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## Responding to Law Enforcement Agencies

LY Corporation provides Internet services, including the LINE communication app and the Yahoo! JAPAN web portal. As a result, the Company handles a variety of data related to the privacy of its users.

In principle, LY Corporation does not provide user information to third parties without the user's consent. The Company does not respond to such external requests, nor will it in any way support any activities that unfairly threaten the human rights of the users, such as wiretapping or censorship by government agencies. This policy applies to all the services provided by the Company.

However, in order to fulfil its social responsibility as a service provider, the Company makes exceptions to the above when responding to investigations by law enforcement agencies, etc. If the Company receives a request for disclosure of information from a law enforcement agency, the Company may provide information necessary for the investigation only under the circumstances and to the extent that the Company deems it appropriate to disclose such information in accordance with the relevant laws and regulations.

### The Company's Stance on Responding to Law Enforcement Agencies

In principle, LY Corporation does not disclose information about its users to law enforcement agencies requesting user information, unless the request is based on a warrant issued by a judge or other procedures that directly obligate LY Corporation to disclose information under laws and regulations (including cases where disclosure is indirectly mandated by explicit laws and regulations).

However, in exceptional cases, the Company will consider responding to disclosure requests to the extent that both the necessity and validity of the disclosure are recognized.

The exceptional cases where disclosure may be deemed necessary are:

1. When there is an imminent threat to the life or physical integrity of a person, and LY Corporation recognizes the urgency.
2. When LY Corporation recognizes that there is a high probability that the specific criminal facts on which the disclosure request is based exist. (LY Corporation will not respond to exploratory requests for information.)

<Specific examples>

- Threats, stalking, and other incidents made on services provided by LY Corporation
- Cases in which payment information was misused, resulting in unidentified bills from LY Corporation
- Unauthorized access incidents that occurred in the account services provided by LY Corporation
- Property crimes (fraud, etc.) committed on services provided by LY Corporation, where LY Corporation is able to recognize the background, etc.

The exceptional cases where disclosure may be deemed valid are:

- Information that LY Corporation deems necessary to eliminate the risk in 1 above.
- Information that LY Corporation acknowledges as directly related to the fact or condition on which the specific claim is based, in 2 above.

<Specific examples>

- Registered information of an ID provided by LY Corporation to identify the suspect
- Log-in history pertaining to an alleged incident that took place on services provided by LY Corporation
- History of service use by an ID pertaining to an alleged incident that took place on services provided by LY Corporation

On the other hand, user information described below will not be disclosed even when LY Corporation recognizes the necessity and validity of disclosure, unless it is as a result of the execution of a warrant.

- Information subject to the protection of the secrecy of communications and information that may be subject to such protection
- Information that LY Corporation regards to be highly private (e.g. special care-required personal information, credit card information, information that covers a wide range of time periods and items)
- Information of a person other than the suspect (except when an emergency request of disclosure for the protection of human life or body is received)

## **Applicable Laws and Regulations**

The services provided by LY Corporation are operated in accordance with the Japanese law.

Under the Japanese law, if deemed necessary for the investigation of an offense, a prosecutor, a prosecutor's assistant officer, or a judicial police official may perform search and seizure under a warrant issued by a judge, and the requested businesses are obliged to comply with the court order (Article 218, paragraph (1) of the Code of Criminal Procedure).

In addition, the law enforcement agency may ask for a report on necessary matters relating to the investigation (Article 197, paragraph (2) of the Code of Criminal Procedure).

Furthermore, there may be circumstances considered appropriate for unavoidable disclosure of information in terms of avoiding clear and present danger (Article 37, paragraph (1) of the Penal Code) to prevent present danger to the life, body, etc. of a person, such as in the case of the need to protect human life from the threat of suicide or abduction.

For international requests, LY Corporation may receive requests from abroad in accordance with frameworks for international investigative cooperation such as the Act on International Assistance in Investigation and Other Related Matters and mutual legal assistance treaties (MLAT) with specific countries. This includes cases where requests are received by the Japanese police via the International Criminal Police Organization (ICPO) or by Japan's Ministry of Foreign Affairs through a Japanese embassy. The same rules apply in handling such cases, such as receiving a warrant and having the request verified by a privacy

protection organization, etc.

## **Response Process**

After LY Corporation receives a request from a law enforcement agency or recognizes a situation where the avoidance of a clear and present danger may be justified, the Company will verify the legality and appropriateness from the perspective of user protection, etc., in accordance with the response criteria and, if necessary, the division in charge of privacy protection of the Company will deliberate the content before deciding on a response.

The Company will not respond to a request from a law enforcement agency if there are legal deficiencies in the request or if there is no probability that the specific facts on which the disclosure request is based exist.

The Company will respond to the law enforcement agency in accordance with strict information handling rules by the person in charge, and only when a thorough verification confirms the legality, necessity, and adequacy, etc., of the request. The provision of information to the law enforcement agency shall only be in accordance with the Company's strict internal procedures. The law enforcement agency is not allowed to wiretap or install backdoors against the Company's privacy protection policy. Furthermore, the Company does not respond to requests in which the cause of the crime is not related to the use of the Company's services, such as a request in terms of national security (public safety, counterterrorism measures) or censorship, etc., on the grounds of abstract danger at a stage that does not constitute a crime.

## **Transparency Report**

The Company believes that responding to requests to apprehend suspects of crimes using services provided by LY Corporation, mitigate damages of such crimes, save human lives, and prevent crime is the responsibility of an Internet service provider that serves a large number of people. At the same time, excessive information disclosure requests from law enforcement agencies to Internet service providers may threaten the privacy of their users.

<https://www.lycorp.co.jp/en/privacy-security/privacy/transparency/guideline01/>

In order to strictly protect the privacy of the users and to fulfill its social responsibility as a service provider, the Company believes that it is essential to provide transparency in how often it receives and responds to requests from law enforcement agencies by publishing transparency reports.

The Company plans to update the transparency report on a regular basis so that users can continue using its services with confidence.