



# IAM JP Privacy Notice Summary

For webpage publication only

Date: January 2024

# Declaration of Personal Information Protection

IMPAX Asset Management K.K.  
CEO Yasumitsu Iwasa

The Company will formulate and publish the following Personal Information Protection Declaration and thoroughly comply with it.

## 1. Compliance with Relevant Laws and Regulations

The Company will comply with the "Act on the Protection of Personal Information" and other related laws and regulations concerning the protection of personal information, the guidelines of the competent minister, the guidelines of authorized personal information protection organizations, and this declaration of personal information protection.

## 2. Purpose of use of personal information

Personal information will be acquired, used, and provided only to the extent necessary for the Company's legitimate business execution, employment of employees, and personnel management related to the following business contents, and personal information will not be handled beyond the scope necessary to achieve the specified purpose of use (use for purposes other than those specified). In addition, we will take measures to prevent unintended use. The Company will not handle your Individual Number.

- (1) Investment advisory and agency business and related operations
- (2) Other operations that can be operated by financial instruments business operators and operations incidental thereto (including operations that will be approved in the future) )

The purpose of use of personal information of customers, business partners, etc. handled by the Company is as follows.

- (1) To solicit financial instrument transactions handled by the Company
- (2) To solicit and sell financial instruments transaction contracts of the Company or its affiliates, and to provide service guidance
- (3) To confirm the identity of the customer or his/her agent
- (4) To perform clerical work related to transactions with customers and business partners
- (5) To exercise rights and fulfill obligations based on contracts with customers and laws, etc.
- (6) To contact job applicants and manage our recruitment operations (personal information obtained from job applicants is limited to the relevant purpose) )
- (7) To respond to inquiries and consultations, and to resolve complaints or disputes
- (8) For joint use described in Section 3 below
- (9) In addition, to appropriately and smoothly carry out transactions with customers and business partners

## 3. Joint Use of Personal Information

The Company may jointly use customers' personal information in accordance with the following.

In addition, if joint use is restricted by the Financial Instruments and Exchange Act or other laws and regulations, joint use will not be carried out except when permitted by laws and regulations, such as when consent is obtained from the customer.

- (1) Items of personal information to be shared
  - Name, address, telephone number, e-mail address, date of birth, etc.
- (2) Scope of joint users
  - Companies belonging to the Impax Group (For the scope of applicable companies, please check [Please enter information that shows the scope such as URL].) )
- (3) Purpose of joint use
  - For integrated risk management, compliance, business management, and other internal controls of the Impax Group
  - To provide comprehensive services as the INPAX Group
  - In addition to the above, for the purposes listed in 2 above
- (4) Entity responsible for the management of personal data to be shared  
〒100-0005 1-8-3 Marunouchi, Chiyoda-ku, Tokyo Marunouchi Trust Tower Main Building  
20F  
IMPAX Asset Management K.K.  
CEO Yasumitsu Iwasa

## 4. Security Control Measures

We will endeavor to keep your personal information accurate and up-to-date.

In order to prevent leakage, etc. of customers' personal information, the Company will implement necessary and appropriate safety management measures and appropriately supervise officers and employees and contractors.

### (1) Formulation of Basic Policy

The Company has formulated and published this "Declaration of Personal Information Protection" as a basic policy for ensuring the proper handling of personal information.

### (2) Establishment of rules regarding the handling of personal information

The Company has established internal rules that stipulate the method of handling personal information, the person in charge, the person in charge, and their duties.

### (3) Organizational Security Control Measures

The Company has appointed a person responsible for the handling of personal information, and has clarified the officers and employees who handle personal information and the scope of personal information handled by such officers and employees.

### (4) Human Safety Management Measures

The Company ensures that all officers and employees maintain the confidentiality of the handling of personal information, and regularly conducts training on the protection of personal information.

### (5) Physical Security Control Measures

The Company has implemented measures to prevent unauthorized persons from viewing personal information.

### (6) Technical Security Control Measures

The Company implements access control to limit the scope of departments, persons in charge, and personal information handled.

(7) Understanding the external environment

When handling personal information in a foreign country, we will implement security management measures based on an understanding of the system for the protection of personal information in that country.

## 5. Matters concerning retained personal data

- (1) Name, address, and name of representative of the Company  
〒100-0005  
1-8-3 Marunouchi, Chiyoda-ku, Tokyo Marunouchi Trust Tower Main Building 20F  
IMPAX Asset Management K.K.  
CEO Yasumitsu Iwasa
- (2) Controller of personal information  
Administrator Job Title: Compliance Officer  
Contact: 03-xxxx-xxxx
- (3) Purpose of use of retained personal data  
Please refer to item 2 above.
- (4) Procedures for responding to requests for disclosure, etc. of retained personal data  
Please refer to item 6 below.
- (5) Measures taken for the safe management of retained personal data  
4. Please refer to .
- (6) Contact for complaints regarding the handling of retained personal data  
Please refer to item 7 below.
- (7) Authorized Personal Information Protection Organization  
Please refer to item 8 below.

## 6. Procedures for responding to requests for disclosure, etc. of retained personal data

Requests for notification of purpose of use, disclosure, correction, addition or deletion of content, suspension of use, erasure, suspension of provision to third parties, and disclosure of records of provision to third parties from individuals and agents (hereinafter referred to as "requests for disclosure, etc.") regarding retained personal data held by the Company (hereinafter referred to as "requests for disclosure, etc."). We will respond as follows. For matters not stipulated below, laws and applicable guidelines (hereinafter referred to as "laws and regulations, etc.") regarding the disclosure, etc. of retained personal data shall be subject to the disclosure, etc. In accordance with the provisions of.

(1) Request procedure (only written requests will be accepted). The Company will confirm the identity of the person by presenting identification documents, etc., and will respond in accordance with laws and regulations. In the case of a request by a representative, in addition to the above, we will check the document certifying the right of representation and the agent's own identification documents. The Company will not charge fees, etc. for requests for disclosure, etc., except for an amount equivalent to actual expenses.

(2) Contact for requests for disclosure, etc. of retained personal data

For requests for disclosure, etc. of retained personal data, please contact the Company's following contact point in writing.

18F Toranomon Hills Mori Tower  
1-23-1 Toranomon, Minato-ku, Tokyo, 105-6318  
Japan  
Contact: Compliance Officer  
TEL : 03-4567 3809

## 7. Questions, comments and complaints

The Company will endeavor to respond promptly and sincerely to questions, opinions, complaints, etc. regarding personal information received from customers. If you have any questions, comments, complaints, etc., please contact us at the following address.

18F Toranomon Hills Mori Tower  
1-23-1 Toranomon, Minato-ku, Tokyo, 105-6318  
Japan  
Contact: Compliance Officer  
TEL : 03-4567 3809  
Reception hours: 9 a.m. - 5 p.m. (excluding Saturdays, Sundays, national holidays, and year-end and New Year holidays) )

## 8. Authorized Personal Information Protection Organization

The Company is a member of the Japan Investment Advisers Association, which is an authorized personal information protection organization accredited by the Personal Information Protection Commission.

The Association accepts complaints and consultations regarding the handling of personal information of its members.

### Complaints and Consultation Desk

Japan Investment Advisers Association Secretariat Complaint Consultation Office (in charge of personal information)  
Address: 〒103-0025 Tokyo Securities Kaikan 7F, 1-5-8 Kayabacho Japan, Chuo-ku, Tokyo  
Tel: 03-3663-0505  
Reception hours: Monday ~ Friday (excluding public holidays)

## Policy Control:

|                           |                              |
|---------------------------|------------------------------|
| POLICY OWNER:             | Miwa Takano                  |
| ADDITIONAL REVIEWERS:     | Elise Bailey, Michael Tyrell |
| EFFECTIVE DATES:          | December 2023                |
| NEXT REVIEW DATE:         | January 2025                 |
| MODIFIED DATE:            | January 2024                 |
| SUPPORTING DOCUMENTATION: | N/A                          |