

Individual Policy IV

Data Protection Law

Established on October 1st, 2021

1. Introduction

It is the policy of the “K” Line Group to strictly comply with all laws and regulations that relate to the protection of personal information or personal data (collectively, “Personal Data”) and are applicable to the businesses of the “K” Line Group globally (“Data Protection Law”). All directors, officers and employees of the “K” Line Group (“Group Employees”) must comply with Data Protection Law. In addition, directors, officers, managers, and others with supervisory responsibility have a duty to ensure that employees under their supervision are aware of and comply with this Individual Policy regarding Data Protection Law (the “Individual Policy”) and related rules and procedures. Group Employees who have doubts about the application of Data Protection Law to past, present, or future conduct of the “K” Line Group should consult with the department in charge of ensuring compliance with Data Protection Law.

2. Lawful Processing

The “K” Line Group collects, records, uses, discloses, provides, and otherwise processes Personal Data (collectively, “Process” or “Processing”) in accordance with its internal rules for the protection of Personal Data and applicable Data Protection Law in the course of its business of handling Personal Data. In particular, the “K” Line Group takes full care in Processing sensitive Personal Data that require special care under applicable Data Protection Law.

3. Collection of Personal Data

The “K” Line Group collects Personal Data only to the extent required for its business activities and by lawful and fair means. In principle, before collecting Personal Data, the “K” Line Group notifies the relevant data subjects of, or publicizes, the matters that applicable Data Protection Law requires be notified or publicized. The “K” Line Group, in principle, also obtains the consent of the relevant data subjects in advance if consent is required under applicable Data Protection Law in Processing Personal Data.

4. Specifying Purposes of Processing

In Processing Personal Data, the “K” Line Group specifies the purposes of processing to the extent possible. In changing any such purpose, the “K” Line Group does so only to the extent permitted by applicable Data Protection Law, including by limiting the post-change purpose to the scope reasonably considered to be relevant to the pre-change purpose.

5. Restrictions by Purpose

The “K” Line Group Processes Personal Data only within the scope of the Processing purpose(s) notified to the relevant data subjects or publicized in advance, unless otherwise permitted by its internal rules for the protection of Personal data and applicable Data Protection Law. In Processing Personal Data outside the scope of the purpose(s), the “K” Line Group does so in a manner consistent with applicable Data Protection Law, including by obtaining the consent of data subjects in advance.

6. Provision to Third Parties

In principle, the “K” Line Group provides Personal Data to third parties within the scope of the purpose(s) notified to the relevant data subjects or publicized in advance, after obtaining the consent of the data subjects.

7. Outsourcing

In outsourcing the Processing of Personal Data to any third party (such third party, a “Processor”), the “K” Line Group does so only if the prospective Processor ensures sufficient level of the protection of Personal Data. When outsourcing the Processing of Personal Data, the “K” Line Group executes, and keeps a record of, a written agreement with the Processor providing for terms in accordance with its internal rules for the protection of Personal Data and applicable Data Protection Law. If the Processor is to use a sub-processor related to the Processing of Personal Data, the “K” Line Group requires that the Processor inform the “K” Line Group of such matters as the identity of the prospective sub-processor, the details of the service to be provided by the prospective sub-processor, and how the prospective sub-processor will Process Personal Data. The “K” Line Group also causes the Processor to properly supervise the sub-processor and ensure that the sub-processor manages the security of the Personal Data.

8. Cross-border Transfer

In transferring Personal Data across a border out of the region where the Personal Data are stored, the “K” Line Group implements appropriate safeguards for data transfer in accordance with applicable Data Protection Law.

9. Rights of Data Subjects

The “K” Line Group respects the rights of data subjects, such as the rights of access, correction, erasure, and suspension of use, under applicable Data Protection Law.

10. Securing Transparency

In providing notice or information to any data subject in connection with Personal Data Processing, the “K” Line Group takes care to ensure that the notice or information is clearly understandable for, and easily accessible by, the data subject.

11. Securing Accuracy

The “K” Line Group keeps Personal Data accurate and up-to-date to the extent required for the purpose of Personal Data Processing, and erases Personal Data without delay if their use is no longer required for that purpose.

12. Records of Personal Data Processing; Verification

The “K” Line Group records the Processing of Personal Data, and manages and stores those records, in accordance with its internal rules for the protection of Personal Data and applicable Data Protection Law. If Personal Data are provided by any third party, the “K” Line Group performs verification, and records and stores the required matters, in accordance with its internal rules for the protection of Personal Data and applicable Data Protection Law.

13. Personal Data Security Management

Directors, officers, managers, employees, and others engaged in Personal Data Processing at the “K” Line Group must take full care in maintaining the confidentiality of Personal Data in accordance with the internal rules for the protection of Personal Data and information security, as well as applicable Data Protection Law.

The “K” Line Group implements, and inspects and improves as necessary, reasonable organizational, personnel, physical, and technical security measures in order to prevent any breach of, and otherwise manage the security of, Personal Data, taking into account the nature

and purpose(s) of Processing the Personal Data and any potential threat to the rights of data subjects that the Processing may pose.

14. Response to Personal Data Breach

When the “K” Line Group is aware of any threat of divulgence or loss of, damage to, or other breach of Personal Data, the “K” Line Group notifies the competent supervisory authority and the relevant data subjects of the breach in accordance with applicable Data Protection Law. The “K” Line Group also creates and stores records of the details and effects of, and measures taken against, the breach.

Established on October 1st, 2021

(For inquiries regarding this Individual Policy)

Corporate Legal Risks & Compliance Group

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Inquiry : <https://www.kline.co.jp/en/contact/other.html>