

# Declaration on Protection of Personal Information (Privacy Policy)

BNP Paribas, Tokyo Branch

BNP Paribas, Tokyo Branch (hereinafter referred to as the “Bank”) shall strictly manage our customers’ personal information and individual numbers (hereinafter referred to as the “Personal Information, Etc.”) in accordance with various applicable laws and regulations pertaining to the protection of Personal Information, Etc. and this Declaration on Protection of Personal Information (Privacy Policy), as the Bank gives primary consideration to our customers’ trust.

## **1. Compliance with Applicable Laws and Regulations, Etc.**

In handling our customers’ Personal Information, Etc., the Bank shall comply with various applicable laws and regulations concerning the protection of Personal Information, Etc., guidelines published by competent ministers and the guidelines established by any Accredited Personal Information Protection Organization, as well as other rules and this Declaration on Protection of Personal Information.

## **2. Proper Acquisition**

When the Bank receives any Personal Information, Etc. from any of our customers, the Bank shall accurately inform such customer of the purpose of use thereof, and shall acquire such customer’s Personal Information, Etc. by any legitimate and fair means.

Meanwhile, please note that the Bank may record telephone conversations with our customers and conduct monitoring, etc. as to e-mail communications for the purpose of exactly grasping the details of the transactions with, and inquiries, etc. from, our customers.

## **3. Purpose of Use and Announcement Thereof**

The Bank shall use our customers’ Personal Information, Etc. to the extent as is necessary for execution of the following businesses and accomplishment of the following purpose of use and shall not use any of such information for any other purpose, except for the case where consent of relevant customers has been obtained or which is deemed as an exception. Individual numbers shall be handled by us only to such extent as is provided for in laws and regulations. Further, the Bank shall not change the purpose of use of the Personal Information, Etc. beyond such scope as is deemed reasonable.

### (1) Description of Business:

- Deposit affairs, exchange business, loan business, foreign exchange business, derivative business and any other businesses incidental thereto;
- Registered financial institution business, and any other businesses incidental thereto; and
- Other businesses permitted to be conducted by the Bank, and any other businesses incidental thereto (including any service to be permitted to be provided in the future).

### (2) Purpose of Use:

The Bank shall use the relevant information for the following purposes, in connection with various products and services, etc. provided by the Bank and those which are provided by our group companies or partner companies and handled by the Bank:

- to conduct solicitation for and sale of marketable securities and financial instruments, provision of information concerning the services and other activities under the Financial Instruments and Exchange Act and other laws and regulations.;
- to confirm the name, address, birth date, place of work, telephone number, etc. of our customers in order to perform our obligations for identity verification procedures, prevention of money laundering and counter-terrorist financing under the provisions of the "Act on Prevention of Transfer of Criminal Proceeds" and other related laws and regulations;
- to confirm if any person has relevant authorization to represent or act on behalf of a corporation, in the case where the title, personal name, etc. of any individual is required to be described for the execution of various contracts and transactions with our corporate customers;
- to determine whether any financial product or service is adequate, including the case of making any decision, etc. in line with the principle of suitability, etc
- to provide the relevant information to any third party to such extent as is necessary for appropriately carrying out our business;

- to appropriately grasp and manage the services to be performed by outsourcees to which any of our services have been entrusted;
- to appropriately carry out any entrusted service in the case where all or a part of the processing works for the Personal Information, Etc. have been entrusted by any other business operator or in any other cases;
- to report transaction results and account balances to customers and perform tasks related to transactions with the customers;
- to exercise or perform our rights and obligations under contracts with our customers or under laws and regulations, etc.;
- to grasp and manage various risks or compliances to perform internal control.
- To ensure the smooth and appropriate execution of other transactions with customers

The Bank will not use nor provide to any third party any information concerning the race, religion, family origin, domicile of origin, health insurance or criminal history or any other sensitive information for purposes other than the purpose deemed necessary for the appropriate operation of our business activities, etc., under the Cabinet Office Order on Financial Instruments Business, etc.

We will announce the foregoing purpose of use by placing this Declaration on Protection of Personal Information on our website. Provided, however, that if the purpose of use of any specific Personal Information, Etc. is limited by any law or regulation, etc., we will not use such information for purposes other than such limited purpose.

#### **4. Measures for Safety Management of Personal Data**

- The Bank is trying to update the information received from our customers with the latest information in order to keep our customers' personal information accurate and updated, and ask for our customers' cooperation therefor.
- The Bank has been taking appropriate measures to prevent unauthorized access, etc. to our customers' personal data.
- The Bank will take appropriate information security measures, such as countermeasures against unauthorized access, measures for computer viruses, in order to prevent any loss, damage, altering and divulge, etc. of our customers' personal data.
- The Bank has concluded confidentiality agreements with those companies which handle, or do any other work for, our customers' personal data on entrustment by the Company, and has such companies strictly handle and manage such data.
- The Bank will appropriately manage our officers and employees and inspect their compliance, and will also seek to appropriately handle complaints.

#### **5. Outsourcing**

The Bank entrusts the handling of personal data to external contractors to such extent as is necessary for achieving the purpose of use of such data. Any entrustment of handling of Personal Information, Etc. to an external contractor is made within our purpose of use, and our customers' personal data shall be appropriately managed under applicable laws and regulations, etc., as well as this Declaration on Protection of Personal Information and the Bank will confirm, on a periodic basis, the status of appropriate supervision and compliance by our outsourcees. Provided that in entrusting any of our services to an external contractor located overseas, we confirm that measures in line with the purpose of the provisions of Chapter IV, Section 1 of the Personal Information Protection Law of Japan under the contract, etc. concluded with each such outsourcee, as appropriate.

#### **6. Provision of Information to Third Parties**

The Bank will not provide any of our customers' personal data to any third party, except for the following cases. Further, if the Bank entrusts handling of any personal data to any third party, we will conduct appropriate investigation into such party and will appropriately supervise such party so as to have such party maintain the confidentiality of all such data.

- if relevant customers have agreed to such provision;
- if such provision is made under applicable laws and regulations (including the case where such provision is required by any supervisory authority or investigative authority of any foreign country under applicable laws and regulations of such country, etc.);
- if the Bank is required to cooperate with any national or local government organ or its trustee in pursuing affairs under applicable laws and regulations and if the obtaining of consent from relevant individual would hinder the performance of such affairs;
- if any Personal Information, Etc. is provided to any third party for the entrustment of any service; or
- any other case where any special reason exists for such provision.

#### **7. Sharing for Use of Personal Data**

The Bank, as a member of BNP Paribas Group having operations all over the world, will share with BNP Paribas Group companies engaged in relevant business, and appropriately manage, our customers' personal data, for the purpose of



providing overall financial services and risk management. Besides this, we may share to use our customers' personal data as follows, to the extent permitted under applicable laws and regulations and within the above-mentioned purpose of use:

(1) Item of personal data to be shared for use:

- information concerning our customers, including its name, address, birth date, occupation, name of company (organization), title, business address, telephone number, facsimile number, e-mail address, information contained in resume;
- information concerning the transactions with our customers, including the details of transactions, balance of deposits; and
- information concerning the needs of our customers for asset management, etc.

(2) Range of users by sharing:

- BNP Paribas S. A. (head office, as well as branches in Tokyo and other locations)
- BNP Paribas Group (which shall mean all present and future domestic and overseas affiliated companies within BNP Paribas Group)

(3) Purpose of Use:

- - Within the range set forth in 3. Purpose of Use and Announcement Thereof above.

(4) Name of the person responsible for the management of personal data to be shared for use:

Chief Privacy Officer of BNP Paribas, Tokyo Branch

In addition, while the foregoing provisions are related to the shared use of personal data under various laws and regulations for the protection of Personal Information, Etc., the Bank, nonetheless, will comply with the measures to prevent adverse effects and our confidentiality obligations as to our customers' information. Further, with respect to the shared use with BNP Paribas Group companies located overseas, the Bank confirms, as necessary, that measures in line with the purpose of the provisions of Chapter IV, Section 1 of the Personal Information Protection Law of Japan have been taken under contracts with such companies, privacy policies adopted by such companies, etc. Upon request from a customer, we will provide information about the details and implementation status of those measures through the procedures set forth in the following section.

#### **8. Sharing for Use of Information Concerning Dishonor**

The Bank may share our customers' personal data as to the information concerning the dishonor with Tokyo Clearing House, other clearing houses in other areas, etc. for the purpose of ensuring smooth circulation of bills and checks and making any determination for credit approval process.

#### **9. Request from Customers for Disclosure, Correction, Suspension of Use, Deletion, Etc.**

In the case where the Bank receives a request from any of our customers for disclosure, correction, suspension of use, deletion or suspension of provision to third parties of his/her own personal data kept by us, as well as for disclosure of information regarding any measures taken in order to ensure the security of relevant customer's Personal Data by a third party overseas to whom such data has been provided, the Bank will confirm the identity of each such customer and shall proceed with the necessary steps as follows. Please note that if we are requested to disclose whether or not any of our customers has his/her individual number, we will respond only as to whether he/she has or does not have such number:

- Point of Contact: Your customer representative of the Bank or the contact as mentioned below
- Method for Request: Application form prescribed by the Bank shall be filled in and submitted to the Bank.
- Identity Confirmation: We will confirm the identity by checking two of identification documents, etc. to be separately specified by the Bank.
- Fees: For any application for disclosure of retained personal data in writing, we will collect the actual costs for making photocopies and mailing, etc. from you. However, in the case of a request for correction, suspension of use, etc., we will not charge any fee.

Method of Response: We will strive to respond in the format requested by the applicant including email and issuance/ mailing of writing as much as possible.

Further, if a request for disclosure, correction, suspension of use, deletion or suspension of provision to third parties of any personal data kept by the Bank is made by your agent, the following documents shall be submitted:

(1) In the case of legal representative:

- any document to confirm that such agent has the power of attorney; and
- any document to confirm the identity of such agent.

(2) In the case of privately appointed agent:

- a power of attorney in such form as is prescribed by the Bank; and
- a certificate of the registered seal impression to be used by the relevant customer.

In the following cases, the Bank will not disclose any of the personal data kept by us. If we determine not to disclose any data, we will notify the relevant customer of such determination, together with the reason therefor:



- if the identification of any relevant individual cannot be confirmed;
- if the agent's authority cannot be verified in the case of an application submitted by an agent;
- if any of the prescribed application documents is incomplete;
- if the object of any request for disclosure does not fall under the "personal data kept by us";
- if there is a possibility that any of the life, body, properties or other rights and interests of the relevant customer or any third party might be damaged;
- if there is a possibility that appropriate performance of our business operation might be impaired; or
- if any other law or regulation would be violated.

If the Bank received from any of our customers a request for disclosure, correction, suspension of use, deletion, suspension of provision to third parties, etc., we will conduct necessary investigations and deal with such request based on the outcomes of such investigations.

#### **10. Contact for Inquiries from Customers**

If you have any request for or complaint about disclosure, correction, suspension of use, deletion or suspension of provision to third parties of the Personal Information, Etc. or any question on unclear points, please contact your customer representative or the following address:

Compliance Department of BNP Paribas, Tokyo Branch  
 Address: GranTokyo North Tower, 1-9-1 Marunouchi, Chiyoda-ku, Tokyo 100-6741  
 Tel: 03-6377-1500  
 Service Hours: 9:00 to 17:00  
 (Other than Saturdays, Sundays, and year-end and New Year holidays)

#### **11. Affiliated Accredited Personal Information Protection Organization**

The Bank is a member and a special member of All Banks Personal Data Protection Council and Japan Securities Dealers Association, which are the Accredited Personal Information Protection Organization approved by the Personal Information Protection Commission, which respectively. The complaint/consultation center of such council and association accepts complaints and inquiries as to the handling of the Personal Information, Etc. by its members.

<<Complaint/Consultation Counter>>

All Banks Personal Data Protection Council

<http://www.abpdpc.gr.jp/> Tel: 03-52222-1700; or the nearest bank transaction consultation center

Personal Information Counseling Room of Japan Securities Dealers Association

<http://www.jsda.or.jp> Tel: 03-3665-6784

#### **12. Method of Announcement of/Amendment to Declaration on Protection of Personal Information (Privacy Policy)**

Any of the foregoing information may change following the amendments to laws and regulations or for any other reason. In such case, the change shall be announced on our website, etc. and such change shall become effective at the time of announcement.

Our website: <http://www.bnpparibas.jp/en/legal-information/privacy/>

