

## NIKKEI FTRI's Policy regarding Handling of Personal Information

Nikkei Financial Technology Research Institute, Inc. (“NIKKEI FTRI,”) recognizes the importance to protect personal information of users (“Users,”), who use our services including financial and credit researches, etc. on corporations and associations, quantitative analyses and their evaluation, consulting services, etc., or other personal information we handle, and we comply with the “Act on Protection of Personal Information” and other related laws and guidelines and endeavor to handle personal information in accordance with the following privacy policy.

Naoto Oshiro

President

Nikkei Financial Technology Research Institute, Inc.

### 1. Acquisition of personal information

#### (1) Personal Information regarding Users

In order to provide better services to Users, NIKKEI FTRI may ask you to provide us with your personal information by appropriate and fair means to the extent required for our operations when:

- Users register to participate in or participate in seminars and events held by NIKKEI FTRI;
- Users join the mailing list of NIKKEI FTRI;
- Users apply for trial use of products or services of NIKKEI FTRI, such as the credit risk evaluation model called “DEFENSE”;
- Users make orders for publications and information media published by NIKKEI FTRI;
- Users answer questionnaires;
- We respond to inquiries from users;
- We perform other operations related to the above.

#### (2) Personal information regarding representatives, etc. of corporations and associations

In providing the services which evaluate credit capability, etc. of corporations and associations, NIKKEI FTRI utilizes corporate information obtained properly by TOKYO SHOKO RESEARCH, LTD., etc. Such corporate information may contain personal information such as names of the representatives and shareholders.

### 2. Acquisition of access log

This website acquires and stores access logs. NIKKEI FTRI manages such access logs. The access logs, which contain domain names, IP addresses, types of browsers used, access dates and other information of visitors, are not used for the purposes other than maintenance and statistical analysis on usage of the website.

### 3. Management and protection of personal information

(Management of personal information)

In handling personal information, NIKKEI FTRI appoints a manager in charge of management of the personal information in order to conduct appropriate and strict management, maintain its accuracy and endeavor to prevent the leakage to the outside. In addition, NIKKEI FTRI strives to protect the personal information of Users by implementing appropriate and reasonable security measures against risks such as unauthorized access from outside.

(Consignment)

NIKKEI FTRI, in order to provide better services to Users, may consign a contractor to handle the personal information. In this event, we will select a group company or a contractor (“Contractor”) which is deemed to handle personal information properly and will instruct and supervise Contractor to manage and protect the personal information appropriately.

### 4. Implementation and Improvement of privacy policy

In addition to compliance with applicable laws and codes regarding the personal information of Users, NIKKEI FTRI, in order to follow this Policy, establishes “NIKKEI FTRI Rules for Protecting Personal Information” which our officers and employees (regular officers and employees, part-time employees, temporary employed workers, etc.) and other related persons are well informed of and instructed to observe and strives to improve initiatives for protection of the personal information continuously.

### Matters which must be publicly announced under the Act on Protection of Personal Information, etc.

The following describes the matters which must be publicly announced under the laws (hereinafter, the Act on Protection of Personal Information is referred to the “Act”) regarding handling of the personal information:

#### ■ Announcement on the purpose of utilizing the personal information

The Nikkei FTRI’s purposes of utilizing the personal information which must be publicly announced in advance are as follows:

- (1) We use the personal information of Users only to the extent required to achieve the following purposes:
  - Model development work;
  - Consulting services;

- Management of an organization to which we provide consulting services;
- Provision of information on our products, services, publications, etc.;
- Invitation to seminars and events;
- Other operations ancillary to provision of our products and services.

(2) NIKKEI FTRI uses the personal information regarding representatives, etc. of corporations and associations only to the extent required to achieve the following purposes:

- Evaluation of credit capability, etc. of such corporations and associations;
- Services which provide Users with result of the evaluation of credit capability, etc. of such corporations and associations

(3) Utilization for unintended purpose

NIKKEI FTRI will not use the personal information provided by Users and the personal information regarding representatives, etc. of corporations and associations for purposes other than the scope described in (1) and (2) above. In the event of any need to change the utilization purposes, such change will be made only to the extent reasonably considered that such change relates duly to the utilization purposes and the details of such change will be announced on our website, etc.

■ Contact for inquiries and complaints about handling of personal information, etc.

Inquiries and complaints about the personal information acquired through our products and services are received by the following point of contact. Please see below for the point of contact, how to make inquires, etc. We will promptly respond to the inquiries and complaints to the reasonable extent. In addition, please understand in advance that Users will be verified your identification when making inquiries or complaints.

[Point of contact]

Nikkei Financial Technology Research Institute, Inc.

Manager in charge of management of the personal information

03-6273-7743 (Switchboard)

10:00 am to 5:00 pm (Weekdays)

(Please specify which product or service you are going to make an inquiry or a complaint about.)

Please understand that we will not accept any inquiry or complaint made by direct visit to the company or by e-mail except for the inquiries we have designated as acceptable.

■ Announcement on our purposes of utilizing Retained Personal Data

Nikkei FTRI utilizes Retained Personal Data for the purposes as described in “Announcement on the purpose of utilizing the personal information.”

■ Matters regarding procedures for “Request for disclosure, etc.”

The following procedures will be taken to handle any request made by a principal regarding Retained Personal Data for notification of utilization purposes, disclosure, correction, etc., suspension of utilization, etc., and suspension of provision to a third party.

1. Where to make “Request for disclosure, etc.”

Please fill in the prescribed application form of “Request for disclosure, etc.” and send it with any necessary document by postal mail to the address below. Please make sure to send them by recorded delivery mail or registered mail for security reason. Please also add “Enclose the application form for Request for disclosure, etc.” on the envelope.

Personal Information Management Desk  
Nikkei Financial Technology Research Institute, Inc.  
10th Floor, TERRACE SQUARE, 3-22 Kanda Nishikicho, Chiyoda-ku, Tokyo 101-0054

Please be advised that we will not accept any request made in any manner other than the above (for example, request made by direct visit to the company or by e-mail will not be accepted).

2. Category of Retained Personal Data used to specify the detail of the request

1. Information regarding products and services
2. Information regarding books and publications
3. Information regarding seminars, lectures, etc.
4. Information regarding Nikkei Telecon 21 NIKKEI FTRI’s corporate risk information called “risklick”
5. Information regarding other areas (\*please provide specific details.)

3. Data items subject to “Request for disclosure, etc.”

(Please specify which data item you are making request for.)

1. Name
2. Address
3. Gender
4. Birthday/age
5. Telephone

- 6. E-mail address
- 7. Customer ID
- 8. Occupation/Company name
- 9. Others (\*please provide specific details.)

4. Document to be submitted to make “Request for disclosure, etc.”

In making “Request for disclosure, etc.,” please download any applicable application form listed in (A). Fill in the application form and enclose necessary identity verification documents described in (B). (Please see the explanation on the application form for more information.)

(A) Application form prescribed by NIKKEI FTRI

- Application form for notification of purposes of utilizing “Retained Personal Data” (PDF)
- Application form for disclosure of “Retained Personal Data” (PDF)
- Application form for correction, etc. of “Retained Personal Data” (PDF)
- Application form for suspension, etc. of utilization of or suspension of provision to a third party of “Retained Personal Data” (PDF)

(B) Identity verification document

Please enclose two (2) documents (copies are acceptable) which are a combination of an “official identification,” such as a driver’s license, a passport or other official identifications with a face photograph which NIKKEI FTRI deems appropriate, and an “original copy of a bill for or a receipt of utility charges,” such as electricity or telephone (excluding mobile, PHS, etc.). If the “official identity document” does not carry a face photograph, please enclose two or more documents consisted of any “official identity document” without a face photograph and any “original copy of bill for or receipt of utility charges.”

5. “Request for disclosure, etc.” made by proxy

If “Request for disclosure, etc.” is made by proxy, please enclose (a) documentation that proves existence of proxy such as a power of attorney and (b) identify verification document of the proxy in addition to the documents (A) and (B) above.

6. Fee for “Request for disclosure, etc.” and payment method

“Demand for disclosing Retained Personal Data” and “Demand for notifying purposes of utilizing Retained Personal Data” will generate the following fee.

Fee:	500 yen/application form (including consumption tax)
Payment method:	Please enclose a postal money order for 500 yen with the application

	<p>form by postal mail.</p> <p>(In the event of shortage in the fee or failure to enclose the postal money order, the applicant will be informed thereof. If such applicant fails to pay in full amount within the designated period, it is assumed that no “Request for disclosure, etc.” is made.)</p>
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7. Response to “Request for disclosure, etc.”

NIKKEI FTRI will send a response letter in writing to the address indicated in the document issued by an official agency which is attached to the application form.

8. Purpose of utilization of personal information acquired in connection with “Request for disclosure, etc.”

Personal information acquired in connection with “Request for disclosure, etc.” will be utilized to the only extent required to handle “Request for disclosure, etc.” such as identity verification, responses, etc.

9. NIKKEI FTRI will not meet “Request for disclosure, etc.” in the following cases. In this case, we will notify the applicant thereof. The prescribed fee will be charged even when “Request for disclosure, etc.” are not met.

1. The application is not verified that it is made by the principal due to inconsistency among the address stated in the application form, the address stated in the identity verification document and the address registered with NIKKEI FTRI;
2. The existence of proxy is not confirmed for an application made by proxy;
3. The prescribed application form is not filled in properly;
4. The subject of “Request for disclosure, etc.” is not “Retained Personal Data”;
5. Disclosure harms or threatens to harm the life, body, property or other rights or interests of the principal or any third party;
6. Disclosure threatens to interfere with the proper performance of NIKKEI FTRI’s operations seriously;
7. Disclosure violates other laws.

■ Information collection on the Internet (Data Policy)

1. Utilization of data

(Collection of data)

NIKKEI FTRI collects the following data from Users who visit our website:

- Date and time when Users visit our website and URL which Users visit;

- IP addresses of Users' computer terminals;
- Types of the operating systems and browsers;
- Referrer information (information regarding from which website Users visit to our website).

The above data does not contain any personal identifiable information such as Users' names, addresses and e-mail addresses.

Cookie, which identifies the browsers of Users, is used for collecting the data.

(Purpose of utilization)

NIKKEI FTRI utilizes the data we collect for the following purposes:

- Registration/confirmation of the services for Users;
- Analysis on utilization status of the website

Considering that the collected data are valuable information regarding Users, NIKKEI FTRI promises to retain and utilize such information strictly and properly and to provide secure Internet services.

## 2. Opt-out

Those who visit the website of NIKKEI FTRI may choose the setting whether to accept/block Cookie from "Allow all Cookies," "Block all Cookies," "User will be notified if Cookie are received", etc. The setting method differs depending on browsers. Please see the "Help" menu how to choose the setting for Cookie. However, please note that certain functions of our website may become unavailable or limited if all Cookies are blocked.

For organizations the access data are shared with, please see the list in the Attachment.

\* Matters which must be publicly announced will be added or updated as appropriate in accordance with the implementation of our businesses. The policy regarding the handling of personal information will also be updated as necessary. The date of such update will be indicated at the end of the document.

April 1, 2019

Attachment

List of organizations with which the access data is shared

Where to share	URL where the matters related to the privacy policy are posted
Google LLC	<a href="https://www.google.com/intl/ja/policies/privacy/">https://www.google.com/intl/ja/policies/privacy/</a>
Google Web Fonts	<a href="https://developers.google.com/fonts/faq">https://developers.google.com/fonts/faq</a>
Google Map	<a href="https://www.google.com/intl/de_de/help/terms_maps.html">https://www.google.com/intl/de_de/help/terms_maps.html</a>