

Privacy Policy

bitFlyer Holdings, Inc. (hereinafter, the "Company") recognizes the importance of protecting the personal information it acquires. The Company complies with the Act on the Protection of Personal Information (hereinafter, the "Personal Information Protection Act"), the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (hereinafter, the "My Number Act"), and other laws, regulations, and guidelines, and strives for the appropriate handling and protection of personal information in accordance with the following Privacy Policy (hereinafter, this "Privacy Policy").

1. Definitions

1. "Personal Information" means personal information as defined in Article 2, Paragraph 1 of the Personal Information Protection Act, that is, information relating to a living individual that falls under any of the following:
 - (1) Information containing a name, date of birth, or other description etc. that can identify a specific individual (including information that can be readily collated with other information and thereby identify a specific individual).
 - (2) Information containing an individual identification code.
2. "Personal Information, etc." means personal information and specific personal information.
3. "Personal Data" means personal data as defined in Article 16, Paragraph 3 of the Personal Information Protection Act, that is, personal information constituting a personal information database, etc.
4. "Retained Personal Data" means retained personal data as defined in Article 16, Paragraph 4 of the Personal Information Protection Act, that is, personal data that a personal information handling business operator has the authority to disclose, correct, add to or delete the content of, cease the use of, erase, and cease the provision of to third parties.
5. "Individual Number" means an Individual Number as defined in Article 2, Paragraph 5 of the My Number Act, that is, a number obtained by converting a resident register code and designated to identify the person recorded on the resident register that contains that resident register code.
6. "Specific Personal Information" means personal information that contains an Individual Number.
7. "The Individual" means the subject of the personal information that the Company acquires.

8. "Special Care-Required Personal Information" means special care-required personal information as defined in Article 2, Paragraph 3 of the Personal Information Protection Act.

2. Purposes of Use of Personal Information, etc.

The Company appropriately uses the Individual's personal information for the purposes set out below. The Company may acquire information such as cookies, IP addresses, advertising identifiers, device identifiers, and browsing history from third parties other than the Company, link it with the Individual's personal data, and use it for the purposes set out in 4. and 5. below.

1. To manage subsidiaries and affiliated companies.
2. To manage shareholders and carry out operations related to shares.
3. To provide information and services to shareholders and investors.
4. To conduct public relations and IR activities and related research.
5. To provide information about the services etc. of group companies.
6. To perform obligations and exercise rights required under contracts, laws and regulations, and equivalent rules.
7. For provision to third parties (regarding the third-party provision of personal data, see "7. Provision of Personal Data, etc. to Third Parties," "8. Joint Use of Personal Data," and "9. Provision of Personal Data to Third Parties in Foreign Countries").
8. To resolve problems, disputes, or litigation etc. arising between the Individual and the Company.
9. Other purposes incidental to the purposes of use above.

3. Changes to the Purposes of Use of Personal Information, etc.

The Company may change the purposes of use of personal information, etc. within the scope reasonably deemed to have relevance to the purposes of use before the change. Where the purposes are changed, the Company will notify the Individual or make a public announcement.

4. Restrictions on the Use of Personal Information

Except where permitted by the Personal Information Protection Act or other laws and regulations, the Company will not handle personal information beyond the scope

necessary to achieve the purposes of use without obtaining the Individual's consent. However, this does not apply in the following cases:

1. Where based on laws and regulations.
2. Where necessary to protect a person's life, body, or property, and it is difficult to obtain the Individual's consent.
3. Where specially necessary to improve public health or to promote the sound development of children, and it is difficult to obtain the Individual's consent.
4. Where cooperation is necessary for a national government agency, a local government, or a party entrusted by either to perform affairs prescribed by laws and regulations, and obtaining the Individual's consent is likely to impede the performance of those affairs.

5. Proper Acquisition of Personal Information, etc. and Prohibition of Improper Use

The Company acquires personal information, etc. properly and does not acquire it by deception or other wrongful means. The Company also does not use personal information, etc. in a manner that may encourage or induce illegal or unjust acts.

6. Security Management of Personal Data and Specific Personal Information

The Company takes the necessary and appropriate security management measures to ensure the security management of personal data and specific personal information against risks such as loss, destruction, falsification, and leakage. Where the Company entrusts all or part of the handling of personal data and specific personal information, it exercises the necessary and appropriate supervision over the contractor to ensure security management at the contractor.

1. Formulation of a basic policy
To ensure the proper handling of personal data, the Company has formulated a basic policy covering matters such as "compliance with relevant laws, regulations, and guidelines" and the "contact point for questions and complaints."
2. Development of rules on the handling of personal data
The Company has established handling regulations for personal data covering the handling methods, the responsible persons and staff, and their duties at each stage of acquisition, use, storage, provision, and deletion or disposal.
3. Organizational security management measures
The Company appoints a person responsible for the handling of personal data, clarifies the staff who handle personal data and the scope of personal data they handle, and has established a system for reporting to the responsible person where a fact or sign of a violation of laws or internal regulations is detected. The Company

also conducts regular self-inspections of the status of personal data handling and conducts audits by other departments or external parties.

4. Human security management measures

The Company conducts regular training for staff on points of caution regarding the handling of personal data. Matters concerning the confidentiality of personal data are stated in the Company's work rules.

5. Physical security management measures

In areas where personal data is handled, the Company controls staff entry and exit and restricts the devices etc. that may be brought in, and implements measures to prevent unauthorized persons from viewing personal data. The Company also takes measures to prevent the theft or loss of devices, electronic media, documents, and the like used to handle personal data, and, where such devices, electronic media, and the like are carried, including movement within an office, implements measures so that personal data cannot be readily identified.

6. Technical security management measures

The Company implements access controls to limit the staff and the scope of personal information databases etc. handled. The Company has introduced mechanisms to protect the information systems that handle personal data from unauthorized external access and malicious software.

7. Understanding the external environment

Where personal data is handled in a foreign country, such as by storing it in or providing it to a third party in a foreign country, the Company ascertains the personal information protection systems of each relevant country and takes appropriate measures.

7. Provision of Personal Data, etc. to Third Parties

1. Except where provision is permitted under the Personal Information Protection Act or other laws and regulations, the Company will not provide personal data to third parties without obtaining the Individual's prior consent. However, the following cases do not constitute provision to a third party as described above:

(1) Where the Company entrusts all or part of the handling of personal data within the scope necessary to achieve the purposes of use.

(2) Where personal data is used jointly (see "8. Joint Use of Personal Data").

(3) Where personal data is provided in connection with a business succession due to a merger or other cause.

2. Notwithstanding the preceding paragraph, the Company may provide information such as cookies, IP addresses, advertising identifiers, device identifiers, browsing history, and other similar information to third parties.

8. Joint Use of Personal Data

The Company may jointly use the Individual's personal data as set out below.

1. Items of personal data used jointly
 - (1) Information relating to the Individual, such as name, address, date of birth, telephone number, occupation, and transaction needs.
 - (2) Information relating to transactions, such as transaction details.
2. Scope of parties using the data jointly

The parties using the data jointly are the corporations belonging to the corporate group to which the Company belongs. The corporations currently covered are as follows:

 - (1) bitFlyer Holdings, Inc.
 - (2) bitFlyer, Inc.
 - (3) bitFlyer USA, Inc.
 - (4) bitFlyer Europe S.A.
 - (5) bitFlyer Blockchain, Inc.
 - (6) Custodiem, Inc.
3. Purpose of joint use

Joint use is conducted within the scope of "2. Purposes of Use of Personal Information, etc."
4. Name, address, and name of the representative of the party responsible for managing the personal data

bitFlyer, Inc.

For information such as the address and representative, see:

<https://bitflyer.com/en-jp/company>

9. Provision of Personal Data to Third Parties in Foreign Countries

The Company may provide the Individual's personal data to its group companies bitFlyer USA, Inc. (United States of America) and bitFlyer Europe S.A. (Luxembourg), providing the personal data described in 1. of "8. Joint Use of Personal Data" for the purposes described in 3. of "8. Joint Use of Personal Data."

When providing personal data to bitFlyer USA, Inc. (United States of America), the Company provides it after establishing, together with that company, a system that conforms to the standards prescribed by the rules of the Personal Information Protection Commission under Article 28 of the Personal Information Protection Act (a system under which that company continuously takes measures equivalent to those required of a personal information handling business operator). Information on the personal information protection system in the United States of America is published on the website of the Personal Information Protection Commission at the following address:

https://www.ppc.go.jp/enforcement/infoprovision/laws/offshore_report_america/

The privacy policy of bitFlyer USA, Inc. is available at the following address:

<https://bitflyer.com/en-us/privacy>

The personal information protection system of Luxembourg conforms to the EU's General Data Protection Regulation (GDPR). Luxembourg is recognized by the Personal Information Protection Commission as having a personal information protection system deemed to be at a level equivalent to Japan's in protecting the rights and interests of individuals.

https://www.ppc.go.jp/personalinfo/legal/guidelines_offshore/#a4-2-12

The privacy policy of bitFlyer Europe S.A. is available at the following address:

<https://bitflyer.com/en-eu/privacy-policy>

10. Handling of Specific Personal Information

The Company uses specific personal information only for the preparation and submission of payment records and other affairs permitted by laws and regulations. The Company does not acquire or handle specific personal information beyond the scope necessary to achieve those purposes of use. The Company also does not provide specific personal information to third parties except where permitted under the My Number Act.

11. Disclosure, etc. of Retained Personal Data

Where the Individual requests, based on the provisions of the Personal Information Protection Act, the disclosure of retained personal data and records of provision to third parties, or requests notification of the purpose of use (hereinafter, "Disclosure, etc."), the Company, after confirming that the requester is the Individual, will carry out the Disclosure, etc. to the Individual without delay (where the retained personal data does not exist, the Company will notify the Individual to that effect). However, this does not apply where the Company does not bear the obligation of Disclosure, etc. under the Personal Information Protection Act or other laws and regulations. A fee prescribed by the Company applies to the Disclosure, etc. of retained personal data. For details on fees etc., contact the Company's personal information inquiry desk.

12. Correction, etc. of Retained Personal Data

Where the Individual requests, based on the provisions of the Personal Information Protection Act, the correction, addition, or deletion (hereinafter, "Correction, etc.") of the content of retained personal data on the grounds that it is not true, the Company, after

confirming that the requester is the Individual, will conduct the necessary investigation without delay within the scope necessary to achieve the purpose of use, will make a Correction, etc. to the content of the retained personal data based on the results, and will notify the Individual accordingly (where the Company decides not to make a Correction, etc., it will notify the Individual of that decision). However, this does not apply where the Company does not bear the obligation of Correction, etc. under the Personal Information Protection Act or other laws and regulations.

13. Cessation of Use, etc. of Retained Personal Data

Where the Individual requests, based on the provisions of the Personal Information Protection Act, the cessation of use or erasure (hereinafter, "Cessation of Use, etc.") of the Individual's retained personal data on any of the following grounds, and it is found that there are grounds for the request, the Company, after confirming that the requester is the Individual, will carry out the Cessation of Use, etc. of the retained personal data without delay and notify the Individual accordingly:

1. The data is being handled beyond the scope of the purposes of use publicly announced in advance.
2. The data is being handled by an improper method.
3. The data was acquired by deception or other wrongful means.
4. There is no longer a need to use the data.
5. A situation has arisen that imposes an obligation to report a leakage etc. of the data.
6. The handling of the data otherwise risks harming the Individual's rights or interests.

However, this does not apply where the Company does not bear the obligation of Cessation of Use, etc. under the Personal Information Protection Act or other laws and regulations.

14. Cessation of Provision to Third Parties of Retained Personal Data

Where the Individual requests, based on the provisions of the Personal Information Protection Act or the My Number Act, the cessation of provision to third parties (hereinafter, "Cessation of Provision") of the Individual's retained personal data on any of the following grounds, and it is found that there are grounds for the request, the Company, after confirming that the requester is the Individual, will carry out the Cessation of Provision of the retained personal data without delay and notify the Individual accordingly:

1. The Individual's consent has not been obtained.
2. Acquisition is not permitted under the Personal Information Protection Act or the My Number Act.
3. There is no longer a need to use the data.

4. A situation has arisen that imposes an obligation to report a leakage etc. of the data.
5. The handling of the data otherwise risks harming the Individual's rights or interests.

However, this does not apply where the Company does not bear the obligation of Cessation of Provision under the Personal Information Protection Act, the My Number Act, or other laws and regulations.

15. Handling of Special Care-Required Personal Information

When acquiring the Individual's special care-required personal information, the Company will obtain the Individual's prior consent before acquisition, except where permitted by the Personal Information Protection Act or other laws and regulations.

16. Use of Cookies and Other Technologies

The Company's website may use cookies and similar technologies. These technologies help the Company understand how its website is used and contribute to service improvement. An Individual who wishes to disable cookies can do so by changing their web browser settings. However, disabling cookies may make some features of the Company's website unavailable.

The Company uses Google Analytics, a service provided by Google LLC, to understand how the Individual uses the Company's website. When Google Analytics is used on the Company's website, Google collects, records, and analyzes the Individual's visit history to the Company's website based on cookies issued by the Company. The Company receives the analysis results from Google and uses them to understand how the Individual visits the Company's website. The information collected, recorded, and analyzed by Google Analytics does not contain any information that identifies a specific individual. That information is managed by Google in accordance with its privacy policy.

The Individual can stop the collection of their information through the Company's use of Google Analytics by disabling Google Analytics in their browser's add-on settings. This is done by downloading and installing the "Google Analytics Opt-out Browser Add-on" from Google's opt-out add-on download page and changing the browser's add-on settings. Where the Individual disables Google Analytics, it will also be disabled on websites other than the Company's website that the Individual visits; however, the Individual can re-enable Google Analytics by reconfiguring the browser add-on.

For the Google Analytics terms of service, see the Google Analytics website; for Google's privacy policy, see Google's website.

Google Analytics Terms of Service:

<https://marketingplatform.google.com/about/analytics/terms/jp/>

Google Privacy Policy:

<https://policies.google.com/privacy?hl=ja>

Google Analytics Opt-out Browser Add-on:

<https://tools.google.com/dlpage/gaoptout?hl=ja>

17. Company Name, Address, and Name of Representative

bitFlyer Holdings, Inc.

For information such as the Company's address and representative, see:

<https://about.bitflyer.com/en/overview>

18. Inquiries

For requests for Disclosure, etc., opinions, questions, complaints, and other inquiries regarding the handling of personal information, etc., please use the following contact:

Personal Information Inquiry Desk TEL: +81-3-6434-5864

19. Continuous Improvement

The Company reviews the operational status of its handling of personal information, etc. as appropriate, strives for continuous improvement, and may amend this Privacy Policy as necessary.

Effective as of June 30, 2026