Privacy Policy

Gaia Co., Ltd. (hereinafter referred to as "the Company") is a personal information handling business operator in the financial sector. In providing cryptocurrency automated exchange machine services and other related services (hereinafter collectively referred to as "the Services"), the Company complies with the Act on the Protection of Personal Information of Japan, related enforcement regulations, applicable guidelines, and international privacy standards. We are committed to the proper acquisition, use, and management of personal information.

This Privacy Policy also applies to customers residing outside Japan, including non-residents and visitors to Japan.

1. Definition of Personal Information

- (1) In this Policy, "Personal Information" refers to information defined under Article 2, Paragraph 1 of the Act on the Protection of Personal Information of Japan, and includes:
 - (a) Information that can identify an individual, such as name, date of birth, passport number, nationality, etc.
 - (b) Information that can identify an individual when combined with other information.
 - (c) Personal identification codes such as facial recognition data or biometric authentication data.
- (2) "Sensitive Personal Information" refers to information defined under Article 2, Paragraph 3 of the same Act, such as race, beliefs, social status, health condition, or criminal record, which could lead to discrimination or prejudice.
- 2. Purpose of Using Personal Information

We use customers' personal information, including that of non-residents and foreign nationals, for the following purposes:

- (a) Registration for use of the Services and providing related information
- (b) Customer support, handling inquiries, and responding to complaints
- (c) Analysis and research regarding service usage and customer needs, including surveys
- (d) Notifications regarding updates to policies, regulations, or manuals
- (e) Identity and age verification (including passport or ID checks)
- (f) Handling violations of the Terms of Use and fraudulent activities
- (g) Emergency communications (including during the customer's stay in Japan)
- (h) Internal audits and business improvement initiatives
- (i) Other purposes incidental to the above
- 3. Security Management of Personal Information

The Company implements physical, technical, and organizational security measures to prevent leakage, loss, or damage of personal information, both in Japan and abroad (including cloud environments and overseas offices).

For more details regarding our security management measures, please contact us using the contact information provided at the end of this Policy.

4. Provision of Personal Information to Third Parties

The Company will not provide personal information to third parties without prior consent, except in the following cases:

- (a) When outsourcing operations to the extent necessary to achieve the purposes of use (e.g., operation of multilingual call centers, identity verification services)
- (b) When required by laws and regulations or in response to requests from judicial authorities
- (c) In the case of business succession due to mergers, acquisitions, etc.
- (d) If personal information is provided to parties located outside Japan, we will disclose necessary information regarding the personal data protection framework of the foreign country and take appropriate measures.
- 5. Restriction on Use of Personal Information

The Company will not use personal information beyond the scope necessary for the purposes stated above.

However, information processed statistically or anonymized will not be subject to these restrictions.

6. Disclosure, Correction, and Deletion of Personal Information

We will promptly and appropriately respond to requests from individuals regarding disclosure, correction, suspension of use, or deletion of their personal information ("Disclosure Requests").

For foreign nationals, identity verification may be conducted using information such as passport numbers.

We also accept Disclosure Requests from overseas via international mail, email, or other reasonable means. Please note that inquiries in languages other than Japanese must be made in English or other supported languages.

Effective Date: June 4, 2025

Contact Information

Department: Customer Support, Administration Department

Phone: 0800-808-0480

 $A vailable \ Hours: 10:00\ AM-5:00\ PM\ (weekdays\ only;\ closed\ on\ weekends,\ national\ holidays,\ and\ during\ the\ New\ Year$

holidays)

Email: info@gaia-btm.com

Gaia Co., Ltd.

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