

# **Privacy Policy**

## **1. Basic Policy**

- (1) Codo Advisory, Inc. (hereinafter referred to as "we" or "the Company") has a social responsibility to protect personal information obtained by the Company and to ensure the trust therein. Therefore, all directors and employees of the Company must comply with all laws and regulations concerning the protection of personal information, and must handle the personal information held by the Company in an appropriate manner.
- (2) Leakage, falsification, loss, unauthorized use, or unauthorized disclosure of personal information obtained by the Company will result in loss of trust from the Company's customers and business partners, as well as damage to the Company. Employees who engage in such acts will be subject to disciplinary action and may also be subject to legal penalties. The Company hereby requires all officers and employees to be aware of the importance and responsibility of personal information management and to act in good faith and in accordance with this Privacy Policy (hereinafter referred to as the "Policy").
- (3) In addition, we will take the following measures to ensure the smooth operation of this Personal Information Protection Policy.

## **2. Handling of personal information**

- (1) We will appoint a person responsible for the management of personal information, properly manage such information in accordance with our rules and regulations for the protection of personal information, and prohibit inappropriate use of such information.
- (2) We will conduct systematic education and training to ensure that all of our directors and employees are familiar with this Policy, and will periodically check and evaluate the status of compliance with this Policy, and review, maintain, and improve our personal information protection measures as appropriate.
- (3) In order to prevent leakage, falsification, loss, or unauthorized use of personal information held by the Company, we will strive to ensure and improve appropriate information security, including measures against unauthorized access, computers, and viruses.
- (4) We shall use personal information only within the scope of the purpose of use and only by authorized persons in accordance with their specific duties, and only to the extent necessary for the performance of their duties.
- (5) All officers and employees of the Company shall not disclose to any third party or use for any improper purpose any personal information obtained in the course of their duties. The same shall apply even after they leave the Company.

## **3. Purpose of use of personal information**

- (1) The purposes of the acquisition and use of personal information shall be as follow:
  - (a) To send out administrative communications, questionnaires, and various types of

- information (products, services, seminars, exhibitions, etc.) from the Company.
- (b) To perform administrative procedures such as billing and payment to customers and performance of contracts and transactions with customers and business partners.
  - (c) To analyze the acquired browsing history information and distribute various types of information in accordance with the analysis results.
- (2) When personal information is provided for purposes other than those listed above, we will notify you in advance of the purpose of use, etc., and handle personal information within an appropriate scope.

#### 4. Joint Use

We may use personal data jointly as follows:

Scope of joint use	Amita Corporation 4-3 Kanda Surugadai, Chiyoda-ku, Tokyo Kenichi Okada, Representative Director MCP Asset Management (Japan), Inc. 1-8-1, Otemachi, Chiyoda-ku, Tokyo Tetsuya Tanaka, Representative Director
Purpose of joint use	<ul style="list-style-type: none"> <li>To use personal information in connection with the performance of contracts and transactions with customers and business partners. We also use personal information for the purpose of administrative communication, surveys, and the distribution of various types of information (products, services, seminars, exhibitions, etc.).</li> <li>To use personal information for the purpose of analyzing the acquired browsing history information and distributing various offers in accordance with the results of the analysis.</li> </ul> <p>When we ask you to provide personal information for joint use purposes other than those listed above, we will notify you in advance of the joint use purposes, etc., and handle your personal information within the appropriate scope.</p>
Information Items used jointly	Name, date of birth, gender, address, telephone number, fax number, e-mail address, company (organization) name, department name, title, and information on use of services, etc.
Joint Use Information Manager	Codo Advisory, Inc. 2-12-1 Tenjin, Chuo-ku, Fukuoka City, Fukuoka Prefecture Kaori Suzuki, President and CEO

#### 5. Provision of personal information to third parties

We will not provide personal data to third parties without the consent of the individual, except when providing personal data to third parties for the purpose of outsourcing work within the scope necessary to achieve the purpose of use, when jointly using personal data as described in 4. above, or when other exceptions are recognized by the laws and regulations concerning the protection of personal information. In addition, when providing personal data to third parties, we will screen such third parties in accordance with predetermined standards, conclude necessary

contracts, and take other measures required by law.

#### **6. Inquiries about disclosure, correction, suspension of use, etc. of personal Data**

We will respond in good faith to your requests for disclosure, correction, addition, deletion, suspension of use, elimination, and suspension of provision to third parties of your personal data held by the Company. Please direct inquiries and complaints to:

Personal Information Complaints and Consultation Desk at Codo Advisory, Inc.  
E-mail address: [privacy@codo.jp](mailto:privacy@codo.jp)

#### **7. Other matters**

- (1) We cannot be responsible for the security of personal information at other companies linked to our website.
- (2) Any important changes or announcements will be posted on the website.
- (3) We may revise this Policy in order to better protect personal information, or in response to changes in relevant laws and regulations.

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