope of Provision: Seiha Network, Co., Ltd.

Party responsible for management of jointly used personal information: ALC PRESS INC.

Method of Acquisition: Entry form on the ALC Group's website

(7) Joint Use in "Elementary School English Instructors' Certification: Training Program"

The following personal information will be jointly used for the purpose of applying for certification by assigning a certification organization code to the Japan Specially Designated Educational Institutions for English Language Instructors (hereinafter, “J-SHINE”), and for the provision and implementation of services.

Purpose of provision: To apply for certification as an elementary school English language instructor to J-SHINE on behalf of the person who has completed the course, with a certification organization code indicating that the person is a participant in our course and a recommendation letter regarding the certification.

Items of personal information: name, gender, age, date of birth, date of application, recommending organization, address, telephone number, e-mail address, nearest station to home, possible city or town of work, survey of personal history, etc. (final education, degrees, qualifications, licenses, special market methods, research, training history, etc.) interview survey, self-promotion of instructor.

Scope of provision: J-SHINE

Party responsible for the management of personal information used jointly: ALC PRESS INC.

Method of acquisition: Written or electronic data

3. Joint use of personal information among group companies

The ALC Group shares personal information with each other.

(1) Personal information will be shared in the following operations

1) Name, address, telephone number, fax, e-mail address, name and address of the company or office to which the customer belongs, department name, position, telephone number, fax, e-mail address

2) Names, addresses, employee numbers and other individually assigned identification numbers, affiliations, positions, etc., attendance management information, and other basic information about the employees of each group company.

(2) Scope of companies for joint use

ALC PRESS INC. ALC EDUCATION INC.

(3) Purpose of joint use

1) To ensure the smooth and appropriate execution of transactions with customers

2) To ensure smooth communication between personnel in charge of operations

3) To carry out various procedures related to personnel and labor management

(4) Company responsible for joint use

ALC PRESS INC.

4. Entrustment of Personal Information

The ALC Group may entrust customers’ personal information to subcontractors who have entered into Agreements on Handling Personal Information, in order to achieve the purposes of use as described above. Entrustment shall be conducted within the scope required for achieving the purposes of use clearly expressed to customers.

5. Disclosure, etc., of Personal Information

(1) Customers’ Rights Pertaining to Personal Information

When a customer requests the ALC Group to notify them regarding the purpose of use of personal information, or to disclose, correct, supplement, delete, cease to use, eliminate, or cease provision to a third party of (hereinafter, collectively referred to as “Disclosure, etc.”) their personal information, the

ALC Group shall respond honestly and in accordance with the law. However, please be aware that for cases based on law, there may be some cases in which information cannot be disclosed.

(2) Customer Consultation Service

For complaints or consultation regarding personal information, or for requests and procedures related to the Disclosure, etc. of personal information, please contact the following department.

< Personal Information Complaints and Consultation Service >

▼ ALC PRESS INC.

Department: ALC Customer Center (Mon.~Fri., 9:00-17:00 / Closed on Sat., Sun., and holidays)

Address: Ichigaya Building, 4-2-6 Kudankita, Chiyoda-ku, Tokyo, Japan 102-0073

Email: privacy@alc.co.jp

Personal Information Protection Manager: Director of Corporate Division, ALC PRESS INC.

▼ ALC EDUCATION INC.

Department: Operation Department

Address: Ichigaya Building, 4-2-6 Kudankita, Chiyoda-ku, Tokyo, Japan 102-0073

Email: pms-info@alc.co.jp

Personal Information Protection Manager: Manager of Sales Department.

*For inquiries to ALC regarding personal information used in overseas training, please contact the following department.

ALC EDUCATION INC. Operation Department, Overseas Training Support Team, Email : pms-info@alc.co.jp

*For inquiries to ALC regarding personal information used at ALC Study Abroad Center, please contact the following department.

ALC PRESS INC. Sales Division, Marketing Section, Study Abroad Center, Tel.: 03-3556-1325

*For inquiries to ALC regarding personal information used in "*Ano Kuni de Ryugaku*", "*Koukou Ryugaku.net*" and "*Daigaku Ryugaku.net*", please contact the following department.
ALC PRESS INC. Sales Division, Marketing Section, Study Abroad Center, Tel.: 03-3556-1376

(3) Procedures

The Customer Consultation Service shall guide customers through the procedures for complaints and consultations regarding personal information, as well as Disclosure, etc., of the details of personal information. In addition, when carrying out the said procedures, documentation verifying the identity of the customer, or their proxy, will be required.

5. Cookies (Applicable only to Online Postings)

(1) Use of Cookies by the ALC Group

The ALC Group's website (indicating the website operated by the ALC Group; hereinafter, "the Website"), uses cookies (an industry-standard technology that allows web servers to identify the user's computer). Cookies do not collect any information that can identify individual users (names, telephone numbers, etc.).

Users can select whether or not to allow the use of cookies via user settings. Although the majority of web browsers' default settings are set to allow the use of cookies, the settings can be changed to

disable cookies. If cookies are disabled, some services within the Website and other websites operated by the ALC Group may become unusable.

(2) Use of Cookies by Third Parties

the ALC Group uses behavioral targeting advertising* services provided by third-party companies in order to deliver appropriate advertising to users. In such cases, cookies are stored and managed not on the server of the ALC Group's website, but on third-party website servers. If you wish to disable the said advertising, please complete the opt-out (disable) procedures on each third-party website. After opting out, the said advertising will be disabled. However, opt-out will need to be performed again if the user's circumstances change, including a change of browser, deletion of cookies, or migration to a new computer.

Behavioral targeting advertising: List of service providers used by the ALC Group

<https://www.alc.co.jp/foroptout/>

*Behavioral targeting advertising is an advertising method that delivers adverts that are tailored to the user's interests, based on online browsing history, etc.

*Use of Google Analytics

The ALC Group's websites uses Google Analytics, a service provided by Google LLC.

When Google Analytics is used on the ALC Group's websites, Google collects, records and analyzes the user's search history, based on cookies issued by the ALC Group. The ALC Group then receives the analysis results from Google and uses the data for the purposes of system development and example sentences. User information collected, recorded and analyzed by Google Analytics does not contain any information that can identify individuals. In addition, the collected information is managed by Google on the basis of Google's Privacy Policy.

By disabling Google Analytics in browser add-on settings, users can prevent the collection of their information through the ALC Group's use of Google Analytics.

The settings to disable Google Analytics can be applied by downloading and installing the "Google Analytics Opt-out Add-on" from Google's opt-out add-on download page, and then changing add-on settings in the user's browser. If the user disables Google Analytics, Google Analytics will be disabled in all websites visited by the user, in addition to the ALC Group's website. Google Analytics can be re-enabled by changing the user's browser add-on settings again.