

**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](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.

<b>Name of Business Operator</b>	<b>Country / Region</b>	<b>Main Purpose of Use</b>	<b>Transfer Method</b>	<b>Summary of Protective Measures</b>
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.

#### 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.