



BNY MELLON

Personal Information Protection Policies

The Company hereby establishes and announces the following Personal Information Protection Policies and Declarations as its approach to the handling of personal information.

1. Compliance with relevant laws and ordinances

The Company shall comply with the Personal Information Protection Act, other relevant laws and ordinances relating to the protection of personal information, the guidelines of the competent minister, the guidance of authorized personal information protection organizations and these Personal Information Protection Policies.

2. Purposes of use

Unless with the consent of the customer or treated as an exceptional case by law, the Company shall handle personal information to the extent necessary for achieving the purposes of use set forth in Exhibit 1 attached hereto.

The purposes of use of personal information by the Company shall be announced by posting it on the Company's website, giving written notices or sending e-mails to customers.

3. Security management measures

The Company shall endeavor to keep personal information accurate and updated. In order to prevent any leakage of personal information, the Company shall take necessary and appropriate security management measures and supervise its officers, employees and contractors in an appropriate manner.

4. Continuous improvements

In order to properly handle personal information, the Company shall review these Personal Information Protection Policies from time to time and improve the Policies on a continuing basis.

5. Procedures concerning disclosure request

Upon the receipt of a customer's request for disclosure, correction or suspension of use of personal data held by the Company, the Company shall check the identification of the customer and endeavor to respond to their request in a proper and prompt manner. The Company may request the customer to submit documents in a prescribed form. For request forms and other details, see Exhibit 2 attached hereto.

6. Shared use

As described in Exhibit 3 attached hereto, the Company shall share personal data with other companies belonging to the Bank of New York Mellon Group.

7. Questions and comments

The Company shall endeavor to respond to questions and comments concerning personal information in a prompt and sincere manner. If customers have any questions or comments, please use the following phone numbers:

【Questions concerning transactions with the Company】

Compliance, The Bank of New York Mellon Trust (Japan) Ltd.

Postal mail: Marunouchi Trust Tower, 1-8-3 Marunouchi, Chiyoda-ku, Tokyo 108-8580

Tel: 03-6756-4500 Office hours 9:00 – 17:00

(Except Saturdays, Sundays, and national holidays including year-end holidays)

8. Point of contact for complaints and consultations at the industrial association to which the Company belongs

The Company is a member of the Trust Companies Associations of Japan and The Japan Bankers Association Personal Information Protection Committee, which are Authorized Personal Information Protection Institutions. These associations handle inquiries and complaints regarding the handling of personal information by their members.

Contact Information for Inquiries or Complaints

<Trust Business>

Trust Companies Associations of Japan (Shintaku Sodansho)

<http://www.shintaku-kyokai.or.jp/>

Tel: 03-3241-7335 or 0120-817335 (toll free)

Office hours: 9:00-17:15 (except Saturdays, Sundays, year-end and other holidays)

<Banking Business>

Japan Bankers Association Personal Information Protection Committee

(JBA Sodanshitsu and Ginko Torihiki Sodansho)

<http://abpdpc.gr.jp/>

Tel: 03-5222-1700 or contact your nearby Ginko Torihiki Sodansho

(Exhibit 1)

Purposes of Use of Personal Information

March 2, 2009
The Bank of New York Mellon Trust (Japan), Ltd.

The Company obtains and uses personal information in the following business operations for the purposes of use listed below:

1. Business operations
 - (1) Trust business for monetary trusts, trusts of money other than monetary trusts, securities trusts, monetary claim trusts, real estate management trusts, movable trusts and blanket trusts, etc.;
 - (2) Safekeeping, debt guarantee, handling of payment of the principal, interest or dividends of public bonds or stocks, acting as agency of acquisition, management, disposal or leasing of property, property arrangement or liquidation agency, servicing agency, obligation performance agency, concurrent operation of business such as sale of trust beneficiary rights;
 - (3) Exchange business, foreign exchange business and business incidental thereto;
 - (4) Business that a trust bank is qualified to engage in by law, and business incidental thereto; and
 - (5) Other business that a trust bank is qualified to engage and business incidental thereto (including those the handling of which is to be permitted in the future).
2. Purposes of use

The Company shall use personal data in connection with financial instruments, trust products and services of the Company or its related or affiliated companies for the following purposes; however, if the purpose of use of a particular piece of personal information is limited by law or ordinance, the Company shall not use such information for any purpose other than said purpose:

- (1) To receive any application or consultation for financial instruments, trust products or services;
- (2) To make various proposals for financial instruments, trust products or services (including the sending of direct mails);
- (3) To identify customers pursuant to the Act on Prevention of Transfer of Crime Proceeds, or to confirm the qualification for use of financial instruments, trust products or services;
- (4) To conduct the management of continuous transactions, including the scheduling of trust transactions;
- (5) To decide the appropriateness in providing financial instruments, trust products or services, including decisions in light of the principle of suitability;
- (6) If entrusted by other operators to handle all or part of personal information, to properly execute such entrusted business;
- (7) To exercise rights or perform obligations pursuant to a contract with a customer or required by law;
- (8) To exercise rights or perform obligations concerning trust property as the trustee required by law or under a contract, and to properly execute business operations in trust transactions;
- (9) To conduct marketing research, and the research and development of financial instruments, trust products or services through data analysis or questionnaire survey;
- (10) To make various proposals for products or services of affiliated companies;

- (11) To terminate various transactions or manage terminated transactions;
- (12) To properly and smoothly perform a transaction or contract (including trust agreement or consignment agreement) with a customer when carrying out the business operations of the Company.

(Exhibit 2)

Customers' Request for Disclosure, Correction, Notification of Purpose of Use or Suspension of Use of Personal Data held by the Company

March 1, 2009

The Bank of New York Mellon Trust (Japan), Ltd.

1. Disclosure of personal data held by the Company

Upon the receipt of a customer's request for disclosure of identifiable personal data held by the Company, the Company shall disclose said personal data in such way as agreed upon with said customer; however, in the following cases, the Company may refuse to disclose the data, and in such cases, will explain the reason for the refusal. The Company may charge the customer for expenses required for the disclosure, and in such cases, will notify the customer of the amount of the expenses in advance.

- (1) When the disclosure is likely to prejudice any right or benefit of the customer or any third party;
- (2) When the disclosure is likely to significantly interfere with the proper execution of the Company's business operations; or
- (3) When the disclosure will result in a violation of a law or ordinance.

2. Correction of personal data held by the Company

Upon the receipt of a customer's request for correction, addition or deletion (hereinafter referred to as a "Correction") of identifiable personal data held by the Company for the reason that the data is untrue, the Company shall conduct a fact-finding investigation without delay to the extent necessary for achieving the purpose of use, and make any necessary Correction if it finds the request to be well-grounded. When the Company makes a Correction or decides not to make any Correction, it will report to the customer to that effect and give the reason therefor.

3. Notification of purpose of use of personal data held by the Company

Upon the receipt of a customer's request for notification of the purpose of use of identifiable personal data held by the Company, the Company shall notify the customer of the purpose; however, in the following cases, the Company may refuse to notify it, and in such cases, will notify the customer to that effect and give the reason therefor. The Company may charge the customer for expenses required for the notification, and in such cases, will notify the customer of the amount of the expenses in advance.

- (1) When it is likely to damage the life, health or assets of the customer or any third party if the purpose is expressly disclosed;
- (2) When it is likely to prejudice any rights or due interests of the Company;
- (3) When there is a need to cooperate with a national organization or local organization in the execution of business stipulated by law, and disclosure of the purpose is likely to interfere with the execution of the business; or
- (4) When it is recognized that the purpose of use is clear given the circumstance of acquisition of the data.

4. Suspension of use of personal data held by the Company

Upon the receipt of a customer's request for suspension of use or deletion (hereinafter referred to as "Suspension of Use") of identifiable personal data held by the

Company for the reason that the data is being used for any purpose other than those announced or notified in advance, or was obtained by undue means, the Company shall conduct an investigation as necessary, and conduct a Suspension of Use of said personal data or take alternative measures to protect the customer's rights to the extent necessary for rectification of the violation. If the Company conducts a Suspension of Use or decides not to conduct any Suspension of Use, it will report to the customer to that effect and give the reason therefor.

5. Suspension of provision of personal data to third parties

Upon the receipt of a customer's request for suspension of the provision of identifiable personal data held by the Company to third parties for the reason that the data is provided to third parties although it is not permitted by the Personal Information Protection Act ^(Note) to do so or the customer's consent was not obtained in advance, the Company shall conduct an investigation as necessary, and if it finds the request to be well-grounded, shall suspend the provision of said data to third parties or take alternative measures to protect the customer's rights. If the Company suspends the provision to third parties or decides not to suspend the provision, it will report to the customer to that effect and give the reason therefor.

(Note) The Personal Information Protection Act provides that personal data may be provided to third parties in the event that:

- (1) it is required by law or ordinance (applicable to the provision of information based on a writ or order of a supervisory authority, investigatory authority or taxation authority);
- (2) it is necessary for the protection of human life, health or assets and when it is difficult to obtain the consent of the customer;
- (3) there is a special need for the improvement of public hygiene or promotion of the welfare of children and when it is difficult to obtain the consent of the customer; or
- (4) it is necessary to cooperate with a national organization or local organization or person entrusted by them in the execution of business stipulated by law, and obtaining the customer's consent is likely to interfere with the execution of business (applicable to responses to inquiries from a supervisory authority, investigatory authority or taxation authority).

6. Procedures concerning request

The Compliance Group of the Company is in charge of receiving the requests listed in 1 through 5 above. Customers may be requested to submit documents in a form prescribed by the Company.

The Compliance Group shall respond to each request and explain in writing or orally.

If a request is made by an officer or employee of a corporate customer or other organizations or by an agent of a customer, the Company shall check the relationship between the person who made such request and the customer by asking said person to present their identification documents (referring to the identification documents as stipulated in Article 4 of the Enforcement Rules for the Act on Prevention of Transfer of Crime Proceeds) and documents evidencing the relationship between the customer and said person (a power of attorney, etc).

(Exhibit 3)

Shared Use of Personal Data

March 1, 2009
The Bank of New York Mellon Trust (Japan), Ltd.

The Company shall share personal data with other companies within the scope of the purpose of use as follows:

1. Items of personal data to be shared

Customer name, organization (company) name, title, office address, telephone number, facsimile number and e-mail address

2. Scope of shared users

Companies belonging to the Bank of New York Mellon Group (under the umbrella of the Bank of New York Mellon, the final holding company)

3. Purpose of use by shared users

- Provision of comprehensive services
- Risk management

- End -