

Information on Cross-Border Transfers of Personal Data Directly Collected and Managed by the Company

The Company may provide personal data that it directly collects and manages to business operators located in foreign countries, or have such business operators handle such personal data, through entrustment, sharing within the Company's group, or other means. The principal recipients and other relevant parties are as follows.

For information on personal information protection systems in each country or region, please also refer to the materials published by the Personal Information Protection Commission of Japan.

Information regarding the United States:

https://www.ppc.go.jp/files/pdf/USA_report.pdf

Where the Company provides personal data to recipients located in foreign countries or has such recipients handle personal data, the Company takes necessary measures to ensure that such recipients continuously implement necessary and appropriate measures for the protection of personal information, in accordance with the Act on the Protection of Personal Information of Japan and other applicable laws, including by entering into contracts, establishing intra-group rules, confirming the recipient's systems, and other means.

| Name of Business Operator | Country / Region | Main Purpose of Use | Transfer Method | Summary of Protective Measures |
|-------------------------------------|------------------|--|--------------------------|---|
| Nulab USA, Inc. | United States | Contract administration, billing, support, and other intra-group operations relating to customers of the Company's overseas subsidiary | Sharing within the group | The Company's group has established rules regarding the protection of personal information and has implemented necessary contractual and organizational measures. |
| Stripe, Inc. | United States | Payment processing and billing-related operations | Entrustment | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |
| PayPal, Inc. | United States | Payment processing and billing-related operations | Entrustment | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |
| Google LLC (Google Workspace, etc.) | United States | Email, document management, internal operations, customer correspondence, and other business operations | Entrustment | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |
| Google LLC (Google) | United States | Analysis of usage of the Company's | Entrustment | The Company has taken necessary measures to |

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|----------------------------------|-------------------------|---|------------------------|--|
| Analytics) | | website and the Service, service improvement, and effectiveness measurement | | ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. As a general rule, User Data is not transmitted to Google Analytics; rather, cookie identifiers, access history, event information, and other Service Data are handled. |
| Mixpanel, Inc. | United States | Analysis of Service Data, understanding usage, and service improvement | Entrustment | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |
| Intercom, Inc. | United States | Inquiry handling and customer support | Entrustment | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |
| Intuit Inc. (Mailchimp) | United States | Email delivery and implementation of marketing measures | Entrustment | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |
| Marketo, Inc. | United States | Implementation of marketing measures and lead management | Entrustment | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |
| Salesforce, Inc. | United States | Customer management, sales activities, and transaction management | Entrustment | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |

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|--|-------------------------|--|---|---|
| Zendesk, Inc. | United States | Inquiry handling and customer support | Entrustment | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |
| HubSpot, Inc. | United States | Customer management and marketing activities at Nulab USA, Inc., the Company's overseas subsidiary | Use by overseas subsidiary | The Company's group has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. At present, this does not include the handling of personal data directly collected and managed by Nulab Inc. in Japan. |
| Slack Technologies, LLC | United States | Internal communication, consultation on matters, and internal communications relating to customer support | Entrustment | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |
| Dun & Bradstreet, Inc. (related to Tokyo Shoko Research "D&B Direct+") | United States | Acquisition of corporate information, identification and matching of business partners, credit management, compliance checks, and other business partner management operations | Entrustment (inquiries and provision via API use) | The Company has taken necessary measures to ensure the appropriate handling of personal data by means of contracts with the recipient, confirmation of the terms of use of the relevant service, and other methods. |
| Zuora, Inc. | United States | Contract management, billing, collections, payment reconciliation, and other sales management operations relating to customers, as well as customer support | Entrustment | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |
| Workato, Inc. | United | Data integration | Entrustment | The Company has taken |

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|---------------------------|------------------|--|--------------------------|--|
| | States | across business systems and execution of automated processes (including those associated with business operations such as contract management, billing, collections, payment reconciliation, sales management, and customer support) | | necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |
| Anthropic PBC (Claude) | United States | Use of AI functionalities for operational efficiency and development support (including analysis and generation support for Service Data and Account Data) | Entrustment (tool usage) | The Company has taken necessary measures to ensure the appropriate handling of personal data by contractual arrangements with the recipient and other means. |

Supplementary Notes

- The foregoing are principal examples of destinations outside Japan to which personal data directly collected and managed by the Company may be transferred.
- In using Tokyo Shoko Research’s “D&B Direct+,” the Company may transmit, via API, company names, representatives’ names, address information, and similar information for the purpose of making inquiries regarding corporate information. If such information includes personal data, such personal data may be provided to, or handled by, Dun & Bradstreet group companies located in foreign countries.
- For subprocessors and processing regions relating to personal data included in User Data where the Company causes subcontractors to process such data for the provision of the Service, please refer to Schedule 3 (Subprocessor List Page) of the Data Processing Addendum (DPA).
- Where required by law and requested by the individual, the Company will provide information regarding the provision of personal data to third parties located in foreign countries by the method prescribed by the Company.
- HubSpot, Inc. is a system used by Nulab USA, Inc., a group company of the Company. At present, it is not included among the destinations outside Japan to which personal data directly collected and managed by Nulab Inc. in Japan is transferred.
- In using Anthropic PBC (Claude), the Company does not handle User Data and limits its use primarily to Service Data and Account Data, only to the extent necessary. The Company does not operate in a manner that involves inputting User Data into Claude, even where information relating to customers is included.