Privacy Policy

Effective as of April 1, 2005 Amended as of April 1, 2022 Mita Securities Co.

Declaration of Personal Information Protection

We have established and publicly announced the following Declaration of Personal Information Protection as our policy for handling customers' personal information and personal numbers (hereinafter referred to as "personal information, etc."). We have established and publicly announced the following Declaration of Personal Information Protection as our policy for handling customers' personal information and personal numbers (hereinafter referred to as "Personal Information, etc.").

Compliance with related laws and regulations

We will comply with all applicable laws and regulations regarding the protection of personal information, guidelines issued by competent ministers, guidelines issued by authorized personal information protection organizations, and this Declaration of Personal Information Protection.

Purpose of Use

We will handle customers' personal information within the scope necessary to achieve the purpose of use, except in cases where we have obtained the consent of the customer or where such information is treated as an exception by law. Personal numbers will be handled only to the extent required by law.

Security management measures

The Company will endeavor to keep customers' personal information, etc. accurate and up-to-date. In addition, in order to prevent leaks, etc. of customers' personal information, etc., the Company will implement necessary and appropriate security control measures and appropriately supervise its officers, employees, and contractors. Details of the measures taken for the safe management of retained personal data are described below

If you contact our Personal Information Desk, we will respond to your inquiry without delay in accordance with the provisions of the Personal Information Protection Law.

Continuous Improvement

In order to ensure the proper handling of customers' personal information, etc., we will review this Protection Declaration from time to time and strive for continuous improvement.

Procedures for Requests for Disclosure, etc.

When we receive a request from a customer for disclosure, correction, suspension of use, or disclosure of records of provision to a third party of retained personal data concerning the customer, we will confirm the identity of the customer and endeavor to respond appropriately and promptly. In addition, when we receive a request for disclosure as to whether or not a personal number is retained, we will respond as to whether or not a personal number is retained.

Procedures for requesting information regarding the provision of your personal data to a third party located in a foreign country

If we provide your personal data to a third party in a foreign country, and we are able to identify the third party after the fact, you may request that we provide you with the name of the foreign country, information on its personal information protection system, and information on the measures taken by the third party to protect your personal information. You may request that we provide you with information on the name of the foreign country, its system for protecting personal information, and measures taken by the third party to protect personal information.

In addition, you may request that we provide you with information on measures that are equivalent to those required to be taken by business operators handling personal information in the handling of personal data (hereinafter referred to as "equivalent measures"). In addition, when we provide your personal data to a person who has established a system that conforms to the standards as necessary for the continuous implementation of measures (hereinafter referred to as "equivalent measures") required of business operators handling personal data, your consent is not required, but you may request us to provide you with the following information

- 1. Method of system development at the relevant third party
- 2. Outline of reasonable measures to be taken by the relevant third party
- 3. The status of implementation of the relevant equivalent measures by the third party, and the method and frequency of our confirmation of the existence or non-existence of any systems that may affect the implementation of the relevant equivalent measures and the details thereof
- 4. Name of the foreign country
- 5. Existence or non-existence of any system in the foreign country that may affect the implementation of the corresponding measures by the third party, and an outline of such system
- 6. Existence or non-existence of any impediments to the implementation of the corresponding measures by the third party, and an outline of such impediments
- 7. (6) Outline of measures to be taken by Minebea in the event of any impediments to the implementation of the corresponding measures

Questions, comments, complaints, etc.

We will make every effort to respond promptly and sincerely to questions, opinions, complaints, etc., received from our customers concerning personal information.

We will make every effort to respond promptly and sincerely to questions, comments, complaints, etc. from customers concerning personal information. Please submit your questions, opinions, complaints, etc. in writing to the following contact point of the Company.

3-11 Nihonbashi Kabuto-cho, Chuo-ku, Tokyo 103-0026, Japan Mita Securities Co. Kunihiro Mita, President and Representative Director Administration Division, Personal Information Protection Phone number: 03-3666-1001

Authorized Personal Information Protection Organization

We are a member of the Japan Securities Dealers Association, an authorized personal information protection organization accredited by the Personal Information Protection Commission. The said The Personal Information Consultation Office of the Association accepts complaints and consultations regarding the handling of personal information by Association members. Complaint/Consultation Desk

Japan Securities Dealers Association Personal Information Consultation Office Tel: 03-6665-6784 (http://www.jsda.or.jp/) Japan Money Lenders Association Money Lending Business Consultation and Dispute Resolution Center Tel: 0570-051-051

Purpose of use of personal information

We will handle your personal information to the extent necessary to achieve the following business activities and purposes of use.

Business

Financial instruments trading business (including the buying and selling of securities, brokerage of the buying and selling of securities, underwriting of securities, etc.) and business incidental to financial instruments trading business, money lending business, insurance solicitation business, leasing of proprietary real estate, residential land and building transaction business, real estate specified joint enterprise, and other business that a financial instruments business operator may engage in under the law. and businesses incidental thereto, and other businesses that financial instruments business operators may engage in and businesses incidental thereto (including businesses that may be permitted to be handled in the future).

Purpose of Use

- To solicit and sell securities and financial products, etc., and to provide information on services in accordance with the Financial Instruments and Exchange Law
- To solicit, sell, and provide information on the financial products and services of the Company, its affiliates, and partners
- To determine the appropriateness of products and services in light of the principle of suitability, etc.
- To make credit decisions, manage credit after credit has been extended, and transfer credits or provide or dispose of collateral in connection with credit services
- To confirm the identity of a customer or the identity of a customer's agent
- To report transaction results, deposit balances, etc. to customers
- To perform administrative work related to transactions with customers
- To exercise rights or fulfill obligations based on contracts or laws with customers
- To research and develop financial services through market research, data analysis, questionnaires, etc.
- To properly carry out the entrusted business when all or part of the processing of personal information is entrusted to us by other businesses, etc.
- To properly and smoothly execute other transactions with customers.

Regardless of the above purposes of use, personal numbers will be used only for "application and notification of opening an account for financial instruments transactions" and "preparation and submission of legal documents related to financial instruments transactions".

Provision of Personal Information to Third Parties

We will not disclose or provide any personal information we have obtained about our customers to any third party, except when we have obtained the prior consent of the customer, when we outsource the use of such information to achieve the purpose of use, when it is necessary to protect the rights, property, or safety of our customers or the public as required by law, or when we reasonably believe it is necessary to protect or defend the rights, property, or safety of our customers or the public, or when we share the information with a certain range of predefined parties.

Joint Use of Personal Information

We may share the personal information we have acquired about our customers within the following scope

Items of Personal Data to be Shared

All customer information held by the Company, including name, address, gender, date of birth, telephone number or contact information, occupation or place of employment/position, date transactions with the Company commenced, transaction details and progress, balance on deposit and credit balance at the Company, etc.

Scope of jointly used parties

Mita Global Finance Corporation and other subsidiaries, etc. listed in the Company's "Statement of Business and Financial Condition

*For our subsidiaries located outside of Japan, if we deem that they meet the criteria set forth in Article 24, etc. of the Personal Information Protection Law, we may entrust or jointly use such information with our company without obtaining the consent of the individual.

Purpose of joint use

- To provide comprehensive services as a group
- To manage risks, business operations, and business administration as a group
- To facilitate smooth and appropriate transactions with customers
- To research and develop financial services

Person responsible for the management of such personal data

3-11 Nihonbashi Kabuto-cho, Chuo-ku, Tokyo 103-0026, Japan Mita Securities Co. Kunihiro Mita, President and Representative Director General Manager, Administration Division

In accordance with the Guidelines for the Protection of Personal Information in the Financial Sector, etc., we will not use or provide to third parties information on race, creed, family origin, legal domicile, health care, or criminal background or other special non-public information for purposes other than appropriate business operations or other purposes deemed necessary.

<u>The source of the personal information, the main outsourced operations, and the</u> <u>scope of those with whom the information is shared.</u>

Main sources of personal information

The sources of personal information we obtain include the following.

- Information provided directly by customers on account opening application forms, questionnaires, etc.
- Information contained in commercially available books such as Kaisha Shikiho (Company Quarterly) and Shikiho for Executives, as well as information published in newspapers and on the Internet
- Information we receive from customers through the provision of our products and services (we record telephone calls between us and our customers for the purpose of improving the accuracy of our customer service and customer service).

Main operations that are outsourced

We outsource some of our operations. The following are examples of operations in which we have our subcontractors handle personal information.

- Printing or shipping documents to be sent to customers
- Providing professional advice on legal, accounting, etc.
- Consignment of financial product intermediary business
- Operations and maintenance of information systems
- Keeping books and documents related to business operations