

# Privacy Policy

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## **Action Guidelines for Protecting Personal Information**

SOFTBANK TELECOM Corp. (hereinafter called "SOFTBANK TELECOM") will abide by the "Secrecy of Communications and Personal Information Protection Law" (Law number 57, May 30, 2003), "Telecommunications Industry Personal Information Guidelines" and the "Personal information protection management systems-Requirements" (JISQ15001) and implement the following items to protect personal information.

Furthermore, these "Action Guidelines for Protecting Personal Information" are based on Article 14 of the "Telecommunications Industry Personal Information Guidelines" and is SOFTBANK TELECOM's "Privacy Policy".

When the definition used in this "Action Guidelines for Protecting Personal Information" is not defined specifically, the meaning is the same as the definition defined in "Telecommunications Industry Personal Information Guidelines".

### **1. Reinforcement of Employee Education**

SOFTBANK TELECOM will prepare learning material concerning the protection of personal information, distribute it to all of SOFTBANK TELECOM's permanent and temporary employees and implement training at least once a year for all permanent and temporary employees handling personal information.

### **2. Enforcement of Internal Rules concerning the Protection of Personal Information**

SOFTBANK TELECOM will enforce internal rules concerning the protection of personal information, clarify the guidelines for handling personal information and take strict actions to prevent leakage of personal information.

### **3. Appointment and Empowerment of a "Supervisor for Protecting Personal Information"**

SOFTBANK TELECOM will appoint the supervisor of Information Asset Management as the "Supervisor for Protecting Personal Information". The "Supervisor for Protecting Personal Information" will obey the law and guidelines, establish internal rules, improve the audit system, establish and maintain a system that clearly shows his duties, and implement any other necessary actions concerning the handling of personal information.

#### **4. Implementation of Information Security**

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To prevent leakage or loss of personal information and for the safe control of personal information, SOFTBANK TELECOM will implement necessary steps such as access control and prevention of external illegal access to protect personal information.

#### **5. Review and Improve Business Subcontractors**

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When concluding an agreement with business subcontractors, SOFTBANK TELECOM will review the qualifications of the business subcontractors as well as establish safety control management, duty of secrecy, recommission conditions and any other items necessary to protect personal information. SOFTBANK TELECOM will also monitor the business subcontractors regularly for the protection of personal information.

Furthermore, when SOFTBANK TELECOM provides the business subcontractors and any other third party partners related to the business subcontractors with subscriber information, SOFTBANK TELECOM will abide by "Japan's Telecommunications Business Law" Article 4 concerning communications secrets.

#### **6. Enhancement and maintenance of the Audit System**

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To ensure that the protection of personal information is handled appropriately, SOFTBANK TELECOM will maintain an internal audit system.

Furthermore, SOFTBANK TELECOM will consider audits using an access log because it is an effective method for early detection of attempts to leak personal information and will have a deterrent effect, leading to the prevention of personal information leakage.

## **7. Appropriate ways of collecting, using, offering and officially announcing personal information**

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When collecting, using, offering and officially announcing personal information, SOFTBANK TELECOM will consider the business contents and size, and carry it out appropriately.

### 1) Usage Purpose of Personal Information

1. To be able to handle enquiries from customers, to be able to explain the company's procedures to customers and to allow SOFTBANK TELECOM to conduct business in a normal fashion.
2. To enable SOFTBANK TELECOM to calculate customer charges
3. To enable SOFTBANK TELECOM to send invoices
4. To enable SOFTBANK TELECOM to carry out market research and analysis
5. To offer customers information on campaigns, products and services of SOFTBANK TELECOM and other companies
6. To provide necessary information to NTT East, NTT West and other telecommunications providers in order to provide connection services to customers
7. To notify customers of changes to their services, and of important changes in the telecommunications industry
8. To enable SOFTBANK TELECOM to carry out and inform customers of construction and maintenance of its telecommunications services and network

Furthermore, in any case where personal information shall be used other than the purposes mentioned above, SOFTBANK TELECOM will clarify the usage purpose and receive prior consent from the customer.

### 2) Third Party Usage

SOFTBANK TELECOM will share personal information with Third Party in the following cases.

- a. Third Party Usage with SOFTBANK TELECOM

1. Group businesses of SOFTBANK TELECOM (For details, please follow the link below.)  
(<http://www.softbanktelecom.co.jp/group/index.html>)
  2. BB TECHNOLOGY Corp. (For details, please follow the link below.)  
(<http://www.bbtec.co.jp/>)
  3. SOFTBANK BB Corp. (For details, please follow the link below.)  
(<http://www.softbankbb.co.jp/>)
  4. Group businesses of SOFTBANK BB Corp. (For details, please follow the link below)  
(<http://www.softbankbb.co.jp/company/group/index.html>)
  5. BB Modem Rental Yugen Kaisha (For details, please follow the link below.)  
(<http://www.bbmr.co.jp/>)
  6. SOFTBANK MOBILE Corp. (For details, please follow the link below.)  
(<http://www.softbank.jp/>)
  7. Group businesses of SOFTBANK MOBILE Corp. (For details, please follow the link below.)  
(<http://www.softbank.jp/corporate/about/group/index.html>)
- b. Personal Information subject to Third Party Usage  
Any personal information such as name, address, phone number, E-mail address, customer's ID, etc. (excluding situations where personal information infringes on the secrecy of communications) SOFTBANK TELECOM acquires from Telecommunication services SOFTBANK TELECOM specifies(\*).
- \* Relay phone service, Otoku Line, ODN, ODN IP phone service.
- c. Purpose of Third Party Usage
1. To be able to handle enquiries from customers, to be able to explain our company's procedures to customers and to allow the company to conduct business in a normal fashion.
  2. To enable the company to calculate customer charges
  3. To enable the company to send invoices
  4. To enable the company to carry out market research and analysis
  5. To offer customers information on campaigns, products and services of SOFTBANK TELECOM and other companies

6. To notify customers of changes to their services, and of important changes in the telecommunications industry

d. Person responsible for Third Party Usage of Personal Information

Supervisor of SOFTBANK TELECOM's Information Asset Management

3) When using SOFTBANK TELECOM's services, customers will need to subscribe to Nippon Telegraph and Telephone East Corporation (NTT East), Nippon Telegraph and Telephone West Corporation (NTT West) or any other telecommunications providers in cases where necessary.

For the customer's convenience or due to an agreement with the telecommunications providers, SOFTBANK TELECOM may carry out the subscription procedures, payments and any other procedures on behalf of the telecommunications providers.

In this case, SOFTBANK TELECOM may receive the customer's personal information needed from the telecommunications providers.

2. Any communications secrets such as communications records, calling records and caller information will be handled pursuant to the "Japan's Telecommunications Business Law" Article 4 and any other related guidelines.
3. In cases where a SOFTBANK TELECOM's employee's personal information is collected, SOFTBANK TELECOM will clarify the usage purpose in each case.
4. In cases where business partner's personal information is accumulated, SOFTBANK TELECOM will clarify the usage purpose in each case.
5. In cases where the customer requests SOFTBANK TELECOM to notify of the usage purpose, disclose or correct personal information, SOFTBANK TELECOM will reply in writing. In doing so, SOFTBANK TELECOM may demand a fee within a reasonable range.
6. For information on the disclosure or correction of personal information acquired or any complaints concerning the handling of personal information, please contact the following: E-mail: [privacy@tm.softbank.co.jp](mailto:privacy@tm.softbank.co.jp) (Japanese Only)

Phone Number:0088-21-5814 (Toll free, Japanese Only)

Office Hours:9:00-18:00/Monday to Friday (excluding holidays, year-end and New Year holidays, and system-maintenance-days)

7. The following is assigned by us as an approved organization to protect personal information and to accept grievance resolution requests.  
Denki Tsushin Kojin Joho Hogo Suishin Center  
(Telecommunications Personal Information Protection Promotion Center)  
<http://www.dekyo.or.jp/suishin/index.html>

## **8. Continuous Improvement in the Protection of Personal Information**

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SOFTBANK TELECOM will continuously improve the protection of personal information for the above activities 1 through 7.

## **9. Revisions**

SOFTBANK TELECOM may revise all or a part of the present "Action Guidelines for Protecting Personal Information". SOFTBANK TELECOM will announce any material changes at its web site in an easily comprehensible manner as necessary

## **Coverage of this "Action Guidelines for Protecting Personal Information"**

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"Personal Information" mentioned in this "Action Guidelines for Protecting Personal Information" is any personal information including name, birth date or any other personal information, customer ID, or any other ID, image or voice (including voices that cannot be identified by cross-checking with other information) that can identify a particular person, regardless of whether it belongs to a SOFTBANK TELECOM customer, employee of a SOFTBANK TELECOM subcontractor or an employee of SOFTBANK TELECOM. This "Action Guidelines for Protecting Personal Information" will apply to all of the personal information SOFTBANK TELECOM possesses unless otherwise specified.