

MCSJL Privacy Policy (English version)

Macquarie Capital Securities (Japan) Limited (Tokyo Branch) (referred to as “our branch”) is committed to the proper handling and maintenance of the accuracy and confidentiality with respect to our customers, our corporate customers’ representatives and responsible persons (referred to as the “customers”) and our vendors’ representatives and responsible persons (referred to as the “vendors”) (collectively referred to as the “customers, etc.”) in line with the relevant laws, including the Act on the Protection of Personal Information and the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures, and the relevant guidelines (referred to as the “relevant laws, etc.”), and our branch’s policies, etc. in relation to the protection of personal information.

1. Purpose of Acquiring Personal Information

1.1 - Our customers’ personal information

Our branch acquires our customers’ personal information (including the personal information of our corporate customers’ representatives and responsible persons) to allow for the sound and secure processing of transactions, and to ensure that our customers receive the highest level of service in the provision of products and services. In details, our branch uses our customers’ personal information, in order to verify the identity of our customers, to confirm various conditions for conducting business, and to market new products and services to our customers. When our branch is to obtain personal information upon credit transactions, our branch is to explicitly indicate the purpose of use and to obtain from the person a consent of the purpose of use.

- To solicit and market securities and financial products and to introduce services in accordance with the Financial Instruments and Exchange Act;
- To solicit and market securities and financial products and to introduce services offered by our branch and our affiliated companies;
- To assess the suitability of financial products and services in accordance with the principle of suitability;
- To verify the identity of our customers or their agent;
- To proceed our internal business practice, for example, in respect of evaluating credit risk and other types of risk and in respect of our management of new or existing transactions with our customers;
- To report transaction results, deposit balances, market valuations, etc., to our customers;
- To facilitate the administration process for transactions with our customers;
- To conduct research and development of financial products and services through the implementation of market surveys, data analysis, and questionnaires;
- Where all or part of the processing of personal information has been outsourced by another company, etc., to perform the outsourced service properly:
- To send market reports, season’s greetings or invitations to seminars and receptions; and
- For any other purposes to conduct proper and smooth transactions with our customers.

1.2 - Our customers’ individual number

Regardless of 1.1, the individual number of our customers our branch obtains is used for the following purposes:

- Application for account opening and reporting to the authorities in relation to financial instruments transactions (including application of use of 小額投資非課税制度, reporting, etc.);
- Preparation of regulatory documents in relation to financial instruments transactions and their provisions; and
- Provisions for settlement organizations, etc. in relation to financial instruments transactions

1.3 - Our vendors’ personal information

- Communication, inquiry, and meeting for the purpose of services

- Execution of rights and fulfillment of obligations in relation to the services
- Other purposes incremental to the above

Our branch shall use personal information of our customers' etc. to the necessary extent of fulfilling the above purposes of use for the purpose of execution of business, and shall not use the personal information beyond the purposes of use without consent by our customers' etc. However, our branch may update the purposes of use within the extent of being reasonably regarded as relevant with the above purposes of use. When our branch is to update the purposes of use, our branch shall notify the updated purposes of use to our customers, etc. or publish the updated purposes of use in our website.

2. Type of Personal Information to Acquire

2.1 - Our customers' personal information

The most common personal information our branch is to obtain are the name, contact information such as address, telephone number, and email address, date of birth, age, sex, profession and corporate title, etc. of our customers. It also includes the information our branch inquired prior to commencement of transaction.

With respect to the sensitive information, our branch shall not acquire, use, or provide for any third party, except for the cases approved in the relevant laws, etc.

2.2 - Our vendors' personal information

Our branch may acquire personal information such as name, contact information such as telephone number, email address, etc.

3. Method of Acquiring Personal Information

Our branch acquires personal information within the necessary extent of business in a proper and lawful manner mainly through the mail and electronic devices such as the internet and telephone, with adequate security measures.

When our branch is to acquire our customers' individual number, our branch is to confirm their identity in accordance with the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures. When our branch is to acquire our customers' individual number from their agents, our branch is to confirm the agents' identify, proxy, and our customers' individual number.

4. Provision for Third Party

Our branch shall not provide personal data of our customers, etc. for any third party, except in the following cases. When our branch is to provide personal data of our customers' etc. for any third party in a foreign country, our branch shall take a proper action in accordance with the relevant laws, etc.

- Where our customers' consent is obtained;
- Where our branch is to provide pursuant to the laws;
- Where the provision for any third party is explicitly mentioned in the terms for the particular products or services
- Where our branch is to provide for the financial advisor designated by our customers, based on our customers' consent;
- Where our branch is to outsource the handling of personal data to any third party within the necessary extent of fulfilling the above purposes of use (Note: in this case, our branch is to do due diligence of this third party, to conclude a necessary legal agreement, and to take any action required by the laws.);
- Where personal data is provided in conjunction with transfer of business because of merger and any other reason;
- Where our branch is to engage in joint use of personal information with any particular third party, as mentioned in 5. below

Regardless of the above, our company shall not provide any third party with any specified personal information of our customer, except for the cases required by the laws and regulations, etc.

5. Joint Use

Our branch may jointly use personal data of our customers, etc. within the necessary extent of fulfilling the above purposes of use, as below:

1) Items of personal data subject to joint use

Our customers' personal data: the name, contact information such as address, telephone number, etc. date of birth, sex, profession and corporate title, family information, contact particulars, investment objectives and risk tolerance, etc. of our customers, and the information our branch inquired prior to commencement of transaction.

Our vendors' personal data: name, contact information such as telephone number, email address, etc

2) Scope of joint users

Macquarie Group Limited, its subsidiary, its affiliate. Please refer to Macquarie Group Privacy Policy Appendix for further information.

3) Purposes of use of joint users

As described in 1. above.

4) Responsible for management of the said personal data

Name: Macquarie Capital Securities (Japan) Limited (Tokyo Branch)

Address: The New Otani Garden Court 20F. 4-1, Kioi-cho, Chiyoda-ku, Tokyo, 102-0094

Name of Representative: Takuji Watanabe

6. Control of Personal Data

Our branch establishes the basic policy in relation to security control action of personal data, as below:

Our branch will strive to keep the personal data of our customers accurate and up-to-date within the scope of the purpose of use. In order to prevent the loss, destruction, falsification, and leakage of personal information of our customers, our branch has formulated a basic policy to ensure the proper handling of personal data and has taken the following measures. In addition, in the event of a leakage of personal information handled by our branch, our branch will respond appropriately, such as by submitting a report to relevant competent authorities, or notifying the customer thereof, in accordance with the provisions of Laws and Regulations.

(Development of Policies on the Handling of Customers' Personal Information)

- Our branch establishes policies for the handling of personal information for each stage of Acquisition, Use, Storage, Provision, Deletion, Disposal, etc./Acquisition/Input, Use/Processing, Storage/Preservation, Transfer/Transmission, Deletion/Disposal.

(Organizational Security Control Measures)

- Our branch assigns a person to be responsible for the handling of personal information of customers, clarifying the scope of employee handling of personal data, the scope of personal information to be handled, and establish a system for reporting information to the person in charge in the event that any fact or sign of violation of laws or regulations governing the handling of personal data is identified.
- Our branch periodically conducts self-inspections of the status of the handling of personal information of customers and conduct audits by other departments and outside parties.

(Measures for Human Security Management)

- Our branch conducts periodic training for employees on the key issues in handling personal information of customers.

- Our branch includes in the Rules of Employment matters concerning the confidentiality of personal information of customers.

(Physical Security Control Measures)

- Our branch implements measures to control the access and exit of employees to and from areas in our premises where personal information of customers is handled, and to prevent unauthorized persons from viewing any personal information of our customers.
- Our branch establishes measures to prevent theft or loss of equipment, electronic media, documents, or similar, handling personal information of customers, and measures to prevent personal information from being easily identified when transporting such equipment, electronic media, etc., including transportation within the business office.

(Technical Security Control Measures)

- Our branch implements access control to limit the scope of employees in charge and the scope of personal information databases handled.
- Our branch has systems and controls that protect information systems that handle customer personal information from unauthorized access from outside or from unauthorized software.

(Understanding of External Environments)

- When handling personal information of customers in foreign countries, security control measures shall be implemented after understanding the regime, etc. related to the protection of personal information in the foreign countries concerned.

7. Request for Disclosure, Correction, or Discontinuation from Our Customers

7.1 - Disclosure, correction, etc.

Our branch appreciates if any request of notifying the purposes of use of retained personal data in relation to our customers, etc. yourself, of disclosure, correction, addition, or deletion, of discontinuation of use, of cessation of provision for any third party or deletion from any third party be given to the following contact. If our branch obtains the request, it shall confirm the identify of requestor, and shall respond to it within a reasonable period in accordance with the laws.

7.2 - Charge

Our branch may request our customers, etc. any cost necessary for the proceeding.

7.3 - Discontinuation

If our customers, etc. may request our branch to refrain from sending marketing materials and correspondence, our branch appreciates that our customers' etc. notify our contact as below, so that our branch shall cease to send them.

8. Our Contacts of Queries, Comments, etc. from Our Customers

Our branch accepts requests to notify the purpose of use, disclose, correct, add or delete the contents of, and cease the utilization of or erase, cease the third-party provision to a third party, or disclose a record of provision to a third party, or other questions regarding the handling of personal information:

Privacy Policy Inquiries Desk

C/O Compliance Department

Macquarie Capital Securities (Japan) Limited (Tokyo Branch)

- Address: The New Otani Garden Court 20F. 4-1, Kioi-cho, Chiyoda-ku, Tokyo, 102-0094
- Telephone: (03) 3512 - 5915
- Hours: 9:00 a.m. to 5:00 p.m. (Excluding weekends, public holidays, and the year-end/New Year holiday)

9. Update

Our branch may update this Policy in accordance with any amendments to the applicable laws, rules, ordinances and prescribed standards in Japan, our branch's internal policies, etc., and any other reason. In such case, the updated Privacy Policy shall be posted on our branch's website and available at our branch's reception, and such update shall take effect once posted.

10. Accredited Personal Information Protection Organization

Our branch is the member of the Japan Securities Dealers Association ("JSDA"), which is accredited as Accredited Personal Information Protection Organization. The JSDA's Securities Personal Information Office advises on and mediates grievances regarding the handling of personal information.

- JSDA - Personal Information Office
- Telephone: (03) 6665-6784
- Web-site: <http://www.jsda.or.jp/privacy/index.html>