

Privacy Policy of Phoenix Consulting, Inc.

Our corporate philosophy concerning personal information protection

Handling personal information requires special attention, since it involves the privacy of our shareholders including our customers, whose individual character and properties may be jeopardized by this procedure. We understand the importance of the nature and handling of personal information, and we are constantly making efforts to respect the character and to protect the privacy of individuals whose personal information we have acquired through appropriate company procedures.

When we handle our customers' personal information, we do it based on this statement so that we can meet their expectation and trust. We will also implement the educational activity for our employees, adhere to all applicable laws and regulations concerning personal information protection, constantly review the content of this statement and make efforts to improve it.

Privacy Policy

1. We will only collect your personal information by appropriate and fair means and use it within the scope of the purpose of use specified in this Privacy Policy.
2. We will maintain corrective and preventive actions to protect your personal information from unauthorized access, loss, destruction, falsification and leaking.
3. We will adhere to all applicable laws and regulations concerning personal information protection.
4. We will regularly review our compliance program and improve it.

Handling of Personal Information

1. Coverage of personal information

We will handle the following information as personal information that need to be protected.

- (1) Name, address, date of birth, corporate name, department, e-mail address, academic background, career, and other information required for registering user information in making use of our services.
- (2) Business service contents and service fee information including invoices.
- (3) User ID and password issued for using our services.
- (4) Any statements, questions, answers, questionnaire results, and other feedbacks on the Q&A. However, information posted on the public Internet bulletin board is excluded since it is regarded as open to public.

- (5) The log-in / log-out information as recorded on the system for using our service,
- (6) Other information submitted to us, and exchanged with our staff, by e-mail, telephone, facsimile, and post-mail letters.

2. Coverage of the target customers

The customers specified in this statement are as follows.

- (1) Individuals or corporation who are about to use or already used our services.
- (2) Individuals or corporation who inquired us by telephone, e-mail or letter, besides when we can identify them.

3. Purpose of the use of Personal Information

We will use your personal information within the purpose as follows.

- (1) To provide our services.
- (2) Communication concerning the billing and collection of fees for our services provided.
- (3) To investigate and analyze user status for our services.
- (4) For research and development of new services.

4. Handling of Personal Information

(1) Receiving Personal Information from customers

When we require your personal information, we will notify you of the purpose of use and request your consent. In the case of an individual, we will not accept thoughts, creed, religion, race, ethnos, family status, permanent address (excluding information about present address), body and mental disorder, criminal history and any other information except for the information we prescribed.

(2) Personal Information Acquired

We will only receive personal information from you. Never acquire your personal information illegally nor use it

(3) Use of Personal Information

We will not use your personal information except for the purpose you give your consent.

(4) Disclosure of Personal Information to Third Parties

We will not disclose personal information to third parties under any circumstances, except for the following purposes.

- (a) When we get a consent to disclose the personal information of a person

- (b) When we have to handle the personal information commissioned by or jointly with a third party, to accomplish of the purpose of use
- (c) When taking over personal information to a third party(e.g. company split-up) in order to continue our business service, as part of the operating assets
- (d) When using personal information mutually with the specific third party, under the condition that it is released or is notified to the person for that particular party and the purpose in advance

(5) Management of Personal Information

We will train and manage our employees not to have any unauthorized access, loss, destruction, unauthorized disclosure to the outside, and any change of Personal Information which the clients provide to us. We also encrypt Personal Information when transmitting through net, take suitable measures to prevent unauthorized access of computer, and establish the anti-virus system and the backup system of Personal Information data.

(6) About the inquiry about Personal Information

When the following request is received from a client about client's own Personal Information which our company manages, our company respects his/her/their intention(s) and does required correspondence in the rational range, after checking their identities.

5. Other Attentions / Notes

Phoenix Consulting, Inc. strictly observes the Personal Information protection rules and regulations according to the policy indicated above, for the Personal Information acquired from our customers through user inquiries, both in the form of e-mails and user inquiry forms submitted online.

(1) Proclamation on Customer Information Indicated on Linked Sites on the Web

We are not liable for the third-party web links from our web site. We recommend our home page visitors to check the respective web sites for their policies with regard to personal information (such as privacy policies).

(2) The use of the "Cookie"

We use so-called "cookies" in our e-learning services. The "cookie" function allows us to know when the home PC user accesses which web page in the course of e-learning. This makes it possible for us to show the next page for e-learning to offer due support. The knowledge will help us improve our e-learning support service by assessing user status in the learning process.

(3) The change of this privacy policy

When we change some part of our privacy policy, we would notify all of you about its change here on this inquiry website.

Date of enactment : 01/08/2014

Toru Kishida, Representative Director and Chairman

Peter A. Owans, President and CEO

Personal Information Help Desk at Phoenix Consulting, Inc.

Phone: (International) 81 03 5962 3511; (Domestic) 03 5962 3511

E-mail: support@phoenix-consulting.com

Office Hours: 9:00 to 18:00, Monday through Friday

(Closed on weekends, national holidays and corporate off-days)

9th Floor, Odakyu Kashiwagi Building, 7-7-30 Nishishinjuku, Shinjuku-ku,

Tokyo 160-0023, Japan