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 a dispute, 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 2, Paragraph 6 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

The Company shall use customers’ personal information 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.

1. Provision and development of the Company’s products or services;
2. Notifications with respect to the Company’s products or services, or campaign;
3. Marketing, research or analysis for the purpose of the quality improvement or expansion of the Company’s products or services, etc.;
4. Provision of the maintenance or support of the Company’s services;
5. Notifications of amendment to the Company’s terms of use, policy, etc. (the “Terms”), with respect to the Company’s services;
6. Dealing with breach of the Terms, with respect to the Company’s services;
7. Verification of user’s own account at financial institutions;
8. Verification of the transfer to user’s account at financial institutions; or
10. 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 8. 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
The Company shall acquire personal information by proper means, and shall not acquire it by deception or other wrongful means.

6. Security controls for personal data and specific personal information
The Company shall sufficiently and appropriately supervise the Company’s employees 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.

7. Provision of personal data to a third party (see 8. 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. Cases where personal data is provided as a result of the succession of business in a merger or otherwise.

8. 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.

9. 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.

10. 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.

11. Discontinuing the use of personal data
In cases where the Company is requested by a customer to discontinue using or to erase the held personal data under the Personal Information Act on the grounds that such held personal data is being handled beyond the purpose of use publicly announced in advance or has been acquired by deception or other wrongful means and where it is found that the request has a reason, the Company shall, after confirming that the request is made by the principal, discontinue the use of or erase the held personal data without delay and 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 discontinuance or erasure under the Personal Information Act or other laws or regulations.

12. Discontinuing the provision of personal data to third parties
In the event that the Company holds personal data obtained from a customer without the customer’s approval or acquires personal data in a method not permitted by the Personal Information Act or Individual Number Act, or if there is a request for the discontinuation of offering personal data to third parties in accordance with the Personal Information Act or Individual Number Act, and the claim or request is deemed to be for one of the preceding reasons, once the request or claim has been confirmed to come from the actual customer, the Company shall promptly discontinue providing the held personal data and notify the customer of the discontinuation. However, the Company is not required to discontinue providing personal data to third parties where not required by the Personal Information Act, Individual Number Act, or other laws and ordinances.

13. 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.

14. **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.

15. **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

16. **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]