

# Privacy Policy

Brown Brothers Harriman Securities (Japan) Inc.

## Preamble

Compliance with applicable laws and regulations, etc.

The Company will comply with the Act on the Protection of Personal Information and other laws and regulations related to the protection of personal information, related guidelines, guidelines of certified personal information protection organizations, and this privacy policy.

As our policy for personal information protection measures, the Company has established this privacy policy as follows:

### 1. Purpose of use

The Company will use customers' personal information within the following purpose of use:

- To smoothly perform confirmation and management upon a transaction pursuant to the Act on Prevention of Transfer of Criminal Proceeds and other laws and regulations, etc., exercise rights and perform obligations under agreements or laws and regulations, etc., or take other legal measures (including cases where the Company, on behalf of the parent company or affiliated companies of the Brown Brothers Harriman Group, observes anti-money laundering regulations in or outside Japan or take other legal measures).
- To make decisions in light of the principle of suitability and other matters or judge the validity of the provision of financial instruments and services.
- To provide support for the exercise of rights and the performance of obligations under agreements with customers or laws, etc. in connection with the handling of private placement of securities or other operations.
- To make proposals related to financial instruments and services.
- To cancel transactions or provide support for management after the cancellation of transactions.
- To appropriately process personal information outsourced in whole or in part by other business operators, etc.
- To appropriately and smoothly perform other services of the Company.

### 2. Method of acquiring information

The Company will acquire customers' personal information orally, in writing, or by other appropriate and lawful means to the extent necessary to achieve the purpose of use from, for example, the following information sources:

- Documents, etc. submitted directly from the relevant person (e.g. business cards, application forms and other documents submitted or data entered on web pages, etc.)
- Joint users or other third parties

### 3. Provision of information

- The Company will not provide personal information to any third party without the consent of the relevant person, except for cases where the Company provides the personal information pursuant to

laws and regulations.

- The Company may outsource the handling of personal information in whole or in part to a third party to the extent necessary to achieve the purpose of use. When outsourcing the handling of personal information, the Company will perform necessary and appropriate supervision of the outsourcing provider.
- The Company will use personal data (excluding personal data on specific personal information, etc.) jointly with the following third parties:
  - (1) Items of personal information contained in the personal data to be used jointly  
Name of the relevant person, name of the company or organization to which the person belongs, name of department and title, address, telephone number, email address, date of birth, passport number, picture, and driver's license number
  - (2) Scope of joint users  
Brown Brothers Harriman & Co. and affiliated companies  
<https://www.bbh.com/us/en/bbh-who-we-are/office-locations.html>
  - (3) Purpose of use
    - (a) To smoothly perform confirmation and management upon a transaction pursuant to the Act on Prevention of Transfer of Criminal Proceeds, anti-money laundering regulations, and other domestic and foreign laws and regulations, etc., exercise rights and perform obligations under agreements or laws and regulations, etc., or take other legal measures.
    - (b) To make decisions in light of the principle of suitability and other matters or judge the validity of the provision of financial instruments and services.
    - (c) To provide support for the exercise of rights and the performance of obligations under agreements with customers or laws, etc. in connection with the handling of private placement of securities or other operations.
    - (d) To make proposals related to financial instruments and services.
    - (e) To cancel transactions or provide support for management after the cancellation of transactions.
    - (f) To appropriately and smoothly perform other services of each company.

#### 4. Transfer to third parties in foreign countries

The Company may provide personal data to a third party in a foreign country, if the Company provides the personal data pursuant to laws and regulations or has obtained the relevant person's prior consent to the provision of personal data to a third party in a foreign country by providing necessary information in accordance with the provisions of laws and regulations. In cases where, at the time of obtaining the consent, the Company is unable to specify the name of the relevant foreign country, information on the personal information protection system of the foreign country that has been acquired by an appropriate and reasonable means, or information on the measures taken by the third party to protect personal information, if the Company later becomes able to specify the third-party recipient, the relevant person may request that the Company provide the above information.

In addition, the Company may provide personal information to a third party in a foreign country that has established a system that conforms to the standards specified in the rules of the Personal Information Protection Commission as necessary for continuously taking measures that are equivalent to the measures to be taken by personal information handling business operators pursuant to the provisions of the Act on the Protection of Personal Information (hereinafter referred to as "Equivalent Measures"). In this case, the Company will take necessary measures to ensure the continuous implementation of Equivalent Measures by the third party, and the relevant person may request that the Company provide information on those necessary measures.

However, for any request for the provision of information, the Company may decide to not provide all or part of the information if such provision of information is likely to seriously interfere with the Company's proper performance of business.

#### 5. Handling of sensitive information

The Company will not acquire, use, or provide to any third party any sensitive information stipulated in the Guidelines for Protection of Personal Information in the Finance Sector, except for cases where the Company acquires, uses, or provides the sensitive information pursuant to laws and regulations, etc. or with the consent of the relevant person to the extent necessary for the performance of business and other cases stipulated in the said guidelines.

#### 6. Security control measures

The Company takes appropriate measures to keep the personal information handled by the Company accurate and updated. In order to prevent any leakage, loss, damage, etc. (hereinafter referred to as "Leakage, etc.") caused to such personal information, the Company will take organizational security control measures, personnel security control measures, physical security control measures, and technical security control measures and thereby perform appropriate management. When handling the personal information in a foreign country, the Company will appropriately manage the personal information with the understanding of external environment. For the detailed security control measures taken by the Company, please inquire at our contact specified in 8 below.

#### 7. Procedures for making a request for disclosure, etc.

With respect to the retained personal data, when our contact specified in 8 below receives a request from the relevant person for the notification of the purpose of use, disclosure, correction, addition, deletion, discontinuation of use, erasure, discontinuation of provision to third parties, or disclosure of the record of provision to third parties, the Company will confirm that the person making the request is the relevant person and meet the request in accordance with the provisions of laws, regulations, and guidelines. Please be informed in advance that notification of the purpose of use or disclosure may require the payment of fees as prescribed by the Company.

#### 8. Inquiries, opinions, etc.

Requests for the notification of the purpose of use of personal information, disclosure, correction, addition, deletion, discontinuation of use, erasure, discontinuation of provision to third parties, or disclosure of the record of provision to third parties, and consultation requests, complaints, or inquiries about doubts related to the handling of personal information are received at the following contact:

Brown Brothers Harriman Securities (Japan) Inc.

1-2-8 Toranomon, Minato-ku, Tokyo 105-0001

Personal Information Protection Manager

Email: [tokyo.inquiry.scj@bbh.com](mailto:tokyo.inquiry.scj@bbh.com)

#### 9. Certified personal information protection organizations

The Company is a member of the Japan Securities Dealers Association, which is a personal information protection organization certified by the Personal Information Protection Commission. The Personal Information Consultation Office of the association receives complaints and consultation requests about the handling of

personal information by members of the association.

Japan Securities Dealers Association Personal Information Consultation Office

Telephone: 03-6665-6784 <http://www.jsda.or.jp/>

#### 10. Amendment

The above content may be amended due to the revision of laws and regulations, etc. or for other reasons, without giving prior notice or individual notification to the extent permitted by laws and regulations. In this case, we will announce such revision on this website, etc.