

# Privacy Policy

July 1st, 2024

State Street Global Advisors (Japan) Co., Ltd.

We hereby announce this Declaration of Personal Information Protection as part of our policy on handling your personal information, pseudonymized personal information, anonymized personal information and information related to personal information (collectively as "Personal Information etc.").

## **1. Compliance with relevant laws and regulations**

We hereby declare that we will comply with any and all the laws and regulations including the Personal Information Protection Act of Japan, the guidelines set by the ministers in charge, the policies of the authorized personal information protection organizations, and this Declaration of Personal Information Protection.

## **2. Purposes of Use**

We will limit the use of your personal information etc. to the extent necessary to carry out our purposes of use. Such limitation of use will not be applicable when you consent otherwise, and the laws or regulations require exceptional handling of it. The notice of our purposes of using your personal information etc. is posted at the head office as well as our homepage.

## **3. Provision of personal information to third parties**

- We will not provide the acquired personal data to third parties except the following cases;
  - when we have the consent of the relevant individual in advance
  - when mandated by laws and ordinances
  - when necessary to protect life, body or property of a person and it is difficult to obtain the consent of the relevant individual
  - when entrusting all or part of the personal data within a scope of the purpose of use
  - and when necessary to cooperate with the execution of legally-defined duties by central government institutions, local government agencies or their entrusted deputies, and obtaining the consent of the relevant individual would potentially impair execution of said duties
- Such consent of provision to a third party shall include, on a written form, the name of a third party, the purpose of use by the third party, and the information

to be disclosed.

- Upon provision of personal data to a third party in a foreign country, we will obtain consent from the relevant person unless the laws and regulations provide otherwise. Notwithstanding the foregoing, personal data may be delegated and/or jointly used between us and State Street Corporation, our parent company, and/or its affiliates (“group companies”) or companies other than group companies without obtaining consent, if we deem the provision suffices Article 28 of the Personal Information Protection Act.

#### **4. Security management of personal data**

We will endeavor to keep your personal information etc. accurate and updated. We will take necessary and appropriate security management measures and implement the supervision on our officers/ employees and third parties in order to prevent leakage etc. of your personal information etc.

- Organizational security measures: We assign Chief Personal Data Security Manager for personal data security measures, implement the handling rules for secure management of personal data, and establish an audit system to check the status of operation according to the rule to prevent leakage etc.
- Human resources security measures: We execute the non-disclosure agreement with our employees, clarify their roles and responsibilities, train the employees to raise awareness of management rule and check the compliance of employees to the management rules
- Physical safety management measures: we take measures to manage the restricted area to handle personal data, prevent theft of equipment and electronic media, prevent leakage etc. when carrying electronic media, delete personal data, and dispose of equipment and electronic media etc.
- Technical security measures: We implement the preventive measures of leakage etc. by identifying / authenticating users of the personal data, setting up the management type and access control, managing access authority
- Understanding the external environment: When handling personal information in a foreign country, we will take appropriate safety management measures after grasping the system for the protection of personal information in the foreign country.

#### **5. Continuous Disclosure**

We will continue to seek improvements of this Declaration of Personal Information Protection by the appropriate review in order to make the handling of your personal information better and more appropriate.

## **6. Procedure regarding requests for disclosure etc. of the retained personal data**

We will respond to the request from you or your agent to disclose, correct, or suspend the use of your personal data as well as the record of the provision to third parties held by us after confirming your identification

- Required Documents:
  - A document having the name, address, phone number and the request details
  - A personal identity document such as a copy of driving license or passport
  - A document to confirm the agent's identity and a power of attorney when a request for disclosure etc. is made by a statutory agent
- Fees: free
- Method of Response: we shall respond by delivering of the relevant document or other methods within a reasonable period upon the request for disclosure etc.

## **7. Outsource the personal data**

When we need to outsource all or any part of the personal data within the scope to achieve the purpose of use, we shall conduct necessary and appropriate supervision over the outsource service provides for security management of the personal data.

## **8. Questions and Remarks**

We will endeavor to properly and faithfully respond to your questions and remarks about our handling of personal information etc. Please contact our following division for questions and remarks:

State Street Global Advisors (Japan) Co., Ltd.  
Compliance and Risk Management Department  
Toranomon Hills Mori Tower 25F, 1-23-1 Toranomon, Minato-Ku, Tokyo 105-6325  
Phone number: +81-3-4530-7085 (service hours: 9 am-5 pm on weekdays)

## **9. Contact point for inquiries and complaints (Authorized Personal Information Protection Organization)**

We are a member firm of the Japan Investment Advisers Association, the Investment Trusts Association and the Japan Security Dealers Association, which are the personal information protection organizations authorized by the Financial Services Agency. These associations deals with complaints and counseling on association members' personal information handling.

[Contact point for inquiries and complaints]

Japan Investment Advisers Association 03-3663-0505

Investment Trusts Association 03-5614-8440

Japan Security Dealers Association 03-6665-6784

# Purpose of Use of Personal Information

July 1st, 2024

State Street Global Advisors (Japan) Co., Ltd.

We shall use personal information of clients within the following business and the purposes of use.

## 1. Business Details

- ① Financial instruments business
- ② Any other services incidental to Financial Instruments business (Including the business which will be approved in the future)

## 2. Purpose of Use

- ① For the solicitation of the investment advisory services or discretionary investment services and provision of services under Financial Instrument and Exchange Act
- ② For the solicitation of securities and provision of related services under Financial Instrument and Exchange Act
- ③ For the solicitation and provision of any other services incidental to financial instruments business
- ④ For making proposals of the services provided by us or our affiliates
- ⑤ For the confirmation of the client's identity or agent's identity or its power of attorney
- ⑥ For research and development of financial products and services by market research and surveys
- ⑦ Others, such as for appropriate and smooth execution of transactions / contracts with the clients in our business

Notwithstanding the foregoing, pursuant to Personal Information Protection Act and its related laws, we shall treat any special non-public information of clients etc., including, but not limited to, race and ethnicity, faith (religion, ideology and beliefs), family origin and registered domicile, medical care and/ or criminal records with appropriate care including obtaining consents upon acquiring and/ or using of such information.

## 3. Other

We may jointly use personal information of clients etc. to propose various financial

services provided by State Street Group collaborating with respective group entity.

(1) Specific items of personal data of the client etc. for joint use

- ① Name
- ② The name of the working place, department, position, title
- ③ Address, telephone numbers, email addresses of ② above

For the avoidance of doubt, any Individual Numbers and/or Personal Information in accordance to 'Act on the Use of Numbers to Identify a Specific Individual in the Administrative Procedure' shall not be subject to joint use.

(2) Scope of Those engaging in joint use

- ① State Street Trust and Banking Co. Ltd.
- ② State Street Bank and Trust Company Ltd., Tokyo Branch
- ③ CHARLES RIVER DEVELOPMENT, INC.
- ④ Other affiliates of US State Street Corporation

(3) Purpose of joint use

- ① For proposal/ guidance or R&D relating to various products and/ or services provided by respective group entity.
- ② To ensure information security management of us or State Street Corporation and its group entities including granting access to the systems provided by State Street Corporation and its group entities.
- ③ For appropriate execution of business administration in State Street Corporation and its group entities including grasping and managing various risks (including KYC pursuant to Act on Prevention of Transfer of Criminal Proceeds, etc.)
- ④ To respond to legitimate requests from law enforcement agencies and/ or regulatory authorities in which SSC and its respective group entities are located
- ⑤ To facilitate to execute transaction with clients in an appropriate and smooth manner

(4) Chief Personal Data Security Manager

State Street Global Advisors (Japan) Co., Ltd.

Compliance and Risk Management Department

Toranomon Hills Mori Tower 25F, 1-23-1 Toranomom, Minato-Ku, Tokyo 105-6325

**ステート・ストリート・グローバル・アドバイザーズ株式会社**

金融商品取引業者登録番号関東財務局長（金商）第 345 号

加入協会：一般社団法人日本投資顧問業協会、一般社団法人投資信託協会、日本証券業協会

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