Personal Information Protection Policy

Effective on April 1st, 2024 Last amended on May 2nd, 2024

Benefit Strategies K. K. (hereinafter referred to as "BFS") acknowledges that it is our utmost responsibility to protect personal information and specific personal information. BFS declares that it will implement initiatives as per below in order to protect properly the personal information of subscribers on BFS benefit portal site (hereinafter referred to as "Personal Information"):

- 1. BFS collects, utilizes and provides Personal Information considering the Health Checkup Service contents and their scope, and will not handle Personal Information beyond the scope necessary to achieve the specified purpose of use. BFS will also take measures to this end.
- 2. BFS shall comply with laws, regulations, national guidelines, and other norms regarding the handling of Personal Information.
- 3. BFS will take measures for its continued improvement by establishing regulations with reasonable safety measures against leakage, loss or damage of Personal Information in accordance with ISO/IEC 27001:2022 (JIS Q 27001:2023) which BFS has obtained in June 2023. In the case of such occurrence, BFS should immediately take corrective measures.
- 4. BFS should respond promptly and in good faith to complaints and consultations with regard to the treatment of Personal Information.
- 5. BFS will review and continuously improve this Personal Information Protection Policy in a timely and appropriate manner in light of changes in the environment and circumstances surrounding BFS.

Kaori Tamura President, Benefit Strategies K. K.

[Contact for inquiries regarding Personal Information Protection Policy]

Benefit Strategies K. K.

Co-co Olympia 515, 6-35-3 Jingumae, Shibuya-ku, Tokyo 150-0001

E-mail: info@benefit-strat.com

Phone: 03-6259-1158

Open 9:30AM - 5:30PM (Closed Saturday, Sunday, bank holidays, and

New Year holiday)

[Handling of Personal Information]

Purpose of use of Personal Information

BFS will use Personal Information it acquires for the following purposes:

- (1) Customer's Personal Information
 - Customers' Personal Information will be used to provide service in the health checkup service operation, to contact customers, to provide after-sales services, and to provide information on new products and services.
- (2) Personal Information of customers who make inquiries or request information materials:
 - Personal Information of those who inquire about BFS health checkup service will be utilized to respond to them, and to send the materials requested by customers.
- (3) Information on BFS employee
 - Information on BFS employee shall be used for personnel and labor administration, business administration, welfare, healthcare management and security management.

[Notice regarding Retained Individual Personal Data and Records of Provision provided by the third parties]

Benefit Strategies K. K. (hereinafter "BFS") informs the following regarding the request for disclosure (notification of purposes to use, disclosure, correction, addition or deletion of content, suspension of use, elimination, and to provide third parties) of retained personal data and the request for disclosure of records provided by the third parties:

1. Name, address, and the representative of BFS

Company name: Benefit Strategies K. K.

Address: Co-op Olympia 515, 6-35-3 Jingumae, Shibuya-ku, Tokyo 150-0001

Name of representative : Kaori Tamura

2. Purpose of use of retained personal data

- (1) Customer Personal Information directly obtained by BFS
 - Customer's Personal Information will be used to provide BFS health checkup services, and to contact customers, to provide after-sales services and to inform customers of new products and services.
- (2) Personal Information of customers who make inquiries or requested information materials:
 - Personal information from those who contacted us with inquiries about our health

checkup service should be utilized to answer to them.

• It should be used to send the requested information material and other items.

(3) Information about BFS personnel

•It should be used for human resources and labor administration, business administration, employee benefits, healthcare management, and security management.

3. Contact for inquiries regarding retained Personal Data

Please contact the following if you have any questions about retained Personal data:

Benefit Strategies K. K.

Co-op Olympia 515, 6-35-3 Jingumae, Shibuya-ku, Tokyo 150-0001

E-mail: info@benefit-strat.com

Open 9:30AM - 5:30PM (closed Saturday, Sunday, bank holidays, and

New Year holiday)

4. Procedure for disclosure

Please contact personal data inquiry desk as stated above, if you wish to make a request for disclosure, etc. BFS will send you an explanation of the procedures necessary for your request and the necessary application documents.

5. Measures Taken for Safety Management of Retained Personal Data, etc.by BFS

BFS has established rules for the handling of Personal Information and specified Personal Information, as well as rules for safety measures, takes the following measures:

- (1) Establishment of basic policy
 - BFS has established a policy for the handling of personal information, and has made it known to all BFS employees as the Personal Information Protection Policy, and has made it available to the general public on its website.
- (2) Establishment of rules for handling personal data
 - BFS has established procedures for handling Personal Information at each stage of acquisition, use, storage, provision, deletion/disposal, etc., including handling methods, responsible persons and persons in charge, and their duties, and has compiled them into a written regulation and made them known throughout BFS.
- (3) Organizational Safety Control Measures
 - BFS conducts periodic self-inspections of the status of personal information handling, as well as periodic internal audits by other departments and external parties from an impartial standpoint..
- (4) Personnel safety control measures
 - BFS provides periodic training to its employees on points to keep in mind regarding

the handling of Personal Information.

BFS employees pledge to maintain confidentiality.

(5) Measures for physical safety control

- BFS limits the handling of Personal Information in order to prevent access to the Personal Information by employees other than those in charge of handling Personal Information or by other unauthorized persons.
- BFS employees' access is controlled in the area where Personal Information is handled.
- Personal Information is stored in lockable cabinets and on servers with restricted access.

(6) Measures for Technical Security Control

- BFS has installed firewalls and other measures to prevent unauthorized access from the outside. In addition, countermeasures against computer viruses and other malicious software are implemented.
- · The following measures are taken when transferring Personal Information;
 - When transferring media, BFS uses a method that keeps a record of delivery or hand-deliver the media in person.
 - ➤ Electronic data communications are encrypted or otherwise protected against leakage.

(7) Understanding the External Environment

When BFS handles personal data in a foreign country, BFS analyzes and understands the external environment and takes necessary security control measures based on its understanding of the laws and regulations applicable in that country.