

Privacy Policy

Marklines Co., Ltd. (hereinafter "MarkLines") places the utmost importance on protecting the privacy of persons who use MarkLines' information system (hereinafter "Users") and furthermore pays due diligence in appropriately administering and maintaining information that is personal to and individually owned by Users (hereinafter "Personal Information").

MarkLines maintains and operates an Internet website (hereinafter the "Website") for corporate use on which is published, provided, and distributed information related to the automotive industry. All Users' Personal Information, which MarkLines collects, compiles, and discloses, is governed in accordance with this policy on privacy (hereinafter the "Privacy Policy").

External websites linked to MarkLines' Website provide proprietary statements regarding privacy. MarkLines is neither obligated to nor liable for any terms & conditions and/or any activities performed by these external websites. It is the responsibility of Users to ascertain beforehand the terms & conditions and other specifics of these websites.

Definition of Personal Information

Personal Information refers to any information of and owned by individual Users and includes, but is not limited to, names, e-mail addresses, and any other types of information that can specifically identify individual Users.

Furthermore, Personal Information includes information that can result in identifying individual Users through association, regardless if the information itself does not specifically identify the individual Users.

Personnel Accountable for Control and Maintenance of Personal Information

In order to protect Users' Personal Information, the Company assigns personnel accountable for controlling and maintaining Personal Information, and ensures that the personnel appropriately control and maintain Personal Information and fully comply with all internal rules concerning the protection of Personal Information.

Purposes for Collecting Personal Information

MarkLines collects Personal Information from Users for the purposes stated below. Personal Information collected from Users is limited to only Personal Information that is essential for MarkLines to conduct business.

- (1) Distributing information updates, notices, and questionnaires
- (2) Distributing promotional emails
- (3) Collecting Personal Information such as, but not limited to, names and e-mail addresses of inquirers who directly contact corporate-member persons presenting information on the All Member Presentation Board and on the Solution (Japanese language only)
- (4) Communicating with applicants and contact persons regarding the status of Website access and registration. (Note: outside of Japan applicants also serve concurrently as contact persons.)
- (5) Conducting market surveys and analysis
- (6) Verifying individual Users accessing membership services
- (7) Servicing customers in order to provide membership services and other matters related thereto
- (8) Responding to customer inquiries
- (9) Verifying the existence of valid service agreements and verifying the terms and conditions of valid service agreements
- (10) Sending correspondence related to IDs and passwords

Updating Personal Information

Users may at any time change, add, or delete their Personal Information registered with the company.

- To change or add Personal Information, Users can access the Update User Profile page on MarkLines' Website.

<http://www.marklines.com/en/members/modify>

- To delete Personal Information, the actual Users, applicants, or contact persons can send e-mail messages to Marklines Customer Support Center. Upon receipt of these messages, MarkLines will delete the Personal Information as requested.

MarkLines Customer Support Center

support@marklines.com

Disclosing Personal Information to Third Parties

MarkLines does not disclose Users' Personal Information to third parties without the prior consent from the actual Users, except under the specific circumstances stipulated in this Privacy Policy. MarkLines discloses Personal Information upon obtaining prior consent from the actual Users after giving notification to Users as to the identity of third parties to whom Personal Information is to be disclosed and as to the nature of the Personal Information that is to be disclosed. MarkLines has the right to disclose Personal Information without the prior consent of Users under the following circumstances as long as the disclosing of Personal Information does not violate any laws and ordinances.

(1) When MarkLines determines that Users would place third parties at undue disadvantages

(2) When obtaining the consent of the actual Users is needed but is difficult in cases involving life and death situations and in protecting persons and assets from harm

(3) When obtaining the consent of the actual Users is needed to cooperate with, but would hinder or would be deemed to possibly hinder, national government bodies, local public organizations, or persons having the authority of these bodies and organizations to perform duties prescribed by law

(4) When obtaining the consent of the actual Users is specifically needed but is difficult in cases to improve public health and support the sound education of children

(5) When courts, public prosecutors, police, bar associations, consumer centers, or any organizations vested with the authority in these bodies, demand that Personal Information be disclosed

(6) When the actual Users request that Personal Information owned by them be expressly disclosed to third parties

(7) When corporate service agreement applicants or contact persons request that Personal Information be disclosed or provided

(8) When disclosing or providing Personal Information is permitted by law

(9) When MarkLines reasonably determines that providing or disclosing Personal Information is required in order to provide Service to other Users

Scope of Providing Personal Information to Third Parties.

The following circumstances are excluded from the scope of providing Personal Information to third parties.

(1) When MarkLines in the course of conducting business outsources the handling of Personal Information in whole or part to third parties under condition that the Personal Information is solely used for the specific purposes by which MarkLines outsourced the handling. However, MarkLines shall be liable for the handling of Personal Information by these third parties.

(2) When Personal Information is provided in the course of MarkLines being acquired by, merged into, or otherwise succeeded by another company or under any other such similar circumstances.

Requests for the Company to Disclose Personal Information

The actual individual Users, applicants, or contact persons can send requests via e-mail to Marklines Customer Support Center asking for MarkLines to disclose Personal Information owned by the respective Users, applicants, or contact persons.

MarkLines Customer Support Center
support@marklines.com

Circumstances When the Company Shall Not Disclose Personal Information

MarkLines does not disclose Personal Information under the following circumstances and notifies the reason or reasons in writing.

(1) When MarkLines cannot verify that the persons contacting MarkLines are the actual persons identified with the Personal Information on record due to discrepancies in the Personal Information on record and the information sent by the persons contacting MarkLines

(2) When any circumstances surrounding requests for MarkLines to disclose Personal Information do not corroborate with current Personal Information on record

(3) When the disclosing of Personal Information harms or is deemed capable of harming the lives, bodies, assets or other interests of the actual Users or any third parties

(4) When the disclosing of Personal Information significantly harms

MarkLines' ability to maintain sound business operations

- (5) When the disclosing of Personal Information violates any laws

Hold Harmless Clause

MarkLines shall not be liable whatsoever for any Personal Information provided to or collected by third parties under the following circumstances.

- (1) When the actual Users themselves enable their own Personal Information to become known or available through any functions on MarkLines' Website, through any means by specific companies or website content providers, or through any format that can be readily accessed by any persons

- (2) When the owners of Personal Information by any circumstance become specifically identifiable because of any information entered in the MarkLines' Website by the actual Users themselves or any other Users

- (3) When the provision of Personal Information to external websites linked with MarkLines' Website is facilitated by Users providing Personal Information to these external sites. Note that also includes the use of the Personal Information provided by Users to these external websites

- (4) When persons other than the actual Users obtain any information such as, but not limited to, IDs and passwords that enables these persons to be identified as Users

Outsourcing

MarkLines may outsource the handling of Personal Information in whole or part to external parties. MarkLines sets standards in terms of these external parties' abilities to uphold and protect Personal Information, and these standards are prerequisite conditions to MarkLines' concluding any outsourcing agreements with these external parties. Furthermore, MarkLines enters into confidentially agreements with these external parties and performs necessary and appropriate monitoring of these external parties' control and maintenance of Personal Information.

Use of Statistical Information, etc.

In order to gain insight as to trends in use of the MarkLines' services, MarkLines, based on Personal Information provided from Users to MarkLines,

compiles usage data and statistics. However, these data and statistics are formatted so that specific Users will be unidentifiable. Furthermore, MarkLines makes the data and statistics available for display and use without any limitations. However, MarkLines is the sole owner of all copyrights to these data and statistics.

Promotional Emails

As part of MarkLines' services promotional emails may be sent to Users who have given prior consent to receive them. These messages are sent to Users of the Advertising & Promotion LINES service by electronic mail. Promotional emails provide information about various products and services that are currently being provided, or will be provided in the future. The originators of these promotional emails can only be individuals and corporations that have entered into service agreements with MarkLines. However, MarkLines sends the promotional emails on behalf of these individuals and corporations, and therefore the originators of the promotional emails are unable to know or obtain any Personal Information whatsoever of the Users to whom the promotional emails have been sent. Regardless that the promotional emails are sent by MarkLines, the originator is clearly identified in all cases. Users registered to receive promotional emails may at any time easily stop receiving promotional emails or modify promotional settings online. In addition, all promotional emails contain instructions to stop distribution of promotional emails.

Control and Maintenance of Personal Information

MarkLines incorporates both technical and organizational means to constantly maintain the precautions necessary to safeguard Personal Information from unauthorized access and from being lost, destroyed, altered, or leaked. MarkLines makes the best efforts to regularly provide employee training on how to control and maintain Personal Information. Furthermore, MarkLines fully complies with all laws, ordinances, industry codes of conduct and ethics, and customs on public order and morals dealing with Personal Information protection.

Revisions to the Privacy Policy

MarkLines from time to time may review and without prior notice revise this Privacy Policy with the aim of improving the content. Whenever MarkLines revises this Privacy Policy, the date of the most recent update is written on the topmost page.

Regarding the Use of Cookies

Since the Company uses cookies to identify Users, cookies will be saved to the hard disks of the personal computers first used to login to the Company's Website. Cookies are text files saved on computer hard disks by website servers and cannot be used to initiate applications or infect computers with viruses. Furthermore, Cookies contain absolutely no Personal Information.

Secure Encryption

MarkLines' Website uses Secure Socket Layers (SSL) which function to encrypt information transmitted via the Internet using server IDs issued by Verisign. This function enables Users' Personal Information to be transmitted while preventing the Personal Information from being compromised in any way.

Questions and Inquiries

Company will respond to questions and inquiries when persons contact the following.

Security Support

TEL · FAX Mon. – Fri. 9:00 - 18:00 (Except holidays)

TEL : 03-4241-3907

FAX : 03-4241-3900

E-mail : security@marklines.com