

## Privacy Policy

Amvis Holdings, Inc.  
Representative Director Keiichi Shibahara

Amvis Holdings, Inc. and its group companies (hereinafter referred to as the “Group”) shall be fully aware of its social mission regarding the protection of all personal information handled in the Group’s all business, and shall comply with laws and regulations regarding the protection of the rights of individuals and the handling of personal information. The Group hereby declares its establishment of a personal information protection management system to realize the following policy and improve the system continuously throughout the Group, always taking into account the latest IT trends, changes in social demands, and fluctuations in the business environment.

- 1 The Group shall obtain, use, and provide personal information only to the extent necessary for the legitimate business operations of the Group’s all businesses and for the employment and personnel management and shall not handle the information beyond the extent necessary to achieve the specified purpose of use.
- 2 The Group shall comply with laws, regulations, national guidelines, and other standards related to the protection of personal information.
- 3 The Group shall not collect personal information from third parties unless there is a legitimate reason such as when required by law.
- 4 The Group shall continuously improve its personal information security system by injecting management resources that match the conditions of its business to take reasonable security measures to prevent risks such as leakage, loss, or damage of personal information. In the event of an emergency, the Group shall promptly take corrective measures.
- 5 The Group shall respond promptly, sincerely, and appropriately to complaints and consultations regarding the handling of personal information.
- 6 The Group shall review its personal information protection management system in a timely and appropriate manner in light of changes in the environment surrounding the Group, and improve the system on an ongoing basis.

The Group shall make all employees aware of this policy.

## **Handling of Personal Information**

In accordance with this policy, the Group shall handle personal information in the following manner.

### **1 Purpose of Use on Personal Information**

The purposes of use of personal information are as follows. The information shall not be used for purposes other than those listed below (except in cases where the customer has given consent or where permitted by law).

#### **(1) Personal information about customers and business partners**

- To provide services
- To fulfill contracts concluded with the Group
- To analyze information on services provided by the Group and to improve service quality
- To respond to inquiries, requests for information materials, and other requests

#### **(2) Personal information about the Group's shareholders**

- To exercise rights and fulfill obligations under the Companies Act and to deal with related matters
- To distribute annual reports and other materials and to communicate
- To manage shareholders, such as preparing shareholder data in accordance with prescribed standards based on various laws and regulations.
- To perform administrative work related to the preparation and submission of payment records

#### **(3) Personal information about job applicants**

- To make employment selections and manage prospective employees
- To respond to opinions or inquiries about the Group

#### **(4) Personal information about residents living near the Group's facilities**

- To contact in case of emergency or other needs

#### **(5) Personal information related to the subjects of security cameras installed in the Group's facilities**

- To prevent crime
- To maintain the safety and security of the Group's facilities and neighborhoods

#### **(6) Personal information about retired employees**

- To pay retirement pensions and other benefits
- To provide information on company conditions

### **2 Management of Personal Information**

The Group shall appoint a person responsible for the management of personal

information and clarify the role of the person. The Group shall also create an environment where the person can appropriately carry out activities related to the protection of personal information.

### 3 Provision of Personal Information

#### (1) Third parties in Japan

The Group shall not provide personal information to third parties in Japan, except in the following cases.

- When the persons themselves agree
- When required by law
- When outsourcing business to a contractor of the Group. In this case, the Group shall comply with “5 Provision of Personal Information to Contractors” below.

#### (2) Third parties in foreign countries

The Group shall not provide personal information to third parties in foreign countries, except in cases where the persons themselves agree or where permitted by the Act on the Protection of Personal Information or other laws and regulations.

### 4 Joint Use of Personal Information

The Group shares personal information with specific parties. The parties listed in “(2) Scope of joint users of personal information” below are not included in the “third parties” in the preceding paragraph.

#### (1) Items of Personal Information that is used jointly

The same as the personal information in (1) through (6) in “1 Purpose of Use on Personal Information”

#### (2) Scope of joint users of personal information

Each company belonging to the Group

#### (3) Purpose of use for joint users

The same as the purpose of use in (1) through (6) in “1 Purpose of Use on Personal Information”

#### (4) Person responsible for managing personal information

General Manager, Administrative Department, Amvis Holdings Inc.

### 5 Provision of Personal Information to Contractors

To provide better services to its customers, the Group outsources a part of business operations to outside companies. Personal information may be entrusted to such contractors. In such cases, the Group shall select contractors that are deemed to handle

personal information appropriately, and require them to implement appropriate management of personal information by stipulating in contracts and other agreements the matters necessary to prevent leaks of customers' personal information through appropriate management, confidentiality, and other measures.

#### 6 Security Control Measures

The Group shall take necessary and appropriate measures to prevent leaks, loss, or damage of and to ensure other security control of personal information handled by the Group.

#### 7 Request for Disclosure of Personal Information

Customers may request the disclosure of their personal information (notification of purpose of use; disclosure; correction, addition, or deletion of content; suspension of use or deletion; suspension of provision to third parties) to the Group by contacting the Group's inquiry desk. In such cases, the Group shall respond within a reasonable period after identity verification. For details on requests for the disclosure, please contact through the “お問い合わせ” section of the Group's Japanese website.

#### 8 Arbitrary Provision of Personal Information

The provision of personal information to the Group is at the individual's discretion. However, if a person does not provide the Group with required information, the Group may not be able to provide that person with its services in an appropriate manner.

#### 9 Changes to Privacy Policy

The Group may change this policy without prior notice in response to changes in social conditions, technological advances, or revisions to the Act on the Protection of Personal Information.

Date of establishment: January 27, 2017

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