

February 28, 2024

**BASIC POLICY CONCERNING PROTECTION OF PERSONAL
INFORMATION
(PERSONAL INFORMATION PROTECTION DECLARATION)**

Citigroup Global Markets Japan Inc.

1. (Policy)

Citigroup Global Markets Japan Inc. (hereinafter referred to as the “Company”) hereby declare that it will strive for the protection of personal information (including My Number / Specific Personal Information) by properly handling such information, in compliance with the Law concerning Protection of Personal Information and other related laws and ordinances, and by having all employees comply with this basic policy and related laws and ordinances.

2. (Acquisition of Personal Information)

The Company will not acquire personal information through illegal means.

3. (Purpose of Use of Personal Information)

The purposes of use of personal information that the Company acquires shall be as listed below. The Company will use personal information only for the implementation of such purposes and the business as listed below and the provision of useful measures, and will not change the purposes of use of such personal information beyond the reasonable extent.

Specific Personal Information is used under the conditions written in the Act on the Use of Numbers to Identify a Specific Individual in the Administrative Procedure.

(Purpose of use)

- a) Guidance for solicitation of transactions of financial product that the Company deals with and invitation of other transactions, sale and trade in securities services
- b) For the settlement of transactions, management of financial products and fund management of transactions and the account control of the financial product that the Company deals with and other transactions.
- c) Payment of dividends on, interests on, or redemption money, etc. of financial products,
- d) To determine appropriateness of providing products and services in light of the principle of suitability,
- e) To verify identities of individual customers and identities of the persons or proxies, in charge of transactions with the Company on behalf of institutional clients,
- f) To report to and confirm with customers trade details and safekeeping,
- g) To handle requests for and queries regarding disclosure of the personal data in custody
- h) To study and develop financial products and services via market research, customer surveys and data analysis;
- i) To conduct internal control management of the Company.

Specific Personal Information is used for opening and reporting the account, preparing and reporting legal documents for the transaction of financial products. The Company shall not use Personal Information in any manner that is likely to encourage or induce any illegal or improper acts.

4. (Assurance of Accuracy of Personal Data)

To the extent necessary for the implementation of the purpose of use, the Company will make efforts to keep the personal data accurate and up-to-date. Unless a retention period is set forth under applicable laws or ordinances, the Company will establish the retention period for personal data in custody according to its purpose of use, and will erase or dispose of the relevant personal data after elapse of the applicable period.

5. (Management of Personal Information)

The Company shall take all measures necessary to securely manage personal data and conduct proper management of such personal data and supervise its officers and employees.

Security management measures implemented by the Company include “organized security management measures,” “human security management measures,” “physical security management measures,” “technical security management measures,” and “understanding external environment,” according to the respective stages of acquisition, use, and safekeeping, etc. of personal data.

6. (Provision of Personal Data to Contractor)

To the extent necessary for the implementation of the purpose of use, the Company may delegate, wholly or partially, the handling of personal data. In such event, the Company shall conduct all necessary and appropriate supervision over the service provider to ensure the security of the personal data

7. (Sensitive Information)

Pursuant to the Guidelines for Protection of Personal Information in the Finance Sector, the Company shall not acquire, use, or provide to a third party, sensitive information (special care-required personal information set forth in Article 2, paragraph (3) of the Act on the Protection of Personal Information or information on individuals' membership in a labor union, family origin, registered domicile, healthcare, and sex life (among these, excluding the matters falling under the category of the personal information requiring special care) (excluding any information made public by the person in question themselves or by a national government organ, local public entity, academic research institute, etc., or any of those set forth in the items of Article 57, paragraph (1) of the Act or the items of Article 6 of the Enforcement Rules, and seemingly clear information acquired by visual observation, filming, or photographing of the person in question)), except cases listed in the guidelines above.

8. (Joint Use of Personal Data)

Citigroup Global Markets Japan Inc. may use the Personal Data jointly with certain other parties as follows:

- (i) Items of Personal Data for Joint Use
 - Information of accounts of customers of individuals at Citigroup Global Markets Japan Inc. (such as the name, address, date of birth, occupation account number),
 - Information of transactions, custody balances and other relevant matters in relation to accounts of customers of individuals at Citigroup Global Markets Japan Inc.
 - Information of names, addresses, telephone numbers, sections and other relevant matters for officers and employees of companies and enterprises which are the Citigroup Global Markets Japan Inc.'s customers, transaction parties, etc.
 - Information of names, corporate profiles (including name of company/organization, department, and title, etc.), address, telephone number, e-mail address of those who apply for and/or participate in seminars, lecture meetings and other events (the “Seminars”) hosted by the Company or co-sponsored with third parties as well as information contained on business cards provided by those who apply for and/or participate in the Seminars
- (ii) Scope of Joint Users
 - Citigroup Global Markets Japan Inc.
 - Citigroup Inc. and its consolidated subsidiaries

- Third party companies and/or organizations which co-sponsor the Seminars with the Company as well as outside lecturers of the Seminars (the “Seminars Co-Sponsors”)
- (iii) Purpose of Joint Use
- For research, development and supply of products and services by a collaboration of Citigroup Global Markets Japan Inc. and any of the joint users described above.
 - For management controls and internal controls of Citigroup Inc. and its subsidiaries taken as a whole
 - For confirming the status of attendance to the Seminars, distributing seminar texts, communicating with seminar participants including schedule changes, gathering and providing feedback in the form of questionnaires, providing future seminar information and post event customer supports which are necessary for managing the Seminars
- (iv) Party Responsible for Administration of Personal Data for Joint Use
- Citigroup Global Markets Japan Inc.
 - If the Seminar Co-Sponsors shares Personal Data with the Company, the Seminar Co-Sponsors handle the shared Personal Data in accordance with their own privacy policies, designate their own officer who is responsible for the shared Personal Data, and set up their own contact point.
- <https://www.citigroup.jp/jp/about/cgmj/index.html>

9. (Request for Disclosure of Personal Information)

When the principal requests disclosure, correction, suspension of use, etc. of his/her personal information, the Company will promptly respond to such request after verification of the identity of the applicant. For such request, please contact the Information Security Office as specified below.

10. (Provision of Personal Information to Third Party)

The Company will not provide personal information with any third party except for the case where;

- a) The prior consent of the principal is obtained,
- b) Such provision is permitted under applicable laws or ordinances,
- c) The disclosure request from a body that has a legitimate authority under applicable laws or ordinances, such as a tax office, a court, Police Department and other organization,
- d) If necessary for the protection of human life, safety, or property, and when it is difficult to obtain the consent of the Principal,
- e) In case of outsourcing all or partial of handling of personal information within the extent of the implementation of the purpose of use,
- f) Providing personal information for continuity of business due to merger/acquisition of company,
- g) Providing personal information based on this policy article 8 (Joint Use of Personal Data),
- h) In other cases authorized by relevant laws and regulations,

11. (Provision of Personal Data to Third Parties in Foreign Countries)

The Company shall not provide Personal Data to any third party in foreign countries, except the cases listed below:

- (i) Cases where such third party is in a country set forth in the Enforcement Rules having

- a personal information protection system accepted to be of the equivalent standards to that of Japan;
- (ii) Cases where such third party develops its system, adapting it to the standards set forth in the Enforcement Rules of a system necessary to continuously implement measures equivalent to the measures to be implemented by personal information handling business operators; or
 - (iii) Cases set forth in (a) through (d) of “10. Provision of Personal Data to Third Parties”

12. (Queries concerning Handling and Security Management Measures regarding Personal Information)

The Company will establish a point of contact for handling queries and complaints from the principal. For queries and or complaints concerning the handling and security management measures regarding personal information, please contact the following:

Citigroup Global Markets Japan Inc.
O&T Planning
Telephone: 03 (6776) 8800 (Main)
Office Hours: From 9:00 a.m. through 5:00 p.m. (From Monday through Friday)
Except: Saturday, Sunday, National Holiday and Year-end and Year start

13. (Approved Personal Information Protection Organization)

The Company is a member of the Japan Securities Dealers' Association which has been approved as a personal information protection organization by the Personal Information Protection Commission. The Personal Information Protection Consultation Office of the Japan Securities Dealers' Association accepts complaints and consultation regarding the handling of personal information by its member firms.

[Contact for Complaints and Consultation]
Japanese Securities Dealers Association Personal Information Protection
Consultation Office
Telephone: 03 (6665) 6784
Website: (<http://www.jsda.or.jp>)

14. (Review and Amendment of This Basic Policy)

The Company may review and amend this basic policy without prior notice when it deems it to be necessary.

Please kindly note that the original of the Basic Policy is made in Japanese language and this English version is a translation for reference purpose only. If there is any discrepancy between any portion of the Japanese version and the English version, the Japanese version shall prevail.