

Privacy Policy

(Declaration on Protection of Personal Information)

Revised as of 27 September 2021
abrdn Japan Limited

Striving to become a company that earns greater trust from customers, abrdn Japan Limited (hereinafter referred to as the "Company") believes that it is extremely important for us to strictly protect customers' personal information.

With the purposes of undertaking transactions with customers in a safe and reliable manner and of providing better financial products and services, and pursuant to the "Act on the Protection of Personal Information", the Company has established and would like to hereby publish its "Privacy Policy (Declaration on Protection of Personal Information)", which is our policy on the protection and use of personal information.

If the Company receives a complaint from a customer, the Company will strive to resolve the issue as quickly as possible, while faithfully making appropriate efforts to protect personal information.

1. Activity Policy for Protection of Personal Information

The Company complies with the "Act on the Protection of Personal Information" and related laws, regulations and guidelines pertaining to the protection of personal information, guidelines established by certified personal information protection organizations, and matters set forth in this Privacy Policy (Declaration on Protection of Personal Information), ensuring the appropriate protection and use of customers' personal information. To promote the appropriate handling of the customers' personal information, the Company will review and update this Privacy Policy (Declaration on Protection of Personal Information), while making efforts for continuous improvement.

2. Appropriate Acquisition of Personal Information

Pursuant to the provisions of laws and regulations, the Company will acquire customers' personal information (Name, Post Code, Address, Birthday (Year Month, Day), Gender, Tel No., E-mail address, Title, Information relating to the Company where the customer is working, etc.) using appropriate and lawful methods, to the extent necessary for the fulfillment of the purposes of use specified in 3: "Purposes of Use of Personal Information" below. When acquiring personal information from a third party, the Company will check the information provider's status of compliance with laws and regulations to confirm that the third party has acquired the personal information in a lawful manner, and preserve records of the confirmed matters, pursuant to laws and regulations, etc.

The following are major information providers, from which the Company acquires customers' personal information, etc.

- (1) Information directly entered by customers at seminars, etc., held by the Company;

- (2) Information stated in commercially available books, such as Kaisha Shikiho and Yakuin Shikiho, and information published in newspapers and on the Internet;
- (3) Information obtained from customers through transactions with customers or products and services, etc., provided to customers (Telephone conversations with customers are recorded for the purpose of maintaining the accuracy of customer services and improving services, etc.); and
- (4) Information acquired to the extent permitted under laws and regulations, etc., through domestic and foreign affiliates of abrdn Group and other third parties.

3. Purposes of Use of Personal Information

The following are the Company's business contents for which the Company uses the customers' personal information and the purposes of use of the personal information (hereinafter referred to as the "purposes of use"), and the Company will use the personal information to the extent necessary for the fulfillment of the purposes of use, unless otherwise provided in laws and regulations, etc.

However, the purposes of use for the "individual numbers (= "My Number")" and "specified personal information (personal information containing the individual numbers (= "My Number"))" are strictly defined under laws and regulations, and the Company will handle these types of personal information only to the extent defined in the laws and regulations.

(1) Business contents

All the businesses which the Company is permitted to conduct under laws and regulations; for example, the discretionary investment management business, non-discretionary investment advisory and intermediary business, businesses incidental to the financial instruments business and notified businesses as provided of Article of the same Article of the Financial Instruments and Exchange Act, and other businesses which can be conducted by the Company and any businesses incidental thereto (including businesses which the Company may be permitted to conduct in the future).

(2) Purposes of use

- (i) To prevent money laundering, report suspicious transactions, confirm identities when conducting transactions, etc., under the Act on Prevention of Transfer of Criminal Proceeds;
- (ii) To confirm the identity of each customer or his/her agent;
- (iii) To determine whether the appropriateness is ensured for products and services to be offered, in light of the principle of suitability, etc.;
- (iv) To provide services for investment trusts launched by the Company or asset management services that the Company determines to be suitable for customers, or to provide information on solicitation, sales or services related to financial instruments;
- (v) To accept applications for account opening, etc., or investment trusts, financial instruments or services;
- (vi) To provide services related to the non-discretionary investment advisory agreement or discretionary investment management agreement concluded with customers, or to perform administrative affairs for such services;

- (vii) To conduct businesses related to agency or intermediary services for the conclusion of the non-discretionary investment advisory agreement or discretionary investment management agreement concluded between a customer and a foreign affiliate of abrdrn Group^(Note);

(Note) An affiliated company located overseas, which is listed in the annual reports, etc., of abrdrn plc as one of the companies belonging to abrdrn Group; abrdrn plc is the holding company of abrdrn Group, to which the Company belongs.

- (viii) To conduct businesses incidental to the financial instruments business and notified businesses as provided of Article of the Financial Instruments and Exchange Act;
- (ix) To report to customers about the transaction contents, investment management results, balance of contract assets, etc.;
- (x) To terminate a transaction or manage administrative affairs after the termination of a transaction;
- (xi) To exercise rights and perform obligations under contracts concluded with customers and laws, etc.;
- (xii) To study or develop financial instruments and services, through market surveys, data analyses, questionnaires, etc.;
- (xiii) To carry out internal administration within the Company (businesses related to compliance management for laws and regulations, etc., finance, accounting, tax affairs, etc.);
- (xiv) To maintain necessary communications with customers, and to promote smooth processing of administrative affairs related to transactions with customers; and
- (xv) To cooperate with investigations conducted by the Securities and Exchange Surveillance Commission with respect to criminal cases, under Articles 210, 211, etc., of the Financial Instruments and Exchange Act.

The customers' individual numbers (= "My Number") and specified personal information will be used only for purposes permitted under laws and regulations, including the preparation of payment records for remuneration, charges, etc., under the Income Tax Act.

For any personal information provided to the Company, the purposes of use will be presented in writing at office counters of the Company's business offices, or posted on the Company's website, etc.

For customers' personal information received from customers in written form, the purposes of use will be clearly stated.

(3) Restriction on purposes of use

The Company will not use customers' personal information for any purpose other than the purposes of use, except when:

- (i) Customers' consent is obtained; or
- (ii) Pursuant to laws and regulations, etc., the Company determines that it is necessary to use the personal information for a purpose other than the purposes of use.

(4) Handling of sensitive information

The Company will not acquire, use or provide to a third party any "special care-required personal information (meaning "personal information containing specified statements, etc., for which special consideration is required to avoid any unfair discrimination or prejudice or any other disadvantage" as defined in the Personal Information Protection Act, such as information on race, belief, social status, medical history, criminal records, or a fact of becoming a criminal victim), and information on membership of a labor union, family origin, registered domicile, health and medical care, sexual life (excluding information falling under the category of special care-required personal information) (excluding information which is publicly disclosed by the person in question, a national government organization, local government, or any other entity defined in laws and regulations (such as a news organization) or information which is obvious from appearance and which can be acquired by seeing or photographing the person in question) (hereinafter collectively referred to as "sensitive information")," unless otherwise provided in laws and regulations, etc. [Guidelines on Protection of Personal Information in Finance Industry]

4. Outsourcing of Services Handling Personal Data

The Company may outsource services handling personal data to a service provider, to the extent necessary for the fulfillment of the purposes of use listed in 3 above.

The major services outsourced from the Company include the following:

- Various services related to the business described in 3 (1) above (including services for the preparation and storage of ledgers and other documents related to the business).
- Services for printing or sending documents, etc., addressed to customers.
- Services to provide specialized advice on legal, tax, accounting matters, etc.
- Services related to the operation, maintenance and management of information systems.

5. Shared Use of Personal Data

In order to fulfill the purposes of use listed in 3 above, the Company may share the customers' personal data with its affiliates, as detailed below:

(1) Personal data items to be shared

Name, Nickname, Post Code, Address, Birthday (Year, Month, Day), Gender, Telephone/Fax numbers, e-mail address, Title, Information relating to the Company where the customer is working, Hobby, Language, customer's needs, Business Records

(2) Scope of persons/entities for the sharing of personal data

abrdn Group (Domestic or foreign affiliated companies, which are listed in the annual reports, etc., of abrdn plc as the companies belonging to abrdn Group; abrdn plc is the holding company of abrdn Group, to which the Company belongs).

However, shared use with affiliates will be limited to the extent permitted under laws and regulations, etc.

(3) Purposes of use of shared users

To make proposals or provide information on, or study or develop, various products, services, etc.

To make determinations on whether to offer various products, services, etc.

To provide comprehensive asset management services from the whole abrdn Group.

To identify and manage various risks and carry out business management, internal management, etc., within abrdrn Group.

- (4) Name of the Chief Personal Data Controller** (meaning the person who primarily accepts and processes complaints addressed to shared users, makes decisions on disclosure, correction, suspension of use, etc., and who is responsible for the safety management):
abrdrn Japan Limited

6. Provision of Personal Data to Third Parties

The Company will not provide the customers' personal data to third parties, except for the cases listed below:

- (1) When the customers' consent is obtained;
- (2) When the whole or part of the handling of personal data is outsourced to the extent necessary for the fulfillment of the purposes of use (The Company will supervise the outsourcing vendors as necessary and appropriate);
The Company will outsource the handling of personal data to an overseas outsourcing vendor only if it is permitted under laws and regulations, etc.;
- (3) When the personal data is shared with the domestic or foreign group affiliates described in 5 "Shared Use of Personal Data" above (however, shared use with affiliates will be limited to the extent permitted under laws and regulations, etc.);
- (4) When personal data is provided to a third party pursuant to laws and regulations, etc.
- (5) When it is necessary to protect human life, limb or property and it is difficult to obtain the customer's consent;
- (6) When personal data is provided in line with business succession due to a merger, business assignment, company split or any other reason; or
- (7) When a third party or the group auditor of abrdrn Group (including an auditor appointed by Aberdeen Asset Management PLC which is the parent company of the Company) effectively carries out an audit of the Company to the extent necessary for the performance of the Company's business and the auditor accesses, checks, etc., the items listed in 5 (1) above.

When the Company provides a third party with the customers' personal information, the Company will maintain and preserve the records on items related to the provision, pursuant to laws and regulations.

7. Safety Management Measures

The Company will appoint the Chief Personal Data Controller responsible for the handling of the customers' personal data, and establish other organizational structures for the handling of the customers' personal data, will make efforts to ensure that the customers' personal information is accurate and up to date, and take necessary and appropriate safety management measures, including information security measures such as measures against unauthorized access and computer viruses to prevent any loss, destruction, falsification, leakage, etc., of the customers' personal information. The Company will provide education on the importance of the protection of personal information to all the executives and employees who handle the customers' personal information, and will appropriately supervise its outsourcing vendors when the Company outsources the handling of the customers' personal information to the outsourcing vendors.

8. Procedures for Requesting Information on Purposes of Use, Disclosure, Correction, Addition, Deletion, Suspension of Use, Erasure, Suspension of Provision to Third Parties, etc., with respect to Retained Personal Data

When the Company receives from a customer a request for information on purposes of use, disclosure, correction, addition, deletion, suspension of use, erasure, suspension of provision to third parties, etc., (hereinafter referred to as the "disclosure, etc.") with respect to the retained personal data of the person in question, the Company will swiftly respond to the request in an appropriate manner after confirming the identity of the requesting person.

If you would like to submit a request for the disclosure, etc., of the retained personal data, please make your request using the contact information below.

When you make a request for the disclosure, etc., you should submit the documents listed below.

Application form for disclosure, correction, etc.:

When the person in question makes the request:

When an agent (agent designated for making the request, adult ward, or agent appointed by the person in question) makes the request:

- Application form designated by the Company
- Identification document: Presentation of the original or submission of a duplicate of a driver's license, passport, residence card, special permanent resident certificate, etc., or similar document issued from a government agency, with a facial photograph attached to the document (One of the documents mentioned above).
(When the individual number card (= "My Number Card") is used, please do not send a copy of the side on which the individual number is stated.)
- Presentation of the original or submission of a duplicate of a health insurance card, pension handbook or similar document issued from a government agency, without a facial photograph attached to the document (It is necessary to present or submit two of such documents).
- Identification document for the person in question: Driver's license, health insurance card, passport, residence card, special permanent resident certificate, pension handbook, etc. (Please refer to "When the person in question makes the request" above).
- Identification document for the agent: Driver's license, health insurance card, passport, residence card, special permanent resident certificate, pension handbook, or registration number in cases where the agent is an attorney (The rules described in "When the person in question makes the request" above also apply here).
- Document based on which the power of attorney can be confirmed:
 - (In the case of an agent appointed at the discretion of the person in question) A power of attorney prepared by the person in question, certifying the appointment of the agent, with the seal of the person in question being

- affixed thereon, and a certificate of registered seal.
- (In the case of a statutory agent) Certificate of registered items, etc., as provided in the Act on Guardianship Registration, etc.
- Other documents to be attached
 - In the case of correction, addition, deletion, suspension of use, erasure, or suspension of provision to third parties: Documents which demonstrate the reason for the measure to be taken.

Please be advised that you may be required to pay certain expenses actually incurred for the disclosure.

In this case, you will be required to make the payment by account transfer to the bank account specified by the Company, in principle.

In principle, the Company will send a written answer to your request, but the Company may answer by another method, if the requesting person agrees to the other method. The Company may reject your request, or take a measure other than the requested measure, if the Company is permitted to do so under laws and regulations, etc. In such case, the Company will notify you or the agent of the rejection or other measure in writing, together with the reason for it.

If you do not wish to permit the Company to use your personal information for sending direct mail or in direct marketing such as telephone marketing, please notify us using the contact information below. After the Company receives such notice, the Company will immediately suspend the handling of the personal information for such purposes.

9. Ensuring Accuracy of Personal Data

The Company will make efforts to ensure that the personal data is accurate and up to date, to the extent necessary for the fulfillment of the purposes of use. If there is any inaccuracy in the information related to you, the Company will correct the information, so please submit a written request using the contact information below.

10. Change of Handling of Personal Information

The information described above may be changed due to the revision of laws and regulations, etc., or any other reason. In cases where such a change is made, the Company will publicly disclose the change by presenting written information at the office counters, etc., of the Company's business offices, or posting information on the Company's website, etc.

◎ Consultation Desk for Customers' Inquiries and Complaints

Contact information:

If you wish to submit a complaint or make a request for disclosure, etc., with respect to your personal information, or any other inquiry about personal information, please contact us using the following contact information.

abrdn Japan Limited

Address: Otemachi Financial City Grand Cube

1-9-2 Otemachi, Chiyoda-ku, Tokyo, 100-0004 Japan

Telephone: +81-3-4578-2251

E-mail: marketing.tokyo@abrdn.com

(9:00 to 17:00, closed weekends, public holidays, Year-end and New Year)

The Company is a member of the following certified personal information protection organization. The organization below receives complaints and consultation requests about the handling of personal information by member companies.

[Complaint / Consultation desk]

The Investment Trusts Association

<https://www.toushin.or.jp/english/index.html>

Address: 6F Tokyo Stock Exchange Bldg., 2-1, Nihonbashi-kabutocho,
Chuo-ku, Tokyo 103-0026 Japan

Telephone: +81-3-5614-8440 (Investor Consultation Desk)

(9:00 to 11:30, 12:30 to 17:00, Monday to Friday (Except for public holidays))

Japan Investment Advisers Association,

Complaints Consultation Desk (Personal Information Team)

https://www.jiaa.or.jp/index_e.html

Address: 1-5-8, Nihombashi-Kayabacho, Chuo-Ku, Tokyo 103-0025, Japan
(7th Floor of Tokyo Shoken Kaikan)

Telephone: +81-3-3663-0505

(9:00 to 17:00, Monday to Friday (except for public holidays))

The Japan Securities Dealers Association,

<https://www.jsda.or.jp/en/index.html>

Address: 2-11-2, Nihombashi, Chuo-ku, Tokyo 103-0027 JAPAN

Telephone: +81-3-6665-6764

(9am to 5pm JST,

Excluding December 31 to January 3, weekends, and public holidays)

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