

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

## Cloud Data Policy

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

### **Classification of Data**

**Among the data generated by Users using our cloud services, the data handled by us is as follows.**

#### 1. Data that the User has registered, input and saved

##### (1) Customer Information

The information that is necessary to apply for our cloud services such as the User number, the User name, company name, address, residence, contact point, contact information and other matters designated by Cybozu in order to specify the contents of the application. Cybozu uses the Customer Information based on “Article 13, Use of Customer Information, cybozu.com Terms of Use.”

##### (2) Input Data

Data that the User has input and saved in our cloud services.

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

#### 2. Usage data

Excluding the data of 1 above, this data is in relation to the access history and the usage of our cloud services (“Usage Data”). None of the Usage data identifies the User individually.

For example, the following data is included in Usage data:

- All common services
  - Type and version of the OS of the User’s terminal, data type, etc. of the device type, etc.
  - Number of users of the User, number of setting organizations, number of comments, number of applications, number of plug-ins
- Garoon and Cybozu Office
  - Schedule access history
  - Usage or not of the read message notification function
  - Number of schedule registrations
- kintone
  - access history to Space
  - Usage or not of Customization Function

### **Handling of Usage Data**

**Cybozu will use the Usage data only for the following purposes:**

1. To support the services  
For example, when the cloud services fails 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 and consider 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 usage data of our cloud services will help to listen to the usage methods, etc. from the targeted persons.

**Cybozu will not provide the Usage data to any third parties, except in the following cases:**

1. When the User agrees to disclose or share its Usage data with others.
2. When Cybozu shares the Usage data with our affiliated companies only for purposes outlined in this policy.
3. When Cybozu shares the Usage data with third parties to which Cybozu outsources part or all of the handling of the Usage data only for purposes outlined in this policy.\*
4. When the User's actions are against our Terms of Use, guidelines, etc., and disclosing the User data is considered necessary to protect the rights, property, services, etc. of other Users or Cybozu.
5. When there is an imminent danger to a person's life, body or property, and disclosing your Usage data is deemed to be needed urgently.
6. When laws and regulations, etc. require Cybozu to disclose your Usage data.

\* 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.

Please note that this page may be amended without notice.

July 28, 2017                      Amended

September 18, 2020              Amended