

# Privacy Policy

SCRIPTS Asia, K.K. (hereinafter referred to as "SCRIPTS Asia") believes it is our social responsibility to protect personal information collected over the course of business activities, and has drawn up this privacy policy as a guideline for protection of personal information handled by SCRIPTS Asia.

## **1. Collection of Personal Information**

SCRIPTS Asia will collect personal information using only fair and legal means. The type of information that SCRIPTS Asia collects could be one or more of the following items which are used to identify an individual: name, age, birth date, telephone number, email address, postal address, or place of work.

## **2. Purpose of Use of Personal Information**

SCRIPTS Asia collects personal information for the following purposes:

- To provide you with the appropriate information, products, or services
- To provide you with notices about your subscription, including expiration and renewal notices
- To notify you about changes to our website or any products or services we provide though it
- To carry out our obligations and enforce our rights as per any contracts between you and us, including for billing and collection of fees

For cases in which personal information is used for a purpose for which the above does not apply, the purpose will be specified and published, and the user will be notified. In addition to specifying the purpose of use, to make the purpose of use clear to the user, the use of information will be limited to the situation in which it is collected.

## **3. Use of Personal Information**

SCRIPTS Asia will use personal information only to the extent necessary for the purposes of use. If the original purposes are changed due to unavoidable circumstances, SCRIPTS Asia will complete the necessary procedures in accordance with laws and regulations such as the Act on the Protection of Personal Information. However, sensitive information that is collected over the course of business will not be used for any purpose other than those originally specified. Furthermore, personal information that contains identification numbers (hereinafter referred to as "Specific Personal Information") will not be used for

any purpose other than those specified by law.

#### **4. Provision of Personal Information to a Third Party**

SCRIPTS Asia will not provide personal information to a third party without prior consent of the relevant individual. When providing such information to a third party, SCRIPTS Asia will complete the necessary procedures in accordance with regulations and laws such as the Act on the Protection of Personal Information. Specific Personal Information will not be provided to a third party, with or without consent of the relevant individual, except if specified by law.

#### **5. Joint Use of Personal Information**

SCRIPTS Asia may share personal information. When information is used jointly, SCRIPTS Asia will act in accordance with laws and regulations such as the Act on the Protection of Personal Information. Specific Personal Information will not be used jointly. The type of information that could be shared and the manner in which it would be shared is detailed below.

- Personal information that may be shared:  
Name, telephone number, email address, postal address, and place of work
- Purposes of use of personal information:  
As specified in 2. Purposes of Use of Personal Information
- Entities involved in the joint use of personal information:  
SCRIPTS Asia  
Japan Exchange Group, Inc.  
Tokyo Stock Exchange, Inc.  
Osaka Exchange, Inc.  
Tokyo Commodity Exchange, Inc.  
JPX Market Innovation & Research, Inc.  
Japan Exchange Regulation  
Japan Securities Clearing Corporation
- Entity Responsible for Managing Shared Personal Information  
SCRIPTS Asia

#### **6. Protection of Personal Information**

When using personal information within the scope of the purposes of use, SCRIPTS Asia endeavors to ensure that the information is accurate and up to date. SCRIPTS Asia takes appropriate and continual measures in security management to prevent leakage, loss, or

damage of personal information.

## **7. Supervision of Employees and Outsourced Contractors**

SCRIPTS Asia conducts all necessary and appropriate supervision of our employees in order to manage the security of personal information. Also, when SCRIPTS Asia outsources the handling of personal information to a third party, we will carefully select the third party and conduct any necessary and appropriate supervision of that party to ensure that the security of personal information is properly managed.

## **8. Disclosure of Personal Information, etc.**

When SCRIPTS Asia receives a request for notification of the purpose of use, or for disclosure, correction, supplementation, deletion, cessation of use, or cessation of provision to a third party of personal information, we will respond faithfully to the request in accordance with laws and regulations. Please contact us via the following link for information on how to submit requests.

Contact Us: <https://reg18.smp.ne.jp/regist/is?SMPFORM=lhmc-lisdra-029d23fe48cccd7f693329975fdd2e3b>

## **9. Use of Information related to Personal Information**

SCRIPTS Asia uses cookies and web beacons to improve our services and to deliver better and more personalized services. We do not use any of them to identify an individual.

Cookies are pieces of data stored on devices (PC, tablet, smartphone, etc.) used to access the internet.

Web beacons are small electronic files embedded in an e-mail or on a website.

You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our website. Please refer to your browser provider's instruction on how to change the setting.

## **10. Inquiry Response**

SCRIPTS Asia strives to respond promptly to complaints and inquiries regarding the handling of personal information. Please contact us via the following link for any inquiries.

Contact Us: <https://reg18.smp.ne.jp/regist/is?SMPFORM=lhmc-lisdra-029d23fe48cccd7f693329975fdd2e3b>

## **11. Organizational Structure for Personal Information Protection**

The CEO of SCRIPTS Asia serves as the head of personal information protection. SCRIPTS Asia ensures the appropriate management of personal information by assigning personnel responsible for managing personal information to each department that handles personal information.

## **12. Enactment of Personal Information Protection Regulations**

SCRIPTS Asia has set personal information protection rules in order to implement this privacy policy, and will ensure that SCRIPTS Asia's executives and employees are aware of both the privacy policy and rules. Moreover, SCRIPTS Asia will periodically conduct checks and implement improvements as required.

## **13. Education and Training**

In an effort to properly manage personal information, SCRIPTS Asia implements in-house education and training to our executives and employees. SCRIPTS Asia will periodically conduct checks and implement improvements as required.

## **14. Compliance with Laws and Regulations**

SCRIPTS Asia will adhere to the Act on the Protection of Personal Information and other laws and regulations, as well as financial industry guidelines to protect personal information. When we use the information of an individual in the European Economic Area (EEA), the information shall be processed abiding by The General Data Protection Regulation (GDPR).

## **15. Continuous Improvement of the Privacy Policy**

In order to protect personal information, SCRIPTS Asia will review and improve upon this privacy policy on a continuous basis, in light of changes to social conventions regarding personal information, advancement of information technology, and other factors.

Effective February 28, 2024

Erik Abbott

Director & Representative Executive Officer, CEO

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