

Personal Information Protection Policy (Privacy Policy)

Seven Seas Advisors Co. Ltd. (hereinafter “our Company”) recognizes that the protection and management of personal information is an important responsibility of our Company. In the management of our business, our Company shall comply with the “Act on the Protection of Personal Information” (Law No. 57 of 2003, hereinafter referred to as the “Personal Information Protection Act”) and related laws and regulations as well as the various rules of voluntary regulatory organizations to which we belong. We will also handle any comments or complaints received regarding the handling of personal information in good faith and in a proactive manner.

The details of the Personal Information Protection Policy of our Company are described below. Directors and employees of our Company shall strive to handle and manage personal information appropriately in accordance with the policy.

1. Obtaining and management of information; Purpose of use

Our Company shall use appropriate methods to obtain and collect personal information. Our Company shall handle personal information within the scope necessary to achieve the purpose of use listed below, except in cases where we have obtained consent from the information owner or when applicable laws or regulations call for such information to be handled outside such scope. In these exceptional circumstances we shall strictly manage such information.

Personal information obtained by our Company shall be used only for the purposes listed below, and except where permitted by applicable laws or regulations etc., we shall not use such information for any other purpose without obtaining the consent of the information owner (or the consent of the requesting customer based on consent of the of the information owner).

Personal information obtained by our Company shall be used to conduct the businesses listed below within the scope of purposes of use also listed below. If the purposes of use are changed, such changes will be disclosed in a manner easily accessible by the public such as by disclosure on our website.

(Businesses)

- (1) Financial instruments business (Investment Management Business, Investment Advisory and Agency business, Type II Financial Instruments Business)
- (2) Real estate specified joint enterprise business
- (3) Comprehensive real estate investment advisory business
- (4) Real estate business
- (5) In addition to the above, businesses permitted to be conducted by financial instruments business operators (including businesses etc. which may be conducted in the future).

Personal Information Protection Policy (Privacy Policy)

(Source of Information and Method of Acquisition)

- (1) Information is directly provided by the information owner, such as contracts etc., and documents etc. written by or provided by the information owner.
- (2) Personal information is provided by third parties to which business services have been commissioned etc. (for example, the case where personal information about a lessee entering fund-held property and written on the lease agreement is obtained.)

(Purpose of Use)

- (1) To introduce or solicit our Company and our Company's business and products, transactions, and services provided by our Company.
- (2) To provide discretionary investment and investment advisory services, brokerage services for securities, private placement service for securities, dealing services in private placement for securities and other services.
- (3) To review properties etc. targeted for investments, advice, trading, brokerage and management etc.
- (4) To report on details of investments, advice and transactions and other reports.
- (5) To verify the identity of parties and make other confirmations upon entering into transactions, in relation to our Company's products, transactions and services and to report or file based on the Act on Prevention of Transfer of Criminal Proceeds.
- (6) To report or file based on the Act concerning Exceptions to the Income Tax Act, Corporation Tax Act and Regional Tax Act in Order to Enforce Tax Treaties
- (7) To manage shareholders, customers, and employees of our Company.
- (8) In addition to the above, to perform clerical work related to contracts and transactions.
- (9) In addition to the above, to conduct our business such as making necessary contacts, sending notices, and communicating in an appropriate and smooth manner.
- (10) To disclose or provide personal information or personal data to third parties to the extent necessary to achieve the above stated purposes. (Please refer to 2 and 3 below.)

(Information to be used)

- (1) Identifying Information of the information owner (name, address, telephone number, gender, date of birth, employer, condition of income, etc.)
- (2) Information related to receivables (date of contract, principle amount of claim, redemption value, past history of performance under guarantees, past history of delinquencies, etc.)
- (3) Information related to real estate (name of contract parties, contract date, contract

Personal Information Protection Policy (Privacy Policy)

amount, and performance conditions etc. related to lease agreements, sale and purchase agreements, loan agreements, and collateral agreements.)

- (4) Information which supplements, or relates to, the above (real estate appraisal, valuation of owned assets, etc.)

The list of businesses, purposes of use, and information to be used are examples, and the lists are not exhaustive.

2. Provision of Personal Data to Third Parties

Personal data obtained by our Company may in some cases be provided to third parties in writing, by mail correspondence, by phone, by facsimile transfer, by e-mail, or by other electronic media or advertisement media etc., within the scope necessary to achieve the purpose of use.

Even in such case, provision of personal information of an information owner to third parties shall be suspended if so requested by the said information owner. Please contact the “6. Complaints and Consultation Desk (of our Company)” described below. However, this excludes instances where consent has been obtained from the information owner regarding individual cases of providing information to third parties.

Furthermore, in the case provided for under Article 23, Paragraphs 1 and 4 of the Personal Information Protection Act, personal information may be provided to third parties.

3. Entrustment of Personal Data to Third Parties

Personal data obtained by our Company may be disclosed to third parties who have been commissioned to provide the business services described below, in writing, through mail correspondences, over the phone, by fax, by e-mail or other electronic media, to the extent necessary to achieve the purposes of use. In such case, our Company shall enter into necessary contracts with the relevant third part, and take other necessary measures required under applicable laws and regulations.

(Contents of business services which may be commissioned to third parties)

- (1) Clerical work related to introduction and solicitation of our Company’s business and our Company’s products and services
- (2) Clerical work related to our discretionary investment and investment advisory business and other services.
- (3) Clerical work related to reviewing properties etc. targeted for investment, advice, trading, and management etc.
- (4) Clerical work related to reporting of investments, transaction contents, and other

Personal Information Protection Policy (Privacy Policy)

reporting.

- (5) Clerical work related to the verification of the identity of parties and other confirmations upon entering into transactions, in relation to our products and services.
- (6) Clerical work related to the management of our shareholders, customers, and employees.
- (7) In addition to the above, clerical work related to the performance of administrative work related to contracts and transactions.

4. Shared Usage of Personal Data

With respect to the shared usage of information permitted under Article 23 Paragraph 4 Item 3 of the Personal Information Protection Act, our Company may share usage within the scope described below.

- (1) Items of personal data to be shared for use.
Name, address, contact information, condition of property, and all other personal data held by our Company.
- (2) Scope of persons with whom personal data will be shared for use.
Our Company's subsidiaries, associated and affiliated companies.
Seven Seas Co. Ltd's subsidiaries, associated and affiliated companies.
- (3) Purposes of use of persons sharing such use
To solicit, execute, and internally manage products and services
- (4) Person who holds responsibility for administering the personal data to be shared for use.
Seven Seas Advisors Co. Ltd.

5. Disclosure, revision, and deletion of stored personal data, and procedures for discontinuance

a. Disclosure, revision and deletion

If you wish to receive disclosure of personal data, we shall do so after confirming that the requesting person is the information owner, unless there is a special reason not to do so. Furthermore, if information held by us is inaccurate or if you desire to delete the data, we shall either correct the data or delete the data unless there is a special reason not to do so.

b. Discontinuance

If you do not desire your personal data to be used, please contact our Company. We will discontinue using the data unless there is a special reason not to do so.

6. Inquiries related to the handling of personal information (including requests for disclosure,

Personal Information Protection Policy (Privacy Policy)

revision, discontinuance of use) and the Complaints and Consultation Desk.

With respect to requests received for disclosure, revision, or discontinuance of use of personal information held by our Company, after identifying the identity of the requesting person, we shall promptly respond to such requests pursuant to applicable laws and regulations etc. unless there is a special reason not to do so.

Regarding the method for making requests for disclosure, revision, or discontinuance of use, based on the procedures prescribed by our Company, such requests shall in principle be accepted in writing by mail correspondence, and we may request that any actual costs (mailing costs etc.) necessary for making the request for such disclosure, revision, or discontinuance of use be borne by the requesting person.

Furthermore, if there is a reason that we cannot respond to your request for disclosure, revision, or discontinuance of use etc. in whole or in part, we shall notify you in writing of the fact and the reason therefor.

Below is our Company's contact details for receiving inquiries etc. related to personal information.

【Complaints and Consultation Desk】

Address: 18th Floor, Fukoku Seimei Building, 2-2-2 Uchisaiwai-cho,
Chiyoda-ku, Tokyo, JAPAN 100-0011

Division in Charge: Corporate Planning Division

Telephone: +81-3-3539-1490

Reception hours: Mondays through Fridays (excluding Holidays)
10am -5pm.(Tokyo Time)

Furthermore, our Company is a member of the Japan Investment Advisers Association (a general incorporated association) which is an authorized personal information protection organization, and the Association is also available to receive complaints and consultations regarding the handling of personal information by member firms including our Company.

【Complaints and Consultation Desk】

Name: Administration office of the Japan Investment Advisers
Association (a general incorporated association)
Complaints and Consultation Room (person in charge of
personal information)

Telephone: +81-3-3663-0505

Reception hours: Mondays through Fridays (excluding Holidays)
9 am to 5 pm. (Tokyo Time)

End