

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

Cloud Data Policy

Cybozu, Inc. (“Cybozu”) appropriately handles data (excluding Customer Information) generated through use of our cloud services (the “Services”) in accordance with the policy described below. Unless otherwise provided for, the terms used in this policy are used in accordance with the terminology used in the cybozu.com Terms of Use.

1. Classification of Data

Data generated through use of the Services is classified as follows.

Data Type	Definition and Examples
Stored Data	<p>Definition:</p> <p>“Stored Data” means data, messages, files, documents and other content (excluding Customer Information) uploaded and stored on the Services by Customers or Service Users.</p> <p>Examples:</p> <ul style="list-style-type: none">• File names and the content of files uploaded by Service Users• Content uploaded in messages or spaces by Service Users• Title and content of e-mails sent and received by Service Users• Names of Service Users
Analytical Data	<p>Definition:</p> <p>“Analytical Data” means data concerning the use of the Services (how and when Customers and Service Users use the Services) and includes log data and device information automatically collected by Cybozu through the use of the Services, application and app configuration information and settings, and statistical data compiled and processed from such data.</p>

	<p>Examples:</p> <ul style="list-style-type: none"> • History of browsing, searching, and other operations in each application • Customer's device operating system type and version • Customer's device type, etc. • Error logs and crash logs • Number of Service Users and number of configured departments • Number of features used and data records created in each application and app • Configuration information and settings for each application • Whether applications have been customized and how many times
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2. Handling of Stored Data

Cybozu will handle Stored Data in accordance with the provisions of the 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, if the Services fail due to an operation by a customer, analyzing and identifying the operation that triggered the failure will help to resolve the problem.
- ② To provide, maintain, protect, improve, and develop the Services
For example, comparing and analyzing the Service Users' usage frequency of each feature will help to determine the priority of which features to improve.
- ③ To analyze, consider and implement appropriate marketing strategies for the Service Users
For example, the results obtained from comparing and analyzing the behavior of Customers who have contracted the Services, with that of people who have not, will help provide the most appropriate marketing communication.
- ④ To optimize the method, content, and timing of communication to the Service User
For example, comparing and analyzing the behavior of customers during trial use and active use of the Services will help optimize the method (telephone, e-mail, mail, etc.), content, and timing of follow-up communication.

- ⑤ To optimize listening to the Service Users' feedback
For example, comparing and analyzing use of the Services will help us identify and interview the most suitable target users about how they use the Services.

(2) Sharing of Analytical Data

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

- ① When the Service User agrees to disclose or share its Analytical Data with others.
- ② When Cybozu shares the Analytical Data with 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 it is deemed necessary to protect the rights, property, or services of other Customers or Cybozu due to a breach of our Terms of Use, etc., by the Service User.
- ⑥ When it is necessary to protect an individual's life, body, or property.
- ⑦ When required by applicable laws and regulations.

* Cybozu shall enter into outsourcing agreements with contractors that include confidentiality obligations and security requirements and shall disclose only the necessary Analytical Data within the scope of such necessary purposes. Cybozu prohibits the use of such 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
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June 19, 2025	Amended
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