

PRIVACY POLICY

Happinet Corporation – "Happinet GAMES" / "Happinet Indie Collection"

This Privacy Policy (this "Policy") explains how Happinet Corporation ("Happinet," "we," "us," or "our") handles information in connection with the English-language pages of the game information website operated under the brand names "Happinet GAMES" and "Happinet Indie Collection," located at <https://happinet-games.com/> (the "Website").

The Website is operated from Japan as an informational portal that introduces video game titles distributed in Japan. No goods, services, downloads, or in-game items can be purchased, ordered, reserved, or paid for through the Website. The Website does not allow user registration, account log-in, newsletter subscription, campaign entry, or comment posting. An English-language inquiry form is provided on the Website for visitors who wish to contact us; the limited information collected through that form and the manner in which it is handled are described in Section 15.

1. Scope

This Policy applies solely to the English-language pages of the Website. It does not apply to:

- (a) Japanese-language pages of the Website or of Happinet, or any other website, application, social media account, or service operated by Happinet or any of its group companies;
- (b) game platforms, online stores, social media services, video services, publisher websites, distributor websites, or any other third-party websites or services that may be linked from the Website; or
- (c) any service, campaign, store, support desk, or inquiry channel operated by Happinet separately from the Website.

For Happinet's handling of personal information in matters that fall outside the scope of this Policy, please refer to Happinet's corporate privacy policy in Japanese, available at <https://www.happinet.co.jp/privacypolicy/index.html>.

2. About the Operator and Place of Establishment

The Website is operated by Happinet Corporation, a company incorporated and having its principal place of business in Japan. We have no establishment, branch, representative, processor, or sales agent located outside Japan that is engaged in the operation of the Website.

3. Purpose of the Website; No Targeting of Foreign Jurisdictions

The Website is provided as a Japan-based informational service. The Website is not specifically directed at, marketed to, or intended to solicit visitors located in:

- (a) the European Economic Area (EEA) or the United Kingdom;
- (b) the State of California or any other state or territory of the United States of America;
- (c) the People's Republic of China (including the Hong Kong SAR and Macao SAR), or Taiwan; or
- (d) any other jurisdiction outside Japan.

We do not offer goods or services to data subjects in the jurisdictions listed in (a) through (d) above, and we do not monitor the behaviour of any individual taking place in those jurisdictions. The availability, purchase, download, post-sales support, age rating, and other conditions of any game introduced on the Website may differ by country or region and are governed by the applicable third-party platform, store, distributor, or service provider. The mere availability of English-language pages on the Website is intended for the convenience of (i) inbound visitors to Japan and (ii) readers interested in the Japanese video-game market who are not fluent in Japanese, and shall not be construed as targeting any specific foreign jurisdiction.

4. Information We Do Not Collect (Other Than Through the Inquiry Form)

Except for the limited information voluntarily provided by visitors through the English-language inquiry form referred to in Section 15, we do not intentionally collect personal information from visitors through the Website. In particular, we do not collect:

- (a) names, postal addresses, telephone numbers, account IDs, or other contact details (other than the email address and any name voluntarily provided through the inquiry form);
- (b) payment information or credit-card information;
- (c) the contents of communications other than the contents of an inquiry voluntarily submitted through the inquiry form;
- (d) newsletter-subscription information;
- (e) campaign or survey responses;
- (f) precise geolocation data;
- (g) any sensitive information, including racial or ethnic origin, religious or philosophical beliefs, political opinions, trade-union membership, genetic data, biometric data, health data, or data concerning sex life or sexual orientation; or
- (h) any information from a child (see Section 10).

Other than the inquiry form referred to in Section 15, the Website does not provide any user-registration form, account log-in, newsletter-subscription form, prize-application form, survey form, or comment field. Please do not send personal information to us through any channel that is not specifically provided for that purpose on the Website, and please do not include any sensitive information when using the inquiry form.

5. Technical Information and Strictly Necessary Cookies

When a visitor accesses the Website, our web servers or hosting providers automatically receive limited technical information that is necessary to display the Website, maintain its security, and prevent abuse. Such technical information may include:

- (a) IP address;
- (b) browser type, version, and language;
- (c) device and operating-system information;
- (d) the requested URL;
- (e) the date and time of access;
- (f) the referrer URL; and
- (g) error or security logs.

The Website uses only "strictly necessary cookies," that is, cookies or similar technologies that are technically required for the basic operation of the Website (for example, to remember the visitor's selected display language, to maintain the integrity of a browsing session, or to balance server load). The Website does not set or permit any third-party advertising cookies, third-party analytics cookies, retargeting tags, social-media tracking pixels, fingerprinting scripts, or any other non-essential tracking technologies.

Because only strictly necessary cookies are used, no cookie-consent banner is displayed.

6. How We Use Technical Information

We use the technical information described in Section 5 only as necessary to:

- (a) display and operate the Website;
- (b) maintain the security and integrity of the Website;
- (c) detect and prevent unauthorized access, abuse, technical errors, or fraudulent activity;
- (d) improve the basic stability and performance of the Website on an aggregated basis that does not identify individual visitors; and
- (e) comply with applicable Japanese law or lawful requests from competent authorities of Japan.

We do not use technical information to identify individual visitors for marketing, profiling, audience-measurement, targeted advertising, or cross-site tracking.

7. No Web Analytics; No Behavioural Advertising

The Website does not use Google Analytics, Google Tag Manager, Adobe Analytics, Meta Pixel, TikTok Pixel, or any other first-party or third-party web-analytics, audience-measurement, behavioural-advertising, or retargeting service. No data describing the behaviour of visitors to the Website is transmitted to any analytics provider, advertising network, or other third party.

8. No Sale or Sharing of Personal Information; Service Providers

We do not sell or rent personal information. We do not share personal information for purposes of cross-context behavioural advertising or any other form of targeted advertising.

Technical information described in Section 5 may be handled by our hosting providers, security providers, or other infrastructure-service providers (collectively, "Service Providers") solely to the extent necessary to operate, protect, and maintain the Website. Such Service Providers act under our written instructions and are bound by appropriate confidentiality obligations. We may also disclose information where required by applicable Japanese law, court order, or a lawful request from a competent Japanese authority.

9. Third-Party Links and Services

The Website may contain links to third-party websites or services, including but not limited to game-platform stores, video services, social-media services, publisher websites, and distributor websites. We have included these links solely for the convenience of visitors who wish to obtain further information about the games introduced on the Website.

When a visitor follows such a link, the third party may collect and process information about the visitor under that third party's own privacy policy, cookie policy, terms of use, and applicable local law. We are not responsible for the content, privacy practices, or any other practices of such third parties. Visitors are encouraged to review the privacy policy of any third party before providing information to it.

10. Children's Privacy

The Website is not directed at, and we do not knowingly request, solicit, or collect personal information from, children under the age of 16 through the English-language pages of the Website. If a parent or legal guardian believes that a child has provided personal information to Happinet through any channel outside the Website, please refer to Happinet's corporate privacy policy referenced in Section 1 for the appropriate procedure.

11. International Privacy Laws; No Local Representative

The Website is operated from Japan as a limited informational service. As stated in Section 3, the Website is not designed to offer goods or services directly to individuals located in any particular jurisdiction outside Japan, nor to monitor the behaviour of any individual in such jurisdictions.

Accordingly, Happinet has not appointed, and does not intend to appoint, any local privacy representative or local responsible person for the Website in any jurisdiction outside Japan, including without limitation a representative under Article 27 of the EU General Data Protection Regulation (Regulation (EU) 2016/679; "GDPR"), an equivalent representative under the United Kingdom General Data Protection Regulation, or a person in charge of personal-information protection located within the People's Republic of China under Article 53 of the PRC Personal Information Protection Law ("PIPL").

Nothing in this Policy is intended to limit, exclude, or override any right of a data subject or consumer that cannot lawfully be limited under any law that mandatorily applies. To the extent any provision of this Policy is held to be inconsistent with such a mandatory provision, that mandatory provision shall prevail, and the remainder of this Policy shall continue to apply to the maximum extent permitted by law.

12. Governing Law and Exclusive Jurisdiction

This Policy and any matter relating to the Website or to the handling of information described in this Policy shall be governed by, and construed in accordance with, the laws of Japan (including the Act on the Protection of Personal Information of Japan, Act No. 57 of 2003, as amended), without giving effect to any conflict-of-laws rule. Subject to Section 11, any dispute, claim, or controversy arising out of or in connection with this Policy or the Website shall be brought exclusively before the Tokyo District Court of Japan as the court of first instance.

13. Disclaimer

The Website is provided on an "as-is" and "as-available" basis for informational purposes only. To the maximum extent permitted by the laws of Japan, we disclaim all warranties of any kind, whether express, implied, statutory, or otherwise, regarding the Website's content, accuracy, availability, or fitness for any particular purpose.

14. Changes to This Policy

We may revise this Policy from time to time. Any revised version will be posted on the Website and will become effective as of the "Last updated" date indicated at the top of the revised Policy.

15. Inquiries; Inquiry Form; Reference to Corporate Privacy Policy

The Website provides an English-language inquiry form for visitors who wish to contact us regarding the content of the Website. Through the inquiry form we collect only the following information:

- (a) the visitor's email address (required, in order to enable us to respond);
- (b) the contents of the inquiry as written by the visitor; and
- (c) the visitor's name (optional; visitors may leave this field blank or use a pseudonym).

We use the information collected through the inquiry form solely for the purpose of receiving and responding to the inquiry. We do not use such information for marketing, profiling, audience-measurement, targeted advertising, or any other purpose. We do not sell or rent such information, and we do not share such information for cross-context behavioural advertising or any other targeted-advertising purpose (see Section 8). Information collected through the inquiry form will be deleted within a reasonable period after the inquiry has been resolved, unless retention is required by applicable Japanese law.

The inquiry form is intended for inquiries about the Website itself. Inquiries that fall within the scope of Happinet's broader corporate operations (such as inquiries by Japanese residents regarding mail-order, campaigns, or customer support operated by Happinet in Japan, and the exercise of rights regarding personal data held by Happinet outside the scope of this Website) should be made through Happinet's corporate privacy policy in Japanese, available at <https://www.happinet.co.jp/privacypolicy/index.html>.

We may, from time to time and at our reasonable discretion, also receive and respond to inquiries sent to us by email written in Japanese, English, Chinese, or another language. Receiving or responding to any such occasional email inquiry shall not be construed as evidence that the Website is directed at, marketed to, or intended to solicit residents of any particular jurisdiction outside Japan, nor as a waiver of any provision of this Policy (in particular, Sections 3 and 11).