

# BNP Paribas Securities (Japan) Limited

Declaration of Employees Personal Information Protection

# BNP Paribas, Tokyo Branch

Declaration of Employees Personal Information Protection



# <u>BNP Paribas Securities (Japan) Limited</u> Declaration of Employees Personal Information Protection



[Translation]

# **Declaration of Employees Personal Information Protection**

BNP Paribas Securities (Japan) Limited (the "Company") strictly manages any and all personal information (hereinafter referred to as the "Employees Personal Information") which the Company acquires, stores and uses for the employment management of employees (including employees, those who will be and wished to be hired by the Company, and those who were in the past hired by the Company) in accordance with the Law Concerning Protection of Personal Information (hereinafter referred to as the "Personal Information Protection Law") and this Declaration of Employees Personal Information Protection, and to keep the Employees Personal Information accurate and confidential.

### 1. Compliance with Related Regulations

The Company abides by the Personal Information Protection Law, other related regulations and other rules regarding the handling of the Employees Personal Information.

### 2. Acquisition and Usage of Employees Personal Information

The Company may acquire or use employees' names, addresses, sex, dates of birth, telephone numbers, e-mail addresses, biographical data and such other Employees Personal Information as may be required for employment management, for the purposes mentioned in the following Paragraph 3.

In principle, the Company does not acquire, use or provide Employees' personal information which includes the following information unless it is required for special operational needs or other business purposes or permitted by laws and regulations:

- Information concerning infectious diseases which are not extremely contagious or widespread at the office, such as HIV or hepatitis B, and genetic information such as colorblindness test results; and
- Information which may become a source of social discrimination such as information concerning one's race, social status, family origin, legal address on family registry, or information concerning one's belief or status of membership with a labor union.

#### 3. Intended Purpose for which the Employees Personal Information will be used

The Company uses the collected Employees Personal Information to the extent necessary to attain the following purposes and does not use it for other purposes:

- For business communication, emergency contacts, and posting of documents;
- For payment of compensation(including salary, bonus, and other allowances) and proceedings concerning tax withholding;



- For decision of recruitment and performance appraisal, decision of assignment, and efficient enforcement of rights over personnel;
- For proceedings of benefits and their management;
- For securing a healthy workplace, appropriate health administration for employees;
- For proceedings relating to social insurance and employment insurance, and other legally-required proceedings;
- For proceedings for obtaining qualifications which are necessary to implement businesses such as Securities Sales Representative License;
- For reports and filing answering to any inquiries by regulatory authorities (including foreign regulatory authorities), and litigation handling;
- For contacts with retired employees; and
- For appropriate and efficient implementation of other personnel and labor management, and business administration of the Company.

## 4. Management of Employees Personal Information

The Company strives to keep the Employees Personal Information accurate and updated, and to delete it without delay, if it ceases being required to be used. In order to prevent leakage, loss, or damage to the Employees Personal Information, the Company sets up appropriate organizational structures and takes strict security measures by setting up internal policies concerning the protection of the Employees Personal Information and keeping them revised and updated.

## 5. Provision of Employees Personal Data to Third Parties

The Company does not provide Employees Personal Information that is Personal Data (the "Employees Personal Data") to any third party except when:

- The person to whom the information relates agrees beforehand,
- The provision of the information is in accordance with the relevant laws and regulations,
- It is difficult to obtain consent from the person to whom the information relates, but the provision of such information is necessary to protect the life, health, or property of a person or persons,
- It is difficult to obtain consent from the person to whom the information relates, but the provision of such information is necessary to encourage the improvement of public health or childcare,
- It is necessary in order to cooperate with government organizations or local authorities, or those commissioned by the aforementioned entities, in the prosecution of duties provided in laws and regulations, for which the act of obtaining consent from the person to whom the information relates may interfere; and
- The provision of the information is permitted under the Personal Information Protection Law.

## 6. Joint Use

The Company may jointly use Employees Personal Data with BNP Paribas S.A. or other affiliate company belonging to the BNP Paribas group, as set out below. In the case where such



affiliate company is located overseas, the Company will, as necessary, either obtain consent of the employee concerned, or confirm that the affiliate company has taken the measures that are in line with the purposes of the provisions of Section 1 of Chapter 4 of the Personal Information Protection Law by way of its established privacy policy or otherwise.

Data to be jointly used	Purpose of Joint Use	Person responsible for managing the joint use
Employees' names, dates of birth, addresses, nationality, sex, title and other Employees Personal Information Information relating to the salary and other compensation of employees	For employment management purposes, including for the purpose of promoting utilization of human resources within BNP Paribas as a group or designing the Group's human resources strategy.	Head of Human Resources at the Company
Employees' names, dates of birth, addresses, phone number, nationality, sex, title and other Employees Personal Information	For maintaining and enhancing compliance by BNP Paribas as a group, including for the purpose of reporting to or filing with the regulatory authorities (including foreign regulatory authorities).	Head of Compliance at the Company

# 7. Request for Disclosure or Correction of Employees Personal Data

Any employee of the Company may ask to receive a notice regarding the purpose for which his/her Employees Personal Data will be used, and may demand the disclosure, correction, addition or deletion, suspension of usage or deletion or suspension of provision to third parties of, the Employees Personal Data held by the Company in accordance with Personal Information Protection Law. In order to make the abovementioned requests or demands, the employee must follow the procedure indicated below.

Request liaison:	Human Resources Department
Documents for submission:	
Disclosure/ Correction request form:	• Please fill in the request form prescribed and submit it.
Direct request from said	Identification Documents:
person:	BNP PARIBAS ID Card, Driver's certificate, health
	insurance card, passport, certificate of alien registration, pension book
Request by an Attorney in	•Identification documents for said person and their Attorney
Fact (person designated to	in Fact: Driver's certificate, health insurance card,
make the request,	passport, certificate of alien registration, pension book
guardian, proxy	(Attorneys at law need to report their registration



commissioned by said	numbers as well), and
person):	• Power of attorney or any other document certifying the agent's authority
Other attachments	•For correction, addition or deletion, suspension of usage or deletion, and suspension of provision to third parties: documents providing the reasons for such measures
Charges:	• We collect the actual costs for copying, postage fees and others.
Response by the Company:	• We make a written response.

### 8. Modification of Declaration of Employees Personal Information Protection

In order to secure and manage the Employees Personal Information appropriately, the Company will review and revise this Declaration of Employees Personal Information Protection as needed. If the Company should make any significant modification, the Company will notify the employees of such changes via the Company's intranet web page or other appropriate means.

#### 9. Queries Concerning the Handling of Employees Personal Information

The Company accepts queries or complaints from employees with respect to the handling of the Employees Personal Information at the following office.

BNP Paribas Securities (Japan) Limited Employees Personal Information Liaison, Human Resources Department GranTokyo North Tower, 1-9-1, Marunouchi, Chiyoda-ku, Tokyo, 100-6740 TEL: 03-6377-2324 Office Hours: 9:00-17:00 (Monday to Friday) E-mail address: tokyohr@japan.bnpparibas.com

# 10. Complaint and Inquiry Liaison of the Authorized Personal Information Protection Organization

Please contact Human Resources for the details of the Organization.

Enacted on May 1, 2011 Amended on February 1, 2017 Amended on May 30, 2017



BNP Paribas, Tokyo Branch Declaration of Employees Personal Information Protection



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- For decision of recruitment and performance appraisal, decision of assignment, and efficient enforcement of rights over personnel;
- For proceedings of benefits and their management;
- For securing a healthy workplace, appropriate health administration for employees;
- For proceedings relating to social insurance and employment insurance, and other legally-required proceedings;
- For proceedings for obtaining qualifications which are necessary to implement businesses such as Securities Sales Representative License;
- For reports and filing answering to any inquiries by regulatory authorities (including foreign regulatory authorities), and litigation handling;
- For contacts with retired employees; and
- For appropriate and efficient implementation of other personnel and labor management, and business administration of the Company.

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- The person to whom the information relates agrees beforehand,
- The provision of the information is in accordance with the relevant laws and regulations,
- It is difficult to obtain consent from the person to whom the information relates, but the provision of such information is necessary to protect the life, health, or property of a person or persons,
- It is difficult to obtain consent from the person to whom the information relates, but the provision of such information is necessary to encourage the improvement of public health or childcare,
- It is necessary in order to cooperate with government organizations or local authorities, or those commissioned by the aforementioned entities, in the prosecution of duties provided in laws and regulations, for which the act of obtaining consent from the person to whom the information relates may interfere; and
- The provision of the information is permitted under the Personal Information Protection Law.

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Data to be jointly used	Purpose of Joint Use	Person responsible for managing the joint use
Employees' names, dates of birth, addresses, nationality, sex, title and other Employees Personal Information Information relating to the salary and other compensation of employees	For employment management purposes, including for the purpose of promoting utilization of human resources within BNP Paribas as a group or designing the Group's human resources strategy.	Head of Human Resources at the Company
Employees' names, dates of birth, addresses, phone number, nationality, sex, title and other Employees Personal Information	For maintaining and enhancing compliance by BNP Paribas as a group, including for the purpose of reporting to or filing with the regulatory authorities (including foreign regulatory authorities).	Head of Compliance at the Company

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Request liaison:	Human Resources Department
Documents for submission:	
Disclosure/ Correction request form:	• Please fill in the request form prescribed and submit it.
Direct request from said	Identification Documents:
person:	BNP PARIBAS ID Card, Driver's certificate, health
	insurance card, passport, certificate of alien registration, pension book
Request by an Attorney in	•Identification documents for said person and their Attorney
Fact (person designated to	in Fact: Driver's certificate, health insurance card,
make the request,	passport, certificate of alien registration, pension book
guardian, proxy	(Attorneys at law need to report their registration



commissioned by said person):	numbers as well), and • Power of attorney or any other document certifying the agent's authority
Other attachments	<ul> <li>For correction, addition or deletion, suspension of usage or deletion, and suspension of provision to third parties: documents providing the reasons for such measures</li> </ul>
Charges:	• We collect the actual costs for copying, postage fees and others.
Response by the Company:	• We make a written response.

#### 8. Modification of Declaration of Employees Personal Information Protection

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