Privacy Policy

DealQuest, Inc.

DealQuest Inc. (hereinafter "DealQuest" or the "Company") provides services including information provision, matching, and other support (hereinafter the "Service") to sellers, target companies, buyers, and their financial advisers (hereinafter collectively referred to as "Users") who are considering or executing M&A transactions. "M&A transactions" refers to share transfers, business transfers, mergers, company splits, capital and business alliances, and similar transactions, regardless of the form of agreement.

Protecting the personal information of Users is one of the Company's most important responsibilities. This Privacy Policy (hereinafter the "Policy") describes how the Company handles personal information in accordance with Japan's Act on the Protection of Personal Information (hereinafter the "APPI"). The Company will confirm Users' consent to this Policy upon registration for the Service.

Article 1 (Information Collected)

The Company collects the following personal information to the extent necessary for the provision of the Service:

(1) Name, company name, job title, email address, phone number, account ID, and password

(2) Business information of sellers and buyers, such as financial overviews, business size, and desired terms

(3) Financial institution account information and other payment-related information

(4) Information collected through use of the Service and access logs

Article 2 (Purposes of Use)

The Company shall use personal information only for the following purposes, except as permitted by law:

(1) To provide, maintain, and improve the Service (including analyzing information provided by Users to generate matching candidates and preparing related materials)

(2) To respond to inquiries and provide after-sales support

(3) To bill for the Service

(4) To prevent and respond to fraudulent activities

(5) To organize and manage seminars and events

(6) To send newsletters and other notifications

(7) To compile and analyze statistical data, improve marketing, and develop new services

(8) To improve the accuracy of the AI used in the Service

Article 3 (Use of AI)

The Service utilizes AI for the preparation of materials and the selection of matching candidates. The Company's policies on AI, including transparency and human oversight, are set forth in the Company's AI Basic Policy. The Company uses personal information to improve AI only for the purpose stated in Article 2(8), and protects such information through the measures described in Article 4.

Article 4 (Security Management Measures)

The Company shall take the following necessary and appropriate measures to prevent the leakage, loss, or damage of personal information:

- **Organizational measures:** Appointing a person responsible for the handling of personal data and conducting internal audits.
- **Personnel measures:** Providing training on the handling of personal data to all employees.
- **Physical measures:** Implementing encryption and anti-theft measures for devices and electronic media that store personal data.
- **Technical measures:** Implementing access controls and protective measures against unauthorized access.
- **Data location:** The Company stores and processes personal data on servers located in Japan, including when using cloud services and AI services. In the event of any change, the Company will update this Policy in advance and take appropriate measures after ascertaining the personal information protection legislation of the relevant country.

The Company's broader security framework is set forth in the Company's Information Security Policy. In the event of a data breach or similar incident requiring reporting under the APPI, the Company shall report to the Personal Information Protection Commission and notify affected individuals in accordance with the APPI.

Article 5 (Retention Period and Deletion)

The Company shall retain personal data only for the period necessary to fulfill the purpose of use or as required by law, and shall promptly delete or dispose of such data once it is no longer needed. The Company sets retention periods for each category of data according to its purpose, including data relating to Users, target companies, and matched transactions obtained through the provision of the Service, data relating to inquiries and after-sales support, and data relating to marketing, and reviews these periods on a regular basis.

Article 6 (Third-Party Provision, Outsourcing, and Joint Use)

The Company shall not provide personal information to third parties without the consent of the individual, except in the following cases:

1. Where required by law
2. Where necessary for the protection of the life, body, or property of an individual, and it is difficult to obtain the consent of the individual
3. Where particularly necessary for improving public health or promoting the sound development of children, and it is difficult to obtain the consent of the individual
4. Where it is necessary to cooperate with a national government organ, a local government, or an entity entrusted by either of the foregoing in performing duties prescribed by law, and obtaining the consent of the individual is likely to impede the performance of such duties

In addition, the Company shall provide personal information to third parties located in foreign countries only to the extent permitted under the APPI.

When outsourcing part of its operations, the Company shall require the outsourcing party by contract to protect personal information and implement appropriate security management measures, and shall

appropriately supervise the outsourcing party. When jointly using personal information with affiliated companies, the Company shall publicly announce in advance the information to be jointly used, the purpose of use, and the person responsible for management.

Article 7 (User Types and Access to Information)

Users of the Service are broadly classified into five categories: sellers, target companies, financial advisers to sellers (hereinafter "sell-side FAs"), buyers, and financial advisers to buyers (hereinafter "buy-side FAs").

- Business information of the seller shall be disclosed to buyers and buy-side FAs only with the consent of the seller. Such consent shall be given directly by the seller or through the sell-side FA acting on behalf of the seller.
- All Users must handle personal information obtained through the Service at a level equivalent to this Policy.
- Upon completion or termination of a transaction, access to the counterparty's personal information shall be promptly removed.

Article 8 (User Rights)

The Company shall respond to requests for disclosure, etc. (meaning requests for notification of purpose of use, disclosure of personal information or third-party provision records, correction, addition, deletion, suspension of use, or cessation of provision to third parties) as set forth below:

(1) Notification of purpose of use or disclosure of personal information or third-party provision records

Users may request the Company, in accordance with the procedures set forth in (4), to notify the purpose of use, disclose, correct, add, delete, suspend use of, disclose third-party provision records of, or cease provision to third parties of their personal information. However, the Company may decline to make such disclosure in cases falling under any of the following:

1. Where disclosure is likely to harm the life, body, property, or other rights and interests of the requesting User or a third party
2. Where disclosure is likely to significantly impede the proper conduct of the Company's business
3. Where disclosure would violate applicable laws or regulations
4. Where the identity of the requesting User cannot be verified

In the event that a User requests notification of the purpose of use or disclosure of personal information or third-party provision records, the User shall pay the disclosure fee set forth in (4) to the Company.

(2) Correction, addition, and deletion

Users may request correction, addition, or deletion of personal information in accordance with the procedures set forth in (4). In such cases, the Company shall conduct an investigation without delay to the extent necessary to fulfill the purpose of use, and based on the results thereof, shall correct, add, or delete the relevant personal information to the extent permitted under the APPI.

(3) Suspension of use or cessation of provision to third parties

Users may request suspension of use or cessation of provision to third parties of personal information in accordance with the procedures set forth in (4). In such cases, the Company shall respond appropriately in accordance with the APPI.

(4) Procedures

To make a request for disclosure, etc., Users shall complete the Company's prescribed request form (see “1” below), enclose identity verification documents (see “2” below), and mail them to the address specified in Article 10. A fee of JPY 1,000 per request shall be charged for notification of purpose of use and disclosure of personal information or third-party provision records. Please remit payment to the account specified in the request form. The prescribed fee shall also apply in cases of non-disclosure or non-notification of purpose of use.

1. Request form

   Please click here to download the request form.

2. Identity verification documents

   a. Requests made by the User in person

      A copy of one of the following identity verification documents of the User: Individual Number Card (My Number Card) (front side), driver's license, health insurance card, or passport.

   b. Requests made by a voluntary agent

      In addition to the documents listed under "Requests made by the User in person" above, the following documents:

      i. Power of attorney

      ii. A copy of one of the following identity verification documents of the voluntary agent: Individual Number Card (front side), driver's license, health insurance card, or passport

   c. Requests made by a legal representative

      In addition to the documents listed under "Requests made by the User in person" above, the following documents:

      i. Documents confirming the existence of legal authority to represent (certified copy of family register or certificate of registered matters of adult guardianship)

      ii. A copy of one of the following identity verification documents of the legal representative: Individual Number Card (front side), driver's license, health insurance card, or passport

Article 9 (Cookies and Similar Technologies)

The Company uses cookies and similar technologies, including analytics tools that collect usage information on behalf of the Company, in order to understand and improve the use of the Service. The Company does not use these technologies for advertising purposes, nor does it sell access logs or other similar information to third parties. In the event of any change in how these technologies are used, the Company will update this Policy prior to such change.

Article 10 (Changes to this Policy)

The Company may review its handling of personal information from time to time and amend this Policy. In the event of any amendment, the Company will provide notice through its website or other appropriate means.

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