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## Personal Information Protection Policy

### 1. Basic policy

Vortex Investment Advisors Ltd. ("our company") lawfully and appropriately handles personal information in accordance with the following basic policy.

#### (1) Clarification of purpose of use of personal information

When our company acquires personal information, it clarifies the purpose of use thereof. When our company changes the purpose of use, our company takes appropriate procedures to clarify the purpose of use after the change.

#### (2) Compliance with the purpose of use of personal information

When our company uses personal information, it complies with the scope of the purpose of use clarified.

#### (3) Restrictions on provision to third parties

If our company provides personal information to a third party, it does so through appropriate procedures.

#### (4) Supervision of person to whom entrustment is made

If our company entrusts business involving the handling of personal data to an external person, it supervises the person to ensure that the person to whom entrustment is made implements appropriate security control measures.

#### (5) Ensuring the accuracy of personal information

Our company always strives to ensure that personal information is correct.

#### (6) Implementation of appropriate security control measures

Our company takes appropriate security control measures for personal data and endeavors to prevent accidents such as leakage, loss, or damage.

#### (7) Participation of the principal

Our company respects the ownership of the principal of the personal information and responds in good faith to inquiries, consultations and complaints from the principal.

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**(8) Compliance with laws and regulations, etc. concerning personal information**

Our company complies with laws and regulations, etc. concerning the protection of personal information.

**(9) Continuous efforts to protect personal information**

Our company continues to make efforts to protect personal information and endeavors to respond quickly to social changes such as technological development.

**2. Name, address and name of representative of our company**

Vortex Investment Advisors Ltd.

Iidabashi Grand Bloom 23F, 2-10-2, Fujimi, Chiyoda-ku, Tokyo

Katsuhiko Gomi, Representative Director

**3. Acquisition of personal information**

If our company acquires personal information, it does so in a lawful and fair manner. In the case where our company acquires personal information directly from the principal, the purpose of use is clearly indicated in advance. However, if the purpose of use is clear or otherwise permitted by laws and regulations, etc., the indication of the purpose of use may be omitted.

**4. Purpose of use of personal information**

- (1) Our company uses personal information only within the scope of the purpose of use stated below or within the scope of the purpose of use that is clear from the status of acquisition thereof, and does not use personal information for any other purpose except with consent of the individual concerned or except as permitted by the Act on the Protection of Personal Information, etc.

(2) The purpose of use of personal information of our company is as follows.

- (i) Offering of private placement funds, handling of private placement, secondary offering and sale and purchase of securities, acquisition and sale of investment properties and the management business, settlement business and other businesses related to accounting and tax in connection with the properties under management or business to respond to inquiries and requests for materials from persons who consider to provide investments or loans, in order for our company to conduct businesses such as investment management business, investment advisory and agency business, Type II financial instruments business, real estate investment advisory business, and real estate brokerage business
- (ii) Exercise of rights and performance of obligations of customers and our company, and any incidental business
- (iii) Confirmation at the time of transaction based on the Act on Prevention of Transfer of Criminal Proceeds
- (vi) Research and analysis on market trends, customer trends and product development, etc.
- (v) Recruitment of employees (officers, employees, dispatched employees, seconded employees, etc.) of our company

If the purpose of use of personal information that is different from the purposes of use described in (i) through (v) above is notified to the principal, such purpose of use shall take precedence over the purposes of use described in (i) through (v) above.

## **5. Entrustment of personal information**

If our company entrusts all or part of the handling of personal information, our company exercises necessary and appropriate supervision over the person to whom entrustment is made to prevent leakage, loss, misuse or alteration, etc. of the handled personal information.

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## 6. Joint use of personal information

Personal information may be shared with Vortex Co., Ltd., the parent company of our company, within the scope necessary for achieving the purposes of use listed in 4 above. The items of personal information to be jointly used are as follows.

Name, age, date of birth, address, telephone number (including mobile phone number), facsimile number, sex, e-mail address, company name, job title, work address, work telephone number, occupation, family structure, work history, educational background, records of negotiations, details of request, and other items within the scope necessary to achieve the purpose of use

The address and representative of the joint user are as follows.

Iidabashi Grand Bloom 22F, 2-10-2, Fujimi, Chiyoda-ku, Tokyo  
Fumihiko Miyazawa, Representative Director, Vortex Co., Ltd.

## 7. Management of personal information

Our company endeavors to keep personal information accurate and up to date to the extent necessary to achieve the purpose of use, and to delete personal information when it is no longer necessary to use it. Our company takes necessary and appropriate security control measures to prevent leakage, unauthorized access, loss, damage, falsification, etc. of personal information in its possession. Our company puts in place rules, provide necessary education and training, and conduct appropriate supervision when our company causes employees to handle personal information.

## 8. Reception concerning personal information held

When you request the disclosure, notification of purpose of use, correction, addition or deletion of the personal data held by our company about yourself, please contact the contact desk of our company set out in 8 below. In making a request, you are required to submit an identification document (original or copy of driver's license certificate or residence certificate), etc.

In the case of request for disclosure or notification of purpose of use, 1,000 yen will be charged per application (including registered mail fee for the reply from our company). When you apply, please enclose a fixed money order of 1,000 yen with the application form. We will inform you if the fees are insufficient or are not enclosed, but if you do not make a payment within the prescribed period, we will assume that you have not requested the disclosure or notification of purpose of use.

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## Vortex Investment Advisors Ltd.

Kanto Local Finance Bureau (FIBO) No.3015

Associations in which a Member: The Japan Investment Advisers Association

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### **9. Contact desk for inquiries, etc. about personal information**

Vortex Investment Advisors Ltd. Compliance Department

Iidabashi Grand Bloom 23F, 2-10-2, Fujimi, Chiyoda-ku, Tokyo, 102-0071

Email: [kojinjoho@vortex-ia.com](mailto:kojinjoho@vortex-ia.com)

### **10. Revision of this policy**

Our company may revise this policy as necessary in connection with the requirements of the Act on the Protection of Personal Information or for further improvement of the protection of personal information. In such case, the personal information protection policy after revision will apply from the date of publication of the revised edition.

End

Established on March 26, 2019

Revised on April 12, 2022

Vortex Investment Advisors Ltd.

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