



**ROBERT WALTERS JAPAN**  
**PRIVACY POLICY**

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## PRIVACY POLICY

Robert Walters Japan K.K. ("the Company") accepts that it has an important duty as a business enterprise to protect the personal information of every person who provides the Company with their personal details. The Company has therefore set out the following Privacy Policy in accordance with the Act on the Protection of Personal Information and other applicable guidelines and will make every effort to protect people's personal information.

### Collecting personal information

The Company will only collect personal information\*<sup>1</sup> insofar as it is necessary for the purposes outlined below and will only do so directly from the individual concerned\*<sup>2</sup>, from a third party with the consent of the individual concerned or via any other means\*<sup>3</sup> deemed to be fair and appropriate. The Company will comply with the law and other applicable legislation at all times and will take adequate steps to prevent personal information from being leaked to outside sources.

### Purposes for which personal information will be used

The Company will only use collected personal information for the purpose of carrying out the following operations.

- Placement services aimed at providing suitable jobs for personnel wishing to change careers or seeking temporary employment
- Other services relating to or supplementary to the above\*<sup>4</sup>
- Employment management operations

The Company will not disclose or provide any personal information to a company offering a work placement, or to any third party, without the consent or permission of the individual concerned. Personal information may be provided without the individual's prior consent however in the following circumstances.

- If required to do so in accordance with the law or other applicable legislation
- If instructed to do so by a government agency
- If there is a potential threat to the individual concerned or to public health, safety or property
- When notifying or reporting matters to concerned parties or relevant authorities due to losses or damage sustained by a placement company, concerned party, the Company or any other third party, or if there is a risk of such losses or damage being sustained

### Outsourcing personal information

Within the scope of the purposes outlined above, the Company may outsource collected personal information to outside contractors with whom it has entered into confidentiality agreements.

### Shared use of personal information

The Company may use collected personal information on a shared basis as detailed below.

1. Shared users: Robert Walters offices in other countries
2. Purposes of shared use:
  - Placement services aimed at providing suitable jobs for personnel wishing to change careers or seeking temporary employment
  - Other services relating to or supplementary to the above\*<sup>4</sup>
3. Items of personal information subject to shared use: Name, address, telephone number, email address and information contained in the individual's CV or work history
4. Supervising manager: Chief Privacy Officer, Robert Walters Japan K.K.
5. Method of collecting information: As outlined above under "Collecting personal information"

### Managing personal information

The Company has in place a personal information protection management system that is designed to manage personal information in accordance with the Japan Industrial Standard JIS Q15001 (requirements for personal information protection management systems). The Company also appoints a Chief Privacy Officer and strives to make improvements on an ongoing basis.

The Company will implement adequate security measures to protect all collected personal information and will make every effort, from both a technical and an organisational standpoint, to prevent personal information from being leaked, lost or damaged. In the event that any inadequacies are detected in the Company's security measures or any other aspects of its personal information management activities, the Company will take immediate remedial action so as to prevent such issues from reoccurring.

### Legal compliance

The Company will handle all collected personal information in accordance with laws and legislation applicable to personal information and related guidelines.

## Collecting personal information so as to prevent easy identification

### Use of cookies

The Company's website features content that uses technology called "cookies". Cookies are small text files that are transferred from our internet server to the hard disks on users' computers in order to identify individual users' computers and monitor their browsing activity.

The Company's website transfers and configures cookies on users' computers when they access online services such as members-only pages. Although cookies can be used to identify a computer, they cannot be used to identify an individual providing that no personal information is inputted.

The Company uses this technology for the sole purpose of making its website more convenient and user-friendly. Details of browsing activities obtained from users' computers are not recorded or kept in a format that would enable individual users to be identified.

Although it is possible to adjust the settings on your internet browser to prevent such data from being collected, please be aware that this may prevent you from accessing some of the features offered via the Company's website.

### Use of statistical tools

Certain pages on the Company's website use statistical tools to monitor access figures. The data collected via these statistical tools cannot be used to identify specific individuals and is only used for purposes such as making improvements to the website.

### Procedures for requesting the disclosure of, alterations or additions to, the deletion or removal of, suspension of access to or suspension of the third party provision of personal information, or for filing a complaint

If you have any questions regarding the procedures for requesting the disclosure of your personal information or other such actions and any associated charges, or if you wish to file a complaint regarding the Company's handling of personal information, please contact the Company via the email address or telephone number below. The Company will only use personal information obtained as a result of any such enquiry for the purpose of responding to the relevant enquiry. Depending on the nature of the enquiry, the Company may need to check the identity of the enquiring party to confirm that they are the individual concerned. The Company will disclose, make any alterations or additions to, delete or remove, suspend access to or suspend the third party provision of all relevant personal information as requested wherever possible.

David Swan  
Managing Director

### Enquiries regarding personal information

Chief Privacy Officer  
Robert Walters Japan K.K.

Personal Information Enquiries Desk  
Email: [privacy@robertwalters.co.jp](mailto:privacy@robertwalters.co.jp)  
Tel: (03) 4570 1500

\*1 For the purposes of this document, the term "personal information" refers to information that could be used to identify a specific individual, including their name, address, telephone number, email address and information contained in their CV or work history (including information that could easily be used to identify a specific individual by comparing it against other information).

\*2 For the purposes of this document, the term "individual concerned" refers to the specific individual who could be identified via their personal information.

\*3 "Other means" includes obtaining information from documents such as corporate releases, business data and industry journals, the internet and other sources in the public domain and receiving information in good faith from industry professionals.

\*4 Other activities carried out for operational purposes include the following.

- Registration of personnel for the purposes of placement or referral, provision and referral of job-related information and other related procedures and operations
- Questionnaires aimed at improving the Company's services, information services (seminars, events, provision of the latest information, etc.) and other related operations
- Use of statistical data for the purpose of notifying government agencies or the authorities
- Processing and collation of data for inclusion in Company publications and other documents in a format that prevents the identification of specific individuals
- Contracted operations such as IT services and admin

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