



Privacy Policy (Handling of Personal Information etc)

October 24, 2016

The Bank of New York Mellon Securities Company Japan Ltd. (“**the Company**” or “**we**”) observes the relevant laws and ordinances as well as the other standards relating to Personal Information and Individual Number of the customers and service providers (including their employees if a customer or service provider is a corporate entity) (correctively “**the Customers etc**”) (collectively “**the Personal Information etc.**”).

We also ensure that our business practices conform to the internal policies and procedures related to personal information protection, and make every effort to appropriately manage and protect Personal Information etc as well as maintain its accuracy and confidentiality in line with the following ideas:

1. Acquisition of Personal Information etc and its method

In the process of providing services to, dealing transaction with, receiving services from the Customers etc, and communicating with Customers etc to conduct certain business of the Company, we acquire the Personal Information etc in legal and fair methods.

For example, we acquire the Personal Information etc in the following processes:

- Conducting customer identification documents in commencing transaction, questionnaires, and receiving any other documents or materials.
- Dealing with customers in relation to the services and products being provided by the The Bank of New York Mellon Corporation as well as its affiliates (“**the Group Company**”).
- The Customer etc’s inputting certain information in the system being provided by the Group Company, and
- Conducting monitoring (via telephone recording or email monitoring etc) in accordance with the relevant laws and regulation.

Note that the above mentioned list is indicative only and non-exhaustive.

In accordance with the Guidelines on Protection of Personal Information in the financial area (“**the Guideline**”), we do not acquire any sensitive information (e.g. political or religious beliefs, trade union membership, race or ethnic origin, health or medical information, sexual orientation, and criminal record information), except the cases as described by the Guideline.

2. Purposes of Acquiring the Personal Information etc

We acquire the Personal Information etc to securely and legally conduct transactions and to provide the Customers etc with better financial products and services.

For example, the Personal Information is used to check the identity of a person, check authorization and various conditions for doing business, record information related with credit control, and introduce new products and services to the Customer etc.

We use the Personal Information etc within the scope of the purposes of acquisition and to the extent that we determine that it is necessary or useful for carrying out business and we shall not use it for any other purpose.

For example, the purposes of acquiring this type of Personal Information etc are to:

- Solicit and sale securities as defined by the Financial Instruments and Exchange Act and any other financial products, as well as to provide explanation of such services.
- Solicit and sale any other services within the scope of the business that the Company is eligible to conduct, as well as to accept application for such services (e.g. opening of account with the Company or the Group Company),
- Fulfill the customer identification obligations at the time of transaction based on the “Act on Prevention of Transfer of Criminal Proceeds”, “Foreign Exchange and Foreign Trade Control Law” and other related regulations and ordinances.
- Confirm a person’s authority and/or title as a representative or agent of a corporation, recording the contact address of the customer when the Company or the Group Company has entered into a business transaction involving securities, with the Customer etc who is a corporate entity.
- Carry out internal controls such as risk assessment, risk management and compliance monitoring within the Company or the Group Company.
- Provide the Personal Information etc to the Group Company for the purpose of their management and administration of the Company as one of their subsidiaries.
- Provide the Personal Information etc to the third party for the purpose of planning, implementing or introducing certain corporate events (e.g. seminar, conference and meetings) to be held or already held by the Company or Group Company.
- Deal with the Customers etc. appropriately, smoothly and legally.
- Provide the Personal Information etc to the Group Company or the third party for any other reasons.

Note that we handle Individual Numbers only to the extent that is stipulated by the relevant laws and regulations.

3. Types of the Personal Information etc to be acquired

To accomplish the purpose of accruing the Personal Information etc, as described in Article 2 of this Policy, the Company acquires the necessary or useful information from the Customers etc.

For example, such information includes the address, name, date of birth, sex, employer, department and status/post in the corporation, telephone number, email address and

signature of the Customer etc. In addition, the Company may ask some other Personal Information etc when transactions are commenced.

Note that the above mentioned types of the Personal Information etc are indicative only and non-exhaustive.

4. Sharing of Personal Information etc with the Group Company of the Company

The Company shares the Personal Information etc with the Group Company under the following condition:

Types of the Personal Information etc to be shared	The Personal Information etc specified in Article 3 above
Scope of the affiliated companies	The Group Company and the service provider
Purposes of sharing	The purposes specified in Article 2 above
The entity responsible for protection of the Personal Information etc	The Bank of New York Mellon Securities Company Japan Ltd.

5. Provision of the Personal Information etc to the third party

In addition to sharing the Personal Information etc with the Group Company, the Company uses or externally provides the Personal Information etc in the cases where:

- the Customer etc has consented
- it is necessary under a law or ordinance
- it is allowed to provide to the third party under a law or ordinance
- it is necessary to provide to the third party by the request of the legitimate foreign authority or the applicable foreign laws and regulations
- it is considered as being necessary for the interests of the Customer etc or community
- it is necessary for protection of human lives, bodies and assets.
- the Company etc introduces to the Customer etc a financial product or service provided by the Group Company, which is thought to be of great interest to them.
- the Personal Information etc is to be entrusted with a third party for the purpose of outsourcing operations (under the condition of the confidential agreement with the outsourcee).
- it is considered as being necessary or useful for the any other purposes in conduction our business.

6. Method of Managing the Personal Information etc

To prevent the loss, destruction, falsification, and leaking, etc. of the Personal Information etc of Customers etc, we take appropriate information security measures such as measures against unauthorized access and computer virus countermeasures.

In addition, we ensure that any company handling the personal data of customers, etc. on consignment from the Company also enforces rigorous management.

7. Applications for Disclosure, Correction, Suspension of provision to the Third Party or Discontinuation of use from the Customer etc

The Company would respond to the following requests from the Customers etc.

Disclosure

Unless there is a particular reason, we approve the Customer etc's requests for the disclosure of their own information after checking that the applicant is the person concerned. Please note that actual costs may be billed for disclosure. Likewise, we would respond any customers' request for disclosure of existence or non-existence of Individual Numbers retained by us.

Correction

If the Company recognizes that the Personal Information etc about the Customer etc is inaccurate, we modify it so that it is accurate.

Suspension of provision to the Third Party

If the Company receives any request from the Customer etc to suspend the provision of their Personal Information etc to the third party, we will respond to their requests.

Discontinuation

If a customer does not want to receive introductory materials by direct mail, mail, telephone, or email etc., apply at the inquiries desk detailed below. From then on, we shall discontinue handling your information.

8. Inquiries and Complaints from the Customer etc.

We try to respond to questions, suggestions and complaints etc concerning Personal Information etc. in a prompt and sincere manner. If you have any inquiries, please contact the following address:

Compliance, The Bank of New York Mellon Securities Company Japan Ltd.	Marunouchi Trust Tower Main, 1-8-3, Marunouchi, Chiyoda-ku, Tokyo 100-0005 Telephone: 03-6756-4300 (the main number)
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You could also contact with Japan Securities Dealers Association, one of the Authorized Personal Information Protection Associations acknowledge by Japan Financial Services Agency. Any issues related to Personal Information etc arising from

Securities Business could be consulted with Financial Instruments Mediation Assistance Center:

Personal Information Consulting Desk, Japan Securities Dealers Association	Address: 1-5-8, Kayaba-cho, Nihombashi, Chuo-ku, Tokyo 103-0025 Telephone: 03-3667-8427
Financial Instruments Mediation Assistance Center	Address: #3 Shoken Kaikan, 2-1-13 Nihonbashi Kayabacho, Chuo-ku, Tokyo Telephone: 0120-64-5005

9. Continuous Improvement of “Privacy Policy (Handling of Personal Information etc)”

We keep reviewing the “Privacy Policy (Handling of Personal Information etc)” and related internal rules to improve our handling of Personal Information etc.

10. Modifications

The above information may be modified as a result of amendments to the law and other reasons. In that case, a notice will be posted at locations such as the reception of the Company.

The Bank of New York Mellon Securities Company Japan Ltd.