「ActSecure χ Information Collection Policy」 Comparative Table of the Old and New Clauses

The words related to the revision are underlined.

| Old | New |
|--|--|
| The ActSecure χ Information Collection Policy ("Policy") explains how information | The ActSecure χ Information Collection Policy ("Policy") explains how information |
| collected by FFRI Security, Inc. ("FFRI") via "ActSecure χ" ("Product") from user | collected by FFRI Security, Inc. ("FFRI") via "ActSecure χ" ("Product") from a user |
| of this Product is handled. | of this Product (<u>"user"</u>) is handled. |
| The contents of this policy are subject to change without agreement from an | The contents of this policy are subject to <u>revision</u> without <u>an</u> agreement from an |
| individual user. Please refer to the web page, | individual user. Please refer to the web page, |
| http://www.ffri.jp/information/privacy/ <u>varai_eng_privacy_policy.htm</u> , for the latest | https://www.ffri.jp/information/privacy/actsecure_eng_privacy_policy.htm, for the |
| policy contents. | latest policy contents. |
| It is <u>considered</u> that a user of this Product agrees to the latest version of this | It is <u>deemed</u> that a user agrees to the latest version of this Policy. |
| Policy. | |
| | |
| I . Collection of information by Product | I. Collection of information by Product |
| 1.Information to be Collected | 1. Information to be Collected |
| FFRI shall collect the following information from a user of this Product in a form | FFRI shall collect the following information from a user <u>using</u> this Product in a |
| that does not identify a specific individual. The information shall be collected via | form that does not identify a specific individual. The information shall be |
| this Product and transmitted to FFRI server ("Server"). | collected via this Product and transmitted to FFRI server ("Server"). |
| 1-1User Attribute Information Registered Upon Initial Usage of Product | 1-1 User Attribute Information Registered Upon Initial Usage of Product |
| Attribute Information that cannot specify an individual shall be transmitted to the | Attribute Information that cannot specify an individual shall be transmitted to the |
| Server. | Server. |
| | |
| 1-2Use Environment of This Product | 1-2 Use Environment of This Product |
| Information related to the hardware environment in which this Product is installed | Information related to the hardware environment in which this Product is installed, |
| on, Operating System, and applications concurrently running shall be transmitted | Operating System, and applications concurrently running shall be transmitted to |
| to the Server. | the Server. |

1-3 Information Pertaining to Detected Files (Omitted)

1-4 Application Operation Logs(Omitted)

- 2. Purposes of Usage of Information Collected By This Product
- 2-1 Improvement of usability of this Product operated on users' machines
- 2-2 Addressing problems occurred from the system operation
- 2-3 Improvement of products and FFRI's business development
- 3. Provision of Information Collected Via This Product to A Third Party (Omitted)
- 3-1 In case there is a legal inquiry from a judicial or administrative organization, such as courts or police departments, or other entities equivalent thereto;
- 3-2 In case FFRI deals with breach of laws, regulations, the terms and conditions provided by FFRI or issues of normal social conventions;
- 3-3 In case it is necessary for protection of safety, rights and interests of users <u>of this Product</u> and other third parties; and
- 3-4 In addition to the above, in case provision or disclosure to a third party is admitted by the laws and regulations.
- 4.Provision of Information Collected Via Product To Business Alliance Party/Business Outsourcing Party (Omitted)

1-3 Information Pertaining to Detected Files

(No Change)

1-4 Application Operation Logs

(No Change)

- 2. Purposes of Usage of Information Collected By This Product
- 2-1 Improvement of usability of this Product operated on users' machines
- 2-2 Addressing problems occurred from the system operation
- 2-3 Improvement of products and FFRI's business development Other purposes of usage shall be as described in Article VI.
- 3. Provision of Information Collected Via This Product to A Third Party (No change)
- 3-1 In case there is a legal inquiry from a judicial or administrative organization, such as courts or police departments, or other entities equivalent thereto;
- 3-2 In case FFRI deals with breach of laws, regulations, the terms and conditions provided by FFRI or issues of normal social conventions;
- 3-3 In case it is necessary for protection of safety, rights and interests of users and other third parties; and
- 3-4 In addition to the above, in case provision or disclosure to a third party is admitted by the laws and regulations.
- 4.Provision of Information Collected Via Product To Business Alliance Party/Business Outsourcing Party (No change)

$\rm II\,.$ Detection Review Setting

(Omitted)

1. Information Transmitted When Using This Setting

Following information ("Transmitted Information") shall be transmitted to FFRI server from a user ("Target User") who submits the inquiry based on the preceding paragraph. FFRI shall perform the review set forth in the preceding paragraph using Transmitted Information and transmit the review result to Target User when it becomes available. Other purposes of usage of the Transmitted Information shall be as described in Article \underline{IV} .

1-1. Target File

(Omitted)

1-2. Information To Identify Target User

This includes user attributable information registered upon initial usage of this Product and Setting which shall be used for the aforesaid review process and sending back the review result.

1-3. Target User's User Environment For This Product

This includes information pertaining to this Product managed by the Product (software version information, the hardware environment in which this Product is installed on, Operating System, applications concurrently running, etc.) that is required for the review of Target File.

II. Detection Review Setting

(No change)

1. Information Transmitted When Using This Setting

Following information ("Transmitted Information") shall be transmitted to FFRI server from a user ("Target User") who submits the inquiry based on the preceding paragraph. FFRI shall perform the review set forth in the preceding paragraph using Transmitted Information and transmit the review result to Target User when it becomes available. Other purposes of usage of the Transmitted Information shall be as described in Article VI. FFRI will not provide Transmitted Information to third parties in any format that could be identified by other third parties, unless otherwise specified by laws and regulations.

1-1. Target File

(No change)

1-2. Information To Identify Target User

This includes user attributable information registered upon initial usage of this Product, <u>FFRI AMC</u> and <u>this</u> Setting which shall be used for the aforesaid review process and sending back the review result.

1-3. Target User's User Environment For This Product

This includes information pertaining to this Product managed by <u>FFRI AMC</u> (software version information, the hardware environment in which this Product is installed, Operating System, applications concurrently running, etc.) that is required for the review of Target File.

1-4. Target User's Product Operation Logs Managed By <u>This Product</u> This information is used for Target File review.

III. Cloud Collaboration Feature

In addition to Setting, a user may submit a Target File using "Cloud Collaboration Feature" ("Feature") through the Product based on this Policy to determine if it is a legitimate software (over-detection) or malware and receive the result on the Product.

1. Information Transmitted When Using This Feature

Hash values relating to a Target File ("Hash Values") shall be transmitted from a $\underline{\text{user}}$ who $\underline{\text{submit}}$ a Target File based on the preceding paragraph ("Target User") to FFRI server. FFRI shall perform the review set forth in the preceding paragraph using the Hash $\underline{\text{values}}$ and transmit the result to a Target User when it becomes available. Other purposes of usage of Hash $\underline{\text{values}}$ shall be as described in Article $\underline{\text{IV}}$.

IV. Improvement of This Setting and This Feature, etc.

FFRI may utilize information and Hash values transmitted by each Target User to reflect them in the improvement and development of this Product including this Setting and this Feature and other FFRI software; provided that, in no case shall FFRI provide the transmitted information to a third party in the form that may be identifiable by a general third party, unless otherwise specified by laws and regulations.

(Established)

1-4. Target User's Product Operation Logs Managed By <u>FFRI AMC</u> This information is used for Target File review.

III. Cloud Collaboration Feature

In addition to <u>this</u> Setting, a user may submit a Target File using "Cloud Collaboration Feature" ("Feature") through <u>FFRI AMC</u> or not through <u>FFRI AMC</u> based on this Policy to determine if it is a legitimate software (over-detection) or malware and receive the result on the Product.

1. Information Transmitted When Using This Feature

Hash values relating to a Target File ("Hash Values") shall be transmitted from a <u>User</u> who <u>submits</u> a Target File based on the preceding paragraph ("Target User <u>of this Feature</u>") to <u>the FFRI server</u>. FFRI shall perform the review set forth in the preceding paragraph using the Hash <u>Values</u> and transmit the result to a Target User <u>of this Feature</u> when it becomes available. Other purposes of usage of Hash Values shall be as described in Article VI.

(Deleted)

IV. Log Collection Feature

FFRI uses the "Log Collection Feature", which is used to manually distribute log

collection commands via FFRI AMC to collect user information, in order to collect the information required to provide the Support Service, etc. 1. Information collected when using the Log Collection Feature FFRI may collect information regarding the user's system information (information about the system, services, tasks, network, drivers, installed software, etc.), Product log information and setting information managed by the system and FFRI AMC, Microsoft Defender information, special folder information, information stored in the browser, registry information, and other information. Other purposes of usage of this information shall be as described in Article VI. (Established) V. Support Service FFRI shall provide a Support Service to a user who has purchased the Product, for the objectives of ensuring the proper and suitable use of the Product and assisting in the resolution of any issues that occur and are confirmed in use of the Product. 1. Information collected in the Support Service In conducting the Support Service, FFRI may collect user system information for the environment where FFRI AMC is installed (information about the system, services, tasks, network, drivers, installed software, etc.), log information regarding the system and FFRI AMC, information on FFRI AMC settings, and other information in addition to the information described in I-IV above. Other purposes of usage of this information shall be as described in Article VI. VI. Purpose of Usage of the Information Collected (Established) FFRI shall be able to view and use the information collected through I-V above at any time for the following purposes:

- (1) For user support such as updates and maintenance of FFRI products
- (2) For improvement, development, etc. of FFRI product functions and quality
- (3) For improvement in quality of FFRI services
- (4) For external disclosure including research pertaining to detected malware or vulnerability attacks and commercial usage such as statistical data and malware analysis information

However, FFRI shall never provide user attributable information to third parties in any format that could be identified by other third parties.

Moreover, FFRI shall take the necessary and appropriate safety control measures to manage the information that is collected in I-V above.

V. Disclaimer

Malware and vulnerability attacks continuously become more sophisticated and complicated on a daily basis and in no case shall FFRI guarantee to Target User that this Setting and this Feature work perfectly despite the effort described in the preceding paragraph. Target User hereby agrees that FFRI shall not be liable for any damages with respect to usage of the Setting and the Feature.

<u>VI</u>. Reference On Information Collected via Product (Omitted)

Revised on June 25, 2020

VII. Disclaimer

Malware and vulnerability attacks continuously become more sophisticated and complicated on a daily basis and in no case shall FFRI guarantee to Target User, etc., that this Setting and this Feature work perfectly. Target User, etc., hereby agrees that FFRI shall not be liable for any damages incurred by Target User, etc., with respect to usage of the Setting and the Feature.

<u>VIII</u>. Reference On Information Collected via Product (No change)

Revised on March 30, 2023