

# Declaration on Protection of Personal Information (Privacy Policy)

BNP Paribas Securities (Japan) Limited.

BNP Paribas Securities (Japan) Limited. (hereinafter referred to as the "Company") shall strictly manage our clients' personal information and individual numbers (hereinafter referred to as the "Personal Information, Etc.") in accordance with the Act on the Protection of Personal Information (Personal Information Protection Law) and this Declaration on Protection of Personal Information (Privacy Policy), as the Company gives primary consideration to our clients' trust.

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

In handling our clients' Personal Information, Etc., the Company 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 Company receives any Personal Information, Etc. from any of our clients, the Company shall accurately inform such client of the purpose of use thereof, and shall acquire such client's Personal Information, Etc. by any legitimate and fair means.

Meanwhile, please note that the Company may record telephone conversations with our clients 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 clients.

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

The Company shall use our clients' 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 clients has been obtained or which is deemed as an exception pursuant to the laws and regulations. Individual numbers shall be handled by us only to such extent as is provided for in laws and regulations.

Further, the Company shall not change the purpose of use of the Personal Information, Etc. beyond such scope as is deemed reasonable.

### (1) Description of Business:

- Financial instruments business and any other businesses incidental thereto;
- Any business permitted to be conducted by a financial instruments business operator under the Financial Instruments and Exchange Act (FIEA) or any other laws, and any other business incidental thereto; and
- Other businesses permitted to be conducted by a financial instruments business operator, and any other business incidental thereto (including any service to be permitted to be provided in the future).

### (2) Purpose of Use:

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

- 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 clients 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 clients;
- 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 personal information have been entrusted by any other business operator or in any other cases;
- to report transaction results and account balances to clients and perform tasks related to transactions with the clients;
- to exercise or perform our rights and obligations under contracts with our clients 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 clients

(3) Notwithstanding the provisions of Paragraphs (1) and (2) above, we will handle individual numbers and specified personal information of our clients (each of which shall refer to the term defined in the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures; hereinafter referred to as the "Specific Personal Information, Etc.") only to such extent as is necessary to achieve the following purposes of use:

- to perform services for application/notification for opening of an account for financial instruments transactions, to perform services for preparation/provision of any statutory document for financial instruments transactions, and to perform services for provision of relevant information to a Book-Entry Transfer Institution, etc. in connection with financial instruments transactions;
- to perform services for preparation/submission of payment records for payment of any remuneration, charge, contract money, prize money or other consideration for any service or right, payment of rent, etc. or consideration for assignment of real estate, etc., payment of dividends, surplus or money interest, etc. or distribution of any other interest; or
- to prepare/submit any statutory document, etc. on which the relevant individual number is required to be stated under the provisions of applicable laws and regulations.

The Company will not use nor provide to any third party any sensitive information concerning the race, religion, family origin, domicile of origin, health insurance or criminal history or any other special non-public 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 Company is trying to update the information received from our clients with the latest information in order to keep our clients' personal information accurate and updated, and ask for our clients' cooperation therefor.
- The Company has been taking appropriate measures to prevent unauthorized access, etc. to our clients' personal data.
- The Company 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 clients' personal data.
- The Company has concluded confidentiality agreements with those companies which handle, or do any other work for, our clients' personal data on entrustment by the Company, and has such companies strictly handle and manage such data.
- The Company will appropriately manage our officers and employees and inspect their compliance, and will also seek to appropriately handle complaints.

#### **5. Outsourcing**

The Company 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 clients' personal data shall be appropriately managed under applicable laws and regulations, etc., as well as this Declaration on Protection of Personal Information and the Company will confirm, on a periodic basis, the status of appropriate supervision and compliance by our outsourcees.

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, except for the case where consent thereto was separately obtained from relevant clients.

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

The Company will not provide any of our clients' personal data to any third party, except for the following cases. Further, if the Company 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 clients 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 such provision is necessary for the protection of human life, body or property and if it is difficult to obtain the consent of relevant individuals;
- if the Company 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 Company, 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 our vendors, etc. from which BNP Paribas Group companies receive services related to their businesses, and appropriately manage, our clients' personal data, for the purpose of providing overall financial services and risk management. Besides this, we may share to use any personal information contained in our clients' 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 clients, including its name, address, birth date, occupation, etc., name of company (organization), title, business address, telephone number, facsimile number, e-mail address, information contained in resume;
- information concerning the transactions with our clients, including the details of transactions, balance of deposits; and
- information concerning the needs of our clients for asset management, etc.

(2) Range of users by sharing:

- BNP Paribas S.A (Head office, as well as the Tokyo branch and other locations)
- BNP Paribas Securities Asia
- BNP Paribas Arbitrage SNC
- BNP Paribas Group companies ((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 Securities (Japan) Limited.

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 Company, nonetheless, will comply with the measures to prevent adverse effects and our confidentiality obligations as to our clients' information. Further, with respect to the shared use with BNP Paribas Group companies located overseas, the Company 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. Request from Clients for Disclosure, Correction, Suspension of Use, Deletion, Etc.**

In the case where the Company receives a request from any of our clients 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 Company will confirm the identity of each such client and shall proceed with the necessary steps as follows. Please note that if we are requested to disclose whether or not any of our clients 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 client representative of the Company or the contact as mentioned below
- Method for Request: Application form prescribed by the Company shall be filled in and submitted to the Company
- Identity Confirmation: We will confirm the identity by checking two of identification documents, etc. to be separately specified by the Company
- 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 Company 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 Company; and
  - a certificate of the registered seal impression to be used by the relevant client.

In the following cases, the Company will not disclose any of the personal data kept by us. If we determine not to disclose any data, we will notify the relevant client 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 client 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 Company received from any of our clients a request for disclosure, correction, suspension of use, deletion, suspension of provision to third parties, etc., we will conduct necessary investigations and make corrections and suspend the relevant use based on the outcomes of such investigations.

#### **9. Contact for Inquiries from Clients**

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 client representative or the following address:

Compliance Department of BNP Paribas Securities (Japan) Limited.  
Address: GranTokyo North Tower, 1-9-1 Marunouchi, Chiyoda-ku, Tokyo  
100-6740  
Telephone: 03-6377-1500  
Service Hours: 9:00~17:00  
(Other than Saturdays, Sundays, and year-end and New Year holidays)

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

The Company is a member of the Japan Securities Dealers Association, an Accredited Personal Information Protection Organization approved by the Personal Information Protection Committee. The personal information consultation center of such association accepts complaints and inquiries as to the handling of the Personal Information, Etc. by its members.

<<Complaint/Consultation Counter>>

Personal Information Counseling Room of Japan Securities Dealers Association (Tel: 03-3665-6784)  
(<http://www.jsda.or.jp/>)

#### **11. 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/>