

## The Life Insurance Association of Japan

### Privacy Policy

The Life Insurance Association of Japan (hereinafter referred to as the “LIAJ”) hereby declares that, in order to comply with the Act on the Protection of Personal Information (hereinafter referred to as the “APPI”), the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (hereinafter referred to as the “Individual Numbers Act”) as well as other relevant laws and legislations and to establish the voluntary rules and system in handling personal information (including specific personal information specified under the Individual Numbers Act (the same shall apply hereafter in this Policy) ) and Individual Numbers (hereinafter collectively referred to as “Personal Information”) as well as information related to personal information, pseudonymized personal information and anonymized personal information, it sets out, implements and maintains a policy on the protection of personal information (hereinafter referred to as the “Policy”) as below.

Additionally, as a certified personal information protection organization under the Act on the Protection of Personal Information, the LIAJ will properly and reliably operate the certified services with the aim of ensuring the proper handling of personal information, information related to personal information, pseudonymized personal information and anonymized personal information by life insurers.

#### ◆ Collection of Personal Information

- The LIAJ will collect Personal Information by proper and fair means. No sensitive personal information will be collected without consent of the identifiable person unless prescribed to do so by the APPI and the APPI Guidelines.

#### ◆ Types of Personal Information to be Collected and the Purpose of Collection

- The LIAJ may collect Personal Information, including address, name, date of birth, state of health, occupation, etc. to the extent necessary to attain the following purposes:
  1. Research and study of theories and practices relating to life insurance;
  2. Public relations relating to life insurance;
  3. Dealing with consultations and complaints relating to life insurance;
  4. Communication between life insurers;
  5. Education, examination and registration of life insurance solicitors who belong to member companies of the LIAJ;
  6. Education and examination of life insurance interviewers who belong to member companies of the LIAJ;

7. Education and examination of claims managers who belong to member companies of the LIAJ;
  8. Social contribution activities;
  9. Activities to play a role as a certified personal information protection organization;
  10. Activities necessary for the sound development of life insurance business;
  11. Employment management of employees of the LIAJ, etc. such as judgement on recruitment activities and personnel evaluation;
  12. Operation of the entrusted business concerning life insurance for the supporters of physical and mental disabilities; and
  13. Operation of the Industry-wide Policy Inquiry System.
- Provided, however, that Individual Numbers and specific personal information will only be collected within the scope necessary for the following businesses and will not be collected for any other purposes:
    1. Preparation of certificates of income and withholding tax and records of payment;
    2. Registration concerning public health insurance and employees' pension insurance; and
    3. Other businesses related to Individual Numbers prescribed by the provisions of laws and regulations, etc.
  - The above-mentioned purposes will be disclosed by posting on the website of the LIAJ and by other means. Additionally, in advance of acquiring personal information in writing, etc. from a person, the LIAJ will clarify all or part of the above-mentioned purposes to the identifiable person.

◆ Use of Personal Information and Provision of Personal Data

- The LIAJ will not use personal information for purposes other than those mentioned above without obtaining an identifiable person's consent to do so in advance unless otherwise prescribed by the APPI. Individual Numbers and specific personal information will not be used for purposes other than those mentioned above.
- The LIAJ will not use personal information in a manner that is likely to encourage or provoke an illegal or unjust act.
- The LIAJ will not provide personal data that it holds to a third party without obtaining an identifiable person's consent to do so in advance unless otherwise prescribed by the APPI. Specific personal information will not be provided to a third party unless prescribed to do so by the Individual Numbers Act.

- In cases in which the LIAJ uses the personal data it holds jointly with a third party or it entrusts the personal data to a third party for the purpose of outsourcing of business, it will conduct an investigation on that third party to conclude a necessary contract and take necessary measures as required by laws and regulations. Specific personal information will not be used jointly.
- ◆ Notification of a Purpose of Use, Disclosure, Corrections, Ceasing of Use, and Ceasing of Provision to a Third Party of Personal Data
  - When the LIAJ has received a request to notify a purpose of use; to disclose (including disclosure of a record of provision to a third party); to correct; to cease to use; or to cease to provide personal data it holds to a third party, it will properly respond to the request in accordance with the APPI.
- ◆ Handling of Information Related to Personal Information
  - When the LIAJ provides information related to personal information to a third party which is assumed to acquire them as personal data, it will take necessary measures required by laws and regulations and properly handle information related to personal information.
- ◆ Handling of Pseudonymized Personal Information
  - When the LIAJ prepares and uses pseudonymized personal information, it will take necessary measures required by laws and regulations and properly handle pseudonymized personal information.
- ◆ Handling of Anonymized Personal Information
  - When the LIAJ prepares, uses or provides anonymized personal information to a third party, it will take necessary measures required by laws and regulations and properly handle anonymized personal information.
- ◆ Measures for Managing the Security of Information
  - In order to ensure the proper handling of personal data (including personal information that the LIAJ holds or seeks to hold and is scheduled to be handled as personal data; this inclusion of personal information applies to “personal data” hereinafter referred to in this article), the LIAJ will endeavor to comply with relevant laws and regulation and guidelines, to keep the content of personal data accurate, and to delete the personal data if it no longer requires it.
  - With regard to management of the security of personal data, the LIAJ will develop and improve the rules for handling information to prescribe how and by whom it should be handled for each stage including acquiring, using, saving, providing to a third party, deleting, and disposing of the data and provide a regular training to the employees.
  - In order to implement the Policy, the LIAJ will designate chief administrators of the personal data to implement proper handling of the personal data, information related to personal information, pseudonymized personal

information and anonymized personal information, and properly supervise the employees (including officers, staff, temp staff and contract staff) and the outsourcing contractors.

- The LIAJ will, in the area in which the personal data is handled, implement an access control for the employees, impose restrictions on the taking in/out of data medium, and take measures to prevent theft or loss of devices, digital medium and documents that are used to handle the personal data.
- The LIAJ will implement necessary measures for managing the security of information to prevent loss, crash, alternation or leak of the personal data that it holds, and take appropriate information-technology security measures such as prevention of unauthorized access and virus countermeasures.
- In cases of handling the personal data in foreign countries, the LIAJ will recognize the protection system for personal information in that foreign country and take necessary and appropriate measures for managing the security of information.

◆ Enhancement of the Rules

- With the aim of implementing this policy, the LIAJ will develop and continuously enhance rules such as the personal information protection rules through a proper audit.

◆ Inquiries, Consultations and Complaints on the Personal Information, Information Related to Personal Information, Pseudonymized Personal Information and Anonymized Personal Information

- The LIAJ will respond to inquiries, consultations and complaints on the handling of personal information, information related to personal information, pseudonymized personal information and anonymized personal information from the customers in a timely and proper manner.
- As a certified personal information protection organization under the APPI, the LIAJ will respond to the complaints on the handling of personal information, information related to personal information, pseudonymized personal information and anonymized personal information by the life insurance companies that are the covered businesses.
- To file the inquiries, consultations and complaints on the handling of personal information, information related to personal information, pseudonymized personal information and anonymized personal information, please contact the following:

The Life Insurance Consultation Center

Tel: +81 (0)3 3286 2648

Shin-Kokusai Building 3F, 4-1 Marunouchi 3-Chome, Chiyoda-ku, Tokyo 100-0005, Japan

Available between 9A.M. and 5P.M. except Saturdays, Sundays and Holidays

Website: <https://www.seiho.or.jp/english/>

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This Policy on Privacy Protection sets out the LIAJ's thoughts and policies on the protection of personal information and the basic policy on management of the security of personal data, based on "the Guidelines on the Act on the Protection of Personal Information (the Volume on General Rules, the Volume on Provision to a Third Party in a Foreign Country, the Volume on Confirmation and Record-Keeping Obligations upon Third-Party Provision, the Volume on Pseudonymized Personal Information and Anonymized Personal Information, and the Volume on Certified Personal Information Protection Organizations)" by the Personal Information Protection Commission and "Guidelines for Personal Information Protection in the Finance Sector" and "Practical Guidelines on Measures for Managing the Security of Personal Data Under the Guidelines for Protection of Personal Information in the Financial Sector" by the Personal Information Protection Commission and the Financial Services Agency.