

Basic Policy on the Protection of Personal Information

JASPAR (General Incorporated Association) (hereinafter referred to as “the Association”) strongly recognizes the importance of personal information and, in order to appropriately protect and manage it, establishes its Basic Policy on the Protection of Personal Information as set forth below. Through the observance of this policy by all officers and employees and related workers, the Association strives to protect the personal information that it acquires and uses in the course of its business.

1. Compliance with Laws and Standards

With respect to the handling of personal information, the Association complies with the laws and regulations and other standards applicable to the protection of such personal information.

2. Acquisition of Personal Information

When acquiring personal information, the Association shall publicly announce or notify the purpose of use thereof, and shall acquire the personal information by lawful and fair means within the scope necessary to achieve the purpose of use.

3. Purpose of Use of Personal Information

The Association shall use the personal information it has acquired only for the following matters necessary for carrying out the business purposes prescribed in its articles of incorporation. With respect to personal information for which the Association has separately specified or notified the purpose of use at the time of acquisition, the Association shall use such information within the scope of that purpose of use.

| Classification of personal information | Purpose of use |
|--|---|
| Personal information concerning the officers and employees, etc. of the Association, and the officers and employees, etc. of the Association's members (including those wishing to become members) | (1) Administrative management relating to the organizational operation of the Association (statutory procedures such as registration procedures, processing of various applications, processing of annual membership fees, ordering / payment and disbursement, asset management, etc.) (2) Administrative management of the Association's general meetings of members, the Board of Directors, the Steering Committee, the Operating Committee, working group (WG) activities, etc. (preparation of rosters / mailing lists, communications, convening of meetings and recording in the minutes, surveys, provision of WG asset-management lending lists, etc.) (3) Administrative management of activity report meetings and other events, lectures, seminars, etc. that the Association hosts, co-hosts, supports, or sponsors (preparation of rosters, communications, surveys, provision of materials, etc.) (4) Guidance and communications concerning the Association's |

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|--|---|
| | activities |
| Personal information concerning participants in events, lectures, seminars, etc. that the Association hosts, co-hosts, supports, or sponsors | (1) Administrative management (preparation of rosters, communications, provision of materials, etc.) (2) Implementation and analysis of surveys (3) Guidance and communications concerning the Association's activities |
| Personal information concerning users of websites managed or operated by the Association, or of content (including software) provided by the Association | (1) Operation and improvement of the website and content (2) Analysis of usage status (3) Prevention, monitoring of, and response to improper acts (4) Improvement of the Association's activities |
| Personal information concerning individuals with whom the Association has a business relationship, or the officers and employees, etc. of domestic or overseas organizations, institutions, etc. | (1) Communications for the exchange of information and for cooperative activities (2) Communications and administrative management relating to the performance of the relevant operations (3) Communications and administrative management relating to payment and billing (4) Guidance and communications concerning the Association's activities |
| Personal information concerning persons who have contacted or made an inquiry to the Association | Responding to contacts and inquiries, management of such responses, sending of related materials and information, etc. |

4. Management of Personal Information

With respect to personal information, the Association takes the following measures to prevent unauthorized access, loss, destruction, alteration, leakage, and the like, and strives to manage such information safely. In addition, where the Association outsources to an external party any operations that handle personal information, it concludes a confidentiality agreement with the entrusted party and exercises necessary and appropriate supervision over its handling.

(Organizational security control measures)

- (i) The Association appoints a Personal Information Protection Manager responsible for the handling of personal data, clarifies the scope of personal data handled by its officers and employees, etc., and has established a system for reporting to and contacting the Personal Information Protection Manager when a fact or sign of a violation of the law or the internal regulations is identified.
- (ii) The Association periodically conducts internal audits of the status of the handling of personal data.

(Human security control measures)

- (i) The Association takes measures to inform, and ensure thorough understanding among, its officers and employees, etc. of matters to be observed in the handling of personal data (such as internal dissemination of trends and points of caution drawn from accident reports concerning the handling of personal information, and methods of response in the event of an accident).
- (ii) The Association receives written pledges from its officers and employees, etc. regarding matters concerning the confidentiality of personal data.

(Physical security control measures)

- (i) In areas where information systems are managed, the Association takes appropriate measures, such as the installation of an entry / exit control system.
- (ii) The Association takes appropriate measures to prevent the theft, loss, etc. of devices, electronic media, documents, and the like that handle personal data.
- (iii) When carrying electronic media, documents, etc. on which personal data is recorded, the Association takes safe measures so that the personal data is not readily identifiable.
- (iv) When deleting personal data, or disposing of devices, electronic media, etc. on which personal data is recorded, the Association uses means by which restoration is impossible.

(Technical security control measures)

- (i) The Association implements appropriate access control in order to limit the persons in charge and the scope of the personal information databases, etc. handled.
- (ii) The Association authenticates, by means of user IDs, passwords, and the like, that the officers and employees, etc. who use the information systems are persons holding legitimate access rights.
- (iii) The Association has introduced, and appropriately operates, mechanisms to protect the information systems that handle personal data from unauthorized access or malicious software from outside.
- (iv) The Association takes, and appropriately operates, measures to prevent the leakage, etc. of personal data accompanying the use of the information systems.

5. Disclosure and Provision of Personal Information to Third Parties

The Association shall not disclose or provide acquired personal information to a third party without obtaining the prior consent of the individual, except where any of the following applies:

- (1) Where it is based on laws and regulations
- (2) Where disclosure is lawfully requested by a court or other governmental agency having legitimate authority

6. Respect for Rights Concerning Personal Information

When the Association is requested by the individual to disclose, correct, add to, delete, or suspend the use of, etc. acquired personal information, or when it receives a complaint, the Association shall, except as otherwise provided by laws and regulations, etc., respect the rights concerning personal information and respond promptly.

7. Establishment and Implementation of Personal Information Protection Regulations

In order to reliably implement the above matters, the Association establishes Personal Information Protection Regulations and has all officers and employees and related workers comply with them.

8. GDPR Privacy Policy

With respect to processing operations relating to personal data at the Association to which the privacy-related rules of the member states of the European Economic Area (EEA) and of the United Kingdom—such as the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act (UK DPA)—apply, the attached “GDPR Privacy Policy” applies.

9. Changes to This Basic Policy

The Association may change this Basic Policy as necessary. When this Basic Policy is changed, the Association will post it on the Association's website.

10. Language

This Basic Policy (including its appendix, the “GDPR Privacy Policy”) has been prepared in the Japanese language and translated into English. In the event of any discrepancy or inconsistency between the Japanese version and the English version, the Japanese version shall prevail.

Contact for Consultation

The contact for questions or complaints concerning the Association's handling of personal information is as follows.

[Consultation Contact] General Incorporated Association JASPAR, Secretariat

Email address: compliance@jaspar.jp

Last revised:6/5/2026

JASPAR (General Incorporated Association)

(Appendix)

GDPR Privacy Policy

1. About the GDPR Privacy Policy

The Association complies with the applicable laws concerning personal information—namely, Japan's Act on the Protection of Personal Information, the EU General Data Protection Regulation (hereinafter referred to as “GDPR”), and the UK Data Protection Act (hereinafter referred to as “UK DPA”), as well as other laws, regulations, and guidelines that apply as a result of the Association's handling of personal information—and makes every effort to protect privacy.

This privacy policy for European data subjects (hereinafter referred to as the “GDPR Privacy Policy”) applies to the handling of the personal data of data subjects residing in the European Economic Area (hereinafter referred to as the “EEA”) and the United Kingdom. The GDPR Privacy Policy applies together with the Association's “Basic Policy on the Protection of Personal Information”; however, in the event of a conflict with the Association's “Basic Policy on the Protection of Personal Information,” the GDPR Privacy Policy shall, to the extent of such conflict, prevail with respect to the relevant data subject.

The Association may revise the GDPR Privacy Policy, and on each such occasion it will post the updated GDPR Privacy Policy on the Association's website.

The Association's website may contain links to third-party websites and links from third-party websites. These third-party websites, and the services accessible through them, each have their own privacy policy. The Association is not responsible for the data protection practices of these third parties.

2. Purposes and Legal Bases for the Handling of Personal Data

The Association uses the following types of personal information (hereinafter collectively referred to as “personal data”) for the following purposes.

| Classification of personal information | Content of the personal information | Purpose of use |
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| Personal information concerning the officers and employees, etc. of the Association, and the officers and employees, etc. of the Association's members (including those wishing to become members) | Contact information including name, email address, telephone number, fax number, company name, address, department, position, and signature Background information including educational background and work history The content and history of communications with the Association Financial history, and other data necessary for financial and | (1) Administrative management relating to the organizational operation of the Association (statutory procedures such as registration procedures, processing of various applications, processing of annual membership fees, ordering / payment and disbursement, asset management, etc.) (2) Administrative management of the Association's general meetings of members, the Board of Directors, |

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|---|---|--|
| | <p>payment processing including bank accounts (including credit / debit card numbers, security code numbers, and other billing-related information)</p> | <p>the Steering Committee, the Operating Committee, working group (WG) activities, etc. (preparation of rosters / mailing lists, communications, convening of meetings and recording in the minutes, surveys, provision of WG asset-management lending lists, etc.)</p> <p>(3) Administrative management of activity report meetings and other events, lectures, seminars, etc. that the Association hosts, co-hosts, supports, or sponsors (preparation of rosters, communications, surveys, provision of materials, etc.)</p> <p>(4) Guidance and communications concerning the Association's activities</p> |
| <p>Personal information concerning participants in events, lectures, seminars, etc. that the Association hosts, co-hosts, supports, or sponsors</p> | <p>Contact information including name, email address, telephone number, fax number, company name, address, department, position, and signature</p> <p>Personal information provided to the Association upon participation in events, etc.</p> <p>The content and history of communications with the Association</p> <p>Financial history, and other data necessary for financial and payment processing including bank accounts (including credit / debit card numbers, security code numbers, and other billing-related information)</p> | <p>(1) Administrative management (preparation of rosters, communications, provision of materials, etc.)</p> <p>(2) Implementation and analysis of surveys</p> <p>(3) Guidance and communications concerning the Association's activities</p> |
| <p>Personal information concerning users of websites managed or operated by the Association, or of content (including software) provided by the</p> | <p>Contact information including name, email address, telephone number, fax number, company name, address, department, position, and signature</p> <p>Personal information provided to</p> | <p>(1) Operation and improvement of the website and content</p> <p>(2) Analysis of usage status</p> <p>(3) Prevention, monitoring of, and response to improper acts</p> <p>(4) Improvement of the</p> |

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|--|---|--|
| Association | <p>the Association upon use of the website, etc.</p> <p>The content and history of communications with the Association</p> <p>Personal information collected through the website (personal data collected through the website, including cookies, access logs, and web beacons (pixels); as well as information about how this website is used, including IP address, browser type and version, device type, time zone setting, browser plug-in type and version, operating system, and platform)</p> | Association's activities |
| Personal information concerning individuals with whom the Association has a business relationship, or the officers and employees, etc. of domestic or overseas organizations, institutions, etc. | <p>Contact information including name, email address, telephone number, fax number, company name, address, department, position, and signature</p> <p>The content and history of communications with the Association</p> <p>Financial history, and other data necessary for financial and payment processing including bank accounts (including credit / debit card numbers, security code numbers, and other billing-related information)</p> | <p>(1) Communications for the exchange of information and for cooperative activities</p> <p>(2) Communications and administrative management relating to the performance of the relevant operations</p> <p>(3) Communications and administrative management relating to payment and billing</p> <p>(4) Guidance and communications concerning the Association's activities</p> |
| Personal information concerning persons who have contacted or made an inquiry to the Association | <p>Contact information including name, email address, telephone number, fax number, company name, address, department, position, and signature</p> <p>Personal information provided to the Association upon contact or inquiry</p> <p>The content and history of communications with the Association</p> <p>Financial history, and other data necessary for financial and</p> | Responding to contacts and inquiries, management of such responses, sending of related materials and information, etc. |

| Classification of personal information | Content of the personal information | Purpose of use |
|--|--|----------------|
| | payment processing including bank accounts (including credit / debit card numbers, security code numbers, and other billing-related information) | |

For the above purposes, the Association processes personal data relating to the individual on the following legal bases.

a. Performance of a contract

It is necessary to handle personal data in order to perform a contract concluded with the data subject and / or to provide a service that the data subject has required.

b. Legal obligation

It is necessary to handle personal data in order to comply with legal obligations under applicable laws.

c. Legitimate interests

This is where the use of personal data is necessary for the legitimate interests pursued by the Association or a third party, and the interests and fundamental rights of the data subject do not override those interests.

d. Consent

This is where the data subject has consented to the handling of personal data. However, even where the Association has obtained consent from the data subject, the Association may, as necessary, handle personal data on another legal basis (for example, a legal obligation or legitimate interests). Furthermore, even if such consent is withdrawn, this does not affect the lawfulness of the handling carried out on the basis of the consent given prior to the withdrawal. Even after the data subject's consent has been withdrawn, the Association may handle that data subject's personal data where another legal basis applies.

3. Cookies

Cookies are small text files that are installed on a computer when a website is accessed. Cookies are generally used to provide website users with additional functions within the website. Cookies cannot access, read, or alter other data on the device.

This website uses Google Analytics, a web analytics service provided by Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, United States) (hereinafter referred to as "Google"). Google Analytics, which uses "cookies," facilitates analysis of the website regarding how users use the website. The Association handles cookies on the basis of its legitimate interest in efficiently producing access statistics that make the website easier to use.

The information about users' use of the website generated by cookies (including the IP address and the URLs of the pages accessed) is transmitted to, and stored on, Google's servers. The Association does not store any personal data of users collected by Google Analytics.

This website uses the IP anonymization function of Google Analytics. As a result, users' IP addresses are removed or anonymized as soon as Google receives them. Google uses this information on behalf of the Association in order to evaluate users' use of the website, to compile reports on website activity for website operators, and to provide other services relating to website activity and internet use. Google does not associate users' IP addresses with any other data held by Google.

Users can refuse the use of cookies by selecting the appropriate settings in their browser. However, by doing so, some functions of this website may become unusable. In addition, users can prevent the collection and use of data by Google by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

For details on Google's terms of use and privacy statement, please refer to <https://www.google.com/analytics/terms/gb.html> or <https://policies.google.com/?hl=en&gl=uk>.

4. Transfer of Personal Data

The Association may share personal data with parties to whom operations are entrusted, such as outside experts and IT-related service providers.

Some recipients are located in, or handle personal data in, countries outside the EEA or outside the United Kingdom. The level of data protection in such countries may not be equivalent to the level within the EEA or within the United Kingdom. However, the Association will either transfer personal data relating to the individual only to countries that the European Commission or the UK government, whichever is appropriate, has recognized as implementing an adequate level of data protection (e.g., Japan), or take measures to ensure that all recipients implement an adequate level of data protection. The Association does this, for example, by concluding an appropriate data transfer agreement based on the Standard Contractual Clauses.

5. Retention Period of Personal Data

The Association retains the personal data it has collected for as long as necessary for the purposes set forth in the GDPR Privacy Policy. This excludes, however, cases where otherwise required by applicable laws, or where personal data is necessary for a potential legal claim, such as where the personal data is necessary for bringing a claim that is not yet time-barred or for the defense against such a claim.

6. Data Subjects' Rights Concerning Personal Data

Data subjects have a number of legal rights concerning the personal data held by the Association. These rights vary depending on the data subject's location and the data protection laws applicable to the relationship between the data subject and the Association, but generally include the following.

a. Right of access

The data subject may request the Association to disclose a copy of part or all of the personal data that the Association handles for the above purposes.

b. Right to rectification

The data subject may, at any time, request the Association to rectify the data subject's personal data if it is inaccurate or incomplete.

c. Right to erasure

The data subject may request the Association to erase the data subject's personal data that the Association handles. However, this is limited to cases that do not violate the Association's obligations under applicable laws or the vital interests of a natural person.

d. Right to restrict use

The data subject may request the Association to restrict the handling of the data subject's personal data.

e. Right to object to use

Where the handling of personal data is not based on the Association's legitimate interests and there is no other legal basis on which the Association relies in order to continue the handling of that personal data, the data subject may request the Association to cease the handling of that personal data.

f. Right to data portability

The data subject may request the Association to transfer the personal data that the Association handles to another processor.

g. Right to withdraw consent

The data subject may withdraw consent to the handling of personal data. In response to the data subject's request, the Association shall terminate the future handling of the data subject's personal data, unless it is able to continue the handling on another legal basis (for example, the Association's legitimate interests, a legal obligation, the vital interests of a natural person, or the public interest).

h. Right to lodge a complaint

If the data subject considers that the Association's handling of personal data violates the data subject's rights or the applicable laws and regulations, the data subject may, at any time, lodge a complaint with the competent supervisory authority.

By contacting the Association in accordance with "7. Inquiries" below, the data subject can exercise these rights.

7. Inquiries

Inquiries concerning the GDPR Privacy Policy are accepted at the following consultation contact.

[Consultation Contact] General Incorporated Association JASPAR, Secretariat

Email address: info@mail.jaspar.jp