

Privacy Policy

This English translation is provided for convenience purposes only. The Japanese version of this document shall be regarded as the official version. In the event of any discrepancy, the Japanese language version shall prevail.

bitFlyer, Inc. (the “Company”) understands the importance of protecting customers’ personal information, and will observe the Act on the Protection of Personal Information (the “Personal Information Act”) as well as the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (the “Individual Number Act”) and endeavor to handle and protect personal information in an appropriate manner in accordance with this Privacy Policy (the “Privacy Policy”).

1. Definitions

1. In the Privacy Policy, “personal information” shall share the definition given in paragraph 1 of Article 2 of the Personal Information Act; information on living individuals including any of the following.
 1. Information such as full name, date of birth, or other descriptors that can be used to identify a specific individual (includes information that can be combined to identify a specific individual).
 2. Includes personal identification codes
2. The definition of “special care-required personal information” used in the Privacy Policy shall share the definition given in Article 2, Paragraph 3 of the Personal Information Act, including, but not limited to, the principal’s race, creed, social status, medical history, criminal record, fact of having suffered damage by a crime, or other descriptions which could be used for unfair discrimination, prejudice, or other disadvantages to the principal.
3. The definition of “personal data” used in the Privacy Policy shall share the definition given in Article 3, Paragraph 16 of the Personal Information Act, summarized as the personal information contained within a personal information database.
4. The definition of “individual number” used in the Privacy Policy shall share the definition given in Article 2, Paragraph 5 of the Individual Number Act, summarized as the number obtained through conversion of the code recorded on a Certificate of Residence, which can be used to identify a specific individual.
5. The definition of “specific personal information” used in the Privacy Policy refers to the combination of personal information and the individual number.

2. Purpose of use of personal information

The Company will use customers’ personal information as appropriate for the following purposes. However, specific personal information shall only be used for administrative operations involved in account creation applications and notifications related to financial instruments trading, administrative operations involved in creating and offering legally required documents for financial instruments trading, and other related

administrative operations. The Company also obtains information including cookies, IP addresses, advertising identifiers, device identifiers, behavior history, etc. from other companies and links the corresponding information to customers' personal data in accordance with purposes 3. and 4. below.

1. Provision and development of the Company' s products or services;
2. To guide customers to the Company' s products, services, campaigns, etc. through emails, solicitations, etc. ;
3. Marketing, research or analysis for the purpose of the quality improvement or expansion of the Company' s products or services, etc. ;
4. Delivering advertisements to meet the customers' needs.
5. Provision of the maintenance or support of the Company' s services;
6. Notifications of amendment to the Company' s terms of use, policy, etc. (the "Terms"), with respect to the Company' s services;
7. Dealing with breach of the Terms, with respect to the Company' s services;
8. Verification of user' s own account at financial institutions;
9. Verification of the transfer to user' s account at financial institutions; or
10. Communication in emergencies.
11. The fulfillment of obligations and the exercise of rights required under contracts, laws and equivalent regulations, as well as self-regulations imposed by the Japan Virtual and Crypto assets Exchange Association etc.
12. Prevention of criminal use of crypto asset transfer systems, and the ability to trace the usage of the corresponding systems if any criminal use is discovered.
13. Provision to a third party (See "7. Provision of personal data to a third party" for more information on providing personal data to third parties)
14. For any other purpose related to the above purposes.

3. Change of purpose of use

The Company may change the purpose of use of personal information and specific personal information to the extent that the purpose of use after the change is reasonably deemed in relation to the previous purpose of use. When the purpose of use has been changed, the Company shall notify the customer and/or publicly announce the purpose of use after the change.

4. Restrictions on the use of personal information (see "10. Specific personal information handling" for specific personal information)

The Company shall not use personal information, without the consent of the relevant customers, beyond the scope necessary for the achievement of the purpose of use, unless permitted by the Personal Information Act or other laws or regulations; provided, however, that this provision shall not apply if:

1. the use of personal information is based on laws and regulations;
2. the use of personal information is necessary for the protection of the life, body or property of an individual and it is difficult to obtain the consent of the relevant customers;
3. the use of personal information is specially necessary for improving public health or promoting the sound growth of children and it is difficult to obtain the consent of the relevant customers; or
4. the use of personal information is necessary for cooperating with a national government, a local government, or a person or entity entrusted thereby in executing the affairs prescribed by laws and regulations and acquisition of the

consent of the relevant customers may impede the execution of the affairs concerned.

5. Proper acquisition of personal information, etc., and prohibition of improper use

The Company shall acquire personal information and specific personal information by proper means and shall not acquire it by deception or other wrongful means. Furthermore, the company shall not use personal information or specific personal information in ways that could promote or induce illegal or improper activities.

6. Security controls for personal data and specific personal information

The Company shall take security management measures to ensure the security control of personal data and specific personal information against the risk of loss, destruction, alteration or leakage. When the Company entrusts a third party with the handling of personal data and specific personal information in whole or in part, the Company shall sufficiently and appropriately supervise the third party to ensure the secure control of personal data and specific personal information.

1. Formulation of a basic policy
Basic policies such as the "Compliance with relevant laws and guidelines", "Question and complaint processing form", etc. are established to ensure that personal data is handled appropriately.
2. Development of rules on personal data handling
Rules are established for the handling of personal data at each step of acquisition, use, storage, sharing, deletion, disposal, etc., as well as the individuals responsible for handling and supervision and their duties, etc.
3. Organizational security management measures
When a person is made responsible for personal data handling, the employees who will handle the personal data and the range of personal data to be handled shall be clarified, and a system shall be established for reporting to the person responsible upon discovery of any facts or indications of a violation of law or handling rules. The status of personal data handling shall be monitored through periodic self-inspection and audits by other departments and external departments.
4. Human security management measures
Employees shall take regular training on the important points of handling of personal data. The confidentiality of personal data is described in the work regulations.
5. Physical security management measures
In areas where personal data is being handled, the entry and exit of employees is managed, the equipment allowed in the corresponding areas is restricted, and measures are taken to prevent unauthorized individuals from seeing personal data. Measures are implemented to prevent the loss, theft, etc. of devices, digital media, and documents that are used for handling personal data. Additional measures are taken to prevent personal data from being easily displayed when the corresponding devices, digital media, and documents are being moved.
6. Technical security management measures
Access controls are implemented to limit the handler, personal information database used, etc. A structure is established to prevent unauthorized access and unauthorized software from accessing the information systems that handle personal data.

7. Understanding the external environment

When storing personal data in a foreign country or providing personal data to a third party in a foreign country, the personal information protection systems of each country shall be understood and the appropriate measures shall be taken.

7. **Provision of personal data to a third party (see “10. Specific personal information handling” for specific personal information)**

The Company shall not provide personal data to a third party without the prior consent of the relevant customers, unless the disclosure is permitted by the Personal Information Act or other laws or regulations; provided, however, that the following cases shall not be regarded as a provision to a third party.

1. Cases where the Company entrusts a third party with the handling of personal data within the scope necessary for the achievement of the purpose of use; or
2. For shared use (see “8. Shared use of personal data” for more information)
3. Cases where personal data is provided as a result of the succession of business in a merger or otherwise.
4. In accordance with the regulations on money laundering and terrorist financing prevention measures imposed by the Japan Virtual and Crypto assets Exchange Association, when the company sends crypto assets based on a customer request, the Company may notify the recipient’s crypto asset exchange operator of the corresponding customer’s personal data.
5. Offering the bitFlyer ID, etc. of customers to advertising agencies, etc. for the purpose of determining the effectiveness of advertising, etc.

8. **Joint use of personal data**

The company may share customers’ personal data for the following uses. Personal data shall not be shared where restricted by the Financial Instruments and Exchange Act or other laws unless the corresponding law has an approved method such as obtaining written consent from the customer.

1. Categories of personal data for joint use
 1. Information about a customer including their name, address, date of birth, telephone number, occupation, trading needs, etc.
 2. Information about a customer’s trading, account balance, etc.
2. Scope of parties jointly using personal data

The scope of parties jointly using the data includes corporations belonging to the bitFlyer Group to which the Company belongs. Currently, the targeted corporations 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 sharing

The scope of sharing shall be the same as stated in “2. Purpose of use.”
4. Name, address, and representative’s name of the one holding responsibility for managing person data

bitFlyer, Inc.

The Company's address, representative, etc. can be referenced below.
<https://bitflyer.com/en-jp/company>

9. Provision of personal data to foreign third parties

The Company may share personal data for the purposes detailed in "8. Shared use of personal data" clauses 1 and 3 within the bitFlyer Group companies including bitFlyer USA, Inc. (United States of America) and bitFlyer Europe S.A. (Luxembourg). More information on the personal information protection system in the United States of America can be found on the website of the Personal Information Protection Commission which can be referenced below. Since the United States of America is participating in APEC's CBPR system, it is understood that the protection of personal information will be equivalent to the personal information protection system in Japan.

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

The Privacy Policy for bitFlyer USA, Inc. can be found below.

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

Luxembourg's personal data protection framework complies with the EU General Data Protection Regulation (GDPR). It has been recognized by the Personal Information Protection Commission as having a personal information protection system that ensures a level of protection for individuals' rights and interests equivalent to that of Japan.

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

10. Specific personal information handling

The Company shall not obtain or handle specific personal information beyond the scope of what is required for purpose of use. The Company shall not provide specific personal information to any third parties except where allowed by the Individual Number Act

11. Disclosure of held personal data

In cases where the Company is requested by a customer to disclose the held personal data under the Personal Information Act, the Company shall, after confirming that the request is made by the principal, disclose the held personal data to the customer without delay (in cases where the Company does not have such held personal data, the Company shall notify the customer to that effect); provided, however, that this provision shall not apply to cases where the Company is not obliged to disclose such held personal data under the Personal Information Act or other laws or regulations. Please note that the Company will charge a fee (eight hundred (800) yen (including tax) per disclosure) to the customer in connection with the disclosure of the held personal data.

12. Revisions of held personal data

In cases where the Company is requested by a customer to correct, add or delete the held personal data under the Personal Information Act on the grounds that such held personal data is contrary to fact, the Company shall, after confirming that the request is made by the principal, make a necessary investigation without delay within the scope necessary for the achievement of the purpose of use, and on the basis of the result, correct, add or delete the held personal data and notify the customer to that effect (in cases where the Company decides not to make such a correction, addition or deletion, the Company shall notify the customer to that effect); provided, however, that this

provision shall not apply to cases in which the Company is not obliged to make such a correction, addition or deletion under the Personal Information Act or other laws or regulations.

13. Discontinuation of use of held personal data

In cases where the Company is requested by a customer to discontinue using or to erase the held personal data based on the Personal Information Protection Act on the grounds that: such held personal data is being handled beyond the purpose of use publicly announced in advance, it is being handled through improper methods, it has been acquired by deception or other wrongful means, the data is no longer necessary for use, an incident requiring reporting of a data breach, etc., has occurred, or the handling of the data may harm the rights or interests of the customer, the Company shall, after confirming that the request has a valid reason and was made by the customer itself, discontinue using or erase the held personal data without delay and shall notify the customer to that effect. However, this provision shall not apply to cases in which the Company is not obliged to discontinue use etc. under the Personal Information Protection Act or other laws or regulations. For more information, please read “Request for disclosure of held personal data in accordance with the Personal Information Protection Act” in the Company’s FAQ.

14. Discontinuing the provision of personal data to third parties

In cases where the Company is requested by a customer to discontinue providing the held personal data to third parties based on the Personal Information Protection Act or the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (Number Act) on the grounds that: the data was provided without the customer’s approval, the personal data acquisition was not permitted under the Personal Information Protection Act or Number Act, the data is no longer necessary for use, an incident requiring reporting of a data breach, etc., has occurred, or the handling of the data may harm the rights or interests of the customer, the Company shall, after confirming that the request has a valid reason and was made by the customer itself, discontinue providing the held personal data without delay and shall notify the customer to that effect. However, this provision shall not apply to cases in which the Company is not obliged to discontinue providing personal data to third parties under the Personal Information Protection Act, Number Act or other laws and regulations. For more information, please read “Request for disclosure of held personal data in accordance with the Personal Information Protection Act” in the Company’s FAQ.

15. Handling of special care-required information

The Company will only obtain a customer’s special care-required personal information after obtaining permission from that customer, except where permitted by the Personal Information Act or other relevant laws and ordinances.

16. Use of cookies and other technologies

Cookies or similar technologies may be used in the Company’s service. Such technologies help the Company to recognize the status of use of the Company’s services, etc. and contribute to improvement of the services. When a user intends to disable cookies, the user may disable cookies by changing the web browser settings. Please note that when cookies are disabled, parts of the service may be unavailable.

The Company uses Google Analytics, a service from Google, Inc., to track users’ visits to the Company’s website. In order for the Company to use Google Analytics on the

Company's website, the Company issues cookies for Google, Inc. to collect, record, and analyze the users' history of visiting the Company's website. The Company receives the results of Google, Inc.'s analysis to track users' visits to the Company's website. The information obtained, registered, and analyzed by Google Analytics does not contain any information that can identify any specific individual. The corresponding information shall be managed by Google, Inc. in accordance with Google, Inc.'s privacy policy. Users can exclude themselves from the data collected by Google Analytics by disabling the browser plugin for Google Analytics. Users can exclude themselves from Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on offered by Google, Inc. and then updating the user's add-on settings. By disabling Google Analytics, Google Analytics will also be disabled on other websites in addition to the Company's website. Google Analytics can be enabled again by reconfiguring the settings in the browser add-on.

For more information, please read the Terms of Use for Google Analytics on the Google Analytics website as well as Google, Inc.'s privacy policy on Google, Inc.'s website.

Google Analytics Terms of Service

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

Google Privacy Policy

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

Google Analytics Opt-out Add-on

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

17. The Company's Name, Address, and Representative's Name

bitFlyer, Inc.

The Company's address, representative, etc. can be referenced below.

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

18. Inquiries

With respect to requests for disclosure, etc., comments, questions, complaints and other inquiries regarding the handling of personal information as well as specific personal information, please use the following contact method:

bitFlyer, Inc. General Inquiries

TEL : 03-6434-5864

19. Continuous improvement

The Company shall endeavor to perform a timely review of the status of the operations regarding the handling of personal information as well as specific personal information and to improve such operations continuously. The Company may amend this Privacy Policy as necessary.

[Effective as of April 26, 2014]

[Amended on December 19, 2018]

[Amended on May 1, 2020]

[Amended on November 10, 2021]

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