

Privacy Policy

Version 1.1

Change History

Date	Ver.	Description
06/28/2022	1.0	Enacted and Implemented
12/16/2022	1.1	Appointment of new CEO (Seiji Jige)

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Privacy Policy

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Declaration on Personal Information Protection

DBJ Americas Inc. (“DBJA”) has formulated and publicly announces the following “Declaration on Personal Information Protection” (this “Declaration”) as its policy initiative for protecting personal information and its approach concerning the handling of personal information.

1. Policy Initiative

DBJA recognizes the appropriate protection and use of personal information as an important social responsibility. In conducting its operations, DBJA will comply with relevant laws and regulations, including the Act on the Protection of Personal Information, as well as DBJA’ rules including this Declaration to strive to appropriately protect and use clients’ personal information.

2. Proper Obtainment of Personal Information

DBJA will acquire clients’ personal information by proper and lawful means to the extent necessary in connection with its services.

3. Purpose of Use of Personal Information

DBJA will specify the purposes of use of clients’ personal information and use the information to the extent necessary to achieve those purposes of use. If the purposes of use for specific personal information are separately limited by laws or regulations, DBJA will not use the information for any purpose other than those purposes of use. The purposes of use for clients’ personal information by DBJA will be published on the website of DBJA’ parent company, Development Bank Japan Inc., . Use for any other purpose will be clearly indicated at the time that information is obtained.

4. Provision of Personal Information to Third Parties

In principle, DBJA will not provide a client’s personal information to a third party, except in cases where consent is obtained from the client or where provision is required by laws or regulations. However, DBJA may provide a client’s personal information to a

third party without obtaining consent from the client: (i) in cases where DBJA outsources the handling of personal information to the third party to the extent necessary to achieve the purposes of use, (ii) in cases of merger, etc., or (iii) in cases where personal information is jointly used with specific persons as separately determined.

5. Security Management Measures

DBJA will strive to store and manage clients' personal information in an accurate and up-to-date manner, and take necessary and appropriate measures for securely managing information to prevent leakage, etc. DBJA will also appropriately supervise its officers, employees, and outsourcees who handle clients' personal information.

6. Continuous Improvement of Handling of Personal Information

DBJA will strive to continuously improve its handling of clients' personal information by reviewing this Declaration from time to time, taking into account developments in information technology and changes in social demands, among other factors.

7. Procedures to Request Disclosure, Etc.

DBJA will strive to appropriately respond to requests for notification of purposes of use for retained personal data regarding clients, requests for disclosure of content, requests for correction, addition, or deletion in cases where the content of retained personal data is contrary to the facts, and requests for suspension of use, erasure, and suspension of provision to third parties.

8. Inquiries

DBJA will strive to sincerely respond to opinions and requests about its handling of personal information.

Public Announcement Based on the Act on the Protection of Personal Information

DBJ Americas Inc., (Business operator handling personal information)

DBJ Americas Inc., ("DBJA") publicly announces the following matters based on the Act on the Protection of Personal Information (Act No. 57 of May 30, 2003, including any subsequent amendment; collectively, the "Act").

I. Matters Concerning the Purpose of Use of Personal Information

DBJA will handle clients' personal information in order to perform the businesses described in item 1. below to the extent necessary to achieve the purposes of use described in item 2. below, and for no purpose of use exceeding those limits.

1. Business Content

- Advisory business which DBJA provides together with Development Bank of Japan Inc., and ancillary operations (including operations that it may handle in the future; collectively, "DBJA Operations")

2. Purpose of Use

- To make decisions and perform follow-up management regarding DBJA Operations
- To conclude contracts, verify identities, or confirm eligibility related to DBJA Operations
- To manage due dates or ongoing transactions pertaining to DBJA Operations
- To provide to third parties within the scope necessary to perform appropriate operations
- To exercise contractual and legal rights and fulfill such obligations
- To monitor economic conditions by conducting surveys, distributing questionnaires, or conducting related operations
- To introduce DBJA's operations
- To execute other activities to perform smooth and appropriate client transactions

In the event that the purposes of use of specific personal information are separately limited by laws or regulations, such personal information will not be used other than for such purposes of use, as described below.

- In accordance with Article 123, Paragraph 1, Item 7 of the Cabinet Office Order on Financial Instruments Business, etc., DBJA will not use or provide to third parties information regarding race, creed, family origin, registered address, medical history, or criminal records, or any other undisclosed and special information it has obtained in the course of its business for any purposes except those required for the proper conduct of its business.

II. Matters Concerning Joint Use of Personal Data

DBJA will jointly use the personal data of its clients as set out below.

1. Personal Data to be Jointly Used

- (1) Information regarding the client, such as contact information, including the client's name, date of birth, physical address, telephone number, and e-mail address; family-related information; employer-related information; information regarding the client's assets and liabilities; information regarding transaction needs; and publicly disclosed information
- (2) Information regarding the content of transactions with individual clients, such as transaction status, type of service, agreement date, transaction amount, balance, and due date
- (3) Information required to manage transactions with clients, such as information on the transaction process and information used in making loan decisions

2. Scope of Joint Users

DBJA, Development Bank of Japan Inc. ("DBJ") and DBJ's subsidiaries and affiliated companies listed in DBJ's annual securities report (or in its lending reports)

(In the event that joint use is limited by the Financial Instruments and Exchange Act or related laws and regulations, information will be handled in accordance with the laws or regulations.)

3. Purpose of Use

- (1) To propose, inform about, study, or develop investment and loan businesses and financial products and services together with DBJA' group companies: for example, to work with group companies in developing and proposing investment and loan businesses and financial products and services that meet client needs
- (2) To properly conduct group management activities, including the understanding and management of risks: for example, to create proper business management systems for the group and provide clients with stable and consistent services

4. Name and Address of Party Responsible for Managing Personal Data and the Name of the Representative

DBJ Americas Inc.

1251 Avenue of the Americas, Suite 2330, New York, NY 10020

CEO and Managing Director: Kenichi Fukumura

III. Matters Concerning Retained Personal Data

1. Name and Address of Business Operator Handling Personal Information and the Name of the Representative

Development Bank of Japan Inc.

Otemachi Financial City South Tower, 9-6, Otemachi 1-chome, Chiyoda-ku, Tokyo
100-8178, Japan

President and CEO: Seiji Jige

2. Purpose of Use of Retained Personal Data

The purposes of use of personal data retained by DBJ are the same as described above in “I. Matters Concerning the Purpose of Use of Personal Information” and “II.3. Purpose of Use.”

3. Procedures Followed to Respond to a Request for Disclosure, Etc.

DBJA will respond, appropriately and promptly in compliance with relevant laws and regulations, including the Act on the Protection of Personal Information, to requests for notification of the purpose of use, disclosure (including the disclosure of records on the provision of personal data to a third party), correction, addition or deletion, suspension of use or erasure, or suspension of provision to a third party (“Request for Disclosure, Etc.”) with regard to client personal data retained by DBJA.

DBJA will be unable to accept a Request for Disclosure, Etc. if it is unable to confirm the identity of the individual or the proxy authority of an agent making the application or if a request form or other stipulated document contains discrepancies. Therefore, persons making such a request are asked to provide any information required to identify the retained personal data subject to the Request for Disclosure, Etc. (In the interest of keeping personal data accurate and up-to-date, clients are requested to promptly notify DBJA of any changes in information provided.)

Please note that DBJA may not be able to respond to a Request for Disclosure, Etc. if it is prevented from doing so by laws or regulations.

4. Security Management Measures for Personal Data

DBJA will take and strive to improve necessary and appropriate measures via the methods listed below to ensure the secure management of personal data, including preventing the leakage, loss, or damage (“Leakage, Etc.”) of personal data. In having its employees handle personal data, DBJA will also exercise necessary and appropriate supervision over its employees so as to ensure secure management of the personal data.

- (1) Formulation of basic policy
- (2) Development of rules for handling personal data
- (3) Organizational security management measures (development of an organizational structure for taking security measures; operation in accordance with rules for handling personal data; development of means to check the status of handling personal information; development of a system of responding to incidents such as Leakage, Etc.; monitoring the status of handling personal information; and review of security management measures)
- (4) Human security management measures (employee education, etc.)
- (5) Physical security management measures (control of areas where personal data is handled; prevention of theft, etc., of equipment and electronic media; prevention of leakage when carrying electronic media, etc.; deletion of personal data; and disposal of equipment and electronic media, etc.)
- (6) Technical security management measures (access control; identification and authentication of authorized persons; prevention of unauthorized external access, etc.; and prevention of Leakage, Etc., associated with the use of information systems)
- (7) Understanding of the external environment (implementing security management measures based on an understanding of systems for the protection of personal information in the EU, the U.K., the U.S., Singapore, and China, where personal data is stored)

*Systems related to the protection of personal information in various countries

The U.S. (Federal): https://www.ppc.go.jp/files/pdf/USA_report.pdf

The U.S. (New York State): https://www.ppc.go.jp/files/pdf/newyork_report.pdf

Singapore: https://www.ppc.go.jp/files/pdf/singapore_report.pdf

China: https://www.ppc.go.jp/files/pdf/china_report.pdf

EU: If you would like DBJA to provide information, please contact us at the contact desk below.

DBJ Americas Inc. +1-212-221-0708

IV. Restrictions on Provision of Personal Data to Third Parties

In principle, DBJA will not provide personal data to third parties without the consent of the individual, except in the cases set out below.

- (1) When required by laws and regulations
- (2) When it is necessary for the protection of the life, body, or property of an individual and it is difficult to obtain the consent of the individual
- (3) When it is especially necessary for improving public health or promoting the sound growth of children and it is difficult to obtain the consent of the individual
- (4) When it is necessary to cooperate with a national agency, a local government, or a person entrusted by either a national agency or local government to execute affairs prescribed by laws and regulations, and obtaining the consent of the individual is likely to impede the execution of those affairs
- (5) When a third party to which personal data is provided is an academic research institution, etc., and the third party needs to handle the personal data for academic research purposes (including cases in which part of the purpose of handling the personal data is for academic research purposes, but excluding cases in which there is a risk of unjustified infringement of the rights and interests of individuals)
- (6) When providing personal data to an outsourcee to the extent necessary for the performance of its business (see “Outsourcing the Handling of Personal Data” below)
- (7) When personal data is provided in connection with the succession of business due to a merger, corporate split, transfer of business, or other reasons
- (8) When jointly using personal data with DBJ, DBJ’s subsidiaries and affiliates (see “II. Matters Concerning Joint Use of Personal Data” above)

V. Outsourcing the Handling of Personal Data

DBJA may outsource all or part of the handling of personal data to third parties to the extent necessary to achieve the purposes of use of personal data. In such cases, DBJA will select appropriate outsourcees to ensure that personal data is securely managed by the outsourcees, and will exercise necessary and appropriate supervision over the outsourcees by, for example, signing confidentiality and personal data protection agreements with the outsourcees and confirming how the personal data is handled by the outsourcees.

VI. Where to Direct Complaints Related to the Handling of Retained Personal Data

Please direct opinions or requests concerning the handling of retained personal data to DBJA

(which telephone number is +1-212-221-0708).

Hours of operation: 9:30 a.m. to 12:00 noon and 1:00 p.m. to 5:00 p.m. (local time) (excluding weekends, public holidays, and year end and new year holidays in Japan and the United States)

Basic Policy on the Proper Handling of Specific Personal Information, Etc.

DBJ Americas Inc. (“DBJA”) has formulated and publicly announces the following basic policy to ensure that specific personal information and individual numbers (“Specific Personal Information, Etc.”) under the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (the “My Number Act”) are properly handled on an organization-wide basis.

1. Name of Business Operator

DBJ Americas Inc.

2. Compliance with Relevant Laws, Regulations, and Guidelines

DBJA will properly handle Specific Personal Information, Etc. in compliance with the My Number Act, the Act on the Protection of Personal Information, and other laws and regulations, as well as the Guidelines for Proper Handling of Specific Personal Information (for Business Operators) and other related guidelines.

3. Purpose of Use

DBJA will use Specific Personal Information, Etc. for the purposes set out below.

For Specific Personal Information, Etc. concerning officers and employees, including their dependent family members (includes processes related to those listed below):

- Tax withholding
- Preparation of salary payment reports
- Preparation of written notices concerning the transfer of salaried employees related to salary payment reports and special collection
- Notifications concerning health insurance, employees’ pension, and corporate pension
- Applications and claims for health insurance, employees’ pension, and corporate pension

- Notifications regarding employment insurance and worker's compensation insurance
- Applications and claims for employment insurance and worker's compensation insurance
- Preparation of certificates for employment insurance and worker's compensation insurance

For Specific Personal Information, Etc. concerning persons other than officers and employees, including their dependent family members (includes processes related to those listed below):

- Preparation of payment records for compensation, fees, and other outlays
- Preparation of payment records for salaries, compensation, pensions, and prize monies paid to non-residents
- Preparation of payment records for consideration paid to non-residents for projects providing personal services
- Preparation of payment records for real estate usage fees or the like
- Preparation of payment records for consideration of the acquisition of real estate or the like
- Preparation of payment records for commissions involving the sale or lease of real estate or the like

4. Matters Concerning Security Management Measures

DBJA will take necessary and appropriate measures to manage the security of Specific Personal Information, Etc. Security management measures for Specific Personal Information, Etc. are set out separately in the "Rules on Handling Specific Personal Information, Etc."

5. Contact Details for Inquiries

If you have any inquiries, complaints, or other communication regarding DBJA's handling of Specific Personal Information, Etc., please contact us at the office below.

Contact:

DBJ Americas Inc.

1251 Avenue of the Americas, Suite 2330, New York, NY 10020

Tel: +1-212-221-0708