



Basic Policy on Personal Information Protection

Understanding the importance of personal information protection, we have established the policy on protection of personal information. Officers and employees work together to protect personal information properly.

Regarding the collection, use, provision, and management method of personal information, we define effective measures such as education, training and auditing as below, and execute them accordingly.

1. Collection of personal information

When we collect personal information, we shall do so only when we have obtained the consent of the individual concerned in a legal and fair manner.

In the collection, we shall clarify the purpose of the use, and restrict it to the extent that is required to attain the purpose.

We will not collect information that may infringe on the interests of individuals unless we obtain explicit consent from the individual or we have grounds to do so such as laws and regulations.

2. Use of personal information

When we outsource or are outsourced work that needs to process personal information, we will determine and comply with clear terms and conditions on confidentiality of personal information, matters related to subcontracting, sharing of responsibility in the event of an accident, return and deletion of personal information at the end of the contract, etc.

In using personal information, we will use it within the scope that was agreed by the individual.

3. Personal information of our shareholders

The purposes of use of shareholders' personal information retained by us are as

follows.

- (1) To exercise the rights and perform the obligations under the Companies Act.
- (2) To provide various privileges to the shareholders for their position.
- (3) To take various measures in order to facilitate the mutual relationship between the shareholders and us.
- (4) To conduct management of the shareholders, such as preparing the shareholders' data in accordance with certain standards based on the applicable laws and regulations.

4. Provision of personal information

We will not provide personal information to a third party without the consent of the individual concerned.

However, when it is required by laws or regulations or it is necessary to protect the life, body or properties of a person and it is difficult to obtain the consent of the person, there are cases where we may provide personal information for unavoidable reasons.

5. Management of personal information

We properly store personal information that we have collected or obtained when we received an order for a task outsourced to us by an external party, and take measures to prevent unauthorized access, loss, damage, tampering, leakage, etc.

When we receive an order for a task that requires the handling of personal information outsourced to us by an external party, we confirm that the customer collected the personal information in a legal and proper manner after obtaining consent from the individual concerned.

We appoint a person who is responsible for the management for each unit of business that handles personal information, and carry out and comply with this policy.

If unauthorized access, loss, damage, tampering or leakage of personal information, or nonconformity of personal information management system to

laws and regulations is identified, we investigate the cause and take a corrective action.

6. Response to complaints from the individual concerned and consultation with the individual concerned

We will endeavor to respond promptly to complaints and consultations regarding the handling of personal information from the individual concerned to the extent appropriate.

7. Laws, regulations, national guidelines and other standards

We observe Japanese laws, regulations, national guidelines and other standards related to the protection of personal information.

8. Continuous improvement of system to manage the protection of personal information

We regularly review and continuously improve the system to manage the protection of personal information based on changes in the social conditions.

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