

[The governing language of this policy shall be Japanese.]

Cloud Data Policy

Cybozu, Inc. (“Cybozu”) appropriately handles the data (excluding the Customer Information) generated by using our cloud services as follows.

1. Classification of Data

Classification of the data generated by using our cloud services is as follows.

Data Type	Definition and Examples
Stored Data	“Stored Data” means data and information uploaded, produced or otherwise stored by Customer or the Users at your or their initiatives on our cloud services other than Customer Information. For example, Stored Data includes without limitation: (a) file names and contents of files uploaded by the Users, (b) contents of what was stored into a message or other fields by the Users and (c) names of the Users. For the avoidance of doubt, data and information generated by extracting and transforming Stored Data so that the original contents cannot be identified constitute Analytical Data, not Stored Data.
Analytical Data	“Analytical Data” means data and information collected or generated during the course of your use of our cloud services in form that cannot identify original contents of Stored Data other than Customer Information and Stored Data. For example, Analytical Data includes without limitation: (a) numbers of Users and department settings, (b) types and versions of operating systems of computer terminals, (c) device types of computer terminals and (d) trends of how applications are used (e.g., (i) how many times applications are accessed, (ii) numbers of used functions and created records, (iii) how configuration and value settings are set and (iv) whether or not and how many times customization functions are used).

2. Handling of Stored Data

Cybozu will handle Stored Data based on “Article 15, Handling of Stored Data, cybozu.com Terms of Use.”

3. Handling of Analytical Data

(1) Purpose of use

Cybozu will use the Analytical Data only for the following purposes:

- ① To support the services
For example, when the cloud services fail due to the User's operation, by analyzing and identifying the triggered operation will help to resolve the problem.
- ② To provide, maintain, protect, improve and develop our cloud services
For example, by comparing and analyzing the usage frequency of the User for each function will help to determine the priority of which features to improve.
- ③ To analyze, consider and implement appropriate marketing strategies for the Users
For example, by comparing and analyzing the behavior of Users who do and don't have agreements for our cloud services, the results will be used to help the best guide the Users.
- ④ To optimize the method, content and timing of communication to the User
For example, by comparing and analyzing the behavior of persons who are undertaking trial use and using of our cloud services will help to optimize the method (telephone, e-mail, mail, etc.), content and timing of communication.
- ⑤ To optimize listening to the Users' feedback
For example, by comparing and analyzing the Analytical Data of our cloud services will help to listen to the usage methods, etc. from the targeted persons.

(2) Sharing of Analytical Data

Cybozu will not share the Analytical Data to any third parties, except in the following cases:

- ① When the User agrees to disclose or share its Analytical Data with others.
- ② When Cybozu shares the Analytical Data to our affiliated companies only for purposes outlined in this policy.
- ③ When Cybozu shares the Analytical Data with third parties to which Cybozu outsources part or all of the handling of the Analytical Data only for purposes outlined in this policy.*
- ④ When Cybozu organizes the Analytical Data in such a way that specific customer's usage cannot be easily assumed by aggregating or analyzing the Analytical Data across several customer accounts.

- ⑤ When the User goes against our Terms of Use, etc., and disclosing the User Data is considered necessary to protect the rights, property, and/or the services of other Users and/or Cybozu.
- ⑥ When there is an imminent danger to a person's life, body or property, and disclosing your Analytical Data is deemed to be needed urgently.
- ⑦ When Cybozu is required to disclose the Analytical Data under applicable laws and regulations

* Cybozu shall enter into an agreement of outsourcing business including confidentiality obligations and security requirements, and shall disclose only the necessary data within the scope of such necessary purposes. In addition, Cybozu prohibits the use of the data for any business that is not for the purpose of providing the services.

4. Amendment of this policy

Please note that this policy may be amended without notice in response to revisions in laws and regulations, changes in business activities, etc.

July 28, 2017	Amended
September 18, 2020	Amended
July 8, 2021	Amended
November 14, 2021	Amended