

Information Management Guidelines

Chapter 1 General Provisions

1 Purpose

The purpose of these Guidelines is to define the basic matters concerning the management of Confidential Information and Personal Information to be observed by officers and employees of our group or group companies.

2 Scope of Application

These Guidelines cover all Confidential Information and Personal Information held by our group companies and apply to the handling of all Confidential Information and Personal Information by officers and employees of our group or group companies.

3 Definitions of Terms

Definitions of terms used in these Guidelines are as follows:

3.1 Confidential Information

Information that our group companies determine should be kept confidential as not to be disclosed outside our group companies or as inappropriate for disclosure.

3.2 Personal Information

Information concerning a living individual, which means information that enables the identification of a specific individual by itself or by comparison with other information, or other information concerning an individual as defined by the Act on the Protection of Personal Information or GDPR or other applicable laws and regulations.

3.3 Employee Information

Personal Information of employees and all persons in the employment relationship.

3.4 Principal

An individual who is identified or can be identified by certain information.

3.5 Handling

Any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

3.6 Act on the Protection of Personal Information

The Act on the Protection of Personal Information in Japan (Act No. 57 of May 30, 2003) and any amendments thereto.

3.7 GDPR

The EU General Data Protection Regulation ("REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC"), including the General Data Protection Regulation which became UK Law by the European Union Withdrawal Act 2018, and any amendments thereto.

3.8 EU

The European Union, including Iceland, Liechtenstein, and Norway, under the European Union Member States and the European Economic Area ("EEA") Agreement.

3.9 Profiling

Any form of computer processing and analysis of Personal Information made to analyze or predict personal trends related to the performance, economic conditions, health, personal preferences, interests, trust, behavior, location, or movement of the individual.

3.10 Processor

Any individual, corporation, public organization, administrative organization, or other organization that handles Personal Information on behalf of our group or group companies.

Chapter 2 Information Management System

4 Obligation to Establish a Responsible Person

Our group or group companies shall appoint an information management supervisor as the person responsible for overseeing the information management system.

5 Establishment of Data Protection Officer (DPO)

5.1 Our group or group companies shall appoint a person in charge of data protection in accordance with the provisions of laws and regulations related to Personal Information.

5.2 Our group or group companies must disclose the information of the data protection officer (e.g., contact information) and notify the supervisory authority (if available in each country).

6 Implementation of Education

Our group or group companies must provide officers and employees with the education necessary to ensure that they understand the contents of these Guidelines and practice the proper handling of information assets.

7 Cooperation in Auditing

Our group or group companies must cooperate with the audit of our group's information management system conducted by us, and the officers and employees must also cooperate with the audit.

8 Establishment of Inquiry and Complaint Contact

Our group or group companies must set up a contact point to receive inquiries and complaints about Personal Information from employees and customers and respond appropriately to inquiries and complaints.

Chapter 3 Proper Handling of Confidential Information

9 Proper Handling of Confidential Information

Officers and employees of our group or group companies shall handle and use the Confidential Information in accordance with the laws and regulations related to the handling of trade secrets and the Detailed Regulations for the Management of Confidential Information (provided, however, that in the event that the same contents are stipulated by each company, the former regulations shall mean these regulations; the same shall apply hereinafter).

10 Disclosure and Provision of Confidential Information to Business Partners, Etc.

Officers and employees of our group or group companies shall disclose and provide Confidential Information to business partners in accordance with the laws and regulations related to the handling of trade secrets and the Detailed Rules for the Management of Confidential Information.

Chapter 4 Handling Personal Information

11 Proper Handling of Personal Information

Officers and employees of our group or group companies shall handle Personal Information in accordance with laws and regulations related to Personal Information and the Detailed Rules for the Management of Personal Information (provided, however, that in the event that equivalent contents are stipulated by each company, the former regulations shall mean these regulations; the same shall apply hereinafter) stipulated in 3.6 to 3.8.

12 Prohibition on the Handling of Sensitive Information

Officers and employees of our group or group companies shall not handle sensitive Personal Information, including race, beliefs, etc., except in cases where laws and regulations relating to Personal Information and the Detailed Rules for the Management of Personal Information permit it or where explicit consent is obtained from the principal.

13 Collection of Personal Information

Officers and employees of our group or group companies shall obtain consent from the principal at the time of Personal Information collection in accordance with the Detailed Rules for the Management of Personal Information.

14 Measures to Be Taken When Collecting Data From the Principal

When collecting Personal Information directly from the principal, officers and employees of our group or group companies shall clearly indicate in writing the matters at the time of obtaining Personal Information in accordance with the Detailed Rules for the Management of Personal Information.

15 Measures to Be Taken When Collecting Personal Information from Persons Other Than the Principal

When collecting Personal Information from a person other than the principal, officers and employees of our group or group companies shall notify the person of the matters specified in the preceding article in accordance with the Detailed Rules for the Management of Personal Information within one month after collecting the Personal Information.

16 Measures Concerning Using Personal Information

Officers and employees of our group or group companies must use Personal Information only within the extent of the purpose of use for which they are notified.

When Personal Information is used beyond the scope necessary for achieving the specified purpose of use, the principal must be notified in advance of the matters specified in Article 15 or matters of equivalent or higher content and consent of the principal must be obtained.

17 Preparation of Records on Handling

17.1 When handling Personal Information, officers and employees of our group or group companies shall record the necessary matters stipulated in the laws and regulations related to Personal Information and the Detailed Rules for the Management of Personal Information.

17.2 Papers and electronic records containing the information set forth in the preceding paragraph shall be retained only for the necessary period as provided for by laws and regulations related to Personal Information.

17.3 Officers and employees of our group or group companies must properly manage paper and electronic records containing information specified in 17.1 that can be submitted when required by the supervisory authority.

18 Use of Processors

When the management of Personal Information is outsourced to a processor, officers and employees of our group or group companies shall conclude a written (including electromagnetic records) agreement with the processor stating the necessary matters stipulated in the Detailed Rules for the Management of Personal Information.

19 Joint Management

When determining the purpose of use and the method of handling Personal Information with a third party, officers and employees of our group or group companies shall stipulate in the agreement with the third party that they shall comply with the obligations stipulated by laws and regulations.

20 Transfer to a Foreign Country

Any transfer of Personal Information by officers and employees of our group or group companies to a place other than the country or region in which the group companies are located (hereinafter referred to as the "data exporting country") shall be made in accordance with the Detailed Rules for the Management of Personal Information.

21 Ensuring the Safety of Use

When handling Personal Information, officers and employees of our group or group companies shall implement, inspect, and improve appropriate technical and organizational safety management measures in accordance with the Detailed Rules for the Management of Personal Information.

22 Ensuring Accuracy of Personal Information

22.1 Personal Information shall be managed in an accurate and up-to-date manner to the extent necessary for the achievement of the purpose of use.

22.2 We shall not retain personal information for more than the period necessary for the purpose for which it is to be processed.

23 Right of Access

23.1 Officers and employees of our group or group companies must respond to requests for confirmation by the principal on whether or not their Personal Information is being handled.

23.2 Our group or group companies must comply with requests for access to information stipulated in the Detailed Rules for the Management of Personal Information.

24 Correction of Personal Information

Officers and employees of our group or group companies must respond to requests for correction of their Personal Information without delay.

25 Deleting Personal Information

25.1 Officers and employees of our group or group companies must respond without undue delay to any request for the deletion of Personal Information from the principal that falls under the circumstances stipulated in the Detailed Rules for the Management of Personal Information.

26 Suspension of Use of Personal Information

Officers and employees of our group or group companies must discontinue the use of Personal Information if requested by the principal under the circumstances stipulated in the Detailed Rules for the Management of Personal Information.

27 Obligation to Notify Subcontractors

In cases where Personal Information is provided to an outsourced party or third party, and the principal makes a request for correction, deletion, or suspension of use of Personal Information, officers and employees of our group or group companies shall notify the said outsourced party or third party of such request. In addition, when requested by the principal to provide information concerning the outsourced party or the third party to whom the Personal Information is provided, officers and employees of our group or group companies shall inform the principle of information concerning the outsourced party or the third party.

28 Data Portability

When required to provide Personal Information by the principal, officers and employees of our group or group companies shall provide the information to the principal in an appropriate form and in a proper manner if they fall under the circumstances stipulated in the Detailed Rules for the Management of Personal Information.

29 Filing an Objection

29.1 When challenged by the principal with regard to the handling of their Personal Information as provided in the Detailed Rules for the Management of Personal Information, officers and employees of our group or group companies shall cease using such information. Provided, however, that this shall not apply where it can be proved that reasonable grounds for the handling of the Personal Information supersede the benefits, rights, and freedoms of the principal or are necessary for a legal claim.

29.2 Officers and employees of our group or group companies must cease using Personal Information if it is handled for the purpose of direct marketing and challenged by the principal.

29.3 Officers and employees of our group or group companies must respond to any objection from the principal to an analytical decision made solely by means of computer processing, including profiling, which has a legal effect or material adverse effect on the principal.

30 Response to Requests for Access, Etc.

Officers and employees of our group or group companies must, in principle, respond to requests within one (1) month from the time they receive requests from the principal in accordance with the provisions of the Detailed Rules for the Management of Personal Information.

31 Implementation of Data Protection Impact Assessment

Officers and employees of our group or group companies must conduct a data protection impact assessment as defined in the Detailed Rules for the Management of Personal Information where data processing may pose a high degree of risk to the rights and freedoms of individuals.

32 Notification to the Supervisory Authority and the Principal

When officers and employees of our group or group companies recognize the existence of infringement of Personal Information (i.e., leakage, loss, or damage of Personal Information), they must notify the supervisory authority of the matters stipulated in the laws and regulations related to Personal Information and the Detailed Rules for the Management of Personal Information within 72 hours and explain them to the principal.

Chapter 5 Miscellaneous Provisions

33 Penalty

Our group or group companies will take disciplinary action against officers and employees of our group or group companies who violate these Guidelines in accordance with the procedures.

34 Compensation for Damages

In the event that officers and employees of our group or group companies, by intent or gross negligence, disclose or lose the Confidential Information of us or our business partners and cause damage to us, our group or group companies shall be entitled to claim compensation for such damage.