

Pronouncement Concerning Protection of Personal Information

Privacy Statement 2026 | ABN AMRO Clearing Tokyo Co., Ltd

We have established and hereby publish this Pronouncement Concerning Protection of Personal Information (Privacy Statement) as our policy for handling Personal Information and Specific Personal Information (collectively, “Personal Information, etc.”).

1. Compliance with Laws and Guidelines

We comply with the Act on the Protection of Personal Information (the “APPI”) and the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (the “My Number Act”), as well as other applicable laws, regulations, and guidelines, in handling Personal Information, etc.

2. Purposes of Use

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3. Proper Acquisition

We acquire Personal Information, etc. by appropriate means and only to the extent necessary to achieve the purposes of use. Main methods of acquisition include:

- Information provided through transaction-related documents and questionnaires
- Publicly available information (e.g., company information publications, commercially available books, corporate registry records, official gazettes, newspapers, and the internet)
- Information generated in connection with transactions or service provision
- Information provided by joint users or third parties

4. Outsourcing

When we outsource the handling of Personal Information, etc., we select service providers based on our standards, enter into appropriate agreements, and provide necessary and appropriate supervision.

Main outsourced services (including services we may outsource in the future) include:

- Professional advice such as legal and accounting services
- Operation and maintenance of information systems
- Preparation and storage of internal materials such as books and records

- Printing and mailing of documents

5. Security Control Actions

We strive to keep the Personal Information, etc. we hold accurate and up to date. We also work to prevent unauthorized access, loss, destruction, falsification, and leakage of Personal Information, etc. by implementing organizational, human, physical, and technical security control actions. We provide education and training to officers and employees to ensure Personal Information, etc. is handled appropriately and to raise awareness of the importance of personal information protection.

→For details, please refer to Annex 2 (Security Control Actions, etc.).

6. Continuous Improvement

We conduct periodic audits of our handling of Personal Information and Specific Personal Information, etc., to confirm implementation of this Privacy Policy and to continuously maintain and improve our practices.

7. Procedures for Requests for Disclosure, etc.

Upon verifying the identity of the requester, we respond appropriately and promptly to requests regarding retained personal data and records of third-party provision, such as disclosure, correction, deletion, and cessation of use. A fee may be charged in some cases.

→For details, please refer to Annex 3 (Procedures for Requests for Disclosure, etc.).

8. Joint Use

Within the scope of the purposes stated in Annex 1, we may jointly use necessary personal data (excluding individual numbers) with our affiliated companies.

→For details, please refer to Annex 4 (Joint Use).

9. Provision to Third Parties

We will not provide your personal data to third parties except in the following cases. With respect to individual numbers, we will not provide them to any third party except where permitted by laws and regulations.

- Where we have obtained your consent
- Where required by laws and regulations (including legally binding requests from investigative authorities or tax authorities, or provision of information to supervisory authorities pursuant to financial laws/regulations)
- Where necessary to protect a person's life, body, or property and it is difficult to obtain the individual's consent
- Where particularly necessary to improve public health or to promote the sound development of children and it is difficult to obtain the individual's consent
- Where it is necessary to cooperate with a national government organ, a local government, or a party entrusted by either to perform duties prescribed by laws and regulations, and obtaining the individual's consent may impede such performance

10. Handling of Personal Data in Connection with Provision to Third Parties in Foreign Countries

We, our parent company ABN AMRO Bank N.V. ("ABN AMRO"), and our affiliated entities provide comprehensive financial services globally through branches, subsidiaries, and other group

companies around the world, and with their support. We may outsource the handling of personal data to ABN AMRO group companies and service providers located in or outside Japan, and/or jointly use such personal data with these entities (please also refer to Annex 4 (Joint Use) for details on the joint use of personal data).

When we provide personal data to a third party located in a foreign country (excluding the United Kingdom and EU Member States), including cases where the handling of personal data is outsourced to such third party or jointly used with such third party, we will not provide the customer's personal data to the foreign third party without obtaining the customer's prior consent permitting such provision, except where such provision is treated as an exception under applicable laws and regulations.

When obtaining the customer's consent, we will provide the name of the foreign country as well as information regarding that country's personal information protection system obtained through appropriate and reasonable means, and information on the measures taken by the relevant third party to protect personal information. If, at the time consent is obtained, the foreign country or the measures taken by the third party to protect personal information cannot be specified or provided, we will provide alternative information in accordance with the APPI.

In addition, where the foreign third party has established a system that meets the standards prescribed by the rules of the Personal Information Protection Commission as necessary for continuously implementing measures equivalent to those required of us under the APPI ("Equivalent Measures"), we may provide the customer's personal data to such foreign third party without obtaining the customer's consent. In such cases, we will take the necessary steps to ensure that the foreign third party continues to implement Equivalent Measures, and customers may request that we provide information regarding such steps.

However, if providing all or part of such information is likely to significantly hinder the proper execution of our business, or in other similar circumstances, we may decline to provide all or part of the requested information.

11. Questions, Comments, and Complaints

We respond promptly and sincerely to questions, comments, and complaints regarding Personal Information, etc.

Contact for inquiries regarding our handling of Personal Information

- Hours: Weekdays 09:00–17:00
- Phone: +81-3-3437-9900 (main)
- Department: Compliance Department (Compliance.jp@abnamroclearing.com)

※Please note that calls may be recorded to ensure accurate understanding of inquiries and requests.

12. Complaint and Consultation Desks of Industry Associations

We are a member of the following associations, which are certified personal information protection organizations. These associations accept complaints and consultations regarding member companies' handling of personal information.

- Japan Securities Dealers Association (Personal Information Consultation Office)
Tel: +81-3-6665-6784 <http://www.jsda.or.jp>

- Financial Futures Association of Japan (Personal Information Complaint Consultation Office)
Tel: +81-3-5280-0881 <https://www.ffaj.or.jp/>

Personal Information Handling Business Operator (Our Address / Name of Representative)

Name: ABN AMRO Clearing Securities Co., Ltd.

Address: Atago Green Hills MORI Tower 39F, 2-5-1 Atago, Minato-ku, Tokyo, Japan

Representative: Richard Clairmont, Representative Director

Annex 1: Purposes of Use

We use Personal Information for the following purposes:

1. Purposes related to financial products and services of us, our affiliated companies, and business partners

- Solicitation and sale of various financial products, provision of information on services, and acceptance of applications for financial products and services, including account opening
- Identity verification and other checks required under the Act on Prevention of Transfer of Criminal Proceeds (KYC/AML checks), as well as verification of eligibility to use financial services
- Management of due dates in financial transactions; management, reporting, and administrative processing related to deposited assets and transaction results in ongoing transactions
- Assessing the appropriateness of providing financial products and services in light of the suitability principle and other requirements under the Financial Instruments and Exchange Act, other applicable laws and regulations, guidelines, rules of self-regulatory organizations, and rules of financial instruments exchanges
- Proper performance of entrusted services, where we are entrusted by other businesses with all or part of operations involving the handling of Personal Information
- Performance of contracts (including contracts between us and clients and contracts directly or indirectly related to our business), and the exercise of rights and fulfillment of obligations based on contracts or laws and regulations
- Research and development of financial products and services through market research, data analysis, and surveys
- Making various proposals regarding financial products and services
- Making various proposals regarding products and services of us, our group companies, and business partners
- Making decisions regarding transactions or managing transactions (including termination of transactions and post-termination management)
- Other purposes necessary to properly and smoothly perform transactions and financial products and services provided by us

2. Purposes related to internal management of us and our group

- Identification and management of various risks and corporate management by our group
- Employment and personnel management within our company
- Administrative work related to our public relations and investor relations activities

Specific Personal Information is used only within the scope permitted under the My Number Act.

Annex 2: Security Control Actions, etc.

In order to ensure the secure management of clients' personal data, and in accordance with the Guidelines for the Protection of Personal Information in the Finance Sector, we work to establish and operate the following security control actions:

1. Establishment and Development of Basic Policies and Internal Rules for the Security Management of Personal Data

- Formulation of basic policies
- Development of internal rules defining handling methods and responsibility structures for each stage of the lifecycle of personal data, including acquisition and input, use and processing, storage and retention, transfer and transmission, deletion and disposal, and response to leakage incidents
- Development of rules for inspecting and auditing the status of personal data handling
- Development of rules regarding the outsourcing of personal data handling

2. Organizational security control actions

- Appointment of persons responsible for the management of personal data
- Establishment of security control measures in work rules and internal regulations
- Operation in accordance with internal rules for managing the security of personal data
- Establishment of methods to monitor the handling status of personal data
- Establishment and implementation of inspection and audit frameworks for the handling status of personal data
- Establishment of response systems for incidents such as leakage

3. Human (personnel) security control actions

- Conclusion of nondisclosure agreements with employees regarding personal data
- Clarification of employees' roles and responsibilities
- Thorough communication, education, and training on security control actions for employees
- Verification of employees' compliance with procedures for managing personal data

4. Physical security control actions

- Management of areas where personal data is handled
- Prevention of theft or loss of equipment and electronic media
- Prevention of leakage when electronic media are carried or transported
- Deletion of personal data and disposal of equipment and electronic media

5. Technical security control actions

- Identification and authentication of users of personal data
- Classification of personal data and implementation of access control
- Management of access rights to personal data
- Measures to prevent leakage of personal data
- Recording and analysis of access to personal data
- Recording and analysis of the operational status of information systems handling personal data
- Monitoring and auditing of information systems handling personal data

6. Understanding of the external environment

- When handling personal information in foreign countries, implementation of security control actions after understanding the relevant personal information protection systems in those countries

Annex 3: Procedures for Requests for Disclosure, etc.

We accept requests regarding retained personal data (excluding depersonalized personal information), including requests for disclosure, correction (including addition or deletion), cessation of use, and disclosure of records of third-party provision.

- Requests are accepted and processed in accordance with our prescribed procedures after verification of the requester's identity (including verification of authority in the case of a representative) and responded appropriately and promptly.
- A prescribed fee may be charged.
- Individual Numbers (My Number): In response to requests for disclosure, we will inform the requester whether we retain such individual numbers.
- For details of the procedures, please contact the inquiry desk listed in "11 Questions, Comments, and Complaints" of this Privacy Policy.

Annex 4: Joint Use

We may jointly use necessary personal data (excluding individual numbers) with our affiliated companies within the scope of the purposes of use set forth in Annex 1.

1. Categories of personal data jointly used

- Customer attribute information: name, gender, age, date of birth, name of affiliated organization (company), address, job title, telephone number, fax number, email address, etc.
- Transaction details: types of products and services, transaction amounts, balance information, contract dates, etc.
- Information necessary for transaction management: account numbers, transaction records, taxpayer identification numbers, etc.

2. Scope of joint users

- ABN AMRO Clearing Tokyo Co., Ltd. and ABN AMRO group companies, which are affiliated companies as defined by applicable laws and regulations of ABN AMRO

3. Party responsible for the management of personal data for joint use

- ABN AMRO Clearing Tokyo Co., Ltd.

Chief Internal Control Administrator