

# PRIVACY POLICY – GOOD SHAPE

[www.cosot.jp](http://www.cosot.jp)

Effective date: 1<sup>st</sup> May 2024

## 1. Introduction

Good Shape, Inc. ("Good Shape," "we," "us," or "our") is committed to protecting the privacy of our users. This Privacy Policy explains how we collect, use, disclose, and safeguard your Personal Information (as defined under the Act on the Protection of Personal Information (APPI) of Japan) when you use our website, mobile application, NFC gadgets, and associated services (collectively, the "Services").

We comply with the APPI and other applicable data protection laws and regulations to ensure the proper handling of your Personal Information. By using the Services, you consent to the collection and use of your Personal Information as described in this Privacy Policy.

We encourage you to read this Privacy Policy carefully to understand our practices regarding your Personal Information and how we strive to protect your privacy.

## 2. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person ("Data Subject").
- **Processing:** Any operation or set of operations performed on Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **Data Subject:** An individual who is the subject of Personal Data.
- **Controller:** The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.
- **Processor:** A natural or legal person, public authority, agency, or other body which processes Personal Data on behalf of the Controller.

## 3. Information We Collect

We may collect the following types of Personal Data when you use the Services:

- **Personal Information:** Name, email address, phone number, mailing address, date of birth, and other information you provide during account registration or when using the Services.
- **Usage Data:** Information about how you use the Services, such as your interactions with the COSOT app, website, and NFC gadgets, including frequency and duration of use, features accessed, and pages visited.
- **Device Information:** Information about the device you use to access the Services, such as your device type, operating system, IP address, device identifiers, and mobile network information.

- **Location Data:** Information about your real-time or approximate location when you use the SOS & Alert or Lost & Found features of the Services. This includes sending your GPS information via SMS to your pre-chosen contacts in the telephone numbers list stored in the app.
- **Telephone Number List:** We collect the list of telephone numbers from your device when you use the SOS & Alert and Lost & Found features to ensure that the SMS alerts are sent to the correct contacts as designated by you.

We may also collect Personal Data from third parties, such as social media platforms, if you choose to connect your COSOT account to such platforms.

#### 4. How We Use Your Information

We may use your Personal Data for the following purposes:

- **To provide and maintain the Services:** This includes creating and managing your account, processing your requests, and providing customer support.
- **To personalize your experience:** This includes tailoring content and features to your interests and preferences.
- **To communicate with you:** This includes sending you emails, notifications, or other messages about the Services, such as updates, promotions, or important information.
- **To improve our Services:** This includes analyzing data to understand how users interact with the Services and to identify areas for improvement.
- **To comply with legal obligations:** This includes complying with applicable laws, regulations, or legal processes.
- **For other purposes with your consent:** We may use your Personal Data for other purposes with your consent, such as for marketing or advertising.

#### 5. Sharing Your Information

We may share your Personal Data with the following categories of recipients:

- **Service providers:** We may share your Personal Data with third-party service providers who help us provide and maintain the Services, such as hosting providers, data storage providers, analytics providers, and customer support providers.
- **Business partners:** We may share your Personal Data with our business partners for marketing or promotional purposes, but only with your consent.
- **Affiliates:** We may share your Personal Data with our affiliates (companies that control, are controlled by, or are under common control with us) for the purposes described in this Privacy Policy.
- **Authorities:** We may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to comply with a legal obligation, protect and defend our rights or property, prevent or investigate possible wrongdoing in connection with the Services, or protect the personal safety of users of the Services or the public.

#### 6. Location Data

We collect location data when you use the SOS & Alert or Lost & Found features of the Services. We use this data to provide the functionality of these features, such as sending your location information to designated contacts in an emergency or helping to locate lost items.

You can control the collection of location data through the settings in the COSOT app. You can choose to allow or deny access to your location data at any time. If you deny access to your location data, the SOS & Alert and Lost & Found features will not function properly.

We take measures to protect your location data and only share it with designated contacts or authorities as necessary to provide the Services or comply with legal obligations.

## 7. Data Security

We take the security of your Personal Data seriously and implement reasonable measures to protect it from unauthorized access, disclosure, alteration, or destruction. We use industry-standard security practices, such as encryption and access controls, to safeguard your information.

We also limit access to your Personal Data to authorized employees and service providers who need to know that information to operate, develop, or improve our Services.

## 8. Data Retention

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

## 9. Your Rights

You have the following rights regarding your Personal Data:

- **Right to Access:** You have the right to request access to your Personal Data that we hold.
- **Right to Rectification:** You have the right to request that we correct any inaccurate or incomplete Personal Data that we hold about you.
- **Right to Erasure:** You have the right to request that we erase your Personal Data under certain circumstances, such as when it is no longer necessary for the purposes for which it was collected or when you withdraw your consent.
- **Right to Restriction of Processing:** You have the right to request that we restrict the processing of your Personal Data under certain circumstances, such as when you contest the accuracy of the data or when the processing is unlawful.
- **Right to Data Portability:** You have the right to receive your Personal Data in a structured, commonly used, and machine-readable format and to have that data transmitted to another controller under certain circumstances.
- **Right to Object:** You have the right to object to the processing of your Personal Data under certain circumstances, such as when the processing is based on legitimate interests or for direct marketing purposes.
- **Right to Withdraw Consent:** If you have given your consent to the processing of your Personal Data, you have the right to withdraw your consent at any time.

To exercise any of these rights, please contact us using the contact information provided below.

## **10. Children's Privacy**

We do not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, please do not use the Services or provide us with any Personal Data. If we become aware that we have collected Personal Data from a child under the age of 13 without parental consent, we will take steps to delete such information from our servers.

## **11. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our website and updating the "Last Updated" date at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **12. Contact Us**

If you have any questions or concerns about this Privacy Policy, please contact us:

Good Shape, Inc.

[Address]

[Email Address]

[Phone Number]

## **13. Complaints and Dispute Resolution**

If you have any complaints about our processing of your Personal Data, please contact us using the contact information provided above. We will do our best to address your concerns. If you are not satisfied with our response, you have the right to lodge a complaint with the relevant data protection authority in your jurisdiction.

## **14. Compliance with Laws**

We comply with all applicable laws and regulations regarding the collection, use, and disclosure of Personal Data, including the Act on the Protection of Personal Information (APPI) in Japan, the General Data Protection Regulation (GDPR) in the European Union and any other applicable to our jurisdiction.

## **15. Third-Party Links**

The Services may contain links to third-party websites, applications, or services. Please note that this Privacy Policy applies only to the Services. We do not control and are not responsible for the privacy practices of any third parties. We encourage you to read the privacy policies of any third-party websites or services that you visit.

## **16. Cookies and Similar Technologies**

We use cookies and similar technologies to collect information about your use of the Services. Cookies are small data files that are placed on your device when you visit a website. We use cookies to enhance your user experience, analyze usage patterns, and personalize content and advertising. You can control the use of cookies through your browser settings. However, please note that disabling cookies may limit your ability to use certain features of the Services. Please refer to the Cookie Policy for more information.

## **17. Do Not Track Signals**

We do not currently respond to Do Not Track signals. Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## **18. Security Breaches**

In the event of a security breach involving your Personal Data, we will notify you as soon as possible and take appropriate steps to mitigate the effects of the breach.

## **19. Marketing Communications**

We may use your Personal Data to send you marketing communications about our products and services. You can opt-out of receiving marketing communications from us at any time by following the instructions provided in the communication or by contacting us directly.

## **20. Automated Decision-Making**

We do not use automated decision-making processes that have a legal or significant effect on you.

## **21. Data Minimization**

We collect and retain only the Personal Data that is necessary for the purposes outlined in this Privacy Policy. We take steps to ensure that the Personal Data we collect is relevant, accurate, and up-to-date.

## **22. Data Accuracy**

We strive to maintain the accuracy of your Personal Data. If you believe that any information we hold about you is inaccurate or incomplete, please contact us using the contact information provided below, and we will promptly correct any inaccuracies.

## **23. Data Controller and Data Processor**

Good Shape, Inc. is the data controller for the Personal Data we collect through the Services. We may also engage third-party service providers to act as data processors on our behalf. These processors are contractually obligated to protect your Personal Data and to process it only in accordance with our instructions and applicable laws.

## **24. Legal Basis for Processing**

We process your Personal Data based on one or more of the following legal bases:

- **Consent:** We may process your Personal Data with your consent, such as when you sign up for our newsletter or opt-in to receive marketing communications.
- **Contract:** We may process your Personal Data to fulfill our contractual obligations to you, such as providing the Services you have requested.
- **Legal Obligation:** We may process your Personal Data to comply with our legal obligations, such as responding to a court order or complying with tax laws.
- **Legitimate Interests:** We may process your Personal Data for our legitimate interests, such as improving our Services, preventing fraud, or protecting our legal rights, provided that these interests do not override your fundamental rights and freedoms.

## **25. International Data Transfers**

Your Personal Data may be transferred to, and stored and processed in, countries other than your own. These countries may have data protection laws that are different from the laws of your country. However, we will take steps to ensure that your Personal Data is protected to the same standards as it would be in your own country, including through the use of appropriate safeguards such as standard contractual clauses.

## **26. Additional Information**

This Privacy Policy is subject to change at any time. We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your Personal Data.

For more information, or any concerns, get in touch with us at ---@cosot.jp