

# Privacy Policy

## SBCC

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### 1. OVERVIEW

1.1. Welcome to the websites, applications and services provided by SBCC - Sunbears Cloud Campus (on behalf of itself and its subsidiaries, "SBCC"), which include without limitation [www.sunbears.com](http://www.sunbears.com), [eu.sunbears.com](http://eu.sunbears.com), and their subdomains (the "Sites").

1.2 This policy is based on our goal to provide our visitors with quality information and resources while maintaining personal privacy. Please forward any comments you may have regarding this policy to [privacy@sunbears.com](mailto:privacy@sunbears.com).

1.3 By visiting the Sites, registering with us or contacting, you signify that you understand and agree to the collection, use and transfer of your information (including your personal data) under the terms of this policy. If you do not accept, or do not wish to be bound by this policy, please do not use the Sites.

1.4 "Personal data" is any information that enables us to identify you, directly or indirectly, such as your email address, name, shipping and billing address, telephone number, financial information, user names, any form of identification number or one or more factors specific to your physical, physiological, mental, economic, cultural or social identity.

1.5 For the purposes of the EU General Data Protection Regulation 2016/679 (the "GDPR"), the data controller is FB Triangle Inc. corporation, with principal place of business at Tokyo, Japan.

### 2. INFORMATION WE COLLECT FROM YOU

2.1 When you access our Sites, we collect different types of information, described as "access information", "contact information" and "third party information", below. Some of the information we collect will be personal data relating to you, and we will be subject to certain obligations in respect of such personal data.

## 3. ACCESS INFORMATION

3.1 We may collect information about your computer, including where available your geographic location, IP address, operating system and browser type, device type, bandwidth, etc. for system administration and to report aggregate information to our advertisers. We will only share anonymised statistical data about our users' browsing actions and patterns from the Sites which cannot be used to identify any individual.

3.2 We may also keep details of your visits to our Sites including, but not limited to, traffic data, location data, weblogs and other communication data, time spent on the Sites, number of pages viewed, referring web pages, the resources that you access and the date and time of access, etc. To the extent this information can identify you directly, or indirectly when combined with other information, it will be personal data and will be subject to this privacy policy.

3.3 Our Sites use cookies, web beacons, and other technologies in order to provide you with an improved browsing experience, to allow us to improve our Sites and to serve targeted advertising. We may collect advertising information, including but not limited to, type of ads seen, number of times ads were served, pages where the ads were served, etc. When you first access the Sites, depending on your location, you may receive a message advising you that cookies and similar technologies are in use. By clicking "accept", closing the message, or continuing to browse the Sites, you signify that you understand and agree to the use of cookies in accordance with our Cookies Policy.

## 4. CONTACT INFORMATION

4.1 When you contact us via the Sites or otherwise (for example, by clicking a link to send us an email or if you telephone or write to us), you may provide certain personal data about yourself including your name, contact details and address which will be stored by us.

4.2 You may also give us information about you by filling in forms on the Sites. This includes personal data you provide when you register to use our Sites, subscribe to our services, participate in discussion boards or other social media functions on our Sites, enter a competition, promotion or survey and when you report a problem with our Sites. The personal data you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph.

4.3 You can also create an account on our Sites and subscribe to our services using your social media profile. If you select this option, we will automatically collect selected personal data about you from your social media account. The personal data we collect depends on your social media privacy settings for sharing such personal

data, and may include name, profile picture, age range, gender, language, country and other public information.

## 5. THIRD PARTY INFORMATION

5.1 We may also receive information about you if you use any of the other websites we operate or the other services we provide. We also work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, search information providers, credit reference agencies, advertising networks, advertising exchanges, data management platforms, content recommendation platforms and analytics providers) and may receive information about you from them. Depending on its nature, this third-party information will either be "access information" or "contact information", as described above. We will take reasonable steps to notify you where your personal data is received from third parties as required.

## 6. THE WAY WE USE PERSONAL DATA

6.1 We use your personal data according to the terms of the privacy policy in effect at the time of our use. We will process your personal data where:

6.1.1 you have provided your consent which can be withdrawn at any time;

6.1.2 where the processing is necessary for the performance of a contract to which you are a party or to perform services you have requested;

6.1.3 where we are required by law;

6.1.4 where processing is required to protect your vital interests or those of another person; or

6.1.5 where the processing is necessary for the purposes of our legitimate commercial interests, except where such interests are overridden by your rights and interests.

6.2 Your "access information" is used to route the requested web page to your computer or mobile device for viewing. It enables us to provide you with access to our Sites. We use this information in line with our legitimate commercial interests to administer our Sites and for internal operations, including troubleshooting, data analysis, site analysis, testing, research, statistical and survey purposes, to improve our Sites, to ensure that content is presented in the most effective manner for you and for your device, to allow you to participate in interactive features of our services, when you choose to do so, as part of our efforts to keep our Sites safe and secure; to measure or understand the effectiveness of advertising we serve to you and

others, and to deliver relevant advertising to you, and where you have provided your consent, to make suggestions and recommendations to you about goods or services that may interest you.

6.3 Your "contact information" enables us to provide services to you, or information tailored more specifically to your needs, or to forward your message or enquiry to another entity that is better able to do so. As such, it may enable us or our selected partners to contact you, for example, to respond to a query you have submitted to us. We will also use and analyse the information we collect so that we can administer, support, improve and develop our business, customer service and the features of our Sites and our services generally. We will not share your personal data for marketing purposes without your consent.

6.4 The "third party information" we receive will be combined with access information and/or contact information. We will use this personal data and the combined personal data for the purposes set out above (depending on the types of personal data we receive).

6.5 We will use the personal data you provide to us to contact you by email, telephone, post and/or fax to notify you occasionally about important changes or developments to the Sites. Where you have provided the appropriate form of consent, we may also use your personal data to let you know by email, telephone, post and/or fax about other goods and services which we, or our selected partners, offer which may be of interest to you.

6.6 We will ask you to give your consent to the use of your personal data for marketing purposes, and to provide you with information about our goods and services, or those of third parties, which we believe, may be of interest to you. If you change your mind about being contacted by selected third parties or us, please click "unsubscribe" from any emails received.

6.7 With your opt-in consent, we may also permit selected third parties to use your personal data, to provide you with information about goods and services which may be of interest to you. We or they may contact you about these by email. In the event that you are given (or where you have chosen) a password which enables you to access certain parts of the Sites, you are responsible for keeping this password confidential. You must not share a password with anyone.

## 7. DISCLOSURE OF YOUR PERSONAL DATA

7.1 Where necessary, we will share your personal data for the purposes described in this privacy policy with:

7.1.1 members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries;

7.1.2 business partners, suppliers and sub-contractors who require access to personal data to assist in the performance of any contract we enter into with them or you;

7.1.3 trusted third-party companies and individuals to perform functions in certain situations on our behalf. These functions include cloud storage providers, email services, providing marketing assistance and data analysis, handling transactions, fulfilling orders and providing customer service and credit referencing. These agents have access to the personal data required in order to perform their functions but may not use it for any other purpose; and

7.1.4 analytics and search engine providers that assist us in the improvement and optimisation of our Site.

7.2 For personal data from the European Union or the European Economic Area (the "EEA"):

7.2.1 We will only transfer your personal data to trusted third-parties who provide sufficient security guarantees and who demonstrate a commitment to compliance with applicable law and this privacy policy.

7.2.2 We will not transfer personal data originating from the EEA to third parties located outside of the EU without ensuring adequate protection under European law.

7.2.3 Where transfer is to a third party is located in a country not recognised by the EU Commission as ensuring an adequate level of protection, we will take appropriate steps, such as enforcing standard contractual clauses recognised by the EU Commission, to safeguard your personal data and to ensure legally enforceable remedies are available.

7.3 We may also disclose your personal data to third parties:

7.3.1 where we are required to do so by law;

7.3.2 in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or

7.3.3 to exchange other information with other companies and organisations for fraud protection and credit risk reduction.

7.4 Unless required to do so by law, we will not otherwise share, sell or distribute any of the personal data you provide to us without your consent.

## 8. PROVIDING INFORMATION IS YOUR CHOICE

8.1 There is no legal requirement for you to provide any information at our Sites. However, our Sites will not work without certain "access information" described above. Failure of your browser to accept "cookies" will not prevent your use of our Sites but may prevent certain features from working.

8.2 For any "contact information" that is requested on a Site, failure to provide the requested information will mean that the particular feature or service associated with that part of the Site may not be available to you.

## 9. HOW LONG WE STORE YOUR PERSONAL DATA

9.1 We will only retain your personal data, in a form which permits us to identify you, for as long as necessary to fulfil the purposes we collected it for. We will retain and use your personal data as necessary to satisfy any legal, accounting or reporting requirements, to resolve disputes or to enforce our agreements and rights. In line with this policy, we will either securely delete or anonymize your personal data so that it cannot be linked back to you.

## 10. OUR COMMITMENT TO DATA SECURITY

10.1 The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data and implement appropriate technical and organisational security measures, we cannot guarantee the security of your data transmitted to our Sites; any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access. To prevent unauthorised access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate safeguards to secure the information we collect online, consistent with the policies of FB Triangle Inc.. and industry standards.

10.2 Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 11. YOUR EUROPEAN PRIVACY RIGHTS

11.1 For individuals within the EEA only. Under the GDPR, in certain circumstances, you have the right to (a) request access to any personal data we hold about you and

related information, (b) obtain without undue delay the rectification of any inaccurate personal data, (c) request that your personal data is deleted provided the personal data is not required by us for compliance with a legal obligation under European or Member State law or for the establishment, exercise or defence of a legal claim, (d) prevent or restrict processing of your personal data, except to the extent processing is required for the establishment, exercise or defence of legal claims; and (e) request transfer of your personal data directly to a third party where this is technically feasible.

11.2 In addition, where you believe that we have not complied with its obligation under this privacy policy or European law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner's Office.

## 12. EMAIL POLICY

12.2 We will not share, sell, rent, swap or authorize any third party to use your email address for commercial purposes without your permission.

## 13. CHILDREN UNDER 16

13.1 The Sites are not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Sites. FB Triangle Inc. does not knowingly target advertising to, or collect information from, children under the age of 16. If you are under 16, do not use or provide any information on the Sites or on or through any of its features, register on the Sites, use any of the interactive or public comment features on the Sites, or provide any information about yourself to us, including your name, telephone number, email address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at [privacy@sunbears.com](mailto:privacy@sunbears.com).

## 14. GENERAL

14.1 We may edit this policy from time to time. Please check this policy regularly for any changes.

14.2 Should you have other questions or concerns about our privacy policies and practices, please contact us at [privacy@sunbears.com](mailto:privacy@sunbears.com).