# Kirara21 Co., Ltd. Privacy Policy

Last updated: August 19, 2022

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

## **Interpretation and Definitions**

### Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

### Definitions

For the purposes of this Privacy Policy:

- Application means the software program provided by the Company downloaded by You.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Kirara21 Co., Ltd., MB Build. 382 Motohonnouji-Cho, Nakagyo-Ku, Kyoto, JAPAN.
- Personal Data is any information that relates to an identified or identifiable individual.
- Service refers to the Application.
- You means the individual or the company, or other legal entity using the Service.

# **Collecting and Using Your Personal Data**

### **Types of Data Collected**

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Company name/ Site name
- Web site URL

Payment information, such as credit card information, that You provide when purchasing Our Service is used only by the sales business partner companies and is never seen or collected by the Company.

### **Use of Your Personal Data**

The Company may use Personal Data for the following purposes:

- To manage Your License: To manage Your license activation, reissue, renewal, You are requested to
  provide the Personal Data and the Company will retain and use to check the validity of Your data, the
  adequacy of your license.
- To contact You: To contact You by email regarding updates or informative communications related to the functionalities, products or contracted services, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about other services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- To manage Your requests: To attend and manage Your requests to Us.
- For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

- With sales business partners: We may share Your information with Our sales business partners to
  process purchases, returns, refunds and other necessary transactions. Payment information, such as
  credit card information, is excluded.
- With Your consent: We may disclose Your personal information for any other purpose with Your consent.

### **Retention of Your Personal Data**

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

#### **Transfer of Your Personal Data**

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

### **Disclosure of Your Personal Data**

#### Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

#### Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

### **Security of Your Personal Data**

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

# **Changes to this Privacy Policy**

We may update Our Privacy Policy from time to time. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

# **Contact Us**

If you have any questions about this Privacy Policy, You can contact us:

• By email: support@kirara21.com