

# Privacy Policy

Organization for Housing Warranty (hereinafter referred to as "the Company") shall recognize the importance of protecting personal information the Company obtains in the course of its business, properly handle the personal information in compliance with the Personal Information Protection Act and other related laws and regulations and take appropriate measures for security management.

The Company will provide the employees exhaustive education and guidance in order to ensure the proper handling of personal information.

In addition, the Company will accordingly review and improve the measures regarding the handling and security management of personal information.

## 1. Acquisition of Personal Information

The Company will acquire personal information through appropriate and fair means within the scope necessary for conducting our business.

## 2. Purpose of Use of Personal Information

(1) The Company will use personal information to achieve the following business purposes.

- A. Work listed in each item of Article 19 of the Act on Assurance of Performance of Specified Housing Defect Warranty Liability (Act No. 66 of 2007) (hereinafter referred to as the "Housing Defect Warranty Implementation Act");
- B. Operation of the housing performance warranty system, the housing completion warranty system and the ground and foundations warranty system;
- C. Duties related to check, inspection and investigation of houses;
- D. Provision of non-life insurance and related services as an agency for non-life insurance companies entrusted by the Company;
- E. Management of various services operated by the Company;
- F. Responding to opinions, requests, etc. received from customers;
- G. Provision of information on various events, campaigns, seminars and others;
- H. Implementation of questionnaires regarding products and services provided by the Company;
- I. Other business ancillary to the items above.

(2) The Company may handle the customer's personal information beyond the scope necessary to achieve the purpose of use listed in (1) without the consent of the relevant person in the following cases:

- A. When the provision of personal information is based on laws and regulations;
- B. When there is a need to protect the life, body or property of a person and it is difficult to obtain the consent of the relevant person;
- C. When it is particularly necessary to improve public health or to contribute to the sound upbringing of children and it is difficult to obtain the customer's consent;
- D. When it is necessary to cooperate with a government organization, local government body or individual entrusted by such entities in performing duties stipulated by laws and regulations and there is a risk that obtaining the consent of the relevant person would interfere with the performance of said duties;
- E. When personal data is provided to an academic research institution, etc. (meaning a university or other institution or group for the purpose of academic research, or a person belonging to them; the same shall apply hereinafter), and when it is necessary for the academic research institution, etc. to handle the personal data for the purpose of academic research (hereinafter referred to as "academic research purpose"). (This excludes cases where there is a risk of unjustly infringing on the rights and interests of individuals including cases where the purpose of handling the personal data is partly for academic research purpose.)

### **3. Security Management**

The Company will take the following necessary measures to prevent illicit access to, leakage, loss, damage, tampering, etc. of personal information and manage personal information appropriately.

In addition, we will strive to protect personal information appropriately by complying with relevant laws and internal regulations regarding the handling of personal information.

- A. Formulation of basic policies for implementing measures stipulated by laws and regulations, etc. for the proper handling of personal information and personal data;
- B. Personnel security control measures such as education and enlightenment for employees regarding the handling of personal data;
- C. Physical security control measures such as implementation of access management system and restrictions on taking out or appropriate management of the equipment and others that handle personal data in order to prevent theft/loss of the those equipment;
- D. Technical security control measures such as introduction of systems to protect from unauthorized access from the outside or unauthorized software to information systems that handle personal data.

#### **4. Provision to Third Parties**

- (1) Except in the following circumstances, the Company will not provide personal data to third parties, without the prior consent of the relevant person.
- A. When the provision of personal data is based on laws and regulations;
  - B. When there is a need to protect the life, body or property of a person and it is difficult to obtain the consent of the relevant person;
  - C. When it is particularly necessary to improve public health or to contribute to the sound upbringing of children, and it is difficult to obtain the customer's consent;
  - D. When it is necessary to cooperate with a government organization, local government body, or an individual entrusted by such entities in performing duties stipulated by laws and regulations and there is a risk that obtaining the consent of the relevant person would interfere with the performance of said duties;
  - E. When the third party is an academic research institution, etc., and the third party needs to handle the personal data for academic research purposes. (This excludes cases where there is a risk of unjustly infringing on the rights and interests of individuals including cases where the purpose of handling the personal data is partly for academic research purpose.)
- (2) The Company may provide a customer's personal data to a third party without obtaining the customer's consent based on an opt-out method that conforms to the provisions of Article 27, Paragraph 2 of the Personal Information Protection Law. In the event that such provision is made, the contents thereof will be released, and if there is a request from the customer, such provision will be discontinued.

#### **5. Provision to Subcontractors**

In order to achieve the purpose of using personal information, the Company may provide customers' personal data to subcontractors such as insurance agents, on-site inspectors, information processing companies and investigation companies, appraisers and attorneys involved in damage investigation. However, the personal data provided will be limited to the extent necessary to achieve the purpose of use, and the Company will ensure that the subcontractor manages the personal data appropriately.

#### **6. Creation of Pseudonymous Processed Information**

The Company may process the acquired personal information and create pseudonymized

information. When creating such processed information, the Company will comply with the standards of the Personal Information Protection Commission and implement necessary safety control measures for its handling. In addition, except in cases based on laws and regulations, the Company will not provide a third party the personal data used to create pseudonymous processed information.

## **7. Creation and Provision of Anonymously Processed Information**

The Company may process the acquired personal information, create anonymous information and provide it to a third party. When creating such processed information, the Company will comply with the standards of the Personal Information Protection Commission and implement necessary safety control measures for its handling. When providing the processed anonymous information to a third party, its contents will be disclosed.

## **8. Shared Use of Personal Data**

The Company will share use of the personal data in the manner described below.

(1) Items to be shared

Attached items related to insurance contracts stipulated in Article 19, item 1 and 2 of "Housing Defect Warranty Implementation Act" (Act No. 66 of 2007)

(2) Scope of users

Organization for Housing Warranty, Ltd.

Center for Housing Renovation and Dispute Settlement Support

(3) Purpose of use by users

Research and study on special housing dispute resolution and prevention of occurrence of housing defects based on the Housing Defect Warranty Implementation System and examination/review of the System

(4) Chief privacy officer

Organization for Housing Warranty, Ltd.

Representative: Tomiyoshi Ogawa

Address: Shibakoen 3-chome Building, 3-1-38 Shibakoen, Minato-ku, Tokyo

## 9. Requests for Disclosure of Personal Information, etc.

When the Company receives a request for disclosure of retained personal data or records provided by a third party, the prescribed form will be sent by fax or e-mail. The form should be filled in, and the request for disclosure will be made by submission of the form. There are additional costs involved with the above request.

## 10. Correction etc. of Personal Information

If any of the contents of the personal data retained by the Company were found out to be different from the actual facts, the Company will take procedures for correction, addition, deletion, cessation of use or suspension of provision to third parties.

## 11. Customer Support

For the above procedures, requests, and other inquiries and complaints regarding the handling of personal information by the Company, please contact the Call Center of the CS Promotion Section, the Operations Department of the Company.

Organization for Housing Warranty, Ltd.

<b>Representative</b>	Tomiyoshi Ogawa
<b>Address</b>	Shibakoen 3-chome Building, 3-1-38 Shibakoen, Minato-ku, Tokyo 105-0011
<b>Contact</b>	Call Center of the CS Promotion Section, the Operations Department
<b>Phone</b>	03-6435-8871
<b>FAX</b>	03-3432-0572
<b>Address</b>	<a href="mailto:callcenter@mamoris.jp">callcenter@mamoris.jp</a>

※ 0900~1700 Monday through Friday (Except New Year holidays)