

## **Policy for Protection of Personal Information and Proper Handling of Specific Personal Information**

Updated as of: January 1, 2022

Nikkatsu Corporation (hereinafter referred to as the "Company") recognizes the importance of protecting personal information and specific personal information. To ensure the proper handling of such information, the Company establishes the following policy for handling personal information and specific personal information in compliance with the Act on the Protection of Personal Information, the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (hereinafter referred to as the "My Number Act") and other applicable laws and regulations, and declares that it will enforce, maintain and continuously improve the policy.

### **1. Compliance with laws and regulations**

For the handling of personal information and specific personal information, the Company complies with the laws and regulations related to the protection of personal information and specific personal information as well as other appropriate and reasonable social norms.

### **2. Ensuring appropriate information management**

The Company ensures that its directors and employees recognize the importance of protecting personal information. The Company also establishes the Personal Information Management Regulations and the Specific Personal Information Handling Regulations for the appropriate use and protection of personal information and specific personal information, and ensure that the directors and employees are fully informed of those regulations.

### **3. Implementation of security measures**

To ensure the accuracy and security of personal information and specific personal information, the Company implements information security measures and other security measures. To prevent unauthorized access to personal information and specific personal information or loss, falsification, leakage, and any other incident affecting personal information and specific personal information, the Company appropriately implements preventive and corrective measures.

**4. Acquisition of personal information and specific personal information**

The Company acquires personal information by proper and fair means, and announce (or give notice on) the purpose of use and other necessary matters.

The Company acquires specific personal information only for the purposes of use for which the acquisition of specific personal information is permitted under laws and regulations, and strictly manages the acquired specific personal information.

**5. Use of personal information and specific personal information**

The Company ensures that only authorized persons use personal information and specific personal information as needed in accordance with the Company's internal regulations within the purpose and scope of each specific work performed by them.

**6. Disclosure and provision of personal information and specific personal information**

When an individual requests that the Company disclose personal information and specific personal information on such individual, the Company will reply without delay except for the following cases:

- where the disclosure may cause damage to the life, body, property, or other rights of a third party;
- where the disclosure may seriously interfere with the Company's proper business operation; or
- where the disclosure will result in a breach of laws and regulations.

The Company will not provide personal information and specific personal information, unless the provision of such information is permitted under laws and regulations. When providing personal information to a third party, the Company shall obtain consent from the relevant individual.

If the Company outsources any operations handling personal information or specific personal information to a third party, the Company shall execute a necessary agreement with an appropriate outsourcing provider and take other measures required under laws and regulations.

**7. Continuous improvement**

To appropriately manage personal information and specific personal information, the Company will be aware of changes in laws and regulations, social norms and information

technology and keep reviewing the management system, continuously promoting improvement.

**8. Response to complaints**

The Company will speedily and appropriately respond to your complaints related to the handling of personal information and specific personal information.