

## Basic Policy on the Protection of Personal Information

### 1. Declaration of Personal Information Protection

In order to provide high quality services in response to customers' requests, the Company processes various types of personal information, including information provided by customers. Here, "personal information" refers to personally identifiable information about a living individual, such as name, date of birth, or other descriptions of the individual (including information that cannot identify an individual by itself, but can be easily matched with other information to identify the individual). If such personal information is not handled properly, not only are the rights and interests of individuals unprotected, but the usefulness of the personal information may be compromised.

The Company is fully aware that the proper handling of personal information is an important responsibility for protecting the rights and interests of individuals, including our customers, and for securing the trust of our customers and society as a company and in our business activities. Therefore, the Company hereby clarifies and declares its views and policies regarding the protection of personal information.

- (1) The Company will comply with all laws, regulations and other rules related to the protection of personal information.
- (2) The Company will acquire personal information appropriately in a legitimate manner to the extent necessary.
- (3) The Company will not use personal information beyond the scope necessary to achieve the purpose of use as set forth in this Basic Policy (except where the customer's consent has been obtained and except as permitted under laws and regulations).
- (4) If we receive any complaints regarding the handling of personal information, we will deal with them appropriately and promptly.
- (5) The Company will establish a system for the safe management of personal information in accordance with the "2. Basic Policy on the Safe Management of Personal Data" and will take the necessary and appropriate measures.
- (6) The Company will not provide a third party with personal information of customers without consents of customers unless otherwise provided in this Basic Policy.
- (7) In the event that the Company outsources the handling of personal data, the Company will select a party that is recognized and deemed suitable to handle personal information properly and will supervise the outsourced party as necessary and appropriate.
- (8) In the event that the Company use personal information jointly with a third party, the Company will cause the third party to comply with this Basic Policy.

- (9) The Company will make this declaration known to its officers and employees through education and training to raise awareness of the need to protect personal information, and will exercise necessary and appropriate supervision over the handling of personal data.
- (10) The Company will announce the purpose of use of personal information by posting it on its website on the Internet at all times, and if necessary, will notify the user in writing, by e-mail, by telephone or by other means.
- (11) In the event of an incident such as leaks of personal information, etc., the Company will promptly and appropriately notify customers and report to the Personal Information Protection Commission the incident in accordance with laws, regulations and other rules related to the protection of personal information.
- (12) If the Company receives a request for notification of the purpose of use, disclosure, correction, addition or deletion of content, cessation of use or erasure, or cessation of provision to a third party of retained personal data, etc., the Company shall accept the request in accordance with the procedures for responding to a request for disclosure of retained personal data.
- (13) Questions, complaints and other inquiries about the handling of personal information should be directed to the Personal Information Management Desk.
- (14) The Company will continuously review the content of this Basic Policy and amend it as needed. The Company will use its efforts to improve this Basic Policy so that it is an advanced data protection rule.

## 2. Basic Policy on the Safe Management of Personal Data

- i. As a business operator handling personal information, the Company has established and announced its Basic Policy on the Safe Management of Personal Data.

In order to prevent leakage, loss or damage of personal data handled by the Company and to otherwise manage personal data securely, the Company will take necessary and appropriate measures, including the following measures for each stage of the acquisition, use and storage of personal data, such as the development of rules for handling personal data and the development of an implementation system for safety management measures.

- (1) As organizational measures for safety management, a system will be established and implemented to clearly define the responsibility and authority of officers and employees for safety management measures of personal data, to establish and operate rules and regulations for safety management, and to inspect and audit the implementation of such rules and regulations.
- (2) As personnel security management measures, the Company will supervise its officers and employees to ensure that personal data is securely managed by concluding non-disclosure agreements with them and providing them with education and training.

- (3) As physical safety management measures, the Company will implement measures, including the management of areas where personal data is handled, prevention of a leak when carrying electronic media, deletion of personal data, and disposal of equipment and electronic media.
  - (4) The Company will take technical measures to control access to personal data and the information systems that handle such data and to monitor such systems as a technical safety control measure.
  - (5) As an understanding of the external environment, in the event that personal data is handled in a foreign country, the Company will take necessary and appropriate measures for the secure management of personal data, based on its understanding of the systems, etc. concerning the protection of personal data in that foreign country. In addition, when the Company receives an inquiry from a customer, it will promptly respond with the name of the relevant foreign country and the details of the measures taken.
- ii. The Company will comply with all laws, regulations and other rules related to the protection of personal information in order to ensure the safe management of personal data.
  - iii. The Company will continuously review the content of this Basic Policy and amend it as needed. The Company will use its efforts to improve this Basic Policy so that it is an advanced data protection rule.
  - iv. Please contact the Personal Information Management Desk for questions, complaints, and other inquiries about safety management measures for personal data.

### 3. Proper Acquisition of Personal Information

Our personal information acquisition methods and other matters are as follows.

- i. The Company will not acquire personal information by deception or other wrongful means. The Company will not inappropriately violate the interests of customers when acquiring personal information from a third party.
- ii. In the event that the Company acquires personal information from a third party, the Company will confirm the compliance with the laws and regulations by the third party and confirm that such personal information has been lawfully acquired. The Company will not acquire information from a third party who has committed wrongful acts such as unauthorized acquisition of personal information after knowing that the information is leaked.
- iii. The methods the Company acquires personal information are as follows:
  - (1) means of acquiring information through filling out and providing documents or via the Internet by

customers;

- (2) means of acquiring information through sending email to our e-mail address by customers;
- (3) means of acquiring information through inquiries from customers to our telephone system;
- (4) means of audio recordings that the Company records when customers contact via our telephone system.;
- (5) means of acquiring information by log that the Company records when customers access our website;
- (6) means of acquiring information from commercially available books, such as the Company's quarterly corporate report (*Kaisha Shiki Ho*), management quarterly report (*Yakuin Shiki Ho*), and information published in newspapers and on the Internet; or
- (7) Other means of acquiring personal information in an appropriate manner in accordance with relevant laws and regulations related to the protection of personal information.

#### 4. Purpose of Use of Personal Information

The Company will handle personal information to the extent necessary to achieve the following purposes of use:

- (1) To compile reports and information on the business activities of the Company and its affiliates
- (2) To introduce, recommend, provide, and act as an agent for products and services handled by the Company and its affiliates
- (3) To verify the identity and qualifications of the customer and to carry out any other checks associated with the above items
- (4) To introduce products and services and websites of third parties to which the Company is entrusted with advertising and promotion
- (5) To report on the use of the products and services listed in the above items and to perform other administrative procedures with customers
- (6) To perform the Company's administrative procedures and internal management tasks necessary for the purposes of the above items
- (7) To improve products and services listed above and develop new products and services
- (8) To implement and analyze various market surveys with the purpose of the preceding item
- (9) To perform administrative tasks for the Company's shareholders
- (10) With respect to business clients of the Company (in the case of corporate clients, their officers and employees) to communicate with them about business matters, to perform contracts, to conduct business negotiations, and to perform administrative tasks
- (11) With respect to applicants for employment and recruiting activities, to contact them, to provide them with information, and for other purposes necessary for recruiting and hiring activities

Regardless of the above purposes of use, we will not use information on race, beliefs, family origin, legal

domicile, health care, criminal background, or any other special non-public information about an individual customer for purposes other than those deemed necessary to ensure appropriate business operations in accordance with laws.

#### 5. Provision to a Third Party

The Company will not provide personal information to any third party without the consent of customers except as follows:

- (1) A case where it is required in accordance with laws and regulations;
- (2) A case where the Company provides a subcontractor to the extent necessary for the performance of the Company's business;
- (3) A case where it is necessary for the protection of the life, body, or property of an individual and it is difficult to obtain the customer's consent;
- (4) A case where it is particularly necessary for improving public health or promoting the sound growth of children and it is difficult to obtain the customer's consent;
- (5) A case where it is necessary to cooperate with a national agency, a local government, or an individual or entity entrusted by either a national agency or local government to perform the affairs set forth by laws and regulations, and where obtaining customer consent may impede the performance of such affairs; or
- (6) A case where the Company uses personal information jointly with the Company's group and partner companies.

#### 6. Shared use of personal data

Shared use of personal data:

Monex, Inc. and the Company may share the use of Personal Data for the purpose of internal control within the group (internal control, internal audit, etc.).

Items of personal data subject to joint use:

Information such as name, address, date of birth, telephone number, email address, institution, title, account number, and transaction history.

Name of the person responsible for managing personal data:

Monex Group, Inc.

ARK Mori Building, 25th Floor, 1-12-32 Akasaka, Minato-ku, Tokyo

Yuko Seimei, CEO

## 5. Purpose of Use and Other Matters Related to Retained Personal Data

The purposes of use and other matters related to retained personal data handled by the Company as a business operator handling personal information are described below.

The purposes of use of all retained personal data are as described in the "Purpose of Use of Personal Information" section of this website.

If there is a request for notification of the purpose of use, disclosure, correction, addition or deletion of content, cessation of use or erasure, or cessation of provision to a third party of personal data in our possession, we will accept the request in accordance with the procedure for responding to requests for disclosure, etc. of personal data in our possession on this website.

Complaints about the handling of retained personal data should be directed to the Personal Information Management Desk.

### Review and Revision of the Basic Policy on the Protection of Personal Information

The Company may review the contents of this Basic Policy from time to time and revise it in response to amendments to related laws and regulations or changes in the information technology environment, etc. The revised Basic Policy will be published on the Company's website.

### Contact for handling personal information

For questions, complaints and other inquiries about the handling of personal information, please contact the personal information contact below.

### Personal Information Management Desk

Monex Group, Inc.

ARK Mori Building, 25th Floor, 1-12-32 Akasaka, Minato-ku, Tokyo 107-6025, Japan

Phone: 03-4323-8698

(Hours of operation: 9 a.m. to 5 p.m. on business days)

Procedures for responding to requests for disclosure, etc. of personal data, etc. in our possession

The person identified by the personal data held by the Company may request disclosure, etc. of the personal data held by the Company or the record of provision to a third party. The Company shall accept requests for disclosure, etc. in the following manner

#### 1. Request for Disclosure, etc.

A request for disclosure, etc. refers to any of the following requests concerning retained personal data or the record of provision to a third party (only (2) set forth below is available for the record of provision to a third party.):

- (1) Notification of the purpose of use
- (2) Disclosure
- (3) Correction, addition or deletion of content
- (4) Suspension or deletion of use
- (5) Stopping the provision of information to a third party

#### 2. Where and how to submit a request

Requests for disclosure, etc. are accepted by submitting the application form designated by the Company. If you wish to make a request for disclosure, etc., please specify which whether the request is made for the retained personal data or the record of provision to a third party you request, and which of the above-indicated requests from 1 to 5 you wish to make and contact the Personal Information Management Desk. The Company will send you the application form prescribed by the Company, so please specify the retained personal data (name, address, date of birth, etc.) subject to your request for disclosure, etc., fill out the required information, affix your seal, and return it to the Personal Information Management Desk with the prescribed identification documents, etc.

#### 3. How to verify your identity

At the time of a request for disclosure, etc., you will be asked to submit documents confirming the identity of the person in question, as specified by the Company. If a request for disclosure, etc. is made by a representative (a legal representative of a minor or an adult ward, or a voluntary representative authorized by the principal), the Company will also ask for identification documents of the representative and a letter of attorney prescribed by the Company and other documents to confirm the power of attorney.

The Company may call the person to confirm his or her identity, if necessary.

#### 4. Commission fee

If the request for disclosure, etc. is for (1) notification of the purpose of use or (2) disclosure as described in 1. above, the requesting individual will be required to pay the specified fee for the request to be processed.

#### 5. Method of response

As a general rule, we will respond to requests for disclosure, etc. electronically or in writing whichever you have requested, but as an exception, if it costs a lot of money to respond electronically or if it is difficult to disclose in a such way, we may respond in writing. In the case of a request made by an agent or representative, a response may be made directly to the person in question.

Please note that it may take a considerable amount of time for a response to be given, and we may not be able to respond to all or part of a request for disclosure, etc.

#### 6. Details of this procedure

Please refer to the application form sent to you or contact the Personal Information Management Desk for details of the procedure, including the method of request, method of identification, fee amount and method of payment.

#### About Cookies and Web Beacons

For your convenience, our website may send information called a cookie to your computer. You can change your browser settings to refuse to accept cookies or to display a warning dialog box when you receive one, but you may not be able to use our website without cookies. Cookies do not contain personally identifiable information, such as your name, telephone number or email address.

We may use web beacons to help us understand how you use our site. Web beacons are small invisible images (1 x 1 pixel GIF) that are embedded in web pages to collect usage information.