

2-2-2, Uchisaiwai-cho, Chiyoda-ku, Tokyo

Seven Seas Advisors Co., Ltd.

Minoru Yonekura, Co-Founder and CEO

Seven Seas Advisors Co., Ltd. (the “**Company**”) recognizes the protection and management of personal information as an important duty, and conducts its operations in compliance with the “Act on the Protection of Personal Information” (Act No. 57 of 2003; as amended; the “**Act**”), the “Enforcement Rules for the Act on the Protection of Personal Information” (Rules of the Personal Information Protection Commission No. 3 of 2016; as amended; the “**Enforcement Rules**”), and other relevant laws and regulations and rules of self-regulatory bodies that the Company belongs to as well as this Personal Information Protection Policy and relevant internal regulations. The Company will also respond to proposals and complaints relating to the handling of personal information (meaning those provided for in Article 2, Paragraph 1 of the Act; hereinafter the same applies) in good faith and in a proactive manner.

Specifically, the Company’s Personal Information Protection Policy is as follows and the Company’s officers, staff and employees shall comply with this Personal Information Protection Policy and relevant internal regulations, and endeavor to perform appropriate handling and management.

The “Specific Personal Information Protection Policy” as separately provided for will also apply to the handling regarding data subject numbers and specific personal information provided for in the Act on the Use of Numbers to Identify a Specific Data subject in Administrative Procedures (Act No. 27 of 2013; as amended; the “**Use Of Numbers Act**”), and the provisions of the Specific Personal Information Protection Policy will take precedence.

1. Purposes of acquisition, management and use

1-1. Personal information and pseudonymously processed information

If the Company acquires personal information and pseudonymously processed information (meaning those provided for in Article 2, Paragraph 5 of the Act; hereinafter the same applies), the Company will do so in proper means and the Company will handle and strictly manage personal information and pseudonymously processed information within the necessary scope to achieve the purposes of use listed below, except for cases where an data subject’s consent is obtained and where it is treated as an exception under laws, regulations, or the like.

Personal information and pseudonymously processed information acquired by the Company will be used within the necessary scope to achieve the purposes of use listed below, and will not be used for any purposes other than its purposes of uses without obtaining a data subject’s consent (or consent of a customer who has made a request pursuant to consent of the data subject) unless such use is permitted under laws,

regulations, or the like.

Personal information and pseudonymously processed information acquired by the Company will be used for the businesses listed below within the scope of purposes of use listed below. If such purposes of use are to be changed, such change will be disclosed by a method that may be readily accessible to the public, such as by publishing on the Company's website.

(Businesses)

- (i) financial instruments business (investment management business, investment advisory and agency business, and type II financial instruments business)
- (ii) specified joint real estate venture
- (iii) comprehensive real estate investment advisory services
- (iv) real estate brokerage
- (v) in addition to the above, any business that financial instruments business operators are allowed to handle (including businesses and the like that they will handle in the future)

(Sources or method of acquisition)

- (i) if such information is directly provided through documents and the like that are filled out and submitted by an data subject, such as an agreement
- (ii) if personal information is provided by a third party such as a contractor (for example, if personal information and the like that are stated in a lease agreement by an data subject who has moved into a property held by a fund or the like are acquired)
- (iii) if such information is acquired in connection with succession of business, merger or the like (for example, if, upon acquisition of a property by a fund or the like, personal information and the like that are stated in a lease agreement by an data subject who has moved into such property held by that fund or the like are acquired from a seller or a party whose business is succeeded to)

(Purposes of use)

- (i) to introduce and solicit the Company, the Company's businesses, and products, transactions and services handled by the Company
- (ii) to provide services including discretionary investment management, investment advisory, and brokerage, private placements and handling of private placements of securities, and other services (for example, if, upon acquisition of a property by a fund or the like that the Company is entrusted with the operations thereof, personal information and the like that are stated in a lease agreement by a data subject who has moved into such property held by that fund or the like are utilized by such fund for recruiting investors)

- (iii) to consider properties or the like that are subject to investments, advisory, sale and purchase, brokerage, management, or the like (for example, if, upon acquisition of a property by a fund or the like, personal information and the like that are stated in a lease agreement by an data subject who has moved into such property held by that fund or the like are acquired from a seller or a party whose business is succeeded to)
- (iv) to report details of investments, advisory and transactions, and other matters (for example, if, in relation to a property acquired by a fund or the like, personal information and the like that are stated in a lease agreement by an data subject who has moved into such property held by that fund or the like are utilized for reports to investors)
- (v) to handle affairs concerning identity confirmation, confirmation at the time of transaction, reporting of suspicious transactions under the “Act on Prevention of Transfer of Criminal Proceeds”, in relation to products, transactions, and services handled by the Company
- (vi) to handle affairs concerning new written notices, voluntary written notices and written notices of change under the “Act on Special Provisions, etc. of the Income Tax Act, the Corporation Tax Act and the Local Tax Act Attendant upon the Enforcement of Tax Treaties, etc.” and report the details thereof
- (vii) to manage shareholders, business partners, and employees
- (viii) to conduct and manage recruiting activities for employees, contact with and provision of information to employment applicants, and other hiring and recruiting activities
- (ix) in addition to the above, to perform affairs concerning contracts and transactions in connection with the above
- (x) in addition to the above, to appropriately and smoothly perform operations such as communications, notifications, or reporting necessary in connection with the above
- (xi) to disclose or provide to a third party within the necessary scope to achieve the above purposes (please see “2. Provision to a third party” and “3. Entrustment to a third party” below)

(Information to be used)

- (i) attribute information of a data subject (name, address, telephone number, gender, date of birth, place of work, position, status of income, nationality, and the like)
- (ii) information regarding claims (contract date, principal of claims, amount of reimbursement, history of performance of guarantee, delinquency history, and the like)
- (iii) information regarding real properties (nominee, contract date, contract amount, status of performance, and the like of a lease agreement, sale and purchase agreement, loan agreement, security agreement, and the like)

- (iv) information necessary for the prevention of infectious diseases (including, but not limited to information on vaccination against the Covid-19, information on positive or concentrated contact, recent physical condition, etc.) and information necessary for response to infection (stay history, activity history, presence or absence of chronic diseases, and other information necessary for response, etc.)
- (v) information incidental to or related to the above (valuation of real property, valuation of owned assets, and the like)
- (vi) information required to achieve the purpose of use above

If any change to the above businesses and purposes of use becomes necessary, the above statements will be revised within the scope recognized to be reasonably relevant to the purposes of use before such change, and the revised policy will be published.

Purposes of use may be changed beyond the scope recognized to be relevant to the purposes of use before such change only with respect to the pseudonymously processed information and as necessary. In such case, the above statements will be revised and the revised policy will be published.

1-2. Sensitive information

Unless otherwise stipulated in this policy, the Company will not acquire sensitive information (meaning those provided for in Article 5, Paragraph 1 of the Guidelines for Protection of Personal Information in the Finance Sector, and including special care-required personal information (meaning those provided for in Article 2, Paragraph 3 of the Act; hereinafter the same applies); hereinafter the same applies), unless prior consent of a data subject is obtained and except for cases where it is treated as an exception under laws, regulations, or the like.

Should the Company unintentionally acquire sensitive information by receiving emails from outside or other reasons, the Company shall immediately mask such sensitive information or take other measures in order to make such sensitive information impossible to be recognized, used, provided, or the like.

1-3. Prohibition on inappropriate use

The Company will not use personal information by means that might encourage or induce an illegal or unjust act.

2. Provision to a third party

2-1. Provision of personal data to a third party

Personal data acquired by the Company may be provided to a third party in writing, by mail, phone, facsimile, email, electronic medium, advertising medium, or other means, within the necessary scope to achieve the purposes of use.

Even in such case, provision to a third party of such personal data concerning an data

subject who makes a request may be suspended at the request of the data subject. Please contact us using the details stated in “7. Contact details for complaints and consultations” below, except for cases where an data subject’s consent to the provision to a third party is individually obtained.

In cases stipulated in Article 27, Paragraph 1 and Paragraph 5 of the Act, personal data may be provided to a third party.

(Article 27, Paragraph 1 of the Act)

- (i) cases in which provision is required pursuant to laws and regulations
- (ii) cases in which there is a need to protect a human life, body or fortune, and when it is difficult to obtain an data subject’s consent
- (iii) cases in which there is a special need to enhance public hygiene or promote fostering healthy children, and when it is difficult to obtain an data subject’s consent
- (iv) cases in which there is a need to cooperate upon a central government, a local government, or the like performing affairs provided for by laws and regulations, and when there is a possibility that obtaining an data subject’s consent might interfere with the performance of such affairs
- (v) cases in which the third party is an academic research institution or the like, and such third party is required to handle such personal data for the purpose of academic research (including cases where a part of the purposes to handle such personal data is for the purpose of academic research, but excluding cases where the handling thereof might cause unjust harm to the rights or interests of data subjects).

(Article 27, Paragraph 5 of the Act)

- (i) cases in which the handling of personal data is outsourced within the necessary scope to achieve the purposes of use
- (ii) cases in which personal data is provided in connection with business succession caused by a merger or other reason
- (iii) cases in which personal data is provided to a person within the scope of joint users set out in “4. Joint use” stated below

2-2. Provision of personal data to a third party in a foreign country

Personal data acquired by the Company may be provided to a third party in a foreign country in writing, by mail, phone, facsimile, email, electronic medium, advertising medium, or other means, in accordance with the above “2-1. Provision of personal data to a third party” and within the necessary scope to achieve the purposes of use, only in cases provided for in Article 28, Paragraph 1 of the Act and cases where a data subject’s consent is obtained in accordance with the Act.

(Article 28, Paragraph 1 of the Act)

- (i) cases in which such third party in a foreign country is in a country prescribed by the Enforcement Rules as a country establishing a personal information protection system recognized to have equivalent standards to that in Japan
- (ii) cases in which such third party in a foreign country has developed a system conforming to standards prescribed by the Enforcement Rules as necessary for continuously taking measures equivalent to the one that a personal information handling business operator shall take
- (iii) cases in which it is based on Article 27, Paragraph 1 of the Act

(Article 27, Paragraph 1 of the Act)

- (i) cases in which provision is required pursuant to laws and regulations
- (ii) cases in which there is a need to protect a human life, body or fortune, and when it is difficult to obtain an data subject's consent
- (iii) cases in which there is a special need to enhance public hygiene or promote fostering healthy children, and when it is difficult to obtain an data subject's consent
- (iv) cases in which there is a need to cooperate upon a central government, a local government, or the like performing affairs prescribed by laws and regulations, and when there is a possibility that obtaining an data subject's consent might interfere with the performance of such affairs
- (v) cases in which the third party is an academic research institution or the like, and such third party is required to handle such personal data for the purpose of academic research (including cases where a part of the purposes to handle such personal data is for the purpose of academic research, but excluding cases where the handling thereof might cause unjust harm to the rights or interests of data subjects).

When obtaining an data subject's consent, if a transferee of personal data remains undecided, information that is of reference to an data subject when giving consent, such as (1) facts that the transferee cannot be identified and reasons thereof, (2) names of foreign countries that are candidates for the transferee will be provided, and if a foreign country that becomes a transferee is identified, information will be provided at the data subject's request. In such case, please contact us using the details stated in "[7. Contact details for complaints and consultations](#)" below.

If personal data is provided to a third party in a foreign country on the grounds that such third party has developed a system conforming to standards prescribed by Article 16 of the Enforcement Rules as necessary for continuously taking measures equivalent to the one that a personal information handling business operator shall take in accordance with the provisions of Chapter IV, Section 2 of the Act regarding the handling of personal data (such measures are referred to as "**Equivalent Measures**"), information will be provided

at the data subject's request after such request is made. In such case, please contact us using the details stated in "7. Contact details for complaints and consultations" below.

2-3. Provision of personally referable information to a third party

If it is assumed that a third party, who is to receive provision of personally referable information acquired by the Company (meaning those provided for in Article 31, Paragraph 1 of the Act; hereinafter the same applies), acquires such personally referable information as personal data, such third party who is to receive such provision may provide such personally referable information to a third party upon confirming that a data subject's consent is obtained.

2-4. Provision of pseudonymously processed information to a third party

Pseudonymously processed information acquired by the Company will not be provided to a third party except for cases provided for in laws and regulations or cases stipulated in Article 27, Paragraph 5 of the Act that is applied pursuant to Article 41, Paragraph 6 of the Act.

3. Entrustment to a third party

Personal data acquired by the Company may be entrusted to a third party who is entrusted with the following operations in writing, by mail, phone, facsimile, email, electronic medium, or other means within the necessary scope to achieve the purposes of use. In such case, the Company shall execute necessary agreements with such third party and take other measures necessary under laws and regulations.

(Details of affairs to be entrusted)

- affairs concerning introduction and solicitation of the Company, the Company's businesses, and products, transactions and services handled by the Company
- affairs concerning discretionary investment management, investment advisory, and other services
- affairs concerning consideration of properties or the like that are subject to investments, advisory, sale and purchase, management, or the like
- affairs concerning reports of details of investments and advisory, and other matters
- affairs concerning identity confirmation and confirmation at the time of transaction in relation to products, transactions, and services handled by the Company
- affairs concerning the Company's management of shareholders, business partners, and employees
- in addition to the above, affairs concerning performance of affairs concerning

contracts and transactions

4. Joint use

The Company may jointly use personal data as permitted under Article 27, Paragraph 5, Item 3 of the Act within the following scope.

- (i) Categories of jointly used personal data
 - a) attribute information of a data subject (name, address, telephone number, gender, date of birth, place of work, position, status of income, and the like)
 - b) information regarding claims (contract date, principal of claims, amount of reimbursement, history of performance of guarantee, delinquency history, and the like)
 - c) information regarding real properties (nominee, contract date, contract amount, status of performance, and the like of a lease agreement, sale and purchase agreement, loan agreement, security agreement, and the like)
 - d) information incidental to or related to the above (valuation of real property, valuation of owned assets, and the like)
- (ii) Scope of joint users
 - Subsidiaries, affiliated companies, and related companies of the Company
 - Subsidiaries, affiliated companies, and related companies of Seven Seas Advisors Co., Ltd.
- (iii) Joint users' purposes of use
 - For the purposes of solicitation, implementation and internal management of products and services
- (iv) Person responsible for management of jointly used personal data
 - 2-2-2, Uchisaiwai-cho, Chiyoda-ku, Tokyo
 - Seven Seas Advisors Co., Ltd.
 - Minoru Yonekura, Co-Founder and CEO

For inquiries regarding joint use, please contact us using the details stated in "7. Contact details for complaints and consultations" below.

5. Matters regarding security management measures for personal data

The Company will take necessary and appropriate security management measures for the purpose of management of personal data such as prevention of divulgence, loss or damage. The Company will also conduct necessary and appropriate supervision of employees and contractors (including sub-contractors or the like) who handle personal data. Security management measures for personal data are separately provided for in

the “Regulations of Personal Information Protection” in specific terms and the details thereof are mainly as follows.

(Formulation of personal information protection guidelines/)

- To ensure proper handling of personal data, the Company has formulated these guidelines (personal information protection guidelines) regarding “compliance with relevant laws and regulations, guidelines, and the like,” “contact details for processing questions and complaints,” and the like.

(Development of disciplines concerning handling of personal data)

- The Company has formulated the “Internal Rules for Handling Personal Information” in relation to methods of handling, persons responsible, persons in charge, their duties, and the like for acquisition, use, storage, provision, deletion, disposal, and all other steps.

(Organizational safety management measures)

- In addition to appointing an information management supervisor and a person responsible for information management for handling of personal data, the Company has developed a system for reporting to and contacting with the information management supervisor and a legal and compliance officer in cases where the Company ascertains facts or signs that any laws or Internal Rules for Handling Personal Information are breached.
- The Company has conducted an audit by an audit department regarding the status of handling of personal data.

(Human safety management measures)

- The Company has conducted regular training for employees in relation to points to note regarding the handling of personal data.
- In addition to stating matters regarding confidentiality of personal data in the rules of employment, the Company has obtained a written pledge from each employee.

(Physical safety management measures)

- In areas where personal data is handled, the Company has taken measures to prevent access to personal data by persons without authority, in addition to managing employees’ access to rooms and limiting devices and the like brought into rooms.
- The Company has taken measures to prevent theft, loss, and the like of devices, electronic media, documents, and the like that handle personal data.

(Technical safety management measures)

- The Company has restricted employees other than those of the Company from accessing any personal information database and the like by controlling that access.
- The Company has introduced systems to protect information systems that handle personal data from externally originating unauthorized access or unauthorized software.

(Ascertainment of the external environment)

- The Company has implemented safety management measures based on an ascertainment of the systems for protecting personal information in foreign countries where personal data is stored.

6. Inquiries regarding handling of personal information (request for notification of purposes of use, disclosure, disclosure of records of provision to third parties, correction, etc., or suspension of use, etc.)

If there is a request for notification of purposes of use, disclosure, disclosure of records of provision to third parties, correction, addition, or deletion (correction, etc.), or suspension of use or erasure (suspension of use, etc.) of personal information held by the Company (collectively, “**Disclosure, Etc.**”), the Company will confirm the identity of the applicant and promptly respond to the request in accordance with laws, regulations, or the like unless there is a particular reason not to do so.

The method of requesting Disclosure, Etc. will be, in principle, by post in accordance with the procedures prescribed by the Company.

With regard to the method of disclosure and notification for Disclosure, Etc., the Company will, in principle, notify the applicant of the disclosure, correction, or suspension of use, etc. by the method designated in the request above. The Company may charge the applicant the actual costs (postage costs, etc.) required for the notification of purposes of use, disclosure, and disclosure of records of provision to third parties. Please note that the Company may not be able to meet the request depending on the content of the request.

If there is any reason that the Company cannot respond to all or part of a request for Disclosure, Etc., the Company will notify the applicant in writing to that effect and the reason therefor. In this case, the Company will not, in principle, charge the applicant any actual costs (postage costs, etc.).

If wishing to make a request for Disclosure, Etc., please contact us using the details stated in “7. Contact details for complaints and consultations” below so that the Company can send an explanation on specific procedures and necessary documents, etc.

Outline of requests for Disclosure, Etc.

a. Overall flow for requests

	<u>Estimated number of days required (Note 1)</u>	<u>Details</u>
1. Applicant -		The applicant will indicate his or her intention regarding disclosure, correction, or suspension of use, etc. by contacting the Company using the details stated in “ <u>7. Contact details for complaints and consultations</u> ” below.
2. The Company	Two business days (Note 2)	The Company will provide the specific application form prescribed by the Company and documents, etc. required for the request in accordance with the applicant’s intention.
3. Applicant -		The applicant will submit to the Company the application form prescribed by the Company and documents, etc. required for the request by following the selected method of request and, in case of notification of purposes of use, disclosure, or disclosure of records of provision to third parties, pay the fees prescribed by the Company.
4. The Company	Two business days	The Company will confirm the identity of the applicant based on the submitted application form prescribed by the Company and documents, etc. required for the request and, in case of notification of purposes of use, disclosure, or disclosure of records of provision to third parties, receive the fees from the applicant.

	<u>Estimated number of days required (Note 1)</u>	<u>Details</u>
5. The Company	Varies depending on the content of the request (Note 3)	<p>After confirming the details of the application form and documents, etc. required for the request and upon finding the request reasonable, the Company will handle the request in accordance with the details of the application form.</p> <ul style="list-style-type: none"> - Disclosure: Confirms and prepares personal data, etc. that should be disclosed - Correction, etc.: Conducts procedures such as confirmation and correction of personal data, etc. that should be corrected - Suspension of use, etc.: Confirms and prepares personal data, etc. for which use should be suspended or the like - Other matters: Confirms and conducts such other procedures in accordance with the content of the request
6. The Company	Two business days	The Company will notify the results of the request by the method selected in the application form. If the Company rejects the request, the Company shall notify the applicant in writing to that effect and the reason therefor.

Note 1: The estimated number of days required is the standard processing period required for the Company to perform each service. Since the Company may require more time depending on the content of the request, there can be no assurance that the Company will always complete processing within this number of days. The estimated number of days required does not include the period required for delivery and other communication, etc., and states the number of days required for processing within the Company.

Note 2: If a large amount of personal information, etc. is subject to the request, the Company may require a greater number of days than as stated above.

Note 3: If the Company requires more than a month or cannot estimate the number of days required, the Company will notify the applicant to that effect and the reason therefor in advance.

b. Contact details for requests

Please contact us using the details stated in “7. Contact details for complaints and consultations” below.

c. Method of request

The method of request shall be by post or e-mail. As the subsequent procedures will differ depending on the method of request, the Company will inform the applicant in accordance with the method of request selected.

d. Documents, electromagnetic records, and the like to be submitted when making a request

(i) Application form

Please fill in the application form prescribed by the Company as required, sign or affix your name and seal thereto, and submit the form to the Company.

(ii) Identification documents

a) In case of an ID with a photo

One copy of the identification document (e.g., a copy of the front and back of a driver's license)

b) In case of an ID without a photo

One copy each of two different identification documents (two copies in total) (e.g., a health insurance card and registered seal certificate)

The Company will explain the details when the application form prescribed by the Company is delivered. Please consult the Company if there is any reason that you cannot obtain various identification documents.

(iii) Other documents

If an applicant's agent makes the request, a document certifying the proxy right (original)

However, in this case, our response regarding the disclosure, correction, or suspension of use, etc. will be disclosed only to the applicant and not to the agent.

e. Fees, etc. to be paid when making a request

In case of a notification of purposes of use, disclosure, and disclosure of records of provision to third parties, the Company will, in principle, charge an amount equal to the postage required for two "Letter Pack Plus" packages set out by Japan Post (as of March 28, 2022: 520 yen per package) as actual costs, unless no actual costs were incurred due to the request being conducted by electromagnetic or other methods.

Depending on the method selected in the request or the content thereof, there may be cases where the actual costs required may be higher than the amount stated above (e.g., cost of the media purchased in case of requests for disclosure by CD-ROM, transport costs if it is necessary to use courier service or any other transport method, and extraordinary costs if such costs are necessary for the disclosure, correction, or suspension of use) and significant expenses may be required.

In this case, the Company will notify the applicant of the estimated actual costs (if an estimate cannot be made, then the reason therefor) in advance and will proceed with procedures only when the applicant has agreed to bear those actual

costs.

7. Contact details for complaints and consultations

Inquiries and contact details regarding the Company's personal information and Personal Information Protection Policy are as follows. Please refrain from making any inquiry or contact anonymously.

Contact details for complaints and consultations

Address: 2-2-2, Uchisaiwai-cho, Chiyoda-ku, Tokyo, 100-0011
Department in charge: Corporate Planning
Division Telephone number: 03-6824-5591
Email: inquiry@sevenseas-adv.com
Business hours: Monday to Friday (except national holidays and the year-end and new-year holidays)
10 A.M. to 5 P.M.

The Company is a member of the Japan Investment Advisers Association that is an accredited personal information protection organization and the said association also receives complaints and consultations regarding the handling of personal information of the members including the Company.

Contact details for complaints and consultations

Secretariat of the Japan Investment Advisers Association
Consultation office (in charge of personal information)
Telephone: 03-3663-0505
Business hours: Monday to Friday (except national holidays and the year-end and new-year holidays)
9 A.M. to 5 P.M.

End

Date	Details
April 2012	Established
August 1, 2014	Amendment to the entire text
May 30, 2017	Enforced on May 30, 2017; response to the Amendment Act
July 29, 2020	Revision in connection with the relocation of the head office
April 1, 2022	Enforced on April 1, 2022; response to the Amendment Act
July 1, 2022	Revision to obtain information necessary for the prevention of infectious diseases