

# DECLARATION OF PERSONAL INFORMATION PROTECTION

Revised on April 1, 2023

JapannextS Co., Ltd.

3-1-1 Roppongi, Minato-ku, Tokyo

Representative: Masakatsu Yamada

We hereby establish and announce this Declaration of Personal Information Protection (“**Declaration**”), which sets forth our policies for our clients’ personal information and Individual Number (hereinafter collectively referred to as “**Personal Information etc.**”).

## 1. Compliance with Applicable Laws and Regulations

In addition to the matters set out in this Declaration, we will comply with all applicable laws and regulations, government guidelines, and guidelines by the recognized personal information protection organizations, with respect to the proper handling of Personal Information etc.

## 2. Purposes of Use of Personal Information

Unless otherwise agreed to between us and our clients or in exceptional circumstances required by applicable laws and regulations, we will only use our clients’ personal information in accordance with the purposes set out below. Individual Number will only be used for specific purposes prescribed by law.

As a PTS business (including any incidental businesses) operator (as provided under Article 2-8-10 of the Financial Instruments and Exchange Act), there are situations where it is necessary for us to collect Personal Information etc. for the purpose of ensuring the effectiveness of our operations.

- sales/solicitation of, and the carrying out of service guidelines regarding securities and financial products, pursuant to the Financial Instruments and Exchange Act;
- to process the client’s application for financial products and services such as opening of an account;
- to confirm the client or its agent’s eligibility;
- to inform the client of the transaction results etc.;
- to carry out transactions related administrative procedures;
- to carry out any other actions necessary for the adequate and smooth performance of our services; and
- notwithstanding the above, Individual Numbers will only be used for the purposes of creating or submitting legal documents concerning financial products transactions.

The principal sources of personal information are as described below:

- information from an account application form, questionnaires etc. completed by our clients
- information provided by our clients in the course of the provision of services

## 3. Secure Management of Personal Information

We will endeavor to ensure that our clients’ Personal Information etc. is always kept accurate and up to date. Further, in order to prevent any leakage of our clients’ Personal Information etc., we will take all necessary and

appropriate security measures as described below, as well as exercising appropriate supervision over all officers, employees and any external outsourcing service providers.

(Development of Disciplines on the Handling of Personal Data)

- Establish the handling rules of personal data including the roles and responsibilities of the person handling personal data, the limitation on the number of the persons handling personal data, and procedures etc. necessary for security control of personal data, at each stage of acquisition and input, use and processing, storage and retention, transfer and sending, and deletion and disposal of data

(Institutional Security Control Measures)

- Appoint a person responsible for handling of personal data, clarifying employees handling personal data and the range of personal data handled by such employees, and developing a system for reporting to a person responsible in the event that information leakage etc. is found
- Implement regular self-inspections and internal audits of the handling status of personal data

(Personnel Security Control Measures)

- Implement regular training for employees about consideration when personal data is handled
- Describe the matters about confidentiality of personal data in rules of employment

(Physical Security Control Measures)

- Prevent unauthorized persons from viewing personal data in areas handling personal data and implement entry and exit control for employees in areas installing a computer system etc. to store personal data
- Take measures to prevent theft or loss of equipment, electronic media, and documents that handle personal data

(Technological Security Control Measures)

- Limit persons handling personal data and the range of personal information database etc. handled by such persons through implementing access control
- Introduce a mechanism to protect information systems that handle personal data from unauthorized access from outside sources or malicious software

(Understanding of External Environment)

- When handling personal data in a foreign country, understand the system regarding protection of personal information in such country and take necessary and appropriate measures for the safety management of personal data

#### **4. Continuous Improvement**

We will endeavor to review this Declaration on a regular basis and to make continuous improvements with the purpose of ensuring the appropriate handling of our clients' Personal Information etc.

## **5. Disclosure of Information**

We will endeavor to address adequately and promptly, after obtaining satisfactory evidence of an individual's identity, our clients' request for disclosure of the personal data we hold on them, correction, suspension of use of such personal data, or disclosure of a record of provision of such personal data to a third party.

Further, we will answer on whether we possess Individual Numbers if requested to disclose it.

## **6. Sharing of Personal Information**

We may share our clients' personal information with our associated company, SBI Holdings, Inc., as well as the subsidiary companies listed in the annual securities report of the associated company, for the purposes of exercising appropriate management and internal control such as compliance and risk management. Personal information that may be shared includes information concerning an individual's name, address, telephone number and occupation.

The person who is responsible for managing such personal data is below:

JapannextS Co., Ltd.

3-1-1 Roppongi, Minato-ku, Tokyo

Representative: Masakatsu Yamada

## **7. Inquiries and Complaints Handling**

We will endeavor to address our clients' inquiries, comments or complaints regarding our handling of Personal Information etc. promptly and appropriately. Please contact our Compliance Department on 03-4577-4040 for any queries, comments or concerns that you may have.

## **8. Recognized Personal Information Protection Organization**

We are a member of the JSDA, which is recognized by the Personal Information Protection Commission as a personal information protection organization. The enquiries and complaints desk of the JSDA accepts complaints and provides consultation services concerning the handling of personal information, pseudonymized personal information, and anonymized personal information by JSDA's members.

**Japan Securities Dealers Association**  
**Personal Information Consultation Office**