



## Declaration of Personal Information Protection

Vantage Capital Markets Japan K.K.

We will collect your personal information and individual number (hereinafter referred to as "Personal Information, etc."). We will formulate and announce the following declaration of personal information protection.

The Company will comply with the proper handling of personal information in the Type I Financial Instruments Business in accordance with the Act on the Protection of Personal Information, the Cabinet Office Ordinance on the Financial Instruments Business and the Cabinet Office Ordinance on Financial Instruments Business, etc., the Guidelines on the Protection of Personal Information in the Financial Field, and the Practical Guidelines on Safety Management Measures in the Guidelines for the Protection of Personal Information in the Financial Field.

The Company fully recognizes that information on customers forms the basis of financial instruments transactions, and that neglect of information management has a significant impact on corporate profits, etc., and attaches importance to the significance of information management by the Compliance Department.

(Specification of purpose of use)

The Company collects personal information by lawful and appropriate means only to the extent necessary for the performance of the Type I Financial Instruments Business, which is the Company's business. When collecting personal information from an individual, the Company will notify the purpose of use and conditions in advance and obtain its consent.

1. The Company's purpose of use of personal information is as follows.
  - 1) Explanation of the Company's business to customers
  - 2) Reporting the results of the Company's operations, etc. to customers
  - 3) Identity verification or agent verification of customers and credit checks
  - 4) Identification of the customer's identity or agent in a request for disclosure of personal information, etc.
  - 5) Recording and storage of transaction history with customers
  - 6) Provision of various information and services to customers related to the business conducted by the Company
  - 7) Confirmation and response of inquirers, visitors, and requests for materials, and records thereof
  - 8) Safety management of the Company's facilities
  - 9) When it is necessary for other purposes related to the Type I Financial Instruments Business conducted by the Company

(Restriction by purpose of use)

- 1) The Company will not handle personal information beyond the scope necessary to achieve the specified purpose of use.
- 2) The Company shall take over the business from another business operator handling personal information due to merger or other reasons.

If personal information is acquired as a result, the personal information will not be handled beyond the scope necessary to achieve the purpose of use of personal information of the other business operator handling personal information before the succession



(Sensitive Information)

1. Sensitive information will not be acquired, used, or provided to third parties.
  - 1) When sensitive information is acquired, used, or provided to a third party to the extent necessary for the execution of business based on the consent of the person due to the necessity of ensuring the appropriate business operation of the Company's business.
  - 2) When biometric information corresponding to sensitive information is used for identity verification based on the consent of the person
2. When acquiring, using, or providing sensitive information to a third party for the reasons set forth in each item of the preceding paragraph, the Company shall handle it with particular care so as not to acquire, use, or provide it to a third party for reasons that deviate from each item.

(Notification, announcement, clarification, etc. of the purpose of use at the time of acquisition of personal information)

Article 9

1. When the Company acquires personal information, the Company shall promptly notify or announce the purpose of use to the individual, except in cases where the purpose of use has been announced in advance in the Privacy Policy (Declaration of Personal Information Protection), etc.
2. Notwithstanding the provisions of the preceding paragraph, when acquiring personal information described in a contract or other document as a result of concluding a contract with the person, etc., the purpose of use shall be clearly indicated to the person in advance. However, this does not apply when it is urgently necessary for the protection of human life, body or property.
3. In the event that the Company changes the purpose of use, the Company shall promptly notify or announce the changed purpose of use.
4. In this Article, "notification" shall be made in writing in principle, and "announcement" shall be made by an appropriate method, such as posting or preparing a document at the Company's sales offices, etc., or publishing it on the website, etc.

(Ensuring the accuracy of data content and retention period)

Article 10

1. The Company shall endeavour to keep personal data accurate and up-to-date to the extent necessary to achieve the purpose of use.
2. The Company shall retain personal data for at least seven years after the termination of the contract or the end of use, and shall delete the personal data after such period has elapsed.

(Security Control Measures)

Article 11

The Company shall take the following safety management measures to prevent leakage, loss, or damage of personal data and to manage personal data otherwise safely.

1. Appointment of a person responsible for personal data management  
The General Manager of the Accounting and General Affairs Department shall be the person responsible for personal data management. The Personal Data Manager shall be in charge of collecting reports from each department, providing advice and guidance, planning and implementing education and training on the safety management of personal data (including participation in education and training by external organizations) that are deemed necessary in accordance with the actual situation of the Company, and other measures related to the safety management of personal data.



2. **Restriction of access to personal information**  
Access to personal databases and files containing documents containing personal data shall be restricted by means of a password, and access shall be granted only to persons deemed necessary for business purposes by the person in charge of personal data management.
3. **Storage of personal information**  
Customer cards, identity verification records, other documents, or electronic media such as USB that contain personal information that is the source of personal data shall be stored in a lockable cabinet, and the key shall be managed by the person responsible for personal data management.
4. **Prohibition of transfer of personal information**  
The Company shall not transfer or transmit personal data unless there is a reasonable reason to believe that it is particularly necessary for the performance of its business.
5. **Security control measures when destroying personal information**  
Documents, etc. containing personal data shall be cut and disposed of, or disposed of by entrusting them to a document disposal company that performs dissolution processing (the person in charge of personal data management shall be present when handing over to a document disposal company).

(Restrictions on Provision to Third Parties)

#### Article 12

1. In addition to the cases stipulated in each item of Article 7, Paragraph 3, officers and employees shall not provide personal data to a third party without the prior consent of the individual.
2. In obtaining the consent set forth in the preceding paragraph, consent shall be obtained after making the person aware of
  - 1) the purpose of use of the third party to whom the personal data is provided
  - 2) the third party to which the personal data is provided
  - 3) the content of the information provided to the third party.
3. Regarding personal data provided to a third party, the Company will suspend the provision of personal data that identifies the individual to a third party at the request of the individual, and
  - 1) Notwithstanding the provisions of Paragraph 1, the personal data may be provided to a third party if the purpose of use is to provide personal data to a third party,
  - 2) items of personal data provided to a third party, and
  - 3) means or methods of provision to a third party have been notified to the person in advance or placed in a state where the person can easily know.
4. In the event that the Company changes the matters set forth in (2) or (3) of the preceding paragraph, the Company shall notify the person in advance of the content to be changed or place it in a state where the person can easily know.
5. In the following cases, the person receiving the personal data shall not fall under the category of a third party for the purposes of the provisions of this Article.
  - 1) When the Company entrusts all or part of the handling of personal data to the extent necessary to achieve the purpose of use
  - 2) When personal data is provided as a result of business succession due to merger or other reasons
  - 3) When personal data is to be used jointly with a specific person, and that fact
    - 1) items of personal data to be used jointly
    - 2) scope of joint use



- 3) purpose of use by the user, and the name or name of the person responsible for the management of the personal data are notified to the person in advance or placed in a state where the person can easily know.
6. In the event that the Company changes the name or name of the person responsible for 3) the purpose of use of the user or 4) the management of personal data as stipulated in 3) of the preceding paragraph, the Company shall notify the person in advance of the content to be changed or place it in a state where the person can easily know.
7. When providing a customer's personal information to a third party, the Company shall, in principle, make it a condition of the contract with the Company to maintain confidentiality, prohibit re-provision, and suspend the use of personal information upon request from the customer.

(Announcement of matters related to retained personal data, etc.)

#### Article 13

1. The Company shall place the following matters in a state where the person can know the following matters regarding the retained personal data.
  - 1) Name of the Company
  - 2) Purpose of use of all retained personal data. If the purpose of use includes provision to a third party, that fact shall be stated.
  - 3) Procedures for responding to requests pursuant to the provisions of Paragraph 2 of this Article, Paragraph 1 of Article 14, Paragraph 1 of Article 15, or Paragraph 1 or Paragraph 2 of Article 16
  - 4) Contact information for complaints made by the Company regarding the handling of retained personal data
  - 5) Name of authorized personal information protection organization and contact for resolution of complaints
2. When a person requests notification of the purpose of use of retained personal data that identifies the individual, the person shall be notified of this without delay. provided, however, that when the purpose of use of retained personal data that identifies the person in question is clear in accordance with the provisions of Paragraph 1 (2), or in Article 1, This does not apply if it is separately stipulated in the listed laws and regulations or guidelines.
3. If the Compliance Department decides not to notify the purpose of use of retained personal data requested pursuant to the provisions of the preceding paragraph, the Compliance Department shall notify the person to that effect without delay

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#### Article 14

1. When a person requests disclosure of retained personal data that identifies the individual, the person shall be notified of the request in writing or the method agreed to by the person who made the request for disclosure (e-mail, telephone, etc.) The retained personal data shall be disclosed without delay. However, if the disclosure falls under any of the following, all or part of it may not be disclosed.
  - 1) When there is a risk of harm to the life, body, property or other rights and interests of the person or a third party
  - 2) In the following cases where there is a risk of significant hindrance to the proper implementation of the Company's business:
    - 1) When the Company receives a request for disclosure of information added by the Company, such as evaluation information, or when the proper



implementation of transactions with customers is hindered by the disclosure of retained personal data.

- 2) When the same person repeatedly requests disclosure of the same content that requires complex response, and there is a risk of significant hindrance to business, such as making other inquiry response operations unsustainable, due to the de facto occupancy of the inquiry desk. The fact that there is a large amount of personal data to be disclosed cannot be used as the sole reason for non-disclosure.
  - 3) When a suspicious transaction has been notified to the competent minister pursuant to Article 2, Paragraph 1 of the Act on Prevention of Transfer of Criminal Proceeds, disclosure of retained personal data in which the notification is recorded (violation of the provisions of Article 2, Paragraph 2) When it violates other laws and regulations.
2. In the event that the Compliance Department decides not to disclose all or part of the requested retained personal data pursuant to the provisions of the preceding paragraph, the Compliance Department shall notify the person to that effect without delay.
  3. In the event that notification is given by a method other than in writing, the method, addressee, date and time, content of the notification, etc. shall be kept in a record.

(Corrections, etc.)

#### Article 15

1. Correction, addition, or deletion of the content of the retained personal data (hereinafter referred to as "correction, etc.") from the person on the grounds that the content of the retained personal data that identifies the person is not true. To the extent necessary to achieve the purpose of use, we will conduct necessary investigations such as confirmation of facts without delay, and based on the results, we will correct the content of the retained personal data. It shall become.
2. When all or part of the content of retained personal data requested pursuant to the provisions of the preceding paragraph is corrected, or when a decision is made not to make corrections, etc., the Company shall notify the person to that effect without delay (including the content of corrections, etc. if corrections, etc. have been made). ) shall be notified.

(Suspension of use, etc.)

#### Article 16

1. Suspension of use or deletion (hereinafter referred to as "suspension of use, etc.") of retained personal data that identifies the person on the grounds that the retained personal data that identifies the person has been handled in violation of the provisions of Article 7 or that it has been obtained illegally. If it is found that there is a reason for the request, the Company shall suspend the use of the retained personal data without delay to the extent necessary to correct the violation. provided, however, that this shall not apply in cases where it is difficult to suspend the use, etc. of the retained personal data or other cases where it is difficult to suspend the use, etc., and when alternative measures necessary to protect the rights and interests of the person are taken.
2. In the event that a person requests the suspension of the provision of retained personal data to a third party on the grounds that the retained personal data that identifies the person is provided to a third party in violation of the provisions of Article 12, Paragraph 1, and it is found that there is a reason for the request, the provision of the retained personal data to the third party shall be suspended without delay. provided, however, that this shall not apply in cases where it



costs a large amount of money to suspend the provision of the retained personal data to a third party or when it is difficult to suspend the provision to a third party, and alternative measures necessary to protect the rights and interests of the person are taken.

3. When the Company suspends the use, etc. or decides not to suspend the use of all or part of the retained personal data requested pursuant to the provisions of Paragraph 1, or suspends the provision of all or part of the retained personal data requested pursuant to the provisions of the preceding paragraph, or decides not to suspend the provision to a third party. To that effect to the person without delay (including the details of measures taken if measures different from those requested by the person are taken) ) shall be notified.

(Explanation of reason)

Article 17:

In accordance with the provisions of Article 13, Paragraph 3, Article 14, Paragraph 2, Article 15, Paragraph 2, and Article 16, Paragraph 3, when notifying the person that all or part of the measures requested by the person will not be taken, or notifying the person that measures different from those measures will be taken, indicate to the person the grounds and the facts that form the basis for the decision not to take measures or take different measures, We shall endeavor to explain the reasons for this.

(Procedures for Responding to Requests for Disclosure, etc.)

Article 18:

Requests pursuant to the provisions of Article 13, Paragraph 2, Article 14, Paragraph 1, Article 15, Paragraph 1, and Article 16, Paragraph 1 or Paragraph 2 (hereinafter referred to as "requests for disclosure, etc.") The method of acceptance, etc. is determined as follows.

1. The contact information for requests for disclosure, etc. shall be posted in the Declaration of Personal Information Protection separately stipulated in order to clarify the Company's efforts to protect personal information.
2. Documents required for requests for disclosure, etc.
  - 1) In the case of the person himself / herself  
Documents and identity verification documents stating the reason for the request for disclosure of retained personal data, the reason for requesting correction, etc., and corrections, or the reason for requesting suspension of use, etc.
  - 2) In the case of a representative  
In addition to the documents in (1) above, power of attorney and identification documents of the agent
3. Method of verifying the identity of the person requesting disclosure, etc.
  - 1) When the applicant comes to the office, at the time of reception, the identity of the applicant shall be confirmed by using one of the following documents (originals).  
In addition, (a) items must be within 6 months from the date of issuance as of the date of presentation, and i~ki must be valid within the expiration date or currently valid, and those that do not contain either "name", "address", or "date of birth" will not be accepted.
    - a. Certificate of seal impression (registered seal must be affixed to the documents described in (2) and (1) above)
    - b. Various health insurance cards
    - c. Various pension handbooks
    - d. Various welfare handbooks
    - e. Driver's license
    - f. Passport



- g. Alien registration card
- 2) In the case of a request by mail, a copy of the documents set forth in (1) above, except for (a), shall be enclosed with the application documents.
- 4. Confirmation of the right of representation in the case of a proxy
  - 1) Depending on the relationship with the individual, the following certification documents shall be collected, and care shall be taken to take sufficient and appropriate verification procedures.
    - a. Certified copy of family register of the person with parental authority
    - b. Adult guardian Certificate of registered matters of adult guardianship
    - c. Voluntary agent: Power of attorney and seal impression certificate
  - 2) Certification documents must be original documents within 6 months from the date of issuance as of the date of presentation. In addition, the power of attorney shall be stamped with a registered seal.

Even if a power of attorney, etc. is submitted, special circumstances that make the existence of the right of representation suspicious are recognized.  
In such cases, the information shall not be disclosed until the intention of the person to conferr the right of representation can be confirmed by telephone, etc.
- 5. Collection method when collecting fees
  - 1) If the work to respond to the request does not reach the point of collecting a fee, the fee will not be collected.
  - 2) When collecting a fee, a postal coupon equal to the fee shall be enclosed in cash if you come to the office, or in the case of a request by mail.
- 6. Identification of retained personal data

The retained personal data subject to requests for disclosure, etc. shall be name, address, date of birth, and telephone number.
- 7. Method of response
  - 1) After confirming the contents of the application, the content of the response shall be confirmed, and the person in charge of personal information data management shall respond as soon as possible.
  - 2) In principle, responses shall be made by mail (to prevent leakage of response information using mail, etc. received only by the individual), and may be separately telephone, e-mail, or other means at the request of the individual.

(Revision and abolition)

Article 19:

The Compliance Department shall be the department in charge of these regulations, and the revision or abolition of these regulations shall be subject to the approval of the Management Committee.