

## DBJ EUROPE LIMITED PRIVACY NOTICE

This version is effective from: 20th June 2022

This Privacy Notice ("**Privacy Notice**") sets out how DBJ Europe Limited ("**DBJE**", "we", "us, "our") processes your personal data in connection with our business, including the provision of our website at <a href="https://www.dbj.jp/en/co/info/branchnews/london/">https://www.dbj.jp/en/co/info/branchnews/london/</a> ("**Site**") and the financial products and services we offer, including through the Site and any of our physical locations ("**Services**").

We will update this Privacy Notice from time to time to reflect any changes or proposed changes to our use of your personal data, or to comply with changes in applicable law or regulatory requirements. We may notify you by email of any significant changes to this Privacy Notice, but we encourage you to review this Privacy Notice periodically to keep up to date on how we use your personal data. If we update this Privacy Notice, we will update the effective date at the top of the page.

Your access to and use of the Site, including any secure area, is subject at all times to the <u>Website</u> Terms of Use (https://www.dbj.jp/en/terms.html).

#### 1 PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice explains our approach to any personal data that we might collect from you or which we have obtained about you from a third party, and the purposes for which we process your personal data. This Privacy Notice also sets out your rights in respect of our processing of your personal data.

When we talk about "personal data", we mean any information which relates to an identified or identifiable living individual. Individuals might be identified by reference to a name, an identification number, location data, an online identifier (such as an IP address) or to other factors that are specific to them, such as their physical appearance.

This Privacy Notice is intended to assist you in making informed decisions when using the Site and our Services. Please take a moment to read and understand it. It should be read in conjunction with our <u>Website Terms of Use</u>. <u>which are accessible here:</u> <a href="https://www.dbj.jp/en/terms.html">https://www.dbj.jp/en/terms.html</a>. Please note that cookies are not collected from visitors to the Site, and so the Cookie Policy contained within the Website Terms of Use does not apply to Site visitors.

<u>This Privacy Notice only applies</u> to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their products or services (for example, where you follow links to third party websites over which we have no control, or you purchase goods or services from those third parties).

#### 2 ABOUT US

The Site is made available by Development Bank of Japan Inc. ("DBJ"). However, DBJ do not process your personal data – rather, DBJE is the data controller responsible for your personal data, and the provider of the Services. DBJE is an English company (No: 06925256) with its registered office at 3rd Floor, 8 Finsbury Circus, London, United Kingdom, EC2M 7EA.

#### 3 How to contact us

If you have any questions about this Privacy Notice or want to exercise <u>your rights as a data</u> subject set out in this Privacy Notice, you can contact us using the following methods:

Post	Write to us at: 3rd Floor 8 Finsbury Circus, London, United
	Kingdom, EC2M 7EA.

Telephone	Call us on: +44 0207 507 6070.
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#### 4 WHAT PERSONAL DATA WE COLLECT

In providing the Site and our Services, we may collect and process different types of personal data about you for different processing purposes. The types of personal data we collect depends on who you are and how you use the Site and our Services and includes the following:

Identity Data	First name; last name; job title; name of the entity you work for or in which you have a beneficial interest; industry and nature of your work.
Contact Data	Delivery address; billing address; email address; telephone number; social media handle.
Registration Data	First name; last name; date of birth; gender; country; nationality; username; any KYC information that we may collect; any other personal data that you may provide when you register with us.
Financial Data	Bank account details; partial payment card details.
Transaction Data	Details about payments made between you and us; details of services with us.

#### 5 HOW WE COLLECT AND RECEIVE PERSONAL DATA

We collect and receive personal data using different methods:

Personal data you provide to us	You, or those acting on your behalf, may give us your personal data directly, for example, when you contact us with enquiries, or provide feedback to us.
Personal data received from third parties	We may receive personal data about you from third parties. Such third parties may include our parent company or group companies, agents acting on our behalf, regulators (including law enforcement bodies), our professional advisors, search engine and web analytics providers, data brokers, third parties who introduce you to us, third party directories and third parties that provide technical services (including fraud prevention, credit reference, due diligence and know your customer services) to us so that we can provide the Site and our Services.
Publicly available personal data	From time to time, we may collect personal data about you (Identity Data, Contact Data or Profile Data) that is contained in publicly available sources (including open source data sets or media reports) or that you or a third party may otherwise make publicly available (for example through speeches at events or publishing articles or other news stories or posts on social media platforms).

#### 6 WHO WE COLLECT PERSONAL DATA ABOUT

We collect and process personal data from the following people:

Site visitors	If you browse the Site, we may collect and process your personal data in connection with your interaction with us as set out above.
Customers	If you buy our Services, we may collect and process your personal data in connection with the supply of services to you.
People who contact us with enquiries	If you contact us with an enquiry or complaint either through the Site or via email or phone or provide any feedback to us in our surveys and feedback forms, we will collect and process your personal data in connection with your interaction with us.
People who work for our customers and suppliers	If you work for one of our customers or suppliers and have responsibility for placing orders with us, administering your organisation's account with us or handling our orders or our account with your organisation, we will process your personal data in connection with your organisation's relationship with us.
Visitors to our physical locations	If you attend one of our physical offices or other locations, we may process personal data that you volunteer in connection with your visit and any enquiries you make. For example, you may volunteer personal data when asking us to assist you in finding accommodation or transportation suitable for your needs, or when signing in as a guest. CCTV footage may also be collected for security purposes.
Event attendees	If you attend one of our events, we will process personal data about you in connection with your attendance at the event. For example, we may ask you to complete a registration or feedback form, or other document relating to the event.
Job applicants	If you apply for a job with us, whether through the Site or otherwise, we will collect and process your personal data in connection with your application.
People who provide us with services	If you provide us with services, we will process your personal data in the context of that relationship
Regulators and other authorities including law enforcement	If you act for a body that engages with us in the context of the regulatory or other similar setting, we will process your personal data as necessary in the context of those interactions

#### 7 How we use your personal data

We use your personal data for the purposes set out in this section. If we wish to make any changes to these purposes, or if we wish to use your personal data for any purpose that is not listed in this section, we will notify you using the contact details we hold for you.

#### Fulfilment of our Services.

Entering into a contract and/or fulfilment of our Services

We collect and maintain personal data that you submit to us for the purpose of supplying our services relating to our investment and lending business. We may collect and process your personal data whether you are interacting with us on your own behalf or on behalf of any organisation you represent. Additionally, DBJE is required by the Financial Conduct Authority to record telephone conversations and electronic communications. We may record the content of emails, telephone, video or other electronic communications with our employees and other staff members.

The personal data we process may include your Contact Data, Registration Data, and Financial Data (where applicable). We process this information so that we can enter into agreements with you, fulfil the supply of Services, maintain our user databases and to keep a record of how our Services are being used.

If you attend one of our physical locations, we will process personal data about you which you volunteer in connection with your visit and any enquiries you may have. This will usually include your Contact Data, and any other personal data you volunteer. Some Services we offer are also subject to separate terms and conditions which will also apply.

#### Our legal basis for processing

It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you, or to enter into a contract with you, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide the Services in an effective, safe and efficient way. Alternatively, we are legally obliged to process data in this way.

#### Customer service.

If you have a general question or need help with any issue concerning the Site or our Services

There are various ways in which you are able to contact us (see the "How to contact us" section above). From time to time, you may also be able to submit specific enquiries on other pages of the Site.

When you make an enquiry, we will collect and process your Identity Data and Contact Data, as well as any other personal data you volunteer that is relevant to your enquiry. We use this information to manage and respond to your enquiry.

We also record (including voice recordings of telephone conversations) and use the information referred to above to train our personnel so that they can effectively deal with enquiries.

#### Our legal basis for processing

It is in our legitimate interest to use your personal data in the ways described above to ensure that we are able to help you with your enquiry, provide a good standard of service and improve our customer services.

#### Hosting and managing events.

### If you sign up for and/or attend one of our events

From time to time, we may organise and host events. We may process your Identity Data and Contact Data to communicate with you about such events where you have specifically requested information about such events or where we have another lawful basis for sending that information to you.

If you attend one of our events, we may use your Identity Data and Contact Data to record your attendance at the event and for related record-keeping purposes and, if relevant, we may collect and process any dietary requirements you may have. You may also feature in photographs taken at our events and such photographs may appear in publications that we make available.

#### Our legal basis for processing

It is necessary for us to use your personal data in this way to perform our obligations in accordance with any contract that we may have with you where you have signed up to attend an event, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that the event is operated in an effective way.

We may specifically ask your permission to use your photographs, quotes, testimonials, or other content that you make available or publish at the event. Where this is the case, our processing of your such personal data will be based on consent.

#### Recruitment.

# If we use your personal data in connection with our recruitment activities

We use your personal data for recruitment purposes, in particular, to assess your suitability for any of our positions that you apply for, whether such application has been received by us online, by email or by hard copy and whether submitted directly by you or by a third-party recruitment agency on your behalf. We also use your Identity Data and Contact Data to communicate with you about the recruitment process, to keep records about our recruitment process and to comply with our legal and regulatory obligations in relation to recruitment.

We will process any personal data about you that you volunteer, including during any interview, when you apply for a position with us. We may also process your personal data obtained from any third parties we work with in relation to our recruitment activities, including without limitation, recruitment

agencies, background check providers, credit reference agencies and your referees.

The personal data we process may include your Identity Data, Contact Data, Registration Data, details of your education, qualifications and employment history, any other personal data which appears in your curriculum vitae or application, any personal data that you volunteer during an interview or your interactions with us, or any personal data which is contained in any reference about you that we receive. Such information may also include special categories of personal data (such as information about your health, any medical conditions and your health and sickness records) and information relating to criminal convictions and offences if that information is relevant to the role you are applying for.

We also use your personal data for the purposes of reviewing our equal opportunity profile in accordance with applicable legislation. We do not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment-related decisions are made entirely on merit.

#### Our legal basis for processing

Where we use your personal data in connection with recruitment, it will be in connection with us taking steps at your request to enter into a contract we may have with you or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment decisions.

We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.

#### Receipt of products and services from our suppliers.

If we have engaged you or the organisation you represent to provide us with products or services If we have engaged you or the organisation you represent to provide us with products or services (for example, if you or the organisation you represent provide us with services such as IT support or financial advice), we will collect and process your personal data in order to manage our relationship with you or the organisation you represent, to receive products and services from you or the organisation you represent and, where relevant, to provide our Services to others. The personal data we collect from you may include your Identity Data and Contact Data and any other personal data you volunteer which is relevant to our relationship with you or the organisation you represent.

#### Our legal basis for processing

It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have

with you or the organisation you represent, or it is in our legitimate interest to use personal data in such a way to ensure that we have an effective working relationship with you or the organisation you represent and are able to receive the products and services that you or your organisation provides, and provide our Services to others, in an effective way.

#### Security.

If we need to use your personal data in connection with the administration of our security measures

We have security measures in place at our premises, including CCTV and building access controls. There are signs in place showing that CCTV is in operation. The images captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident). CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft).

We may require visitors to our premises to sign in on arrival and where that is the case we will keep a record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need-to-know basis (e.g. to look into an incident).

#### Our legal basis for processing

It is in our legitimate interests to process your personal data so that we can keep our premises secure and provide a safe environment for our personnel and visitors to our premises.

#### Business administration and legal compliance.

If we need to use your personal data to comply with our legal obligations or in connection with the administration of our business

We may use your personal data: (i) to comply with our legal obligations; (ii) to enforce our legal rights; (iii) to protect the rights of third parties; and (iv) in connection with a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.

#### Our legal basis for processing

Where we use your personal data in connection with a business transition, to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so. For all other purposes described in this section, we have a legal obligation to use your personal data to comply with any legal obligations imposed upon us, such as a court order.

We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.

#### 8 IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA

Where we are required by law to collect your personal data, or we need to collect your personal data under the terms of a contract we have with you, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you. This may apply where you do not provide the personal data we need in order to provide the Services you have requested from us or to process an application to register an account. In these circumstances, we may have to cancel your application or the provision of the relevant Services to you, in which case we will notify you.

#### 9 HOW WE OBTAIN YOUR CONSENT

Where our use of your personal data requires consent, you can provide such consent at the time we collect your personal data following the instructions provided, or by informing us using the contact details set out in the "How to Contact Us" section above.

#### 10 THIRD-PARTY LINKS

This Privacy Notice only applies to personal data processed by us through your use of the Site and/or in connection with our business operations. However, from time to time, the Site may contain links to third-party websites and services. We have no control over these websites and services and this Privacy Notice does not apply to your interaction with the relevant third parties.

When you use a link to go from the Site to another website (even if you don't leave the Site) or you request a service from a third party, your browsing and interactions on any other websites, or your dealings with any other third-party service provider, is subject to that website's or third-party service provider's own rules and policies. For example, if at any stage the Site invites you to connect with us on social media platforms such as Facebook and Instagram. When you click on the links we provide to such third-party platforms, you will be transferred from the Site to the relevant third-party platform and the privacy notice (and other terms and conditions) of that platform will apply to you.

We do not monitor, control or endorse the privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third-party service provider that you use in connection with your interaction with us and to contact them if you have any questions about their respective privacy notices and practices.

#### 11 SHARING PERSONAL DATA

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

When processing your personal data, we may need to share it with third parties (including our parent company, Development Bank of Japan Inc., other entities within our group of companies and entities with whom we are entering into a joint venture), as set out in the table below. This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties.

Third-party suppliers who provide applications/ functionality, data processing or IT services

We or DBJ or another group company may share personal data with third parties who support us in providing the Site and help provide, run and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, identity management, website design, hosting and management, data analysis, data back-up, search engine and web analytics, security and storage services. The

	servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.
Payment providers and banks	We share personal data with third parties who assist us with the processing of payments and refunds.
Delivery and courier companies	We share personal data with suppliers who assist us in the delivery of our Services to our customers.
Event partners and suppliers	When we run events, we will share your personal data with third-party service providers that are assisting us with the operation and administration of that event. If we are running an event in partnership with other organisations, we will share your personal data with such organisations for use in relation to the event.
Hotel and transport operators and other travel-related businesses	When you submit an enquiry to us about a hotel or transport provider, we will share your enquiry (including any personal data you volunteer) with that third party so that they can provide the information and assistance that you have requested.
Recruitment agencies and related organisations	We share personal data with external recruiters, third-party providers that undertake background checks on our behalf and other entities within our group of companies.
Auditors, lawyers, accountants and other professional advisers	We share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.
	We also share personal data with entities who provide due diligence and/or know your customer services
Credit reference and fraud prevention agencies	We share personal data with credit reference and fraud prevention agencies that carry our checks on our behalf and other entities within our group of companies.
Law enforcement or other government and regulatory agencies and bodies	We share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.
Other third parties	Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.
	In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

#### 12 TRANSFERS OUTSIDE THE UK

Our parent company, Development Bank of Japan Inc. is located in Japan. Therefore, when you submit personal data to us, whether through your interactions with the Site or our registered office in the UK, you acknowledge that your personal data will be transferred outside the UK to Japan where it will be stored and processed by us and our suppliers for the purposes set out in this Privacy Notice.

Where necessary in order to provide our Services, we will transfer personal data to countries outside the UK and the EEA.

Certain non-UK countries do not have the same data protection laws as the UK. In particular, they may not provide the same degree of protection for your personal data, may not give you the same rights in relation to your personal data and may not have a data protection supervisory authority to help you if you have any concerns about the processing of your personal data. However, when transferring your personal data outside the UK to a country that does not have adequate data protection legislation in place, we will comply with our legal and regulatory obligations in relation to your personal data, including having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data. We will take reasonable steps to ensure the security of your personal data in accordance with applicable data protection laws.

When transferring your personal data outside the UK, we will, where required by applicable law, implement at least one of the safeguards set out below. Please contact us if you would like further information on the specific mechanisms used by us when transferring your personal data outside the UK.

Adequacy decisions	We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see 'https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries en' and 'https://ico.org.uk/for-organisations/dp-at-the-end-of-the-transition-period/data-protection-and-the-eu-in-detail/the-uk-gdpr/international-data-transfers'
Model clauses	Where we use certain service providers, we may use specific contracts approved by the ICO which give personal data the same protection it has in the UK. For further details, see https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-data-transfer-agreement-and-guidance/

#### 13 HOW LONG WE KEEP YOUR PERSONAL DATA

In respect of personal data that we process in connection with the supply of our Services, we may retain your personal data for up to six years from the date of supply of the relevant Services and in compliance with our data protection and other regulatory obligations, unless otherwise there is no regulatory requirements to retain the data for shorter or longer. We may then destroy such files without further notice or liability.

Where we process any other personal data, we will retain relevant personal data for up to five years from the date of our last interaction with you (and in compliance with our data protect obligations). We may then destroy such files without further notice or liability.

If any personal data is only useful for a short period (e.g. for a specific activity, promotion or marketing campaign), we will not retain it for longer than the period for which it is used by us.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list indefinitely so that we know not to send you further marketing communications in the future. However, we will not use this personal data to send you further marketing unless you subsequently opt back in to receive such marketing.

#### 14 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA

We are committed to keeping the personal data you provide to us secure and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e. those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of the Site and those who use our Services.

#### 15 PERSONAL DATA OF MINORS

We do not knowingly collect personal data of minors (individuals under the age of **18**). However, this does not prevent minors from providing personal data to us. If we do collect personal data of minors, we will comply with all applicable laws and regulations relating to the processing of personal data of minors.

If you are under the age of 18, you must not use the Services and you must not provide us with any personal information. If we discover that we are holding the personal data of a minor, we will delete that information as soon as possible. Please contact us if you have reason to believe that a minor may have submitted personal data to us (see the "How to contact us" section above).

#### 16 YOUR RIGHTS AS A DATA SUBJECT

You have certain rights in relation to the personal data we hold about you. These rights include the right: (i) to obtain copies of your personal data; (ii) to have your personal data corrected or deleted; (iii) to limit the way in which your personal data is used; (iv) to object to our use of your personal data; (v) to transfer your personal data; (vi) not to be subject to decisions based on automated processing (including profiling); and (vii) to complain to a supervisory authority. If you would like to exercise any of these rights, please contact us using the details set out in the "How to Contact Us" section above.

Your right of access	If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may charge a reasonable fee for producing those additional copies.
Your right to rectification	If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we've shared your personal data with so that you can contact them.
Your right to erasure	You can ask us to delete or remove your personal data in some circumstances, such as where we no longer need it or where you withdraw your consent (where applicable). If we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you

	who we have shared your personal data with so that you can contact them directly.
Your right to restrict processing	You can ask us to "block" or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data but, where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further. If we've shared your personal data with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.
Your right to data portability	You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer it to your chosen third party.
Your right to object	You can ask us to stop processing your personal data, and we will do so, if we are: (i) relying on our own or someone else's legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal data for direct marketing purposes.
Your rights in relation to automated decision-making and profiling	You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for the entering into, or the performance of, a contract between you and us.
Your right to withdraw consent	If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by contacting us using our contact details in the "How to Contact Us" section above or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.
Your right to lodge a complaint with the supervisory authority	If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the "How to Contact Us" section above
	As we are incorporated in the United Kingdom, our regulatory authority is the Information Commissioner's Office ("ICO"). Contact details for the ICO can be found on its website at <a href="https://ico.org.uk">https://ico.org.uk</a> .