

Privacy Policy

Neural Group Inc.
Founder & CEO Roi Shigematsu
Establishment date: October 1, 2018
Final revision date: February 27, 2025

Privacy Policy

1. Basic Policy on Personal Information Protection

Neural Group Inc. (hereinafter referred to as “the Company”) recognizes the protection of personal information as the Company’s social mission in the development of various services using AI, and will take the utmost care in collecting and handling personal information in accordance with the privacy policy established by the Company.

2. Definition of personal information

For the purpose of this Privacy Policy, personal information is information about living individuals that falls under any of the following categories

- Name, date of birth, and other descriptions, etc. all matters described or recorded in a document, drawing, or electromagnetic record (meaning a record made by electronic, magnetic, or other means not recognizable to human perception), or expressed by voice, motion, or other means (excluding personal identification codes) that can be used to identify a specific individual (including information that can be easily cross-checked with other information and thereby identify a specific individual).
- Any personal identification code contained.

Cases that fall under the category of personal information

- Name of the person
- Date of birth, contact information (address, residence, telephone number, and e-mail address), and position in the company,
- or affiliation, combined with the person’s name
- Video information that can be used to identify the person, such as information recorded by security cameras
- Audio recording information that can identify a specific individual by reason of the inclusion of the individual’s name, etc.
- E-mail address that can identify a specific individual
- Even if it is not possible to identify a specific individual who is alive at the time of acquisition, if new information is added or collated after acquisition, and as a result it becomes possible to identify a specific individual who is alive, then it is considered to be personal information.
- Information that can identify a specific individual that is publicly available in official gazettes, telephone directories, staff records, legal disclosure documents (e.g., securities reports), newspapers, websites, SNS, etc.

3. Acquisition of personal information

When we acquire personal information, we will specify the purpose of use and obtain personal information through legal and appropriate means.

In order to make our services more convenient, we may collect information about how you access and use the services we provide, including cookies.

4. Use of personal information

Personal information acquired by the Company will be used within the scope of the purpose of use indicated at the time of acquisition. In the event that personal information is to be shared with a third party, the Company will notify or publicly announce the fact that personal information will be shared, the items of personal information to be shared, the scope of the parties with which the information will be shared, and the name of the party responsible for managing the information. In addition, when the handling of personal information is entrusted to a third party, we will exercise necessary and appropriate supervision over the third party to ensure that the personal information is used appropriately.

5. Limitation by purpose of use

We will use the personal information we have obtained within the scope necessary to achieve the purpose of use. In addition, we will establish and implement procedures to take necessary measures to ensure that personal information is not used outside of the scope of the purposes of use (use for purposes other than those stated). When using personal information outside the scope of the purpose of use, we will obtain the prior consent of the person concerned. However, this does not apply in the following cases.

- (1) In accordance with the Personal Information Protection Law and other laws and regulations
- (2) When it is necessary for the protection of the life, body, or property of an individual and it is difficult to obtain the consent of the individual
- (3) Cases in which the provision of personal information is particularly necessary for improving public health or promoting the sound growth of children and in which it is difficult to obtain the consent of the individual concerned
- (4) When it is necessary for us to cooperate with a national agency, a local government, or an individual or entity entrusted by either a national agency or local government to execute affairs prescribed by law, and obtaining the consent of the individual is likely to impede the execution of the relevant affairs.

6. Provision of personal information to third parties

We will not provide personal information to third parties without obtaining the prior consent of the individual, except as required by the Personal Information Protection Law or other laws and regulations. When providing personal information to a third party, we will properly fulfill the obligation to confirm and record the information as stipulated in the Personal Information Protection Law.

7. Management of personal information

We will maintain the accuracy and up-to-dateness of personal information to the extent necessary for the achievement of the purpose of use, manage it safely, including necessary and appropriate supervision of employees who handle personal information, and implement necessary and appropriate information security measures to prevent loss, alteration, or leakage of personal information. In addition, we will endeavor to delete without delay any personal information that is no longer required for use.

8. Compliance with laws, regulations, national guidelines, and other norms

We will comply with the Personal Information Protection Law, related laws and regulations, guidelines, and norms of the organizations to which we belong.

9. Continuous improvement of the personal information protection management system

We will implement and maintain a management system for the protection of personal information, which will be regularly reviewed and continually improved.

10. Contact for inquiries

If you wish to request notification of the purpose of use, disclosure, correction, addition or deletion of content, suspension of use, elimination, suspension of provision to third parties, or any other inquiries or complaints regarding your personal information held by us, please contact the "Personal Information Inquiry Desk" below.

- Contact for Personal Information Inquiries: Personal Information Protection Manager, Executive Officer (CFO)
- Email us at: contact@neural-group.com

Handling of Personal Information

1. Purpose of use of personal information acquired by the Company

We will acquire the following personal information in a proper and fair manner

(1) Personal information obtained by methods other than direct writing

- Image and video data acquired in the course of business operations for which we are entrusted
 - To analyze and compile statistical data for the provision of our services
- Image/video data to be provided as a third party
- Image/video data to be obtained from public information
- Images and video data taken on public roads, parking lots, warehouses, common areas of offices and condominiums, etc.
 - To create statistical data related to our services in a format that does not identify individuals
 - To improve the accuracy of our technology, products or services, and to develop new functions and services
- ✂ In the case of obtaining analyzed estimation information from image data, the image data is not acquired and stored, but discarded after analysis.
- ✂ Image data is acquired for the purpose of analysis and research and development, and is not intended to identify passers-by. The image data may include information such as the faces and behavior of passers-by as incidental and indivisible information, but will not be used for any purpose other than those stated above.

(2) Personal information subject to disclosure request

- Personal information concerning all of our subcontractors
 - For various management purposes necessary for operation
- Personal information related to the employment management of all employees of the Company
 - For personnel and labor management
- Personal information of applicants who wish to join our company
 - For employment selection, etc.
- Personal information of each inquirer

- To respond to inquiries
- Personal information of users of our services
 - To send and provide information regarding our services, events, special offers, etc.
 - To provide services, ship products and contact you in connection therewith
 - For questionnaires and various surveys
 - To provide related after-sales services

2. Handling of information that may be obtained in connection with the “Smart-kun” service, a drive recorder application

In providing services through the “Smart-kun” drive recorder application (hereinafter referred to as the “Application”), the Company will use information that cannot be used to identify individuals, such as the characteristic points of images captured by the camera when the Application is launched (hereinafter referred to as “Vehicle Information”). In providing services through the “Smart-kun” drive recorder application (“the Application”), the Company will use information that cannot be used to identify individuals, such as feature points of images captured by the camera when the Application is launched (“Vehicle Information, etc.”). (hereinafter referred to as “vehicle information, etc.”). The Vehicle Information, etc. will be used mainly for the purpose of improving the accuracy of this application and developing its functions, to understand road conditions, pedestrians, and distance to other vehicles in the vicinity, etc., but will not identify the user of this application, passengers, or passersby (hereinafter referred to as “Passersby, etc.”). However, it does not identify the user of this application, passengers, or passers-by (hereinafter referred to as “Passers-by, etc.”). The vehicle information, etc. that we collect may incidentally include information on the faces and behavior of Passers-by, etc. However, such information will not be used for any purpose other than the purposes of use of the vehicle information, etc. listed below, except as required by law. The acquired information shall be deleted as soon as the purpose of use ends.

Purpose of use of vehicle information, etc:

- Provision of services, improvement of accuracy, development of functions, other changes, and operation and maintenance of this application
- Consideration and development of our business other than this service, etc.
- Creation and provision (including provision to third parties) of aggregated and analyzed statistical data, attribute information, etc. The same shall apply hereinafter).
- Providing information on traffic, roads, topography, structures, weather and other environmental information, etc.

Details of the acquisition of vehicle information and other information in this service are as follows.

Period of acquisition of vehicle information, etc.: From June 2020 to the end of provision of this service

3. Handling of information that may be obtained in connection with signage advertising services

In providing signage advertising services, we obtain and use information that does not identify individuals, such as characteristic points of images taken by AI cameras and signage advertising services equipped with AI cameras (“viewer information, etc.”). (hereinafter referred to as “Visitor Information, etc.”). The Visitor Information, etc. is used to monitor the status of visitors (hereinafter referred to as “visitors, etc.”) viewing the signage advertisements. The information is not intended to identify Passers-by, etc., but is used to understand how they are viewing signage advertisements, to improve the accuracy of AI software, and to develop functions. The Visitor Information that we obtain and use includes information on the faces and behavior of Passers-by (limited to information that does not identify any individual). Such information shall not be used for any purpose other than the purposes of use of visitor information, etc., as described below, except as required by law. The acquired information shall be deleted as soon as the purpose of use ends.

Purpose of use of visitor information, etc:

- Provision of signage advertising services, improvement of accuracy and development of functions, other changes, and operation and maintenance
- Consideration and development of our business other than this service, etc.
- Creation and provision of aggregated and analyzed statistical data, attribute information, etc.

Details of the acquisition of visitor information and other information in this service are as follows.

Period of acquisition of viewer information, etc.: From October 2021 to the end of the provision of signage advertising services

Acquisition (planned) location: condominium with signage advertising service installed

4. Handling of information that may be obtained in connection with the development of AI functions

In providing AI for person attribute estimation, we acquire and use images captured by AI cameras. The acquired images are used to improve the accuracy of our AI software and to develop its functions, but are not intended to identify passers-by. When taking images, we will notify passers-by that the images are being taken, and if they request that the acquired images be deleted, we will comply with their requests in accordance with this Privacy Policy. This AI function development is mainly used for signage advertising services to provide better advertisements to viewers, and will not be used for purposes other than those listed below, except as required by law. The acquired images will not be provided to any third party. The acquired information shall be deleted as soon as the purpose of use ends.

Intended Use:

- Accuracy evaluation, function development, other changes, operation and maintenance of AI for human attribute estimation (not provided to third parties)

Details of the acquisition in this case are as follows

Period of acquisition of viewer information, etc.: From October 2021 to the end of the provision of signage advertising services

Acquisition (planned) location: Tokyo, Japan

5. Outsourcing of personal information acquired

We may outsource some of the personal information we obtain. We conduct evaluations of the outsourcing partners based on our standards.

6. Security control measures for retained personal data

(1) Formulation of basic policy

The Company has established a basic policy to ensure the proper handling of personal data (including personal information that the Company has obtained or is about to obtain and that is scheduled to be handled as personal data) as an organization (see "Personal Data Protection Policy", etc.). The Company has established a basic policy to ensure the proper handling of personal data (including personal information that the Company has acquired or is about to acquire and is scheduled to be handled as personal data) as an organization (see "Personal Information Protection Policy", etc.).

(2) Discipline for handling personal data

We have established rules for handling personal data, including methods of handling personal data, responsible persons and persons in charge, and their duties.

(3) Technical and physical safety control measures

In areas where personal information is handled, the company controls employee access to rooms and restricts the equipment they bring in, and implements measures to prevent unauthorized persons from viewing personal information.

The Company takes measures to prevent theft or loss of equipment, electronic media, and documents that handle personal information, and implements encryption or password control for such equipment, electronic media, etc. when carried, including within the Company.

A system is in place to protect information equipment that handles personal information from unauthorized external access or unauthorized software.

(4) Organizational safety control measures

We appoint a "Personal Information Protection Manager" as the person in charge of personal information management, and clearly define the responsibilities and authority of employees regarding the safe management of personal information.

We will establish internal rules and manuals for safety management, ensure that all employees comply with them, and conduct appropriate audits of the status of compliance.

(5) Personnel safety control measures

Provide regular education and training for employees regarding the safe management of personal information.

7. Requests for Disclosure of Personal Information

We recognize that you have the right to request that we notify you of the purpose of use of your personal information, disclose your personal information or records provided to third parties, correct, add, delete, stop use of, erase, or stop providing to third parties your personal information, and if you make such a request, we will respond promptly within a reasonable time and to a reasonable extent in accordance with the Personal Information Protection Law and related laws. In the event of such a request, we will respond promptly within a reasonable period of time and to a reasonable extent in accordance with the Personal Information Protection Law and related laws and regulations.

Procedures for Responding to Requests for Disclosure, etc.

To make a request for disclosure, etc., please follow the procedure below and send your request by mail.

Please note that we may not be able to accept your request if there are any deficiencies or shortcomings in the requested information. For each request for disclosure of personal information or notification of purpose of use, an administration fee of 1,000 yen will be charged by bank transfer.

Personal information received on the "Personal Information Disclosure Request Form" will be used to respond to inquiries and will not be used for any other purpose.

When the person himself/herself makes a request	<p>To make a request for disclosure, etc., please prepare the following documents and send them by delivery recorded mail.</p> <ol style="list-style-type: none">1. Request for Disclosure Form Please download the above file and fill in the required information.2. Identification documents A copy of a document that verifies your name and current address, such as a driver's license, passport, or health insurance card.
When a proxy makes a request	<p>If the person making the request for disclosure, etc. is a legal representative or a representative authorized by the principal, please enclose the following documents in addition to the documents listed in the preceding paragraph.</p> <p>In the case of a legal representative</p> <ol style="list-style-type: none">1. Documents to confirm that the applicant has the right of legal representation A copy of the family register or, in the case of a person with parental

	<p>authority, a copy of the health insurance card with dependents' names filled in is acceptable.</p> <p>2. Documents to verify the identity of the legal representative A copy of a document such as a driver's license, passport, or health insurance card that verifies the name and current address of the proxy.</p> <p>In the case of a proxy by power of attorney</p> <p>1. Power of Attorney (Attachment to Request Form for Disclosure of Personal Information) Please download the above file and fill in the required information.</p> <p>2. Certificate of your seal impression (issued within the last 3 months)</p> <p>3. Documents to verify the identity of the proxy by power of attorney A copy of a document that verifies the name and current address of the proxy, such as a driver's license, passport, or health insurance card.</p>
Billing Address	<p>1-1-2 Yurakucho, Chiyoda-ku, Tokyo, Japan Tokyo Midtown Hibiya Hibiya Mitsui Tower 32F Neural Group Inc. Personal Information Inquiry Desk</p>

*For details regarding disclosure, etc., please contact the Personal Information Inquiry Desk.

Personal Information Inquiry Desk

name	Neural Group Inc.
Location	1-1-2 Yurakucho, Chiyoda-ku, Tokyo, Japan Tokyo Midtown Hibiya Hibiya Mitsui Tower 32F
Personal Information Protection Manager	Executive Officer (CFO)
Contact	contact@neural-group.com

8. About authorized personal information protection organizations

We are a target business of the following authorized personal information protection organization. You may file a complaint with the association regarding the handling of personal information by the association. Please note that this is not the contact information for inquiries about our products and services.

(1) Name of authorized personal information protection organization

Japan Association of Information System Users (JUAS)

(2) Contact for resolution of complaints

Complaint Consultation Office, Secretariat of Authorized Personal Information Protection Organizations
NBF Higashi Ginza Square, 1-13-14 Tsukiji, Chuo-ku, Tokyo

TEL: 03-6264-1316

Hours: 10:00 – 16:00 (except Saturdays, Sundays, and holidays)