

PERSONAL INFORMATION PROTECTION POLICY

Revised on July 21, 2020
Japannext Co., Ltd.

This statement sets out our policy concerning the protection of personal information (including “Individual Number” provided under the Social Security and Tax Numbers Act (the “My Number Act”)) of our clients as we believe it is our social responsibility to handle such information with due care.

1. Compliance with Applicable Laws and Regulations

In addition to the matters set out in this statement, 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.

2. Purposes of Use of Personal Information

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 for the purpose of ensuring the effectiveness of our operations.

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.

- 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 and account balances;
- 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 (i) setting up an account for financial products transactions; and (ii) creating or submitting legal documents concerning financial products transactions.

3. Secure Management of Personal Information

We will endeavor to ensure that our clients’ personal information is always kept accurate and up to date. Further, in order to prevent any leakage, loss and damage to our clients’ personal information, we will take all necessary and appropriate security measures, as well as exercising appropriate supervision over all officers, employees and any external outsourcing service providers.

4. Continuous Improvement

We will endeavor to review this statement on a regular basis and to make continuous improvements with the purpose of ensuring the appropriate handling of our clients’ personal information.

NOTE: *Personal Information* means personal information with the exclusion of Individual Number.

5. Disclosure of Information

Our clients may request disclosure of the personal information we hold on them, or request the amendment, removal or updating of such personal information. After obtaining satisfactory evidence of an individual's identity, we will endeavor to address our client's request adequately and promptly.

We will comply with our obligation to address any inquiries regarding our possession of Individual Numbers.

6. Sharing of *Personal Information*

We may share our clients' personal information with our parent company, SBI Holdings, Inc., as well as the subsidiary companies listed in the annual securities report of our parent 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. For the avoidance of doubt, we still bear the responsibility of managing such personal information.

7. Inquiries and Complaints Handling

We will endeavor to address our clients' inquiries, comments or complaints regarding our handling of personal information promptly and appropriately. Please contact our Compliance Department on 03-4577-4048 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 accredited by Personal Information Protection Commission as a personal information protection organization. The Personal Information Helpdesk of the JSDA accepts complaints and provides consultation services concerning the handling of *personal information* by JSDA's members.

Complaints and Consultation Helpdesk

Japan Securities Dealers Association

Personal Information Liaison Office

TEL: 03-6665-6784

URL: <http://www.jsda.or.jp/>

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