

# Privacy Policy

## Standard Chartered Securities (Japan) Limited

In order to retain and protect the confidence of our valued customers, we (Standard Chartered Securities (Japan) Limited) shall make every effort, in good faith, to ensure the appropriate protection and usage of personal data through effective implementation of organizational, people, and technical security measures. Regarding customers' personal data protection, we will conform to the Act on the Protection of Personal Information (herein after called "Act"), the relevant applicable local laws, ordinances and Guidelines etc (herein after called "Laws and Regulations") and we shall not use our customers' personal data for the purposes other than the purposes set forth by this Privacy Policy without consent from our individual customers. If we receive a complaint from a customer, we shall make every effort to swiftly find an appropriate resolution.

### 1. Services Provided

- Financial Instruments business and other ancillary businesses.
- Services that we are allowed to perform by Financial Instruments and Exchange Act.
- Other services and related operations that can be performed (including any additional services that may be permitted as a result of future changes in the regulatory environments).

### 2. Purposes of Acquiring Information

We acquire "personal information" of customers to process transactions in a secure and sound manner, and to provide our customers with appropriate financial products and services. Personal information shall be used for the following purposes:

- To process applications for account opening, transactions of financial products and services.
- To verify customer identity in accordance with the Act on Prevention of Transfer of Criminal Proceeds, the Foreign Exchange and Foreign Trade Control Act and other Laws and Regulations.
- To confirm a customer's qualifications to purchase financial products and/or use provided services.
- In order to verify the authority of a person acting as a representative or agent of a corporation, if the customer is a legal entity.
- To report result of transaction, market value information and balance received from the customer.
- To conduct administrative processes for transactions with customers.

- To make decisions based on the principle of suitability, and to judge the appropriateness of providing financial products or services.
- To exercise rights or to fulfil obligations under applicable Laws and Regulations or arising from contractual relationships with the customer.
- For market research, data analysis and surveys related to the research and development of financial products and service.
- To provide customers with solicitations regarding securities, financial products and information regarding services based on Financial Instruments and Exchange Act to provide customers with solicitations regarding financial products and information regarding services provided by us, affiliates company(s), partner company(s).
- When entrusted by another business entity with processing of all or part of a database of personal information, as necessary to carry out consigned services in an appropriate manner.
- Other uses to secure smooth and appropriate execution of transactions with customers.

Personal information shall be used as stated above and shall only be used within the limits of carrying out business requirements. Such information shall not be used for a purpose other than the aforementioned purposes.

As per Cabinet Office Ordinance on Financial Instruments Business etc, we shall not use or provide to a third party non-disclosed information e.g., race, beliefs, lineage or domicile of origin, health care or criminal records for any purposes except appropriate business operation or other necessities.

### **3. Types of Information to be Acquired and Acquiring Channels**

#### **Typical Information**

The typical information to be acquired from a customer which is described in Chapter 2 above. Purpose of Acquiring Information will be the name, address, date of birth, place of work, and telephone number for the purpose of prevention of money laundering under the Act on Prevention of Transfer of Criminal Proceeds and other laws requiring customer due diligence. There may be cases where additional information is necessary at the commencement of business dealings. . We would not collect or store any Specific Personal Information, in principle, except for those set forth in the applicable Laws and Regulations.

## **Sensitive Information**

We shall not acquire "Sensitive Information" which is defined by the "Guideline on Personal Information Protection in Financial Sector" which include Special Care Required Personal Information (e.g race, beliefs, social status, medical history, fact such as being a victim of a crime etc ) which is defined by the article of 2-3 of the Act except for the cases permitted by Laws and Regulations.

In cases where we acquire sensitive information that is co-mingled with other information for the purpose of customer identification, the area of sensitive information shall be blacked out before it is archived.

## **Methods of Acquisition**

We acquire the personal information of customers who request information over the phone, and customers who visit our branch and fill out account opening forms, etc. **Usage and Provision of Information**

### **4. Usage and Provision to a Third Party**

**We shall not use customers' information** beyond the above-mentioned "purposes" nor provide to external parties except in the following cases:

- Where the customer has given his or her prior consent.
- Where it is judged as necessary under Laws and Regulations.
- Where it is considered as necessary to protect human lives, human bodies, or property and it is difficult to acquire the data subject's consent.
- Where it is required to cooperate with a government organization, local authority, etc. so that it can accomplish the duties set down by Laws and Regulations and it is possible that acquiring customers' consent may obstruct the accomplishment of those duties.
- Where the personal information is to be entrusted with a third party for the purpose of outsourcing operations.
- Where it is allowed other Laws and Regulations.

We have outsourced a portion of our business processing for transactions, to external vendors. On such occasions, in order to select outsourcing vendors, we shall conduct due diligence on the security control measures according to our prescribed assessment criteria. In addition, we shall take necessary measures to ensure that outsourced operations are carried out properly. We will supervise outsourcing vendors, including those vendors that use subcontractors for more than 2 phases. Except for the cases

where we obtained the consent from the identical person and where it is allowed other Laws and Regulations, we will not share personal information of the customer with third parties outside Japan.

## **Joint Use**

Personal data is jointly shared within compliance of Laws and Regulations as follows:

- ① Scope of information to be joint use  
Joint use of name, address, date of birth, phone number, place of work (membership of an organization), title, business address, fax number, e-mail address and other related matters
- ② Scope of joint users  
Companies which belong to Standard Chartered Group whose ultimate holding company is Standard Chartered PLC.
- ③ Purposes of joint use  
To provide our total services  
To manage risks relating to business management and internal control, etc. by SCB Group
- ④ Name of responsible person in charge of managing personal data  
Standard Chartered Securities (Japan) Limited.

## **5. Information Management Method**

We make it a rule to take appropriate measures to keep our customer information accurate. In addition, to prevent the loss, destruction, falsification, and leakage, etc. of the personal information of customers, we have taken appropriate information security measures such as implementing rules on information security control and measures against unauthorized access and computer virus, etc.

In addition, we ensure that any company handling the personal data of our customers, etc. on outsourcing from us, shall enforce rigorous information security management standards.

We will make every effort to ensure personal information is maintained accurately and kept up-to-date in accordance with the purposes set out in this Policy. Customers are asked to inform us in writing of any changes in registered information. Regarding personal information of our customers which are no more in use, we will also take responsibility for abolishing them in an appropriate manner.

## **6. Request for Disclosure, Correction, or Suspension of using Information by the Customer.**

When a customer requests disclosure of his/her personal information held by us, we shall provide the requested information once the identity of the customer has been verified and unless there is any

particular reason for not accepting such a request. If we find that the information kept by us is incorrect, we shall correct such information.

In the case where a customer informs us or we find out that customer information has been used for a purpose other than the aforementioned or has been acquired by illegal measures, we shall suspend the use of such information.

Please take the following steps to make a request for disclosure of personal data held by us.

**\* Request Submission to:**

**Standard Chartered Securities (Japan) Limited**

Inquiry Desk

Sanno Park Tower 21F

2-11-1 Nagata-cho, Chiyoda-ku, Tokyo 100-6155

Request shall only be accepted in writing.

Please fill out and send the appropriate application form with a customer identification documents to the above address.

**\* Submission of Request**

The following documents are requested to be provided by the customer.

- a. Personal Information Disclosure Application Form (when the request for disclosure is based on Article 25 of the Personal Data Protection Law).
- b. Documents verifying the customer's identity (a copy of driver's license, passport, etc.).
- c. When the request for disclosure is made by a person acting as the customer's representative, additional documentation verifying the legal authority of that person to represent the customer and identification documents of the legal representative are required.

**\* Related Fee**

When a disclosure request based on Article 25 of the Act is received, a specified amount of fee, JPY3,300 tax inclusive per case will be charged with the customer.

### \* Method of Providing Response

In principle, we will promptly respond to the customer request in a written document by post to the customer's registered address. Even if the request is received from the customer's legal agent, our response may be mailed directly to the customer.

### \* Denial of Disclosure Request

We shall deny any request by a customer for disclosure of personal information in the following cases. When the determination has been made to deny the request for disclosure, the customer shall be informed to that effect. The specific amount of fees, however, will still be charged to the customer.

1. When the customer's identity cannot be verified.
2. When the identity or authority of the person making the disclosure request as the customer's legal agent cannot be verified.
3. When there are errors or omissions in the request form.
4. When required fees are not paid within the specified period of time.
5. When the requested information does not match personal data held by us.
6. When we suspect that such disclosure could threaten or harm the life, body, property or other rights of the customer or a third party.
7. When we suspect that fulfilling the request could result in a significant hindrance to conducting our business in an appropriate and effective manner.
8. When fulfilling the request would be a violation of other laws or regulations.

### **Inquiry Desk**

The following is the contact regarding inquiries as to disclosure of personal information etc.

#### **Customer Inquiry Desk**

#### **Standard Chartered Securities (Japan) Limited**

Address: Sanno Park Tower 21F 2-11-1 Nagata-cho, Chiyoda-ku, Tokyo 100-6155

Inquiry Desk: Conduct, Financial Crime & Compliance

Telephone: 03-5511-6386

Hours: 9:00a.m. - 5:00p.m

(Excluding Saturday, Sunday, public holidays and the yearend/New Year non-banking business days)

## 7. **Complaints**

Complaints regarding the handling of personal information.

We are a member of the Japan Securities Dealers Association, an accredited Personal Data Protection Organization in the financial sector. The association accepts complaints and consultation with regards to the handling of personal information by association members at consultation office Japan Securities Dealers Association, Personal Information Consultation Office).

Japan Securities Dealers Association, Personal Information Consultation Office

Tel: 03-6665-6784

<http://www.jsda.or.jp/privacy/index.html>

## **8. Amendment to This Privacy Policy**

The aforementioned purposes of usage or information contents in this Policy may be modified from time to time as a result of amendment to the Laws and Regulations and other reasons. When the Policy is modified, the modified policy will be made available to our customers on our website, or by other means.