First Advantage

First Advantage Japan K.K.
Privacy Policy

Constitution Date: 1 July 2005
Revised Date: 1 September 2023
First Advantage Japan K.K.
Address: Ninomiya Bldg. 2F, 18-4, Sakuragaoka-cho, Shibuya-ku, Tokyo
Representative Director: Masumi Fukuda

Our company, as a business entity handling personal information and conducting pre-employment screening, observes the laws and regulations relating to personal information and respects the individual's rights to personal information protection as well as the importance of a public mission of protection.

The Personal Information Protection Management System is structured in accordance with our policy below. We are hereby committed to regular improvement in terms of information technology, changes in social demands, and management environment.

1. Personal information is appropriately collected, used and provided solely for the execution of our business operations relating to Pre-Employment Screening of personnel and for management of First Advantage Japan staff. No personal information will be handled beyond the specified purpose of use and necessary measures have been taken to ensure this.
2. All laws and regulations regarding personal information will be observed.
3. Responsible security measures and corrective actions will be employed to safeguard against unauthorized access, loss, destruction and compromise of any personal information. We will ensure the continuous improvement of the Personal Information Protection Management System using reasonable management resources.
4. Queries relating to the handling of personal information will be responded to promptly and with integrity.
5. Regular improvements to the Personal Information Protection Management System will be made in accordance with changes to the situation and environment.

Handling Personal Information

1. Personal Information Administration Manager
   Name: Minako Suda
   Department: Personal Information Protection Management Team
   Contact: 03-5422-3460

2. Purpose of using personal information
   a. Personal Information relating to Pre-Employment Screening Service
      I. Conduct requested pre-employment screening
      II. Reporting to clients
      III. Responses to inquiries
   b. Personal Information relating to clients and vendors
      I. Execution of contractual rights and obligations
      II. Client management and sales activities
      III. Responses to inquiries
   c. Personal Information relating to applicants who applied to a position at FA Japan
      I. Recruitment process
      II. Responses to inquiries
   d. Personal Information relating to employees
      I. Human Resources Management
      II. Payroll Management
      III. Employment Insurance, Social Insurance
      IV. Responses to inquiries

3. Providing Personal information to third parties
   Personal Information received will not be disclosed or provided to a third party except in those cases set forth in the following:
   a. Consent given from the principal
   b. Cases based on laws and regulations
   c. Cases in which there is a need to protect a human life, body and fortune, and when it is difficult to obtain principle's consent.
   d. Cases in which there is a special need to enhance public hygiene or promote fostering healthy children, and when it is difficult to obtain principal's consent.
   e. Cases in which there is a need to cooperate with regard to a central government organization or a local government, or a person entrusted by them performing affairs prescribed by laws and regulations, and when

there is a possibility that obtaining a principal's consent would interfere with the performance of the said affairs.

f. Cases in which the third party is an Academic Research Institute, etc., which needs to process personal information for academic purpose, including that the purpose partly includes academic purpose and unless there is a risk of infringement of rights and interests of individuals.

4. Outsourcing Personal Information to third parties
First Advantage Japan may outsource personal information due to business operations. In such a case, First Advantage Japan selects trusted third parties with a high standard of personal information protection and agree on the contract for confidentiality and security control of personal information for appropriate supervision.

5. Request – Disclosure etc. of personal information
Principal can request First Advantage Japan to disclose etc., (Notification of a utilization purpose, to disclose personal information pertained by First Advantage or record on provision of personal information to third parties, to correct, add, or delete content of personal information, suspension of use of personal information and provision of it to third parties) the personal information retained by First Advantage Japan by contacting the below contact. First Advantage will respond to the request in a reasonable period after confirming the identity of the principal.

6. Voluntary provision of Personal Information
Providing personal information to First Advantage Japan is on a voluntary basis. However, please note that some services may not be provided under appropriate circumstances when necessary information is not provided.

7. Cross Border Data Transfer
To the extent necessary in order to conduct the background check, your personal data may be transferred overseas (in other words, a "cross border transfer of data") for processing purposes. The circumstances of cross border transfer may be as follows:
   - To our affiliated entities and/or third-party fulfilment partners to fulfil the services to our Client. Affiliates and third parties may be located outside Japan; and/or
   - To third party sources of information to the extent you have lived or worked outside Japan.

(1) To affiliated entities

We may need to transfer your personal data to our affiliates located outside Japan for administrative purposes, operational and/or processing purposes in connection with the preparation of a report to the Client. As a result, we may transfer your personal data to our affiliates located in countries including Australia, Canada, India, the Netherlands, New Zealand, the Philippines, the USA or the UK. The applicable privacy and data protection laws set forth in the country where the personal data is being transferred to is listed here

In relation to the acts and regulations of the protection of personal information in Australia, Canada, India, New Zealand, the Philippines, and the USA, we shall provide such information to you prior to your judgement of consent on transfer of your personal data to foreign countries. You can confirm the information of those countries in the following website of the Personal Information Protection Committee in Japan;Austrailia:
https://www.ppc.go.jp/files/pdf/australia_report.pdf
Canada: https://www.ppc.go.jp/files/pdf/canada_report.pdf
India: https://www.ppc.go.jp/files/pdf/india_report.pdf
New Zealand: https://www.ppc.go.jp/files/pdf/newzealand_report.pdf
Philippines: https://www.ppc.go.jp/files/pdf/philippin_report.pdf
USA: https://www.ppc.go.jp/files/pdf/USA_report.pdf

The affiliates obey globally applicable policies and rules of our group corresponding to the OECD's Eight Principals. Such policies and rules include a Privacy Information Management System (PIMS) Manual and Global Information Privacy Policy, and it is based on ISO/ IEC 27701 for all FA entities. Also, some of the affiliates are certified under ISO for limited locations.

(2) To third party fulfilment partners

We also use a limited number of third-party fulfilment partners to assist us in providing our background screening services to customers. We will transfer your personal data to third parties located where, such as, you lived, studied or worked overseas. Therefore, we may not be able to identify which countries your personal data is transferred to and which actions a third party takes for the purpose of security management of personal information prior to your judgement on whether you agree to such transferring of personal data or not. These third parties may also perform reference and credential verifications and complete portions of services requested by our Clients, such as by obtaining records from data sources.

(3) To third party sources of information

We may need to transfer your personal data to sources outside Japan depending on your prior work or address history and the extent to which our Client requests us to verify certain information. Therefore, in this case, we may not be able to identify which countries your personal data is transferred to and which actions a third party takes for the purpose of security management of personal information prior to your judgement on whether you agree to such transferring of personal data or not. For example, if you lived, studied or worked overseas, we may need to transfer certain limited personal data to liaise with sources, former employers, third party references, or educational institutions.

8. Disclosure by third parties

We may acquire your personal information from the third party mentioned above from 1 to 3. We will use such information for the purposes described in this policy.

9. Security of Information

First Advantage is committed to ensuring that your personal data is kept secure. We have a comprehensive data security program in place that implements appropriate technical and organisational measures and which at a minimum cover:

- Protection against loss, misuse, or unauthorised alteration of personal data.
- Our customer facing web applications utilise Secure Sockets Layer (SSL) encryption to protect all confidential data across the public network, reducing the risk of exposure.
- In addition, data is encrypted while at rest when it is stored in our data centres, further protecting the data from unauthorised access or loss.
- Access to personal data is strictly limited to those employees who need this access in order to carry out their job responsibilities.

When disposing of personal data, ensuring that information cannot be practicably read or reconstructed.

- Our Data Centre, located in the European Union, is certified to meet ISO Standard 27001:2013 and is regularly audited to ensure that the security controls are effective and in place.

Cookies:

Cookies are dealt with in the FA Privacy Policy for use of the First Advantage web site:
https://fadv.com/privacy-policy/?msclkid=eb69ab3dc52111ecab407edea69548ba#website

Inquiries:

Please contact below for inquiries relating to our privacy policy.

First Advantage Japan K.K. Ninomiya
Bldg. 2F
18-4, Sakuragaoka-cho
Shibuya-ku, Tokyo 150-0031
E-mail: pmark@fadv.com
TEL：03-5422-3460（9:00～17:30*）
* Monday – Friday except national holidays

Procedures to meet requests for disclosure, etc. of personal information

Please see the following for the procedures of the requests to notify the purpose of use, to disclose personal information or record on provision of personal information, to correct, add or delete content of personal information, to discontinue its use, to erase, or to discontinue its provision to a third party with respect to personal information subject to disclosure.

(1) Personal Information Administration Manager
Name: Minako Suda
Department: Personal Information Protection Management Team
Contact: 03-5422-3460

(2) Utilization purpose for all personal information subject to disclosure.

a. Personal Information relating to clients and vendors
   Execution of contractual rights and obligations, client management, sales activities, responses to inquiries
b. Personal Information relating to applicants who applied to a position at First Advantage Japan
   Recruitment process and responses to inquiries
c. Personal Information relating to employees
   Human Resources Management, Payroll Management, Employment Insurance, Social Insurance and responses to inquiries

(3) Address for requests

Please send a request to the following address and we will send an application form to you accordingly.

First Advantage Japan K.K.
Ninomiya Bldg. 2F
18-4, Sakuragaoka-cho
Shibuya-ku, Tokyo 150-0031
E-mail: pmark@fadv.com
TEL：03-5422 - 3460（9:00～17:30*）
* Monday – Friday except national holidays

(4) Application forms

a. Notification of utilization purpose
   Application form for notification of utilization purpose of personal information subject to disclosure (「開示対象個人情報利用目的通知請求書」)
b. Disclosure of personal information or of record on provision of personal information
   Application form for disclosure of personal information or record on provision of personal information subject to disclosure (「開示対象個人情報及び第三者提供記録開示請求書」)
c. Correction, addition, deletion, suspension of use and provision of personal information.
   Application for correction, addition, deletion, suspension of use and provision of personal information subject to disclosure (「開示対象個人情報訂正等及び利用停止等請求書」)

Please note that we will request you to submit your ID or your agent's ID for confirmation after we have received an application.

(5) Disclosure application processing fee and payment

Please note that there will be charges equivalent to postal fee for Notification of utilization purpose of personal information, Disclosure application. Payments can be made by money order.

(6) Response to Disclosure application

A response will be made in writing to the address provided on the application form.

Name of the accredited personal information protection body to which First Advantage Japan belongs and the contact for resolution of complaints.

Name of authorized personal information protection organization
JIPDEC
Contact details:
Address: Personal Information Protection Complaint Desk
Roppongi First Bldg., 1-9-9,
Roppongi, Minato-ku, Tokyo 106-0032 Tel:
03-5860-7565, 0120-700-779
*This is not a contact point for our services.