

## Privacy Policy

ShuR Co., Ltd. (the “Company”) considers that it is our social responsibility to properly handle personal information in connection with providing “SLinto”, a cloud-sourced online sign language dictionary. To fulfill this responsibility, the Company will take the actions set forth below.

### 1. Compliance with Laws and Regulations

In order to protect customers’ personal information, the Company will comply with privacy laws and regulations, national policies and other standards, guidelines issued by regulators, this Privacy Policy statement and other documents that govern customers’ relationship with the Company.

### 2. Appropriate Acquisition of Personal Information

When the Company acquires personal information, the Company will do so by lawful and fair means. If personal information is not provided as requested by the Company, all or part of the Company’s services may not be available.

### 3. Purposes of Using Personal Information

Personal information will be only used within the limits necessary to implement the purposes of use listed below without otherwise forming an agreement between customers and the Company. Further, the Company will not modify the purposes of use exceeding the limits recognized to be fair and rational.

- (i) For provision, maintenance, improvements, application of the cloud-sourced online sign language dictionary service provided by us, development of new services, research and analysis regarding sign language, publishing of and communication in connection with information regarding sign language and the sign language dictionary. and services ancillary thereto (together, “SLinto Service”);
- (ii) to perform operational and marketing activities including customers’ development;
- (iii) to research or develop the SLinto Service provided by or to be provided by the Company by using market research, data analysis or customer surveys; and
- (iv) for any other purposes in connection with the above purposes to enable the Company to adequately and smoothly provide services to customers.

### 4. Sensitive Information

The Company will not collect, use or provide to third parties information on political views, creed (religion, philosophy, and beliefs), membership of labor unions, race or ethnic group, family origin or permanent domicile, matters related to health and medicine, or sex life or criminal record (“Sensitive Information”), except in cases permitted by laws. If such information is to be collected, used or provided to third parties in such cases, the information will be handled with special care to avoid the collection, use or provision to third parties beyond the extent required or permitted.

5. Notification, Publication and Exhibition of Purposes of Use in the Collection of Personal Information

The Company will make public the purposes of use of personal information by displaying usage information on its Web site and by responding to inquiries (if any) or otherwise.

The Company will notify the person of or make public the purposes of use of personal information promptly upon the collection of the said information, except when the purposes of use are disclosed.

The Company will specify the purposes of use of personal information in advance, when the Company obtains personal information directly from the principal.

6. Guarantee of Accuracy of Personal Data

The Company will endeavor to ensure that personal data is accurate and up-dated to the extent necessary to implement the purposes of use. The Company will specify the period of storage of personal data depending on the purposes of use, and delete the said data upon expiration of the said period, except when the period of storage is designated by law.

7. Measures for Personal Data Security Control

The Company will implement reasonable preventive and corrective measures against unauthorized access to, and the leakage, loss, destruction or falsification, etc., of personal information, by establishing a basic policy and rules on security and the necessary administration pertaining to security control measures.

8. Provision of Personal Data to Third Parties

The Company will not provide personal data to any third party without that person's prior consent except in cases permitted by laws.

9. Outsourcing Handling of Personal Data

The Company may outsource all or part of handling of personal data to the extent necessary for implementation of the purposes of use. In such case, the Company will exercise necessary and appropriate supervision over the contractors to which handling of personal data is outsourced in order to ensure personal data security.

10. Share within the group

The Company may share and use personal information within the Company's Group. The personal information which the Company may share or use within the Company's Group are the customer's all personal information and the purpose of the shared use are the purposes set forth in Purposes of Using Personal Information above. The Company's Group means Specified Non-profit Organization ShuR, ShuR Co., Ltd., and University Student Association Linksign. The person in charge of controls and operations of the customer's personal information is as follows.

ShuR Co., Ltd.

Person in charge:[Mai Kawano]

#### 11. Procedure for Responding to Requests for Disclosure, etc. of Collected Personal Data

The Company will accept requests for notification of purpose of use, disclosure, revision, addition, deletion, suspension of use, and removal or suspension of provision to third parties related to collected personal data in accordance with the procedure prescribed by the Company.

#### 12. Use of Cookies

The Company may use “cookies” or similar electronic tools to collect information to enhance customers’ experience with this Web site. Any information collected by the cookies used by the Company will be collected anonymously and will not be used by the Company to subsequently identify customers or to prepare the collection, processing, or use of personal information about customers without customers’ prior consent.

If customers prefer, customers can usually set their browser to disable cookies. However, it is possible that some parts of this Web site will not function properly if customers disable cookies.

#### 13. Access-log Recording

This Web site can keep track of customers’ visiting histories. The Company’s access log contains customers’ domain names, browsers, access dates, links used, etc. but such information does not identify individual names.

#### 14. Contact for Inquiries, Complaints, etc., regarding Handling of Personal Information

The Company will properly handle inquiries, complaints, etc., regarding the handling of personal information. All inquiries, complaints, etc. should be directed to:

ShuR Co., Ltd.

Contact: 4489-105 SFC-IV, FUJISAWA-SHI, KANAGAWA, JAPAN, 252-0816

Tel: +81(0)-44-589-4448

E-mail: slinto-pp@shur.co.jp

#### 15. Links To Third-Party Web Sites

The Company may provide links to third-party Web sites. Since the Company does not control third-party sites and is not responsible for any personal information that customers may provide while on such sites, the Company encourages customers to read the privacy policies on those Web sites before the customer provides any of his or her personal information to such sites.

#### 16. Personal information protection initiatives (personal information protection management system)

The Company shall review the content of the Privacy Policy as needs arise and revise it in response to any revision of the laws and regulations, or development such as changes in the IT environment.

The revised Privacy Policy will be published on the Company’s Web site, by responding to inquiries or otherwise.

Instituted on August 14, 2013

ShuR Co., Ltd.

Representative Director: Junto Ohki