

## **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 and Individual Numbers (the “Personal Information, etc.”).

### 1. Compliance with relevant laws and ordinances

The Company shall comply with the relevant laws and ordinances relating to the protection of Personal Information, etc., 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, etc. to the extent necessary for achieving the purposes of use set forth in Exhibit 1 attached hereto. The Company shall handle Individual Numbers only to the extent stipulated by the relevant laws and ordinances.

The purposes of use of Personal Information, etc. 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, etc. accurate and updated. In order to prevent any leakage of Personal Information, etc., 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, etc., 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. In case of a request for disclosure of existence or non-existence of Individual Numbers retained by the Company, the Company shall respond existence or non-existence of a customer’s Individual Number retained by the Company.

### 6. Shared use

As described in Exhibit 2 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, etc. in a prompt and sincere manner. If customers have any questions or comments, please use the following phone numbers:

**【Point of Contact】**

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 9am – 5pm, Monday to Friday (except bank holidays)

Point of contact for Authorized Personal Information Protection Institutions

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: 03-6206-3988 or 0120-817335 (toll free)

Office hours: 9 am - 5:15 pm, Monday to Friday (except bank 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

Office hours: 9am-5pm, Monday to Friday (except bank holidays)

- End -

(Exhibit 1)

**Purposes of Use of Personal Information, etc.**

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 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, etc. 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, etc., 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;
- (13) Notwithstanding the foregoing, Individual Numbers can only be used for the creation and submission of statutory documents required for the trust business and other financial transactions.

- End -

(Exhibit 2)

### **Shared Use of Personal Data**

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 Corporation, the ultimate holding company)

3. Purpose of use by shared users

- Provision of comprehensive services
- Risk management

- End -