

Privacy Policy

With the social mission of “practicing marketing for consumers,” we provide support for our clients’ marketing and sales promotion activities. Therefore, especially for personal information we handle in our operations, we have established a comprehensive framework, including the following personal information protection policy, and are working on the protection of personal information.

Personal Information Protection Policy

FIRST Co., Ltd. (hereinafter referred to as “the Company”) has defined this Personal Information Protection Policy, as a code of conduct that our executives and employees should observe, and intends to ensure full compliance with the policy, in order to handle personal information in our various activities such as implementing research studies to contribute to society and achieve our mission as a corporation, and conducting awareness-raising activities on various systems, in a more rigorous manner.

01.

To comply with the Act on the Protection of Personal Information, the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures, and guidelines and other norms set forth by the Japanese government, concerning personal information handled across all our business activities and personal information of our executives and employees, the Company has established and maintained a personal information protection management system that is compliant with Japanese Industrial Standard “Personal Information Protection Management System – Requirements (JIS Q 15001),” and operates the system appropriately.

02.

The Company clearly defines the purpose of use of personal information, and collects, uses, and provides personal information appropriately, to the extent necessary to conduct our business. The Company intends to use acquired personal information only within the scope of the purpose of use, and implement measures to prevent use beyond the stated purposes of such information.

03.

In cases where the Company entrusts the whole or any part of the handling of personal information acquired through any of the actions specified in the preceding paragraph to any other person, the Company will select a person who maintains an adequate level of protection, and take appropriate measures, including entering into contractual agreements.

04.

The Company intends to take reasonable security measures and corrective actions against risks such as unauthorized access to personal information, or loss, destruction, alteration, leakage of personal information and other incidents.

05.

Regarding the handling of an individual’s personal information, the Company intends to promptly

respond to the person's request, complaints or inquiries concerning the disclosure, correction, suspension of use, deletion, and other requests regarding personal information.

06.

The Company intends to review the personal information protection management system to continuously improve it.

Established: March 1, 2004

Last revised: April 1, 2020

Director and Chairman: Yoshinobu Oka

Representative Director and President: Katsutoshi Oka

FIRST Co., Ltd.

Contact on our Personal Information Protection Policy:

Personnel and General Affairs Department,

FIRST Co., Ltd.

TEL: 06-7639-2001

FAX: 06-7639-2021



The Company has been authorized, by the Japan Institute for Promotion of Digital Economy and Community (JIPDEC), to display the PrivacyMark certification mark, which is granted to business operators that appropriately handle personal information.

Handling of personal information

Regarding the handling of personal information, the Company is committed to protecting personal information by complying with the following matters, in accordance with our Personal Information Protection Policy.

Purpose of use of personal information

01.

The Company intends to use personal information within the scope of the purpose of use of such

information under service contracts between the client (contractor) and the contractor for the commissioned businesses (shown below).

- i Campaign administration services (reception of applications, lotteries, giveaway shipment)
- ii Eligibility certificate issuance (issuance of an eligibility certificate to eligible persons)
- iii Event staff dispatching (dispatching MC, promotional models, directors)
- iv Event operation (questionnaire for visitors, questionnaire for those concluding a contract)
- v Convention/trade show operation (questionnaire for visitors, questionnaire for those attending a seminar)
- vi Sampling (food tasting, drink tasting, questionnaire on tasting evaluation)
- vii Requested survey (group interviews, Web survey)
- viii Customer relationship management
- ix Joint promotion administration services, secretariat services for specific projects

02.

Conduct of the Company's sponsored events and surveys

- i Company-sponsored surveys (group interviews, Web survey)
- ii Company-sponsored events (reception of those wishing to attend the events, questionnaire for visitors, reception of applications for gifts, lotteries, giveaway shipment)

03.

Conduct of the Company's staffing services (e.g., event staff)

04.

Information on members of the Company's on-line shopping operation, information on purchasers (for purchase and shipment of products and services, provision of on-line shopping site service, troubleshooting and improvement)

05.

The Company's recruiting operation (new graduates, mid-career recruiting, external partners)

06.

The Company's operations related to personnel matters, labor affairs, education, accounting, and general affairs (personal information of employees and retirees)

07.

Liaison operation for business partners, etc. (personal information of business partners, etc.)

08.

Responding to inquiries received by the Company in writing, by telephone, by fax, by email, or through other means.

09.

Other operations using personal information, for which the purpose of use of such information is communicated to the person and the use of the information is approved by him/her

* The Company will never use anyone's personal information for an unintended purpose without the consent of the person.

Provision of personal information to third parties

The Company will never provide anyone's personal information to any third party without the consent of the person. However, this does not apply in cases where the Company receives a request from a judicial, administrative, or other governmental authorities to provide such information in accordance with laws or regulations or the like.

Security management of personal information

We strive to prevent unauthorized access to personal information, or loss, alteration, leakage, etc. of personal information, and strive to manage such information securely and accurately, by taking security management measures based on the Company's Personal Information Protection Policy. In addition, we intend to dispose of or erase personal information in an appropriate manner once it becomes unnecessary.

Entrustment of operations

The Company may outsource the personal information handling operation within the scope of the purpose of use indicated above. For outsourcing, we will select a subcontractor that is regarded as appropriate in accordance with criteria set forth by the Company, conclude a contract intended to ensure appropriate handling of such information, and properly manage and supervise the subcontractor in order to ensure the security of such information.

Other

Please note that if the Company cannot obtain any accurate personal information, we may be unable to provide appropriate services or support.

Contact on our Personal Information Protection Policy, etc.

For our Personal Information Protection Policy, etc., contact the following:

PrivacyMark Secretariat, FIRST Co., Ltd.

06-7639-2020

* Please note that inquiries made on Saturdays, Sundays and national holidays, or during the New Year holidays or the summer holidays will be handled on or after the following business day.

Atsushi Ebinuma,

Personal Information Management Manager, FIRST Co., Ltd.

Information regarding retained personal data and records of third-party provision

FIRST Co., Ltd. (hereafter called "the Company") intends to inform data subjects with the following matters concerning requests for disclosure, etc. of personal data that the Company holds (notification of the purpose of use, disclosure, correction of content, addition or deletion, suspension of use, erasure, and suspension of provision to a third party), and requests for disclosure of records that the Company provides to a third party.

01. Name of the business operator

FIRST Co., Ltd.

20 F, Chuo-odori FN Building, 1-3-8, Tokiwa-machi, Chuo-ku, Osaka City

Representative Director and President: Katsutoshi Oka

02. Personal information management manager

Director: Atsushi Ebinuma

03. Purpose of use of retained personal data

Please see “Purpose of use of personal information.”

04. Contact for making complaints about the handling of personal data that the Company holds

For requests for matters such as consultations, complaints and disclosure concerning personal information, please ask the following contact.

PrivacyMark Secretariat, FIRST Co., Ltd.

TEL: 06-7639-2020

05. Authorized personal information protection organization to which the Company belongs

The Company does not belong to any authorized personal information protection organization.

06. Procedures for disclosure, etc.

Please see “Procedures for requesting disclosure, etc. of personal information subject to disclosure.”

07. Measures taken for secure management of personal data

The Company has set forth provisions for the handling of personal information and specific personal information, and taken the following actions.

(1) Organizational security management measures

① The Company has set forth a Personal Information Protection Policy, and thoroughly made the policy known internally with the policy. In addition, the policy is published on the company’s website so that those outside the company can also understand it.

② For the state of handling of personal information, the Company conducts daily inspections on a regular basis, and conducts internal and external audits on a regular basis.

(2) Human security management measures

① The Company provides the employees with regular education on the handling of personal information.

② The Company obtains a “written pledge on confidentiality of secret information and personal information” from the employees.

(3) Physical security management measures

① The Company restricts access to areas where personal information can be handled in order to prevent employees other than those in charge of handling personal information, or any other unauthorized people, from viewing personal information

② In any of the zones where personal information is handled, the Company controls employee access.

(4) Technical security management measures

① Personal information is stored in lockable cabinets or a server where access control is performed.

② For electronic data communication, measures against leakage such as encryption are implemented.

Procedures for requesting disclosure, etc. of personal information subject to disclosure

01. Personal information subject to disclosure and the purpose of using it

01 Personal information of the Company's employees

To conduct operations such as those related to personnel affairs including employment contracts, labor affairs, general affairs, accounting, and education

02 Personal information of the Company's employees on the emergency contact network

To communicate in case of emergency such as an earthquake disaster

03 Personal information of applicants for employment with the Company (new graduates, mid-career recruiting, external partners)

To manage employment selection

04 Personal information of the Company's retirees

To inform retirees about matters such as procedures, or manage records including social insurance documents

05 Personal information of staff registered for the Company's staffing operations

To dispatch staff to events, etc.

06 Member information and purchaser information for on-line shopping operations

To purchase and ship products and services, provide on-line shopping site service, or troubleshooting and service improvement.

02. Items of personal information subject to disclosure, etc.

Personal information subject to disclosure that the Company holds (e.g., the person's name, address, phone number), and the purpose of using it

However, such information may not be disclosed in the following cases.

Cases where notifying such information to the person concerned or publishing the information may harm the life, body, property, or other rights and interests of the person or a third party.

Cases where notification of such information to the person or publication of the information may affect the conduct of the Company's operations.

Cases where it is necessary for the Company to cooperate on the conduct of duties of a national governmental organization or a local government set forth by laws and regulations, when notifying such information to the person concerned or publishing the information may affect the conduct of the Company's duties, and cases where notifying such information to the person concerned or publishing the information may affect the conduct of the duties.

03. Procedures for requesting disclosure, etc. of personal information subject to disclosure

Concerning personal information subject to disclosure that the Company holds, for requests by the

person concerned or his/her authorized representative for actions such as disclosure, correction, addition, deletion, or use of such information in relation to items of such information or the purpose of its use, or for suspension of provision of such information to a third party, attach the following prescribed request form for disclosure, etc. (1) (necessary information to be entered) and the required documents (2) and (3), enclose the prescribed charge (actual post-related expense), and submit them to the contact for requests.

01 Prescribed request form for disclosure, etc. (click the following to download the form)

[Request form for disclosure, etc. of personal information \(pdf file\)](#)

02 Documents that need to be attached

Documents for identification: a copy of either a driver's license*, a passport*, or health insurance card

* Please note that a copy of the driver's license or the passport to be submitted contains information on the domicile, or conceal the domicile when submitting the copy.

03 In the case of the representative's request: attach the following documents in addition to (1) and (2), and submit them.

(1) Power of attorney that proves the representative's authority (requiring the person's autograph and seal)

(2) Identification document of the representative: any one copy of the representative's driver's license*, passport*, and health insurance card

The Company will use the "Request form for disclosure, etc. of personal information," which the representative is asked to submit at the time of request, the documents necessary for identification, and the document necessary to confirm the representative, only for operations such as disclosure, and will never use them for any other purposes.

* Please note that a copy of the driver's license or the passport to be submitted contains information on the domicile, or conceal the domicile when submitting the copy.

04 Prescribed charge (actual mailing-related expense)

If you intend to send reply documents by regular mail, affix a stamp for return to the return envelope. If you intend to send them by simplified registered mail, enclose a postage stamp equivalent to the actual expense of simplified registered mail in addition to the return envelope (with a stamp for return affixed to it), and send the entire envelope.

05 Measures taken for security control of personal data that the Company holds

To appropriately handle personal information, the Company has established and maintained a personal information protection policy, etc. complying with JIS Q 15001, and operates a personal information protection management system. In addition, when handling personal information, the Company takes security management measures from organizational, human, physical and technical perspectives. For details of the security management measures, see "04. Contact for requests and contact for inquiries."

04. Contact for requests and contact for inquiries

20 F, Chuo-odori FN Building, 1-3-8, Tokiwa-machi, Chuo-ku, Osaka City, 540-0028

Masaaki Iida,

PrivacyMark Secretariat, Personnel and General Affairs Department, FIRST Co., Ltd.

TEL: 06-7639-2020 / FAX: 06-7639-2021

Reception hours: 9:00 to 17:30*

* Please note that inquiries made on Saturdays, Sundays and holidays, or during the New Year holidays or the summer holidays will be handled on or after the following business day.

Cookies Policy and Terms of use of Cookies

1. Cookies

On the website managed and operated by FIRST Co., Ltd.'s group companies and its subsidiaries (hereafter collectively called "our Group") (hereafter called "this site"), we may use Cookies in order to enrich the contents of information and services that we provide to all customers (hereafter called "Customers"), and ensure comfortable use of this website.

2. Purpose of use of Cookies

Our Group may use Cookies in order to analyze the state of use of the website by Customers (e.g., access status, traffic, and navigation patterns), improve the performance of the website itself, and improve the services we provide to Customers, by using information collected through Cookies.

3. Confirmation of your consent to our use of Cookies

The Company's website uses Cookies with the aim of maintaining and improving its convenience and quality.

For details, please read the Cookies Policy. If you accept Cookies, please check in the "Accept" box.