

Basic Policy for Appropriate Handling of Personal Information

April 1, 2022

Hokko Chemical Industry Co., Ltd.

Hokko Chemical Industry Co., Ltd. (“Hokko”) recognizes the importance of protecting personal information, and complies with the Japanese Act on the Protection of Personal Information, related laws and ordinances, guidelines and other relevant regulations, and will fulfill people’s expectations and maintain trust by appropriately managing and using personal information in accordance with the following policy.

1. Purpose of Use of Personal Information

<Personal Information of Customers>

Hokko uses personal information obtained from customers for the following purposes.

- To send products, giveaways and other items as part of Hokko business, and to provide related after-sales service

<Personal Information of Business Partners>

Hokko uses personal information obtained from business partners for the following purposes.

- To execute and manage transactions related to Hokko business and services

<Personal Information of Hokko Shareholders>

Hokko uses personal information obtained from shareholders for the following purposes.

- To exercise rights and perform duties based on the Japanese Companies Act and other laws and ordinances
- To confer various conveniences from Hokko to shareholders
- To implement various activities to facilitate smooth relations with shareholders
- To engage in shareholder management, including creation of shareholder data based on various laws and ordinances
- To execute plans including various types of events and questionnaires

<Personal Information of People Applying for Jobs at Hokko>

Hokko uses personal information obtained when people apply for jobs for the following purposes.

- To screen applicants and perform hiring procedures

2. Security Controls

Hokko takes the following measures to prevent leaks, losses and damages pertaining to personal information and otherwise appropriately manage personal information.

2.1 Establishment of the Basic Policy

- This basic policy has been established to ensure appropriate handling of personal information and to communicate the contact department for questions and processing complaints regarding the handling of personal information.

2.2 Development of Regulations Related to Handling of Personal Information

- Hokko has established personal information handling regulations regarding methods of handling personal information, designation of responsible persons and staff and their responsibilities, and similar matters.

2.3 Organizational Security Controls

- A personal data management ledger has been created, and management information for the personal information database is recorded.
- A person responsible for management of personal information (Person Responsible for Personal Information Management) is designated.
- In the event of learning of an information leak or other incident, or signs of such, the Person Responsible for Personal Information Management takes swift and appropriate action as necessary.
- In the event of a department learning of a violation of laws, ordinances, or internal regulations, or signs of such, regarding the handling of personal information, a framework for reporting and contacting the Person Responsible for Personal Information Management has been created.
- Departments that have obtained personal information periodically perform self-inspections of the status of their handling of personal information, and audits by the internal department in charge of audits are performed.

2.4 Personnel Security Controls

- Periodic trainings for employees on the handling of personal information are conducted.
- Matters relating to confidentiality in terms of personal information are established in the Personal Information Handling Regulations.

2.5 Physical Security Controls

- In areas that manage important information systems, including personal information databases and servers that handle deleted information, access management and the devices that can be brought in are restricted.
- Measures are put in place to prevent information leaks due to theft or loss of devices and electronic media, etc. that handle personal information.
- When disposing of personal information and deleted information, as well as when disposing of devices and electronic media containing recorded personal information and deleted information, they are disposed of using means that do not allow them to be restored.

2.6 Technical Security Controls

- Access controls are implemented, and the staff and scope of personal information that is handled are restricted.
- Systems to protect information systems that handle personal information from unauthorized external access and unauthorized software are implemented.

3. Personal Information Provision to Third Parties

Except in cases stipulated by laws and ordinances, Hokko does not provide personal information to third parties without obtaining the consent of the person in question.

4. Outsourcing Handling of Personal Information

Hokko may outsource handling of personal information to a third party when outsourcing business tasks such as sending announcements to customers and conducting campaigns to a third party. In this case, Hokko performs the necessary and appropriate oversight of the outsourcing partner.

5. Provision to Third Parties in Foreign Countries

Hokko does not foresee the provision of personal information to third parties in foreign countries, but in the event of such provision, actions are taken appropriately in accordance with laws and ordinances.

6. Shared Use of Personal Information

Hokko engages in shared use of personal information as follows.

However, shared use is not performed for <Personal Information of Hokko Shareholders> and <Personal Information of People Applying for Jobs at Hokko>.

(1) Personal Data Items Whose Use Is Shared

- Name
- Name of affiliated company (organization)
- Address
- Telephone number
- Fax number
- Email address

(2) Scope of Parties Engaging in Shared Use

Hokko and Hokko Group companies

Please refer to www.hokkochem.co.jp (in Japanese) for information about Hokko Group companies.

(3) Purpose of Use

- Hokko purpose of use: To provide information about Hokko and Hokko Group companies' products and services to customers and business partners and other purposes
- Hokko Group companies' purpose of use: Same as above

(4) Person with Responsibility Regarding Management of Personal Data Subject to Shared Use

Trade name: Hokko Chemical Industry Co., Ltd.

Address: 1-5-4 Nihonbashi-Honcho, Chuo-ku, Tokyo

Representative: Ken-ichi Sano, President

7. Obtaining, Use and Provision of Information Associated with Cookies and Other Identifiers

Cookies refer to small pieces of data in a text file sent from a website and saved on a web browser when a website is viewed. Hokko and the Hokko website do not use cookies or other similar technologies.

8. Requests for Disclosure of Stored Personal Data, Etc.

When there is a request to disclose, correct, add, delete, suspend or eliminate use, or suspend provision to third parties of stored personal data from the person in question or their representative, Hokko responds to the request without delay and in accordance with laws and ordinances.

In addition, please inquire separately to the following department regarding fees pertaining to the aforementioned requests, the format and submission method of written requests to be submitted to Hokko by the person in question or their representative when making a request, and the method of verifying the identity of the person in question or their representative.

General Affairs Department, Hokko Chemical Industry Co., Ltd.
Phone: +81-3-3279-5151 Fax: +81-3-3279-5195
Website: www.hokkochem.co.jp/english

9. Contact for Questions and Processing Complaints

Please contact the following department for questions and complaints regarding the handling of personal information at Hokko.

General Affairs Department, Hokko Chemical Industry Co., Ltd.
Phone: +81-3-3279-5151 Fax: +81-3-3279-5195
Website: www.hokkochem.co.jp/english

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Hokko Chemical Industry Co., Ltd.
1-5-4 Nihonbashi-Honcho, Chuo-ku, Tokyo
Ken-ichi Sano, President