

Citigroup Japan Holdings Corp.

Policy for the Protection of Personal Information

1. Introduction

Citigroup Japan Holdings G.K. (hereinafter the "Company") herein declares its basic policy on the protection of Personal Information (hereinafter this "Basic Policy") in order to comply with the requirements of the laws and regulations applicable to the Company.

2. Compliance with Laws and Regulations

The Company values and protects Personal Information (including My Number/Specific Personal Information) on its customers, as the holding company of a financial services group that values and appreciates the importance of good standing in its relationships with customers and with society at large.

The Company is fully aware of its social responsibility to safeguard the Personal Information of customers when engaging in business activities. Based on this understanding, the Company confirms that all of its Employees will comply faithfully with the Law Governing the Protection of Personal Information, other laws and regulations, and this Basic Policy, and that the entire Company is committed to fair and appropriate handling of Personal Information.

3. The Purposes of Use of Personal Information

Personal Information will be used within the limits necessary to achieve the purposes of use listed below in executing the business activities described below, and such information shall not be used exceeding the limits necessary to achieve the said purposes. Further, the Company shall not modify the purposes of use exceeding the limits recognized to be fair and rational.

(Business Activities)

- (1) Activities regarding supervision and management of the business activities of companies in which the Company holds shares (hereinafter the "Subsidiaries").
- (2) Activities regarding data processing for the business and financial affairs of the Subsidiaries.
- (3) Activities regarding development of computer programs related to the business and financial affairs of the Subsidiaries, as well as activities related to computing services.
- (4) Activities regarding affairs of compensation, wages, and employee welfare benefits for the directors and Employees of the Subsidiaries.
- (5) Activities regarding the maintenance and management of brands and trademarks, market research, event planning, and advertising and publicity for the Subsidiaries.
- (6) Activities regarding consulting for management of the Subsidiaries.
- (7) Other activities that financial holding companies are authorized to engage in, as well as other supplementary and accompanying activities (including activities authorized in the future).

(Purposes of Use)

- (1) For the purpose of undertaking information services concerning the products and services of the Company, its related companies and affiliates.
- (2) For the purpose of conducting research and development of products and services by means of market research, customer satisfaction surveys, data analysis and questionnaire surveys, etc.
- (3) For the purpose of correctly executing activities relegated from other business entities, or relegated with handling of Personal Information either in full or in part, etc.
- (4) For the purpose of responding to the inquiries from the shareholder(s) of the Company (including the individuals who used to be shareholders of Nikko Cordial Corporation ("NCC") prior to the merger between the Company and NCC).
- (5) For the purpose of handling inquiries, etc., related to Personal Information.

- (6) For the purpose of business management and internal control and administration of the Company and Subsidiaries.

(Prohibition of Inappropriate Use)

The Company shall not use Personal Information in any manner that is likely to encourage or induce any illegal or improper acts.

4. Shared Use of Personal Data

The Company may use and share Personal Data as follows:

- (1) Items of Personal Data to be shared and used
 - Information on the customer, such as name, address, date of birth, occupation
 - Information related to transactions of the customer, such as transaction details, outstanding deposits, etc.
 - Information on customer needs, such as in asset management.
- (2) The range of parties authorized for shared use
 - The Company, and its consolidated companies and equity method affiliates of the Company entered in the latest annual security report of the Company
 - Group companies: Citigroup Inc. and its consolidated subsidiaries identified in its public financial statements (Exhibit 21.01 of Form 10-K, available at the website of the U.S. Securities & Exchange Commission (<https://www.sec.gov/>)).
Affiliated joint ventures: the Japan-based joint ventures identified in Citigroup's Japan website (<http://www.citigroup.jp>).
- (3) Purposes of use by using parties
 - For the purpose of a full range of research, development, information service and supply of the best and most appropriate products, and services that match the needs of the customers in asset management, etc., through coordination of the entire Subsidiaries led by the Company as the holding company of the entire group.
 - For the purpose of business management and internal control and administration of the group companies led by the Company as a holding company.
- (4) Name of the corporation and its representative responsible for the management of Personal Data for shared use:
 - Marc Luet, Citigroup Japan Holdings G.K.

5. 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 policy for the protection of personal information, designate their own officer who is responsible for management of the shared Personal Data, and set up their own contact point for complaints separate from that of the Company. 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 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.

6. Appropriate Collection of Personal Information

- (1) The Company shall not collect Personal Information using fraudulent or other unauthorized means.

- (2) When Personal Information is collected from third parties, the Company shall not improperly infringe the interests of the Persons in Question. Moreover, the Company shall not collect information from third parties that have employed illegal means to collect Personal Information with the knowledge that such Personal Information in question had been leaked illegally.
- (3) The Company may collect Personal Information of customers using the following methods:
 - Collection of Personal Information from third parties, such as database services, etc.
 - Collection through audio recordings, video recordings, reception of e-mail, etc.
 - Collection of information found in government bulletins, newspapers, magazines, Internet, etc.
- (4) If Personal Information is not provided as requested by the Company, all or part of the Company's services may not be available.

7. Notification, Declaration and Explicit Display of Purposes of Use in the Collection of Personal Information

The Company shall indicate the purposes of use of Personal Information on its Web site and shall indicate the means, responding to inquiries (if any), etc.

The Company shall notify the person or disclose publicly the purposes of use of Personal Information promptly at the collection of the said information, except when the purposes of use have been disclosed in advance.

The Company shall explicitly specify the purposes of use of Personal Information in advance, when the Company obtains Personal Information directly from the Person in Question in writing.

8. Guarantee of Accuracy of Personal Data

The Company shall make the efforts to guarantee that Personal Data is accurate and up-to-date within the range necessary to achieve the purposes of use.

The Company shall specify the period of storage of Personal Data depending on the purpose of use, and delete the said data after expiration of the said period, except when the period of storage is designated by laws and regulations.

9. Measures for Personal Data Security Management

The Company shall implement measures that are necessary and appropriate for Personal Data security, such as prevention of leakage or loss of, or damage to Personal Data collected, by establishing a basic policy and regulations on security management and the necessary administration pertaining to security management measures.

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.

Necessary and appropriate measures include the following for collection, use, storage, etc., of Personal Data.

- (1) Organized security management measures: The responsibilities and authority of Employees regarding the management of Personal Data security are clearly defined. Regulations related to security management, etc., have been developed and implemented, and inspection and audits are executed to examine the state of implementation.
- (2) Human security management measures: Contracts, etc., are concluded with Employees on non-disclosure of Personal Data, and employee training, and other programs are executed for the necessary and appropriate supervision of Employees in ensuring the management of Personal Data security.
- (3) Physical security management measures: Necessary measures are implemented regarding the management of regions in which Personal Data is managed, prevention of theft, etc. of equipment and electronic media, etc., prevention of leakage, etc. in the case of carrying electronic media, etc., and deletion of Personal Data and disposal of equipment and electronic media, etc.

- (4) Technical security management measures: Technical measures are implemented for the management of Personal Data security, such as access control to Personal Data and information systems handling Personal Data, surveillance of information systems, etc.
- (5) Understanding external environment: Necessary measures are implemented in cases where Personal Data is handled in foreign countries.

10. Provision of Personal Data to Third Parties

The Company shall not provide Personal Data to a third party, except under the conditions below:

- (1) With the advance consent of the Person in Question.
- (2) In case of application of laws and regulations.
- (3) In response to inquiry or investigation by taxation office, investigative organization, juridical body and other external organizations, etc.
- (4) In case of need for the protection of human life, health, or property, and when the consent of the individual in question is difficult to obtain.
- (5) If all or part of Personal Data handling is commissioned to others, within the range necessary for the achievement of the purposes of use.
- (6) In case of provision of Personal Data due to consolidation or succession of business by other reasons.
- (7) In case of shared use of Personal Data based on Article 4 of this Basic Policy.
- (8) In other cases authorized by relevant laws and regulations.

Specific Personal Information shall not be provided to the third party except under the conditions written in the Act on the Use of Numbers to Identify a Specific Individual in the Administrative Procedure.

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 (1) through (4) of "10. Provision of Personal Data to Third Parties"

12. Outsourcing the Handling of Personal Data

The Company may outsource all or part of its handling of Personal Data within the range necessary for achievement of the purposes of use. In such a case, the Company will execute necessary and appropriate supervision over the contractors to which Personal Data handling is outsourced, in order to ensure Personal Data security.

13. Procedure for Responding to Requests for Disclosure, etc., of Collected Personal Data

The Company will accept requests for notification of use purpose, disclosure, revision, addition, deletion, suspension of use, and removal or suspension of provision to third parties related to Collected Personal Data (hereinafter called "Disclosure") in compliance with the application procedure designated by the Company. For further details, please read the [Guide to Procedures concerning Applications for Personal Information Disclosure](#).

The guide is outlined below:

- (1) Contact when requesting Disclosure.

Requests are accepted by O&T Planning/PIP Management, Citigroup Japan Holdings G.K.

- (2) Forms to be submitted to request Disclosure.
Please submit the [Application for Personal Information Disclosure](#)
- (3) Method of confirmation of identity for the applicant or proxy requesting Disclosure.
Documents for authenticating identity as designated by the Company must be submitted.
- (4) Charges and collection of payment
Charges will be made in accordance with the method designated by the Company in case of notification of the use purposes or disclosure.

14. Contact for Inquiries, Security Management Measures, and Complaints, etc., regarding Handling of Personal Information

The Company will properly handle inquiries, complaints, etc., regarding the handling and security management measures of Personal Information.

All inquiries, complaints, etc., regarding the foregoing should be directed to:
Citigroup Japan Holdings G.K.
O&T Planning
Tel: 03-6776-6600 (Main)

Available Weekdays 09:00-17:00

(Excluding Saturdays, Sundays, National public holidays, and Year-end/New-year holidays)

15. Review and Revision of this Basic Policy

The Company shall review the content of this Basic Policy as needs arise and revise it in response to any revision of relevant laws and regulations, or developments, such as changes in the IT environment, etc.

The revised Basic Policy will be published on the Company's Web site, and the revised methods to respond inquiries (if any), etc. shall be disclosed.

Please kindly note that the original of the Basic Policy [Guide][Application Form] 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.

History of revision of this Basic Policy:

- Published May 1, 2008
- Updated as of June 30, 2008
- Updated as of October 1, 2009
- Updated as of November 1, 2013
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