



Privacy Policy and Handling of Personal Information MACQUARIE CAPITAL SECURITIES (JAPAN) LIMITED

MACQUARIE

September 2019

Introduction

Macquarie Capital Securities (Japan) Limited (the "**Company**") places a high priority on maintaining the accuracy and confidentiality of personal data of the Company's customers and counterparties, and their authorized signatories, agents and representatives (collectively referred to as "**Customers**"). The Company is committed to the proper handling of Customers' personal information in line with the relevant laws, internal regulations and the following principles:

1. Purposes of Acquiring Personal Information

The Company may acquire personal information of Customers to allow for the sound and secure processing of transactions, and to ensure that Customers receive the highest level of service in the provision of products and services. The Company may collect personal information to verify the identity of Customers, to confirm various conditions for conducting business, and to market new products and services to Customers. Specifically, the Company may acquire personal information for the following purposes. The Company shall use personal information collected only within the scope of these purposes.

- To solicit and market securities and financial products and to introduce services in accordance with the Financial Instruments and Exchange Law;
- To solicit and market securities and financial products and to introduce services offered by the Company and its affiliated companies;
- To assess the suitability of financial products and services;
- To verify the identity of a customer or its agent;
- For the development of internal business practice, for example, in respect of evaluating credit risk and other types of risk and in respect of our management of new or existing transactions with customers;
- To report trading results, deposit balances, and valuations, etc., to customers;
- To facilitate the administration process for transactions with customers;
- To conduct research and development of financial products and services through the implementation of market surveys, data analysis, and questionnaires;

- Where all or part of the processing of personal information has been outsourced by another company, to perform the outsourced service properly:
- To send market reports, season's greetings or invitations to seminars and receptions; and
- For any other purposes to conduct proper and smooth transactions with clients.

To the extent of the purposes described above, the Company and its affiliated companies both within Japan and overseas may jointly use personal information.

2. Types of Information to be Acquired

The Company may request personal information in order to fulfill the purposes described in Section 1 above. The required personal information may include the name, title, address, date of birth, sex, family information, contact particulars, investment objectives and risk tolerance of the Customer or the representative or agent of the Customer. The Company may request other information from the Customer, such as the experience level and signing authority of the representative or agent of the Customer, in order to achieve the purposes described in Section 1 above.

3. Information Acquisition Method

The Company may acquire personal information through the mail and electronic devices such as the internet and telephone. The Company shall enforce adequate security measures at all times to protect the confidentiality of all personal information.

4. Use and Provision of Information

The Company shall not disclose Customers' personal information to third parties except in the following cases:

- **(i)** The Customer's consent is obtained.
- **(ii)** The Company is compelled to disclose the personal information pursuant to a judicial or regulatory order, or an applicable law, regulation or ordinance.
- **(iii)** Disclosure is essential to protect the interests of the Customer or community.
- **(iv)** Personal information is entrusted with a third party for the purpose of outsourcing operations. In this situation, the Company shall conduct thorough due diligence on such third party, and shall take all appropriate

steps to ensure that the third party undertakes strict controls to ensure the confidentiality of the personal information.

5. Information Management Method

The Company shall take appropriate measures to ensure that Customers' personal information is kept current and accurate. The Company shall also take the appropriate security measures, such as computer access limitations and computer virus countermeasures, to prevent the loss, destruction, falsification, and leakage of Customers' personal information.

The Company shall ensure that any agent or service provider of the Company which receives or has access to personal information of the Company's Customers shall also maintain strict controls over such personal information to ensure confidentiality.

6. Applications for Disclosure, Correction, or Discontinuation from the Customer

a. Disclosure and correction

The Company shall respond to Customer requests for the disclosure of their own personal information, after confirming the identity of the requesting party. In such cases, if the Customer informs the Company that the relevant personal information is inaccurate or incomplete, the Company shall make the necessary amendments. Customers may direct any inquiries regarding their personal information held by the Company to the Privacy Policy Inquiries Desk referred to hereunder in Section 7.

b. Discontinuation

If a Customer is no longer conducting any business with the Company and the Company is not required to maintain the personal information with respect to such Customer, the Customer may request the Company to dispose of the personal information held by the Company. The Customer may also request the Company to refrain from contacting the Customer or sending marketing materials and correspondence. Customers may direct such requests to the Privacy Policy Inquiries Desk referred to hereunder in Section 7.

7. Customer Applications, Inquiries and Complaints

Customers are requested to direct all applications relating to the disclosure, correction, and discontinuation of the use of personal information as well as any other inquiries or complaints about the administration of the Company's privacy policy to the following:

- Privacy Policy Inquiries Desk
C/O Compliance Department

- Macquarie Capital Securities (Japan) Limited
The New Otani Garden Court. 4-1, Kioi-cho, Chiyoda-ku, Tokyo, 102-0094
- Telephone: (03) 3512 - 7864
- Hours: 9:00 a.m. to 5:00 p.m.
(Excluding weekends, public holidays, and the year-end/New Year holiday)

8. Modifications

The Company may amend this Policy in accordance with any amendments to (i) the applicable laws, rules, ordinances and prescribed standards in Japan, or (ii) the Company's internal rules, instructions and guidelines relating to the protection of personal data. In such case, the amended Privacy Policy will be posted on the Company's website and available at the Company's reception. Such amendment will be in effect once posted.

9. Approved Association

The Company is a member of the Japan Securities Dealers Association ("JSDA"), which is designated as an Authorized Personal Data Protection Organization. The JSDA's Securities Personal Information Office advises on and mediates grievances regarding the handling of personal information.

- JSDA – Personal Information Office
 - Telephone: (03)6665-6784 / Web-site: <http://www.jsda.or.jp/privacy/index.html>