

FRONTAGE INC.

policy on disclosure in conformity with the Act on the Protection of Personal information

Enacted: April 1, 2005

Revised: January 1, 2017

The "Act on the Protection of Personal Information" (hereinafter referred to as the "Act") stipulates that designated measures for the obtaining, handling and use of personal information by FRONTAGE must be clearly laid out and such notification made readily accessible. For notification purposes, Frontage will list the designated measures below. (The terms used are the same as those used in the Sony Group Privacy Policy.)

Takashi Tachibana

President & Representative Director

FRONTAGE INC.

[1]

The purpose of use of the personal information (Paragraph 1 of Article 18 of the Act) handled by FRONTAGE INC is as follows:

(1)

FRONTAGE handles the entrusted personal information for operating the outsourcing businesses stated below a to j.

a.

"Make announcement", "manage applicants", "create campaign database", "send premium", "operate point system", "operate campaign server", and "manage back office" in reference to campaign activity.

b.

"Web research", "effect measurement", "inquiry survey", "monitor survey", "group interview", and "send reward" in reference to research service.

c.

"Manage membership (customer)", "analyze member (customer) data", "develop programs for membership (customer)", "create member (customer) database", "operate customer center", "distribute e-mail", and "send direct mail" in reference to CRM activity.

d.

"Manage response data", and "create response database" in reference to response advertisements.

e.

"Operate commerce server", "operate commerce site", "examine qualification", and "send and receive e-mails" in reference to EC activity.

f.

"Request for documents", "operate membership system", "issue periodical publication", "transmit e-mail newsletter", "operate BBS", "develop opinion / request / inquiry format", and "manage ID / password" in reference to web page activity.

g.

"Deliver opt-in mail", "deliver targeting mail", "deliver mail with coupon", "deliver short cut ad", "sponsor program (telephone-shopping program, .)", "broadcast interactive commercial", "media consulting", and "announce incentives" in response to media business.

h.

"Collect participants", "register admission", "manage name list", and "operate back office" in response to event operation activity.

i.

"Performers' audition" in reference to creative business.

j.

"Manage member (customer)", "create member (customer) database", and "deliver mail" in reference to facility operation.

(2)

FRONTAGE limits the use of personal information obtained through its services to the objectives stated below a to d.

a.

"Manage member (customer)", "create member (customer) database", and "deliver mail" in reference to facility operation.

b.

"Performers' audition" in reference to creative business.

c.

Sell office supplies and other products to Sony Corporation and its affiliate companies.

d.

"Manage member (customer)", "send articles", "create member (customer) database", "distribute e-mail", and "send direct mail" in reference to selling articles.

(3)

Provide information or dispatch messages to business connections, subcontract companies and stakeholders. (Provisions relating to the purpose of use of information on job applicants and FRONTAGE employees will be notified or announced separately.)

[2]

The purpose of use of personal information (Paragraph 1 of Article 24 of the Act) handled by FRONTAGE INC is as follows:

(1)

Entity responsible for handling personal information: FRONTAGE INC.

(2)

The purpose of use of all personal information data managed by FRONTAGE INC.

The same purpose of use as aforesaid 1. (Provisions relating to the purpose of use of information on job applicants and FRONTAGE employees will be notified or announced separately.)

(3)

Contact point for handling personal information managed by FRONTAGE INC. such as to notify purpose of use (in reference to Paragraph 2 of Article 24 of the Act), to disclose (in reference to Paragraph 1 of Article 25 of the Act), to correct, add or delete the content (in reference to Paragraph 1 of Article 26 of the Act), to suspend its use (in reference to Paragraph 1 of Article 27 of the Act).

Requests can be made for notification of intended use, disclosure, correction, addition or deletion of content, and suspension of use.

Such requests shall be accepted by the following contact point.

Personal Information Management Office, FRONTAGE INC.

(4)

Method of requesting notification of intended use, disclosure, correction, addition or deletion of content, and suspension of use.

Please send inquiries provided for in the preceding paragraph by post in writing for items 1 to 3 below. We may not be able to respond if sufficient details are not provided.

1.

"Request for the Disclosure of Personal Information"(please fill in the necessary details)

2.

Document to verify your identity

(copy of an official documents such as your driving license, health insurance certificate, pension book, certificate of residence, passport, .)

*Please black out sensitive information (parts of your registered domicile address other than the prefecture, information relating to health care, .) in such way that it cannot be seen when sending such documents.

3.

Power of attorney from individual concerned if the request is being made on behalf of someone else.

We may not be able to respond to requests if requests violate the law or due to some other reason. In such cases we shall inform you to such effect and explain the reasons.

(5)

Contact point for inquiries and complaints relating to personal information data managed by FRONTAGE shall be the personal information inquiries desk stated below.

Personal Information Management Office, FRONTAGE INC.

[3]

The Opt-Out System - relating to third parties (in reference to the Paragraph 2 Article 23 of the Act)

Paragraph 2 of Article 23 of the Act stipulates that with respect to personal data intended to be provided to third parties, where any entity handling personal information agrees to suspend, at the request of a person, the provision of such personal data as will lead to the identification of the person concerned, and where the entity, in advance, notifies the person of the matters enumerated in the following items or put those matters in a readily accessible condition for the person, the entity may provide such personal data concerned to third parties.

FRONTAGE will not provide personal information to third parties without the knowledge of the person concerned taking advantage of the Opt-Out System.

[4]

Remarks:

Please note, when FRONTAGE separately notifies the purpose of use to a person through notification or a request to approve binding terms and conditions of usage, such terms and conditions of individual purpose of use, and others will supersede all the aforementioned.