



CapitaLand Japan Kabushiki Kaisha

Privacy Policy

With regards to the handling of personal information, the Company promise to establish a Personal Information Protection Policy as follows and to ensure the protection of all personal information held by us, based on the importance of safely managing and appropriately using such information.

1. Our name, address, and the name of the representative

CapitaLand Japan Kabushiki Kaisha

〒100-0005 Marunouchi Nakadori Building 6F, 2-2-3, Marunouchi, Chiyoda-ku, Tokyo

Hideto Yamada, Representative Director

2. Complying with relevant laws and rules

The Company comply with the Act on the Protection of Personal Information (Act No. 57 of May 30, 2003) and other related laws and guidelines in the handling of personal information.

3. Appropriate use of personal information

The Company will clarify the purpose of use of personal information by making it public on our website, etc. or by making it known in writing, and use personal information to the extent necessary to achieve the purpose of use, except as provided by law. When identifying the purpose of use, the Company will strive to make the purpose of use more clear to customers, for example, by taking into account the nature of our business and implementing measures to limit the purpose of use by the attributes of customers and by the choice of customers. In addition, the Company will endeavor to clearly indicate, as much as possible, the source of personal information or the method of acquisition thereof (type of acquisition, etc.), as well as not acquiring personal information through deception or other wrongful means, notifying the purpose of use or publicly announcing the purpose of use in the event of obtaining such information (except in the case where such information has already been publicly announced).

4. Intended use of personal information

The Company shall handle personal information of the customer to the extent necessary to achieve the following purpose of use, except with the consent of the customer and in cases where it is treated as an exception pursuant to laws and rules.



4.1 Description of Businesses

- a) Sale, purchase, ownership, management, lease, and brokerage of real estate
- b) Type II Financial Instruments Business
- c) Investment Advisory and Agency Business
- d) Acquisition, holding, management, and disposal of securities (including deemed securities) or shares or equity interests of various corporations
- e) Other businesses that the Company are able to operate under laws and rules, and other businesses incidental thereto (including businesses that will be permitted to be handled in the future).

4.2 Purpose of Use

- a) For the purpose of conducting our business and providing the products and services the Company handle
- b) For the purpose of introducing the products and services handled by us and our group companies related to our business and of providing various information
- c) For judging the appropriateness of the provision of goods and services in light of the principle of conformity, etc.
- d) For the purpose of confirming that you are the principal or that you are the agent of the principal
- e) To conduct clerical work related to transactions with customers (including communication necessary for business and management of customer information)
- f) In addition, in order to appropriately and smoothly execute transactions with customers
- g) To conduct our Group business management, internal management, and recruitment and recruitment activities

5. Shared Use of Personal Information

The Company share the personal information of our customers as follows.

5.1 Personal Information

Customer's address, name, postal code, telephone number, FAX number, mail address, etc.

5.2 Scope of joint users

The Company, CapitaLand Investment Limited and CapitaLand Development Private Limited, which are part of the CapitaLand Group, and their subsidiaries and associated companies Private Limited and their subsidiaries and associated companies.

5.3 Purpose of Use

The information shall be shared within the scope of the purpose of use of the "Purpose of Use " mentioned in 4 above.

5.4 Name, address, representative, etc. of the company responsible for the management of personal data

The Company is responsible for sharing personal data. Please refer to 1 above for our address and representative.

If you have any questions about shared use, please contact the following.

Compliance Department, Personal Information Protection Counseling Service

[Contact information]

〒100-0005 Marunouchi Nakadori Building 6F, 2-2-3, Marunouchi, Tokyo

CapitaLand Japan K. K. Personal Information Protection Consultation Desk

E-mail address Compliance_jp@capitaland.com

Entry times [Monday to Friday (excluding national holidays and year-end and New Year holidays)]

[9:30-12:00, 13:00-16:30]

6. Handling of personal data in foreign countries¹

The recipient includes third parties such as contractors and group companies in countries or regions outside the customer's Japan.

Name of foreign country to which data is transferred	Singapore
Existence of a system for the protection of personal data	Comprehensive system Yes
Reference information on systems for the protection of personal data	EU adequacy decision: No ²
	Participated in CBPR system ³
Existence of a system that may have a significant impact on the rights and interests of the individual	Existence of a system that imposes an obligation on businesses to cooperate with government information collection activities, which may have a significant impact on the rights and interests of the individual.

¹ Personal Data Protection Commission website

Please refer to the 'Survey of Systems for the Protection of Personal Information in Foreign Countries'



published by the Personal Data Protection Commission on its website (2020 Revised Personal Data Protection Law | Personal Data Protection Commission (ppc.go.jp)).

²EU Sufficiency Certification refers to a decision by the European Commission to recognise a country/region as having an adequate level of protection for personal data. If a country/region has obtained EU Sufficiency Certification, it can be expected to provide a level of protection for personal data generally equivalent to that of Japan.

³If the country/region concerned is a participant in the APEC CBPR system, it is considered to have laws and regulations compliant with the APEC Privacy Framework and an enforcement body that enforces such laws and regulations, and can therefore be expected to protect personal information in a manner generally equivalent to Japan.

7. Secured management of personal data

The Company will strive to prevent unauthorized access, loss, destruction, alteration, and leakage of personal information in our possession, and take appropriate security control measures. The Company will also properly supervise our officers and employees. For the safety management measures that the Company is taking, please contact [Inquiries about the handling of personal information] in "10. Establishment of an inquiry desk for personal information" below.

8. Provision of personal information to a third party

The Company will not provide your personal information to any third party without obtaining the prior consent of the Customer, except as otherwise provided by laws and rules.

9. Personal information on consignment

In the event that the Company outsources the handling of personal information, the Company will select an external who is deemed to be properly handling personal information in accordance with the standards set forth by us, conclude contracts to ensure proper handling, and conduct necessary and appropriate supervision to ensure the safe management of personal information by the outsourcee.

In addition, the Company will make efforts to make outsourcing processes transparent to the extent possible by clarifying whether or not to outsource operations and the contents of outsourced operations.



10. To maintain and improve the protection of personal information

To ensure that personal information is handled appropriately, the Company conducts regular audits of all officers and employees regarding the education and handling of personal information, implement this protection policy, and strive to continuously improve this policy.

11. Request for Disclosure of Personal Information

Upon request for inquiry, correction, suspension of use, or deletion of personal information, the Company shall promptly respond to such request after confirming the identity of the individual in accordance with the prescribed procedures. If you have any questions or are exercising your rights with regard to these Basic Guidelines, please contact [Contact for inquiries regarding the handling of personal information] in "11. Establishment of contact points for inquiries about personal information" below.

12. Establishment of Contact Points for Personal Information

The Company will set up a contact point for inquiries from customers regarding the handling of personal information and will strive to respond appropriately and promptly. For inquiries about the handling of personal information, please contact the following contact point. The Company will endeavor to respond to any request from any individual regarding our retained personal data, to the extent possible, including suspension of the dispatch of direct mails from us.

[Contact for inquiries about the handling of personal information]

CapitaLand Japan K.K.

Reception time 9 o'clock to 17 o'clock on weekdays

Compliance Department

E-mail address Compliance_jp@capitaland.com

13. Authorized personal information protection group

The Company is a member of the Japan Investment Advisory Association, an authorized personal information protection organization accredited by the Financial Services Agency. The Complaint Consultation Office of the Association receives complaints and inquiries about the handling of personal information by Association members.

[Complaint/Consultation Desk]

Complaint Consultation Office, Japan Investment Advisors Association

Telephone: 03-3663-505 (Japan Investment Advisors Association (jiaa.or.jp) ([Link](#)))



Dated 1 June 2024
CapitaLand Japan Kabushiki Kaisha
Hideto Yamada, Representative Director

Please refer to the following for the “Privacy Policy” of our group.
<https://www.capitaland.com/en/legal-notices/privacy-policy.html>

Handling of Personal Information of Employees, etc.

The Company may collect personal information of employees, etc. on the assumption that it will be used for the following purposes. If personal information (excluding personal numbers as defined in the “Act on the Use of Personal Information to Identify Specific Individuals in Administrative Procedures” (Act No. 27 of May 31, 2013) (hereinafter referred to as the “Number Act”)) is to be used for purposes other than those listed below, prior consent shall be obtained from the employee or other individual.

1. Purposes of use of personal information

- a) For business communication, preparation of employee lists, and employment management, including procedures required by law (including after retirement of the employee)
- b) For personnel selection, determination of assignment, secondment, and dispatch.
- c) To determine and pay remuneration, tax processing, social insurance procedures, and to provide benefits
- d) For security control measures in video and online monitoring, etc.
- e) To ensure proper health management.

2. Joint use of personal information

2.1 Items of personal information

- a) Personal information (excluding personal numbers): - Name, gender, date of birth, contact information (address, telephone number, e-mail address, etc.), face photograph, employee number or other individually assigned identification number, affiliation, position, work history, transfer history, information on relatives, and other information regarding the attributes of employees, etc. (however, personal numbers will not be included).
- b) Information related to personnel evaluations, awards, disciplinary actions, salaries, social insurance, work conditions, various celebrations and condolences, and other information related to personnel management and employee benefits
- c) Information related to education/training records, qualifications held, results of various assessments, and other information related to the abilities of employees, etc.
- d) Other information acquired and retained for the purpose of human resources and



business administration.

2.2 Scope of joint users

The Company, CapitaLand Investment Limited, and their subsidiaries and affiliated companies, and other CapitaLand Group companies. Private Limited and their subsidiaries and affiliates.

2.3 Purpose of use

Personal data will be shared within the scope of the purposes of use described in “Purposes of Use of Personal Data” in 1. above.

2.4 Name, address, representative, etc. of the company responsible for the management of personal data

The Company will be responsible for the personal data to be jointly used. Please refer to the “Declaration of Personal Information Protection” for the Company's address and representative, as well as contact information for inquiries regarding joint use.

3. Others

Matters not described in “Handling of Personal Information of Employees, etc.” shall be in accordance with the “Declaration of Personal Information Protection”.

The Company will not return the personal information of employees, etc. to the individual after the employee leaves the company, and will dispose of the information responsibly after the purpose of its use has been fulfilled.

Dated June 1, 2024

CapitaLand Japan Kabushiki Kaisha
Hideto Yamada, Representative Director