

3. Privacy policy

The Bank shall handle customers' personal information in accordance with the following guidelines.

- (1) Customers' personal information shall only be used for the purposes stated in (3) of 4. below, and shall never be used for any other purpose. Individual Numbers (My Number) shall only be used within the scope established by laws and regulations. The Bank shall specifically set forth the purpose of use so it is clear to the customer and strive to limit the purpose of use according to the situation in which the information was obtained.
- (2) Unless required by law, customers' personal information shall not be divulged to any third party without the express prior permission of the customer.
- (3) The Bank shall take appropriate measures to ensure that its customers' personal information is accurate and up-to-date at all times, and shall take appropriate security measures to prevent loss, destruction, tampering, leaking and illegal access.
- (4) The Bank shall establish appropriate internal control systems for the safe management of personal information, and conduct necessary and appropriate monitoring of its personnel.
- (5) The Bank contracts handling of personal data to other parties. In the event that management of personal information is entrusted to an outside contractor, the Bank shall conduct appropriate monitoring of the contractor to ensure that customers' information is safely managed.
- (6) The Bank shall respond in good faith to customers' complaints and disclosure requests.

4. Collection and use of personal information

To ensure the smooth and appropriate execution of transactions with customers, the Bank collects, stores, and utilizes personal information in an appropriate manner in order to verify an individual's identity in the course of a transaction, to sell financial products and to accept orders for various services, and to conduct credit checks and perform appropriate management after credit checks are completed. Prior to collecting such personal data, the Bank shall clearly explain to the customer the purpose for which the customer's personal information is to be used.

(1) Main personal information collected

- (a) The main personal information the Bank shall collect from customers consists of name, address, date of birth, sex, telephone number (including work telephone number) and place of work (or occupation).
- (b) When customers apply for or request financial services, the Bank may request other information in addition to that listed in (a) above. Such information may include number of dependents if any, family composition, assets, annual income, number of years of service at present employer (or number of years in current business), status of outstanding loans at other financial institutions and the debtor's relationship with the guarantor.
- (c) When customers order mutual funds or other financial products, the Bank may collect other information in addition to the above, including investment knowledge and experience, assets and annual income.

(2) Method of collection of information

Customers' personal information shall be collected by the following methods.

- (a) The customer may be requested to supply the information on the various application forms and agreement forms required for services such as opening of new savings accounts.
- (b) The customer may be asked to supply information verbally or in writing, to a Bank teller or liaison clerk.
- (c) The customer may be asked to enter the information on the Bank's website, when requesting a product, service,

information or advice.

- (d) The customer may be asked to supply information from third parties, such as joint users of bill clearing houses and personal-credit rating agencies.
- (e) Other information available from ordinary, public sources.
- (3) Purposes for which the personal information may be used
The Bank will use customers' personal information for the following purposes and shall not use it for any other purpose. Individual Numbers shall only be used within the scope established in laws and regulations. The purpose of use shall be specifically set forth so it is clear to the customer and efforts shall be made to limit the purpose of use according to the situation in which the information was obtained.
With the exception of situations where the customer consents, or where disclosure is required by laws or regulations, personal information shall not be disclosed to third parties.
- A. Personal information (except for when it includes Individual Numbers)
 - (A) Purpose of use
 - (a) To process applications for financial products, including opening a bank account.
 - (b) The customer may be asked to supply proof of identity based on legal requirements, or proof of qualification to use certain financial instruments and services.
 - (c) For daily management or ongoing processing of credit transactions, such as deposit taking and lending.
 - (d) To assess applications for or ongoing use of lending and other credit transactions.
 - (e) To assess the appropriateness of providing financial products and services, including judgments based on the Bank's conformance principles.
 - (f) To supply information to third parties for the strict purposes of executing appropriate banking operations, such as providing information to personal credit rating organizations of which the Bank is a member; for credit rating purposes.
 - (g) To ensure the appropriate processing of personal information, in whole or in part, when outside operators contract the Bank to process such personal information.
 - (h) To execute the Bank's rights or duties with respect to the law or an agreement with the customer.
 - (i) To conduct market research, data analysis or surveys, as part of research or development regarding financial products.
 - (j) To inform the customer of financial products or services, as part of a direct-mail campaign or other marketing program.
 - (k) To inform customers of financial products or services provided by Bank partner companies.
 - (l) To cancel a transaction or conduct the processing required after such.
 - (m) For other purposes necessary for the smooth and appropriate execution of transactions with the customer.

(B) Restrictions on scope of use

- (a) In accordance with Article 110 of the Ordinance for Enforcement of the Shinkin Bank Act, information provided by personal-credit rating agencies on the ability of persons requesting loans to repay said loans shall be used for the sole purpose of appraising said ability, and shall not be used or divulged to third parties for any other reason.
- (b) In accordance with Article 111 of the Ordinance for Enforcement of the Shinkin Bank Act, special confidential information such as information regarding race, religious belief, lineage, domicile of origin, insured health/medical record or criminal record, shall not be used or divulged to third parties for any other reason for any purpose other than as necessary to perform appropriate banking operations or as otherwise deemed necessary.