

Privacy Policy – Recruiting related Personal Data

abrdrn Japan Limited
Ken Yajima: Chief Executive Officer and Representative Director
Otemachi Financial City Grand Cube
1-9-2 Otemachi, Chiyoda-ku, Tokyo, 100-0004 Japan

abrdrn Japan Limited (hereinafter referred to as "the Company", "we") strives to tightly control personal information of applicants which we obtain, keep or use for the recruitment purpose (hereinafter referred to as the "Personal Information") and keep accuracy and confidentiality of the Personal Information, in accordance with the Act on the Protection of Personal Information (hereinafter referred to as the "Personal Information Protection Act"), this Declaration of Personal Information Protection as well as the applicable laws and regulations and other guidelines, etc.

1. Collection and Use of Personal Information

We may, by proper and lawful means, collect and use name, gender, birth date, nationality, address, phone number and other contact details, e-mail address, income, job history and education, business-related qualification, medical history, name and status of family members and other Personal Information necessary for recruitment, for the purposes set forth in 2. below.

We shall not obtain those information falling under the "Sensitive Personal Information (as specified in paragraph 3, Article 2 of the Personal Information Protection Act)", unless prior consent of the relevant individual is obtained or otherwise permitted by the laws and regulations.

<Sensitive Personal Information>

- Meaning the Personal Information that contains race, creed, social status, medical history and criminal history of the relevant individual, the fact that the relevant individual has suffered from any crimes, and other descriptions specified by the cabinet order as those requiring special care in handling so as not to cause unfair discrimination, prejudice or other disadvantages to the relevant individual (e.g. the fact that as a result of malfunction of the body and mind or medical check, doctors, etc. have made guidance, examination or prescription, that procedures have been taken for a criminal case, and that procedures have been taken for a juvenile protection case).

2. Purpose of Use of Personal Information

We shall use the collected Personal Information to the extent necessary to achieve the following purposes, and shall not use them for any other purposes:

- to make judgment of recruitment and administrative communication necessary for such purpose; or
- to implement other recruitment activities properly and smoothly.

When an individual is determined to be hired and becomes an employee, the purpose of use of the Personal Information collected for recruitment activities shall be subject to the

separately provided "Declaration of Personal Information Protection in Employment Management".

3. Security Management Measures of Personal Information

We shall strive to keep the Personal Information accurate and most updated. To prevent any leakage, loss or damage of the Personal Information, we shall establish internal regulations for protection of the Personal Information and develop a proper internal system by reviewing and revising such regulations from time to time, as well as implement strict security management measures.

Concerning the detailed contents of our security management measures, please submit such request to our contact point listed below.

4. Joint use of Personal Information

We may jointly use the Personal Information with the following joint users, pursuant to the provisions of item 3, paragraph 5, Article 27 of the Personal Information Protection Act as follows:

- **Personal data items to be jointly used**
Name, gender, birth date, nationality, address, phone number and other contact details, e-mail address, income, job history and education, business-related qualification, medical history, name and status of family members and other Personal Information necessary for recruitment
- **Range of joint users**
We and domestic and overseas affiliates as set forth in its annual report, etc. of abrdrn plc, which is the holding company of abrdrn Group which the Company belongs to, are joint users.
We may jointly use the Personal Information with the above affiliates to the extent permitted by the laws and regulations.
- **Purpose of use by joint users**
 - (1) to make judgment of recruitment and administrative communication necessary for such purpose; or
 - (2) to implement other recruitment activities properly and smoothly.
- **Name and address of the party responsible for management of the personal data and the name of the representative person of the Company :** Please refer to the above information.

5. Provision of Personal Information to a Third Party

We shall not provide the Personal Information to any third party except in the following cases:

- where prior consent is obtained from the relevant individual;
- where required by the laws and regulations;
- where necessary to protect a human life, body or property and it is difficult to obtain consent of the relevant individual;
- where particularly necessary to improve public health or promote sound development of children and it is difficult to obtain consent of the relevant individual;
- where necessary to cooperate with any national government organization or local government or a person delegated thereby in performing operations specified by the laws and regulations, and obtaining consent of the relevant individual is likely to interfere with the performance of such operations; or
- other cases permitted by the Personal Information Protection Act.

When we provide or receive the Personal Information to or from a third party, we will maintain and preserve the records on items related to such provision (hereinafter collectively referred to as “records on third-party provision”), pursuant to laws and regulations. The procedure for requesting the provision of information shall be in accordance with the procedure in the Section 8 below, regarding the “records on a third-party provision”, “personal information protection regime in the foreign country where a third party is located to which personal data is provided”, “security management measures taken by the third-party in the foreign country” and “measures taken by the Company toward such third-party in the foreign country”.

6. Request for Disclosure and Correction, etc. of Retained Personal Data

We accept any request for notification of the purpose of use, disclosure, correction/addition/deletion, suspension/elimination of use, and suspension of provision to a third party with respect to personal data which we retain, pursuant to the Personal Information Protection Act. Applicants may request us any time for disclosure and correction of their own Personal Information in accordance with procedures that we specify. For details please contact with us as provided in 8. below.

You can choose the disclosure method from the method of providing electromagnetic records, the method of delivering paper-based documents, or any other methods specified by the Company. In the case where it is difficult to disclose by such method, where legally accepted or in the similar cases, we may decline the requests or our response may not be in accordance with the requests. You or your proxy shall be informed of our decision and the reasons in such case.

7. Revision of This Declaration of Personal Information Protection

To ensure proper safety control of the Personal Information, we shall review and revise this Declaration of Personal Information Protection from time to time. Any revision shall be notified through our website or in other appropriate and clear manner.

8. Inquiry on Handling of Personal Information

We accept any complaints and other inquiries from applicants with respect to handling of the Personal Information. The contact details are as follows:

abrdrn Japan Limited
Otemachi Financial City Grand Cube, 1-9-2 Otemachi, Chiyoda-ku, Tokyo 100-0004
Phone: 03-4578-2264
Reception hours: 9:00 - 17:00 (excluding Saturday, Sunday, holidays, year-end and New Year holidays)

9. Complaints and Consultation Desk at The Investment Trusts Association, Japan and Japan Investment Advisers Association

We are a member of The Investment Trusts Association, Japan and Japan Investment Advisers Association. Both associations accept complaints and consultation requests with respect to handling of the Personal Information by their respective members.

【Complaints and Consultation Desk】

The Investment Trusts Association, Japan
<<http://www.toushin.or.jp/>>

Tokyo Stock Exchange Building 6F, 2-1 Nihombashi Kabutocho, Chuo-ku, Tokyo
103-0026

Phone: 03-5614-8440 (Direct)

Reception Days: Monday - Friday (excluding holidays)

Reception Hours: 9:00 - 11:30, 12:30 - 17:00

**Japan Investment Advisers Association, Secretariat, Complaints and
Consultation Desk (in charge of Personal Information)**

<http://www.jiaa.or.jp/>

The Tokyo Shoken Building 7F, 1-5-8 Nihonbashi Kayabacho, Chuo-ku, Tokyo
103-0025

Phone: 03-3663-0505

Reception Hours: Monday - Friday (excluding holidays) 9:00 am - 17:00 pm

Established as of 1 April 2005
Revised as of 27 August 2008
Revised as of 1 July 2009
Revised as of 16 November 2009
Revised as of 22 October 2012
Revised as of 4 January 2013
Revised as of 1 June 2014
Revised as of 1 October 2015
Revised as of 1 July 2017
Revised as of 16 August 2017
Revised as of 13 February 2018
Revised as of September 27 2021
Revised as of 1 April 2022

abrdn Japan Limited