

Basic Policy on Handling Personal Information

1. Basic Policy

JR East Building Co., Ltd. (hereinafter referred to as the “Company”) will comply with laws, regulations, and internal rules regarding the protection of personal information (information about a living individual who can be identified by name, date of birth, or other description contained in said information), and will protect such information by acquiring and using personal information appropriately handled by the Company, managing personal information in a safe and up-to-date manner, and appropriately disposing of personal information.

2. Organizational Activities

(1) We will comply with laws and regulations regarding the protection of personal information.

(2) We will establish and comply with internal rules for handling personal information.

(3) We regularly check to ensure that personal information is handled appropriately and make improvements if any problems arise.

(4) We will request cooperation from our Group companies, organizations and individuals with whom we do business, etc., to achieve the objectives of the internal rules.

(5) This Basic Policy shall be made available for viewing at any time, for example, by posting it on the Company’s website (URL: <https://www.jebl.co.jp>).

3. Handling of Personal Information

We shall handle personal information as follows, except in cases where laws and regulations permit exceptions.

(1) Establishment of internal systems

We will assign a manager to each personal information and manage it appropriately.

(2) Obtaining personal information

When obtaining personal information, we will clarify the purpose for which the information will be used and obtain it in an appropriate manner.

(3) Use of personal information

We strongly recognize the importance of protecting personal information and will use it appropriately within the scope of the intended purpose of use.

(4) Appropriate management of personal information

We will implement the necessary security measures for the management of personal information.

(5) Handling of personally-related information provided by third parties

When handling personally-related information provided by a third party, we will not cross-reference it with other information that identifies or may identify an individual, unless we have obtained the individual's consent.

(6) Respecting individual rights

We respect the individuals' rights regarding their personal information. We will respond to requests for disclosure, correction, suspension of use, etc., of such information within a reasonable period and to the extent required by laws and regulations.

(7) Continuous improvement of the handling of personal information

We will continuously strive to improve our handling of personal information.

*Personal information in this Basic Policy includes specified personal information.

April 2024

JR East Building Co., Ltd.

Specific Items Regarding the Handling of Personal Information (Items to be Published in Accordance with the “Act on the Protection of Personal Information”)

JR East Japan Building Co., Ltd. (hereinafter referred to as the “Company”) obtains personal information that is necessary for the smooth operation of our business, and this personal information will be handled as follows in addition to the “Basic Policy on the Handling of Personal Information.”

In cases where the terms and conditions of each business operated by the Company individually stipulate handling personal information related to customers, such stipulations shall take precedence over the “Specific Matters Concerning the Handling of Personal Information” herein.

1. Name and Address of the Business Operator Handling Personal Information and Name of its Representative

JR East Japan Building Co., Ltd.

5-33-8 Sendagaya, Shibuya-ku, Tokyo 151-0051, SOUTH GATE Shinjuku 8F

Naoto Nishida, Representative Director

2. Purposes of Use of Personal Information

The purposes of using personal information obtained by the Company are as follows.

We may entrust your personal information to a third party to the extent necessary to achieve the purpose of use specified to you. However, in such cases, we will confirm the security level of such third parties and enter into a confidentiality agreement with them before entrusting such information to such third parties.

(1) Purposes of use of personal information obtained from customers

- a. To make necessary contact for the provision of products and services (including when requesting delivery of products, etc. to courier companies, etc.)
- b. To provide information on products and services and other information related to the Company's business activities
- c. To examine and develop new products and services, as well as software, systems, facilities, equipment, etc. to provide these products and services
- d. To charge and collect fees for products and services and to protect receivables (including when requesting credit card payment procedures from a consumer credit company, etc.)
- e. To conduct market research and other surveys and studies
- f. For business analysis.

- g. To conduct sweepstakes, campaigns, etc.
- h. To enter into and fulfill contracts with customers and to manage the contracts after they have been entered into
- i. To exercise the Company's rights and to respond to various matters incidental thereto
- j. For CSR (corporate social responsibility) related activities
- k. To receive and respond to inquiries and opinions from customers
- l. To ensure the security of customers and employees
- m. To study and develop software, systems, facilities, and equipment for ensuring security
- n. To maintain and manage facilities, equipment, and devices and their usage
- (2) Purposes of using personal information obtained from employees, applicants for employment, retirees and their family members, etc.
 - a. To provide recruitment-related information and to perform tasks related to recruitment
 - b. For operations related to employment management (including secondment and transfer)
 - c. For operations related to the payment of salaries, etc.
 - d. For operations related to employee benefits, etc.
 - e. For operations related to health care, etc.
 - f. For various procedures after retirement
 - g. For various procedures and communications required by laws and regulations
 - h. For other procedures and communications necessary for business operations
- (3) Purposes of use of specified personal information
 - a. To perform administrative work related to health and employment insurance, etc.
 - b. To perform administrative work related to employees' pensions and national pensions, etc.
 - c. To perform administrative work related to the withholding of income taxes, such as salaries, bonuses, and year-end adjustments
 - d. To perform administrative work related to preparing and submitting withholding tax certificates, payroll reports, etc.
 - e. To perform administrative work for employee stock ownership plans, etc.
 - f. To perform administrative work related to preparing and submitting of statutory payment records, etc.
 - g. To perform other administrative work stipulated in the "Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (Numbers Act)" and other laws.

3. Provision of Personal Information to Third Parties

(1) Except for the purposes stated in "2. Purposes of Use of Personal Information" and in the following cases, we will not provide personal information obtained from customers to third parties without obtaining the customer's prior consent.

- a. When required by law
- b. When it is necessary for the protection of the life, body, or property of an individual, and it is difficult to obtain the customer's consent
- c. When it is essential to improve public health or promote the sound growth of children, and it is difficult to obtain the customer's consent
- d. When it is necessary to cooperate with a national agency, a local government, or an individual or entity entrusted by either a national agency or local government to execute affairs prescribed by laws and regulations, and obtaining the customer's consent may impede the execution of such affairs

(2) Notwithstanding the preceding item, we will not provide specified personal information to any third party, except in cases where it falls under the purposes of use of specified personal information described in the preceding paragraph or in cases provided for in the "Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures."

4. Measures Taken for the Safe Management of Personal Information

We will implement the following items to ensure the safe management of personal information. The following are examples only, and the specific measures for implementing safety management may differ depending on the individual personal information.

(1) Formulation of a basic policy

The "Basic Policy on the Handling of Personal Information" will be formulated and made public to ensure the proper handling of personal information.

(2) Establishment of disciplinary rules for the handling of personal data, etc.

We will establish internal rules for handling personal information to ensure appropriate acquisition, storage, use, and management.

(3) Organizational safe management measures

In addition to appointing a person responsible for handling personal information, we will clarify the employees who handle personal information and their roles and establish a system for contacting the person responsible in the event of an accident, such as the leakage of personal information (including cases where we become aware of signs of such an accident).

(4) Personnel safety control measures

In addition to providing regular education and training to employees on matters to keep in mind regarding the handling of personal information, we will include matters related to the confidentiality of personal information in our internal rules and regulations.

(5) Physical safety control measures

Personal information shall be disposed of or deleted in a manner that makes it difficult to recover, such as by cutting, dissolving, or physically destroying it.

(6) Technical safety control measures

When storing or transferring personal data outside the company, we will take necessary measures to prevent leakage, such as encryption and setting passwords.

(7) Understanding the external environment

We will take necessary and appropriate measures to safely manage the security of personal data based on our understanding of the systems for protecting personal data in foreign countries where personal data is stored.

(8) Supervision of employees

We will conduct an audit at least once a year to assess the status of employees' handling of personal data, confirm that it is operating in compliance with laws, regulations, and internal rules, etc., and promptly make improvements if any problems are found.

(9) Supervision of contractors

We will conduct an audit at least once a year to assess the contractors' handling of personal data, confirm that they are operating following the contract, laws and regulations, etc., and take necessary measures if any problems are found.

5. Point of Contact for Inquiries

For inquiries regarding this policy or any other matters related to the protection of personal information, please contact us at the e-mail address below.

Please note that we will not respond to any inquiries submitted in any other way (including those made in person at our company).

E-mail address of "Personal Information Reception Office": privacy@jebl.co.jp

*We may revise the "Basic Policy on Handling Personal Information" and "Specific Items Regarding the Handling of Personal Information" posted on our website, etc. to improve the protection of personal information, or in response to changes in laws, regulations, and other norms, so we ask that you periodically check these items.