

## **Global Privacy Notice**

**EFFECTIVE DATE: [7 August, 2023]**

This Privacy Notice explains how Shoko Chukin Bank, Ltd. (the “**Company**”, “**we**”, “**us**” or “**our**”) collects, uses, discloses, and otherwise processes personal data in connection with our global business, especially business related to our overseas branches and offices listed here, and the related products, websites, digital services, mobile applications and services that we offer (collectively, the “**Services**”).

For processing of personal data regarding our domestic business in Japan, please refer to our [information regarding protection of personal information](#) in Japanese.

This Privacy Notice does not cover or address, for example:

- Any of the Company’s other product or service offerings, including other websites and mobile applications that do not post or link to this Privacy Notice. To learn more about the Company’s personal data practices relating to these other product or service offerings, please review their respective privacy notices and policies.
- Personal data and privacy practices relating to Company job applicants, employees or other personnel.

### **Customer Data**

Data protection laws sometimes differentiate between “controllers” and “processors” of personal data. A “controller” determines the purposes and means (or the why and the how) of processing personal data. A “processor,” which is sometimes referred to as a “service provider,” processes personal data on behalf of a controller subject to contractual restrictions.

As part of our business relationship with our customers, we are often asked to receive, gather, store, analyze, or otherwise process information, which may include personal data, on behalf of our customers. We refer to this type of information and personal data as “customer data.” When we process customer data, we generally act as a processor. This means we process customer data on behalf of our customers subject to restrictions set forth in our contracts with them.

This Privacy Notice does not cover or address how we or our customers process customer data in connection with our role as our customers’ processor. Instead, this Privacy Notice only covers our processing of personal data in our capacity as a controller. In addition, we are generally not permitted to respond to individual requests relating to customer data.

As a result, we recommend referring to the privacy notice of the business or government organization with which you have a relationship for information on how they engage processors, like us, to process customer data on their behalf.

### **Region-Specific Disclosures**

Depending on your country, province or state of residence certain rights may apply to you. Please refer below for disclosures that may be applicable to you:

- If you are resident of the State of California in the United States, please click [here](#) for additional California-specific privacy disclosures.

### **What is Personal Data?**

When we use the term “personal data” in this Privacy Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to a person or household. It does not include aggregated or de-identified information that is maintained in a form that is not reasonably capable of being associated with or linked to a person.

### **1.Our Collection of Personal Data**

We collect personal data about you in a variety of ways. Sometimes we collect personal data automatically when you interact with the Services, and sometimes we collect the personal data directly from you. At times, we may collect personal data about you from other sources and third parties, even before our first direct interaction. We may link or combine your activities and information collected from you on our websites with information we have collected from you offline (e.g., at an event), information we receive from third parties, as well as information we collect automatically through tracking technologies.

The Company collects and processes the following personal data from you (i.e., directors and employees of our customers):

- **Contact information:** Name, e-mail address, postal address, postal code, territory or country of residence, phone number.
- **Account information:** including industry, your company`s name, your department, and phone number of your company, your job title, username and password, social security number and passport number.
- **Inquiry and communication information:** including the content of any communications between you and the Company.
- **Tax and payment information:** including a personal tax identification number, bank account information, and payment information where the individual is a representative of a sole proprietor or similar legal structure that uses personal tax and account information in lieu of separate business information.

- **Log File Data**, including your internet protocol (IP) address, operating system, browser type, browser id, date/time of visit, and pages visited.
- **Analytics Data**, including the electronic path you take to the Services, through the Services and when exiting the Services, as well as your usage and activity on the Services, such as the links and object you view, click or otherwise interact with (also known as “Clickstream Data”).
- **Location Data**, including your general geographic location based on your IP address or more precise location when accessing our online services through a mobile device.
- **Information You May Post/Submit to our Services**. We may collect information about how you use and interact with our Services, including any information and content you post to the Services.
- **Other personal data**, Any other personal data automatically collected (we will separately notify you of the category of the personal information if it is required under applicable laws).

## 2. Our Use of Personal Data

The Company may collect, use, disclose or otherwise process your personal data for the following purposes:

- to fulfil or meet the reason the information was provided, such as to open accounts for various financial products and accept applications for financial products and services;
- to confirm your identity as required by law and qualification to use financial products and services;
- to manage various transactions (such as deposit, bond and loan, etc.);
- to provide information on sale and solicitation of financial products and services;
- to make decisions on loan applications, use of services and the validity of the provision of financial products and services;
- to report transaction results and deposit balances;
- to execute operations entrusted to the Company, to ensure the efficient flow of electronically recorded monetary claims and to make decisions on credit transactions;
- to perform obligations or exercise rights under applicable laws;
- to research and develop products and services by market research, data analysis, customer research, audits, fraud prevention, developing new products and/or features, enhancing the Services, improving the Services and identifying usage trends, and questionnaires;
- to communicate with you, including via email, text message, push notification and/or telephone calls.
- to operate, maintain and provide the features and functionality of the Services;
- to send you important information regarding the Services, such as certain changes to our terms, conditions, policies, and/or other administrative information. Because this information may be material to your use of the Services, you may not opt out of receiving such communications;

- to help maintain the safety, security, and integrity of the Services, technology assets, and business;
- to propose various financial products and services;
- to manage various transactions after cancellation or termination;
- to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations and enforce our corporate reporting obligations and Terms of Use, or to comply with applicable laws;
- for other purposes permitted under applicable laws and regulations.

### **3. Legal basis, etc. for processing**

The Company processes your personal information in accordance with applicable personal information protection regulations.

You may be required to provide the Company with certain personal information because the provision of personal information is a statutory or contractual requirement, or a requirement necessary to enter into a contract or for other reasons. In this case, if you do not provide your personal information, the Company may not be able to provide to you our service.

For example, customer's IP addresses, provider information, terminal information and web browser information is a requirement necessary for the customer to access the Website.

### **4. Data Retention**

We retain personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for compliance and protection purposes. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **5. Sources of personal information**

The Company collects your personal information directly when you provide your personal information and the Company may also collect personal information from you automatically.

The Company may also collect your personal information indirectly from third parties, such as the following sources and third parties:

- **Our Affiliates:** We may receive information about you from our other affiliates, so that information you provide to one affiliate may be used by us to provide you Services, communicate with you or provide you advertisements or other personalized content.
- **Your Employer / Business:** If you are an agent, a representative or any employee of your employer or business, we may receive information about you from your employer or business.
- **Service Providers:** Our service providers that perform services on our behalf, such as our call center operations vendors, identity verification providers, and analytics providers. For example, we may receive personal data from our service providers that conduct call center support, marketing, or analytics activities.
- **Business Partners:** Our business partners whom we partner with to provide our co-branded services may collect personal data in connection with these activities and may share some or all of the information with us.
- **Other Third Parties and Publicly Available Sources:** From time to time, we may receive information about you from third parties. For example, we may obtain information from our marketing partners or from third parties to enhance or supplement our existing user information. Where permitted by applicable law, we may also collect information about you that is publicly available, including contact information, employment-related information and product interest information. We may combine this information with the information we collect from you directly.

## 6. Our Disclosure and sharing of Personal Data

The Company shares with and discloses your personal data to the following third parties in order to fulfil the purpose of processing personal data as set out above:

### I Disclosure Personal Data

- **Within the Company:** We may disclose personal data between and among the Company and its current and future parents, affiliates, subsidiaries and other companies under common control or ownership (please see “II Joint use (Data Sharing) among our Group Companies” for more information).
- **Your Employer / Business:** If you are an agent, a representative or any employee of your employer or business, we may disclose information about you to your employer or business.
- **Business / Promotional Partners:** We may share limited information with third parties with whom we partner to provide joint promotional activities or co-branded services.
- **Service Providers:** We may disclose personal data with third-party vendors, third-party dealers, consultants and other service providers, including analytics service provider such as Google, whom we engage to perform functions or

services on our behalf and under our instructions in connection with the purposes and uses described in this Privacy Notice.

- **Business Transaction or Reorganization:** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal data to a third-party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal data may also be disclosed in the event of insolvency, bankruptcy, or receivership, in compliance with applicable law.
- **Legal Obligations and Rights:** We may disclose personal data to third parties, such as legal advisors and law enforcement:
  - in connection with the establishment, exercise or defense of legal claims;
  - to comply with laws or to respond to lawful requests and legal process;
  - to protect the rights and property of the Company, our agents, customers, and others, including to enforce our agreements, policies and our Terms of Use;
  - to detect, suppress, or prevent fraud;
  - to reduce credit risk and collect debts owed to us;
  - to protect the health and safety of us, our customers, or any person; or
  - as otherwise required by applicable law.
- **With Your Consent or At Your Direction:** We may disclose personal data about you to certain other third parties with your consent or at your direction.

## **II Joint use(Data Sharing ) among our Group Companies**

### **(1) Categories of personal information to be shared**

- Name, address, birth date, phone number and occupational type
- Information on the details of transactions such as transaction types, balances, transaction histories and other information related to deposit, loan and other transactions
- Information of financial status including revenues, expenses, assets and borrowings
- Financial institutions
- Information on transaction needs
- Any other information necessary to manage transactions such as information required for credit decisions and debt protection

### **(2) Parties with whom personal information is shared**

- Our Group Companies (please see "[Subsidiaries](#)")

### **(3) Purposes of joint use (data sharing)**

- To make various proposals regarding financial products and services
- To make decisions regarding applications for or continued use of financial products and services
- To conduct market research and to research and develop financial products and services by analyzing data, conducting questionnaires, etc.

- For comprehensive group-wide business management through credit decisions, credit management, risk management, etc.

**(4) Company responsible for the management of personal information to be jointly used**

The Shoko Chukin Bank, Ltd. (For the address and name of the representative, please see “[Outline of the Bank](#)”)

## **7. Data Transfers**

As a result of the above sharing and disclosure, your personal data may be transferred to the following countries, and other countries and regions to which transfer of personal data is required to fulfil any of the purposes provided in Section 2 of this Privacy Notice (“Our use of Personal Data”):

- United States of America
- Ireland

## **8. Safety management measures**

For safety management of your personal information, the Company takes the following safety management measures:

- Organizational safety management measures: the Company will appoint persons responsible for the processing of personal information, appropriately manage personal information and consider the information control and security measures.
- Human safety management measures: The Company will conduct regular and continuous training for all of employees for important matters regarding processing of personal information.
- Physical safety management measures: The Company will manage employees’ access of rooms, and take measures to prevent access to personal information by persons without authority. The Company will manage devices, electronic media, documents and anything else containing personal information.
- Technical safety management measures: The Company will implement access limit. The Company will take measures to prevent information leakage due to computer virus.

## **9. Cookies and Other Data Collection Technologies**

Cookies are small data files that are stored on your computer that allow us and our third-party partners and providers to collect certain information about your interactions with our email communications, websites, and other online Services. We and our third-party partners and providers may also use other, related technologies to collect this information,

such as web beacons, pixels, embedded scripts, location-identifying technologies, and logging technologies (collectively, “cookies”).

We and our third-party partners and providers may use cookies to automatically collect certain types of usage information when you visit or interact with our email communications, websites, and other online Services. For example, we may collect log data about your device and its software, such as your IP address, operating system, browser type, date/time of your visit, and other similar information. We may collect analytics data or use third-party analytics tools such as Google Analytics to help us measure usage and activity trends for our online Services and better understand our customer base.

Third-party partners and providers may also collect personal data about your online activities over time and across different websites when you use our websites and online Services.

We use or may use the data collected through cookies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit our websites and online Services; (b) provide and monitor the effectiveness of our websites and online Services; (c) monitor online usage and activities of our websites and online Services; (d) diagnose errors and problems with our websites and online Services; (e) otherwise plan for and enhance our online Services; and (f) facilitate the purposes identified in the “Our Use of Personal Data” section above.

Please note that we link some of the personal data we collect through cookies with the other personal data that we collect about you and for the purposes described in this Privacy Notice.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using our online Services, as some features and services on our online Services may not work properly. Depending on your device and operating system, you may not be able to delete or block all cookies. In addition, if you want to reject cookies across all your browsers and devices, you will need to do so on each browser on each device you actively use. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it.

You can learn more about Google’s practices with Google Analytics by visiting Google’s privacy policy (available at: <https://policies.google.com/technologies/partner-sites>). You can also view Google’s currently available opt-out options at: <https://tools.google.com/dlpage/gaoptout>.

## **10. Rights of data subjects**



The Company will respect the rights you hold regarding personal information protection regulations applicable to you. You may require disclosure of personal information (including records of the provision of personal information to third parties), correction, addition, and elimination of content, suspension and erasure of usage, and suspension of provision to third parties in accordance with Japanese laws regarding protection of personal information. In addition, in personal information protection regulations of each country that will be applied, rights may be granted to you. For rights granted in each country, please refer to the country-specific exhibit. If you wish to exercise your rights, please make an inquiry using the contact in Section 14 (Contact Details) of the Global Privacy Notice.

## **11. Children’s Personal Data**

Our websites and online Services are not directed to, and we do not intend to, or knowingly, collect or solicit personal data from children under the age of 16. If you are under the age of 16, please do not use our websites or online Services or otherwise provide us with any personal data either directly or by other means. If a child under the age of 16 has provided personal data to us, we encourage the child’s parent or guardian to contact us to request that we remove the personal data from our systems. If we learn that any personal data we collect has been provided by a child under the age of 16, we will promptly delete that personal data.

## **12. Third Party Websites**

Our websites and online Services may include links to third-party websites, plug-ins and applications. Except where we post, link to or expressly adopt or refer to this Privacy Notice, this Privacy Notice does not apply to, and we are not responsible for, any personal data practices of third-party websites and online services or the practices of other third parties. To learn about the personal data practices of third parties, please visit their respective privacy notices.

## **13. Choices and Control Over Your Information**

**How to control your email preferences:** You can stop receiving promotional email communications from us at any time by clicking on the “unsubscribe link” provided in such communications. We make every effort to promptly process all unsubscribe requests. You may not opt out of service-related communications (e.g., account verification, transactional communications, changes/updates to features of the service, technical and security notices).

## **14. Contact Details**

For questions and inquiries regarding the Global Privacy Notice or other privacy-related matters, please contact the consultation center stated below:

Tel +81-3-3272-6111

Address 2-10-17 Yaesu, Chuo-ku, Tokyo Japan

## **15. Changes to the Global Privacy Notice**

The Company may make changes or updates to the Privacy Notice (including any region-specific exhibit) from time to time. Any changes we make to this Privacy Notice will be posted on this page and are effective as of the “Effective Date” at the beginning of the Privacy Notice. If we make material changes to the Privacy Notice, we may notify you by e-mail to your registered email address, by prominent posting on our online services or giving notice by any other method that the Company deems appropriate (subject to applicable laws and regulations, if any).

## **Exhibit - California Privacy Addendum**

**EFFECTIVE DATE: [7 August, 2023]**

To view the Global Privacy Notice, click [\[here\]](#).

### **1. Applicability and Scope of the California Exhibit**

This California Exhibit supplements the information contained in our Privacy Notice by providing additional information about how the Company processes personal data and applies solely to individual residents of the State of California.

Unless otherwise expressly stated, all terms in this California Exhibit have the same meaning as defined in our Privacy Notice.

If this California Exhibit and any provision in the Privacy Notice conflict, then this California Exhibit controls for the processing of personal data of California residents pursuant to California law.

### **2. Categories of Personal Data Collected in the Past 12 Months and the Source of Personal Data Collected**

We may have collected the following categories of personal data within the past 12 months:

- **Identifiers** (e.g., name, mailing address, email address, phone number).
- **California Customer Records** (Cal. Civ. Code Section 1798.80(e)) (e.g., name, mailing address, phone number).
- **Commercial information** (e.g., information related to products and services which you wish to purchase).
- **Internet or other electronic network activity information** (e.g., cookies, ADID, IDFA and other advertisement identifiers).
- **Geolocation information** (e.g., information about your physical location collected from geolocation features on your device, including your IP address).

- **Sensory information** (e.g., content and audio recordings of phone calls between you and the Company and/or you and our services providers, that we record where permitted by law).
- **Professional/employment information** (e.g., job title, department, employer or business).
- **Other personal data** (e.g., information or content you submit to us, including inquiry and communication information when you contact us).
- **Inferences drawn from any of the information above** (e.g., purchasing tendency inferred from website browsing history and level of interest generated from your length of time on our website).

For more information about our collection of personal data, the sources of personal data, and how we use this information, please see Section 1 (“Our Collection of Personal Data”) and Section 2 (“Our Use of Personal Data”) of our Privacy Notice.

### ***Sensitive Information***

The following personal data elements we collect may be classified as “sensitive” under certain privacy laws (“sensitive information”):

- Account name and password;
- Social Security number;
- Driver’s license number;
- Passport number;
- Financial account number and security code; and
- Precise geolocation data.

As described in our Privacy Notice, we use sensitive information to provide certain of our products and services, and to prevent fraud.

We do not sell sensitive information, and we do not process or otherwise share sensitive information for the purpose of targeted advertising.

### ***Deidentified Information***

We may at times receive, or process personal data to create, deidentified information that can no longer reasonably be used to infer information about, or otherwise be linked to, a particular individual or household. Where we maintain deidentified information,

we will maintain and use the information in deidentified form and not attempt to reidentify the information except as required or permitted by law.

### **3. Business Purposes**

We collect the information for the business and commercial purposes set forth in the Privacy Notice under Section 2 ([“Our Use of Personal Data”](#)).

The business purposes for which we may use personal information include (but are not limited to):

- i. Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with law and other applicable standards
- ii. Helping to ensure security and integrity;
- iii. Debugging to identify and repair errors that impair existing intended functionality;
- iv. Short-term, transient uses, including nonpersonalized advertising.
- v. Performing services on our behalf , including maintaining or servicing accounts, providing customer service, processing or fulfilling transactions, verifying identity information, processing payments, and other services;
- vi. Providing advertising and marketing services, except for cross-context behavioral advertising
- vii. Undertaking internal research for technological development and demonstration;
- viii. Undertaking activities to verify or maintain the quality or safety of a service or device used by us, and to improve, upgrade, or enhance our services or device used by us; and
- ix. Other operational purposes, purposes for which we provide you additional notice, purposes disclosed elsewhere in this California Addendum, or for purposes compatible with the context in which the personal information was collected.

### **4. Categories of Personal Information we have disclosed to third parties in the past 12 months & Categories of Third Parties to whom Such Personal Information was disclosed**

Within the past 12 months, we have disclosed all categories of personal data described in [“Categories of Personal data collected within the past 12 months and the Source of Personal Data Collected”](#) of this Exhibit with parties set forth in the [“Our Disclosure of Personal Data”](#) section of the Privacy Notice and for the purposes described in [“Business Purposes”](#) of this Exhibit.

**5. Categories of Personal information we have sold and / or Shared within the past 12 months & Categories of Third Parties to whom Such Information was Sold and/or Shared**

Within the last 12 months and within the meaning of the CCPA, we have sold / shared the following categories of personal data, to the following categories of recipients for the business purposes listed in the “Business Purposes” section above in the preceding 12 months.

<b>Category of California Personal Information</b>	<b>Sold / Shared to the following categories of third parties:</b>
<b>Identifiers</b>	Analytics service provider such as Google
<b>Commercial information</b>	Analytics service provider such as Google
<b>Internet or other similar network activity</b>	Analytics service provider such as Google
<b>Geolocation data</b>	Analytics service provider such as Google

**6. Retention Period**

We retain personal information for only so long as necessary for our commercial and business purposes further described in this Exhibit as explained in [“Data Retention”](#) section of the Privacy Notice.

## 7. Your Privacy Rights

If you are a California resident, you may exercise the following rights regarding your personal data, subject to certain exceptions and limitations:

- The **right to know** the categories and specific pieces of personal data we collect, use, disclose, and sell about you; the categories of sources from which we collected your personal information; our purposes for collecting or selling your personal information; the categories of your personal information that we have either sold or disclosed for a business purpose; and the categories of third parties with which we have shared personal information;
- The **right to request that we delete** the personal data we have collected from you or maintain about you;
- The **right to correct inaccurate** personal information we maintain about you;
- The **right to opt out of our sale(s) or sharing** of your personal data for targeted advertising; and
- **The right not to receive discriminatory treatment** for the exercise of the privacy rights conferred by the CCPA.
- **Other California Privacy Rights.** Under California’s “Shine the Light” law (Civil Code Section § 1798.83), you, as a California resident, may ask us to provide a list of what personal data (if any) we disclosed to third parties for their direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Please note that we do not disclose your personal information to third parties for their direct marketing purposes.

If you have a request regarding your information and would like to exercise your rights under applicable law, please contact us through the methods provided in the “[Contact Details](#)” section in the Privacy Notice.

For certain requests, we will need to verify your identity and confirm you are a resident of a state that offers the requested right(s) before processing your request. In order to verify your identity, we will generally either require the successful login to your account or the matching of sufficient information you provide us to the information we maintain

about you in our systems. As a result, we require requests to include name, email address, and state of residency. Although we try to limit the personal data collected in connection with a request to exercise any of the above rights, certain requests may require us to obtain additional personal data from you. In certain circumstances, we may decline a request, particularly where we are unable to verify your identity or locate your information in our systems, or where you are not a resident of California.

To opt-out of sales or sharing of your personal data:

We may sell or share personal data (including Identifiers, Commercial Information, Internet/Network Information, and Geolocation Data) to analytics service provider such as Google

The third parties to whom we sell or share personal data may use such information for their own purposes, in accordance with their own privacy statements, which may include reselling or sharing this information to additional third parties.

We currently use Google as analytics service provider, and if you want to opt out of sales or sharing of your personal data to Google, please view Google's currently available opt-out options at <https://tools.google.com/dlpage/gaoptout>.

If you have any questions regarding opt out of sales or sharing of your personal data, please contact us using our contact information provided in the "Contact Details" section above.

### ***Authorized Agent***

In certain circumstances, you are permitted to use an authorized agent to submit requests on your behalf through the designated methods set forth below where we can verify the authorized agent's authority to act on your behalf. In order to verify the authorized agent's authority, we generally require evidence of either (i) a valid power of attorney or (ii) a signed letter containing your name and contact information, the name and contact information of the authorized agent, and a statement of authorization for the request. Depending on the evidence provided and your state of residency, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.



## **8. Updates to this California Exhibit**

We will update this California Exhibit from time to time. When we make changes to this California Exhibit, we will change the “Last Updated” date at the beginning of this California Exhibit. If we make material changes to this California Exhibit, we will notify you by email to your registered email address, by prominent posting on our online services, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided in the notification.

## **9. Contact Us**

If you have any questions regarding this California Exhibit, please contact us using our contact information provided in the “Contact Details” section of our Privacy Notice.