



May 26, 2016

Over the past several years there has been a heightened global regulatory focus on anti-money laundering (**AML**). Through our continued commitment toward proactively detecting and preventing money laundering, we've refined our AML program, including our Know Your Customer (**KYC**) procedures, under one set of global standards. As we move forward, we're focused on taking recommended steps to ensure we know our clients and have proper monitoring processes in place. Structurally, we've established operational centers of excellence in Bangalore, India and Krakow, Poland to ensure successful implementation, consistency and increased global subject-matter expertise. Team members at our centers of excellence are focused on reviewing customers so that we satisfy KYC and relevant monitoring requirements. The data servers that we use to support these activities will be located in the US with customer information (including the personal data) accessible globally to only designated State Street personnel (who belong to each of the local State Street entities) and a limited number of authorized suppliers or third parties such as regulators or contracted audit firms. Data security measures for the relevant systems align with State Street's Corporate Standards. As before, you will continue to work with your current State Street contacts on AML. With these changes, we're confident we will meet the requirements of global regulators and continue to maintain consistency with your experience with State Street.

As these process enhancements involve changes in the way in which State Street processes information regarding your organization (**customer data**) and the individuals associated with your organization (**personal data**), which State Street possesses or collects based on a service agreement with you, we would like to draw your attention to the following statements:

1. For the purpose of AML in relation to the proposal and provision of our products and services, we may collect (either directly from you or from third parties) identification and background information about individuals associated with your organisation as well as identification and background information relating to your organization and its business activities.
2. We (meaning the specific legal entity which collected your information originally or other entities within the State Street group) may share, use, store, disclose and process the personal data and customer data for the purposes described above. Such use, storage, disclosure and processing may involve making the personal data and/or customer data accessible to State Street entities, suppliers or third parties that are located in other countries.

We shall deem that, by providing you with this prior written notice, you agree that we share the customer information among State Street companies pursuant to Article 153, Paragraph 2 of the Cabinet Office Ordinance on Financial Instruments Business, etc. unless you request that we discontinue the sharing. To request discontinuance, please contact our Client Service.

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Please see below for the scope of non-public information shared among State Street companies, the State Street companies among which we share the information, how we share the information, how the companies manage the information provided, for what

purpose the companies use the shared information for, and how we will manage the information if we discontinue the information sharing. These are also available on our website. <http://www.statestreet.com/about/office-locations/japan.html>

1. The scope of non-public information shared among State Street companies

Non-public information we have thus far acquired, and may acquire in the future, about the history and verification of your company and its business activities (customer information)

2. The State Street companies among which the non-public information is shared

Our parent corporation (as specified in Article 15-16-1 of the Order for Enforcement of the Financial Instruments and Exchange Act) and subsidiary corporations (as specified in Article 15-16-2 of the same), including State Street Bank and Trust Company, Tokyo Branch

3. How the non-public information is shared

We share the non-public information with the State Street companies orally, in writing, via e-mail, by authorizing access to or sharing a database, or by any other appropriate means.

4. How State Street companies manage the non-public information provided

The State Street companies for which we provide the non-public information about your company take measures required by State Street's basic policy on information management. They apply access restriction or use any other proper means to prevent unauthorized access to and use of the non-public information.

5. The purposes of use of the non-public information by the State Street Companies

The State Street companies use the non-public information about your company they have received for the following purposes:

(1) For the provision of financial products and services

(2) To manage State Street's business operations, including financial and operational management and reporting, risk management, legal and regulatory compliance, customer service management, business continuity management, and product development

6. How the non-public information will be managed if the information sharing is discontinued

If you request that we no longer share the non-public information about your company with the State Street companies, we discontinue the provision of the information to them (this will not apply to the exchange of information needed for internal control operations or for the maintenance and management of the organization for electronic information processing). The State Street companies will continue to properly manage and retain the non-public information about your company they have already received from us, while they will no longer use the information for any sales presentations.

If you would like any further information, please do not hesitate to contact Client Service [TKY-Onboarding@jp.StateStreet.com](mailto:TKY-Onboarding@jp.StateStreet.com) or your sales representative.