

Ship&co Privacy Policy

BERTRAND Co., Ltd (hereinafter referred to as "Company") has established the following privacy policy (hereinafter referred to as "Policy") regarding the handling of personal information in Ship&co, an invoice issuing service (application software and API application programming interface) operated and provided by the Company (hereinafter referred to as the "Service"), and the Ship&co website (hereinafter collectively referred to as "Related Services"). This Policy is part of the Ship&co Terms of Use.

Article I (General Provisions)

1. This Policy applies to all users of the Service and Related services regardless of country or region.
2. In order to protect users' information, we comply with the Personal Information Protection Law, the EU General Data Protection Regulation (GDPR), and other relevant local laws and regulations, and strive to handle and protect users' information in the most appropriate manner.
3. The Company will store personal information obtained from users, in Data Base located in Japan.
4. The provisions of this Policy do not apply to services provided by business operators (hereinafter referred to as "Affiliated Business Operators") that provide services affiliated with this Service (hereinafter referred to as "Affiliated Services"), or other parties other than the Company.

Article II (Definitions)

1. The term "Personal Information" as used in this Policy refers to information about an individual (as defined in Article II, Section 1 of the Personal Information Protection Law) that can be used to identify the specific individual.
2. The term "Personal Data" as used in this Policy refers to information about any identifiable individual. An "Identifiable Individual" refers to any individual who can be identified, directly or indirectly, through access to identifying information such as name, location data, or online identifiers.

Article III (Agreement to the Policy)

1. The User agrees to this Policy by indicating his/her willingness to agree to the Policy.
2. You may withdraw your consent to this Policy at any time. Should you withdraw your consent, however, you will not be able to use the services (the Application or API functions) that require use of information obtained by the Company with your consent. If you wish to withdraw your consent, please contact us.

Article IV (Information Collected by the Company and the Method of Collection)

1. We value our website (shipandco.com) users' privacy and do not collect any personal data on them.
 - (1) Shipandco.com does not use Google Analytics or Facebook Pixel.
 - (2) We use the privacy-focused solution "Plausible : <https://plausible.io/>" for simple analytics of website users. Information collection on the site is performed completely anonymously.
 - (3) Although no personal identifiable information data is collected, we know what geographic region our visitors are in so we can provide them with the appropriate language. We also know what browser and operating system the visitor is using, and how long they have been on the website, so we can adapt the content.

2. The following information is collected by us when providing Related Services through "app.shipandco.com" (Application, API Service).
 - (1) In accordance with our Terms of Use, registration information directly provided by a registered user or an individual who uses the Service incidental to the use of a registered user (hereinafter referred to as a "Sub User").
 - ① Registered user's email address
 - ② Profile information of the registered user (personal name, company name, telephone number, email address, country, prefecture, address, postal code)
 - ③ Sub User's email address
 - ④ Shipper's information (personal name, company name, telephone number, email address, country, address, postal code)
 - ⑤ Registered user's selected carrier account registration information
 - ⑥ Registration information for the registered user's selected store account
 - (1) Information automatically collected by the Company when you use the Related Services, etc.

Cookie and anonymous ID

The Related Services may use "cookies" and other similar technologies. However, only "session cookies" that do not identify the individual's data are used, and these cookies are deleted when the user exits the Related Services.

Users of the Related Services may choose to disable or reject the use of cookies by changing the settings of their browsers. Please note that some of the Related Services may not work properly if you disable or reject cookies.

- (2) Information collected through services operated by third-party providers
If a user authorizes us to collect his/her personal data through a service operated by a third party provider (EC platform), we will collect such personal data to the extent that we are permitted to do so.

Article V (Purposes of Use)

1. We will properly handle user information, etc. obtained through the use of the Related Services within the scope of the following purposes. The Company will not use the information beyond the scope of the purposes of use without the consent of the user.

Type of Data	Purpose of Use
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<p>Registered users (sellers/consigners) and Sub Users' email addresses and registered users' profile information</p>	<ul style="list-style-type: none"> • To provide the Related Services. • To respond to inquiries, requests, and guidance regarding the Related Services. • To provide information on our products, Related Services, etc., and to notify users of events. • To respond to any breach of the Company's Terms of Use, policies, etc., regarding the Related Services. • To inform users of changes in the Terms of Use of the Related Services. • To improve our services including Related Services, to develop new services, and for marketing purposes.
<p>Shipper's information (individual name, company name, telephone number, email address, country, address, postal code)</p>	<ul style="list-style-type: none"> • To generate shipping label and invoice. <p>We share this information with the registered user's selected shipping company's system to create the invoice.</p>
<p>Consignee (buyer) information (individual name, company name, address, city, postal code, telephone number, email address) Cargo description (product name, weight, HS code, country of origin) Size and weight of the shipment Type of shipping service and carrier options</p>	<ul style="list-style-type: none"> • To generate shipping label and invoice. <p>We share this information with the registered user's selected shipping company's system to create the invoice.</p> <ul style="list-style-type: none"> • To produce anonymous statistical data related to our services processed to a format that does not allow identification of individuals.
<p>Registered user's shipping company account and store account</p>	<ul style="list-style-type: none"> • In order to retrieve information necessary to prepare shipping labels and invoices.
<p>Shipment tracking information</p>	<ul style="list-style-type: none"> • To allow shipment tracking using shipment data created.
<p>Email address of the newsletter subscribers</p>	<ul style="list-style-type: none"> • To send email newsletters

Article VI (Provision of Personal Data)

1. The Company will not distribute any Personal Data it has collected to any third party without the consent of the individual concerned, except as required by law.

2. The Company may entrust all or part of the handling of Personal Data to subcontractors to the extent necessary for the achievement of the purpose of use. In such cases, the Company will thoroughly examine the eligibility of the subcontractor, define confidentiality requirements in the contract, and establish a system to ensure that the information is properly managed.
3. The Company may transfer users' Personal Data from its offices in countries or regions within the European Union to its offices in Japan or to the Company's overseas offices. The transfer of Personal Data to Japan will be based on the Japanese government's certification of sufficiency for extraterritorial transfers of acquired data or on standard contractual clauses that the Company has already established. Transfer of Personal Data to any country or region other than Japan or the EU (excluding countries or regions that have obtained sufficiency certification) will be made in accordance with the standard contractual clauses that have been concluded by the Company.

Article VII (Storage Period of Personal Data)

1. The Company will store the Personal Data it has collected for periods of time as described below. Personal Data will be securely deleted as soon as possible after the end of the storage period, unless it is necessary in connection with the purpose of the contract or other processing.

Type of Data	Storage Period
Email addresses of registered users (sellers/ consigners) and Sub Users and profile information of registered users	We store this data for as long as the account is active. You may request us to delete your account at any time.
Shipper's information (individual name, company name, telephone number, email address, country, address, postal code)	We store this data for as long as the account is active. You may delete it at any time inside the Ship&co app.
Consignee (buyer) information (individual name, company name, address, city, postal code, telephone number, email address)	You can delete it in the Ship&co app at any time. We will also automatically delete it from our database after 100 days. After that, we will only store the country code in a non-identifying format for statistical purposes.
Cargo (shipment) description (product name, weight, HS code, country of origin) Size and weight of the shipment Type of shipping service and carrier options	We retain this data for the life of the account. We then keep this data for statistical purposes in a non-personally identifiable format.
Registered user's shipping company account and store account	We will retain this data for the duration of the account. Users may delete their carrier account information within the Ship&co app at any time.

Shipment tracking information	We store this data for as long as the account is in active.
Shipping labels (PDF or ZPL file)	We delete them 100 days after they are created.
Email address of the newsletter subscribers	We store this data for as long as you remain subscribed to our email newsletter.

Article VIII (Security Management System)

1. The Company has implemented sufficient security control measures, both technical and organizational, for the protection of Personal Data as described below.
 - ① The Company's websites and online services are regularly scanned for potential security holes and known vulnerabilities to ensure that they are secure.
 - ② The Personal Data collected is behind a well secured network and can only be accessed by members who have special access rights to the system in question and are obligated to maintain confidentiality.
 - ③ All Personal Data is encrypted via Secure Socket Layer (SSL) technology.
 - ④ To keep your Personal Data secure, we have implemented a variety of security measures when entering, submitting, or accessing your information.
 - ⑤ All customer payments are never stored or processed on our servers.
2. The Company has appointed a representative director as the person responsible for the management of user information (Personal Information Protection Officer), and is in charge of the appropriate management of user information and other information, as well as ensuring its continual improvement. The person responsible for the management of user information can be contacted using the contact information provided in Article XI.

Article IX (Disclosure, Rectification, Suspension of Use of Personal Information)

1. If a user requests disclosure of Personal Information or records provided to a third party in accordance with the provisions of the Personal Information Protection Law (Japan), we will disclose the Personal Information or records provided to a third party without delay and upon confirmation that the request was made by the user in question. In such cases, please note that a fee of ¥1,100 (including sales tax) per request will be charged.
2. If a user requests that the Company correct the content of their Personal Information that it is inaccurate, or requests that the Company stop using the Personal Information that it is being used for purposes other than those disclosed in advance or that it has been obtained through deception or other wrongful means, the Company will, after confirming that the request was made by the user in question, conduct the necessary investigation without delay, and based on the results, correct the content of the Personal Information, stop using it, or stop providing it to third parties, and notify the user to that effect.
3. In the event that a user requests the deletion of their Personal Information, the Company will delete the Personal Information and notify the user of such deletion after confirming that the

request was made by the user themselves, provided that the Company deems it necessary to comply with such a request.

4. To make a request mentioned in the preceding paragraphs, please send the following information and other information and materials specified by the Company to the contact address specified in Article XI.
 - (1) Name, address, telephone number, and email address used for login
 - (2) Details of the request, circumstances, and supporting documents
 - (3) Identification documents
5. The Company may not be able to comply with the requests in Paragraphs 1 and 2 if any of the following items applies. In such cases, we will notify the user to that effect and explain the reason.
 - (1) If there is a risk of harm to the life, body, property, or other rights or interests of the customer or any third party
 - (2) If there is a risk of significant impediment to the proper conduct of the Company's operations
 - (3) If doing so would violate laws or regulations

Article X (Rights of Users in the EU and in the United Kingdom)

1. Users in the EU and the UK are entitled to the following rights under the GDPR or the UK GDPR with respect to how the Company handles user information. To exercise any of these rights, please direct your inquiries to the contact information specified in the following article.
 - (1) The right to access data
 - (2) The right to rectification or erasure
 - (3) The right to restrict data processing
 - (4) The right to object data processing
 - (5) The right to data portability
2. Users have the right to file an objection with the supervisory authority if they believe that the Company is not complying with this Policy or its legal obligations.

Article XI (Inquiries)

1. Please direct any inquiries regarding the handling of this Policy to the following address
BERTRAND Co. / Ship&co
117 Yaoyacho, Nakagyo-ku, Kyoto, 604-8072, Japan
hello@shipandco.com

Article XII (Modification of this Policy)

1. The Company will review its processing of user information and other information as needed, and will strive for continual improvement, and reserves the right to modify this policy should it be necessary.
2. Unless otherwise specified by the Company, any changes to this Policy shall be communicated by notice posted either through the Company's Service or on the website operated by the Company (<https://www.shipandco.com>) and shall become effective upon such posting. Registered users may be notified via email.

Enacted on December 16th, 2022