## Handling of Personal Information

Tokyo Water Co., Ltd.
Shinjuku i-LAND Tower 37F, Nishi-Shinjuku 6-5-1, Shinjuku-ku, Tokyo, Japan
President Kazusa Noda

## Acquisition, Purpose of Use, and Provision of Personal Information to Third Parties

 Tokyo Water will collect and use personal information only to the extent necessary to achieve the following purposes in relation to our business activities, which are primarily consulting, construction, and operation of systems, business operation services, and water facility management and maintenance services.

Furthermore, when we ask individuals to provide personal information, we will clearly state the purpose of acquisition and use of such information in advance and shall obtain their consent.

- Public utility charges calculation services, payroll calculation services, and other information system consulting services, information systems, computer network system construction and operation, information processing services, business operation services, water facility management and maintenance services
- 2) Management of contractual relationships with business partners
- 3) Human resources and attendance management for employees, etc.
- 4) Employment screening
- 5) Response to inquiries
- 2. We will not provide the individual's personal information to a third party without their prior consent. However, this does not apply in any of the following cases:
  - 1) When required by laws and regulations;
  - 2) When it is necessary to protect a person's life, body, or property, and it is difficult to obtain the individual's consent;
  - 3) When it is particularly necessary for the improvement of public health or the promotion of healthy child development, and it is difficult to obtain the consent of the individual;

- 4) When it is necessary to cooperate with a national government agency, local government, or a party outsourced by them in carrying out duties prescribed by laws and regulations, and obtaining the individual's consent may hinder the performance of said duties;
- 5) When outsourcing the handling of personal information to the extent necessary to achieve the purpose of acquisition and use.
  Note that when outsourcing the handling of personal information, we will select a company that
  - Note that when outsourcing the handling of personal information, we will select a company that meets the standards for protecting personal information and oversee it to ensure that such information is handled appropriately;
- 6) When personal information is provided in connection with business succession due to a merger or other reasons; or
- 7) When the third party is an academic research institution, etc., and the third party needs to handle personal data for academic research purposes.

# Requests for Disclosure of Personal Information or Filing Complaints

If the individual wishes to request notification of the purpose of use, disclosure, correction, addition, partial deletion, suspension of use, complete erasure, suspension of provision to a third party, or disclosure of records of personal information held by our company, or if the individual wishes to file a complaint, we ask that they or their representative apply in accordance with the prescribed procedures.

- 1. Personal data held that is not subject to requests for disclosure, etc.
  - 1) When the information does not fall under "retained personal data" We cannot respond to requests for personal information that we do not have the authority to disclose, such as personal data that we handle at the request of a third party.
    - For example, we ask that you contact\_the Customer Center at the Tokyo Metropolitan Government Bureau of Waterworks regarding water contract details, application details, fees, leak repairs, and personal information related to waterworks services.
  - 2) When not subject to disclosure, etc., pursuant to Article 33 of the Act on the Protection of Personal

#### Information

- When disclosure, etc. is likely to harm the life, body, property, or other rights and interests of the individual or a third party
- When disclosure, etc. is likely to significantly impede the proper execution of our business
- When disclosure, etc. would violate other laws and regulations

### 2. Procedures for requesting disclosure, etc.

Please download and fill out the "Request form for disclosure, etc." listed in Section 3., enclose the "Personal identification documents" listed in Section 4. and "Disclosure request fee" listed in Section 5., and mail it to the address below.

We also accept procedures where you submit the "Request form for disclosure, etc." listed in Section 3. in person. In that case, we will check the originals of the "Personal identification documents" listed in Section 4.

General Affairs Department, General Affairs Division, Management Headquarters Tokyo Water Co., Ltd.

Shinjuku i-LAND Tower 37F, Nishi-Shinjuku 6-5-1, Shinjuku-ku, Tokyo, Japan

#### 3. Request form for disclosure, etc.

Please download the request form from the "Form: Request for Disclosure, etc. of Retained Personal Data" attached to the Handling of Personal Information.

#### 4. Personal identification documents

- 1) Procedures to be carried out by the individual in question
  - One copy of either the individual's driver's license, Individual Number Card, passport, or other document whose photograph can be used to verify their identity (a valid document that contains the name and address of the individual requesting disclosure, etc.)
  - If you are submitting documents other than the above official documents with your photograph,
    please provide copies of any two documents among your residence certificate, various health
    insurance cards, certificate of the family register, and extract of the certificate of the family register
    (created within 30 days prior to the date of the request for disclosure, etc.)
  - If you bring the above documents with you, we will check the originals.

- 2) Procedures by a representative of the individual

  If a representative is carrying out the procedures for the individual, please submit the following documents in addition to the documents for the procedures carried out by the individual.
  - Power of attorney indicating the person acting on your behalf (any form is acceptable, but please include the name, address, signature, and seal of the individual, the name, address, date of delegation of the representative, and the fact that the request for disclosure, etc. is being delegated to the representative).
  - In the case of a legal representative (parent), one copy of either the certificate of the family register or an extract of the certificate of the family register.
  - In the case of a legal representative (guardian of an adult), one copy of either the certificate of registered matters or the certificate from the family court certifying adult guardianship.
  - In the case of a legal representative (guardian of a minor), one copy of either the certificate from the family court (judgment document for commencement of guardianship) certifying the guardianship of a minor, the certificate of the family register, or an extract of the certificate of the family register.
  - If the voluntary representative is a lawyer, a document showing the registration number.
  - One copy of either the legal representative's and voluntary representative's driver's license,
     Individual Number Card, passport, or other document whose photograph can be used to verify the identity of them (a valid document that contains the name and address of the person requesting disclosure, etc.)
  - If the legal representative or voluntary representative submits documents other than official documents with their photograph, copies of any two documents among your residence certificate, various health insurance cards, certificate of the family register, or extract of the certificate of the family register (created within 30 days prior to the date of the request for disclosure, etc.).
- 5. Disclosure request fee (only for requests for notification of purpose of use and requests for disclosure)

  Please pay the following fee by fixed amount postal money order.

Fee: 700 yen

6. Response to requests for disclosure, etc.

We will respond to your request by sending you a Notice of Disclosure Request Decision within 30 days from the day following the date of your request for disclosure, etc., in the manner you specify. Response methods include sending by mail and electronic files.

7. Where to file complaints regarding the handling of retained personal data For complaints regarding personal data held by our company other than those specified in "Section 1. Personal data held that is not subject to requests for disclosure, etc.," please contact the Inquiry Desk regarding Requests for Disclosure, etc. of Personal Information and Complaints below.

# Inquiry Desk regarding Requests for Disclosure, etc. of Personal Information and Complaints

Personal information	Vice President, Tokyo Water Co., Ltd.
protection manager	
Inquiry desk	General Affairs Department, General Affairs Division, Management
	Headquarters
Telephone number	03-3343-4561
E-mail	soumu@tokyowater.co.jp

## **Authorized Personal Information Protection Organization**

Name of authorized personal	Japan Institute for Promotion of Digital Economy and Community
information protection	
organization	
Contact for complaint	Accredited Personal Information Protection Organization
resolution	Administrative Office
Location	Roppongi First Building, Roppongi 1-9-9, Minato-ku, Tokyo 106-0032
Telephone number	03-5860-7565
	0120-700-779 (Toll-free)

Measures Taken for the Safe Management of Personal

### **Information**

We have taken the following measures for the safe management of personal information handled in our business.

- 1. Formulation of basic policies
- To ensure the proper handling of personal information, we have formulated a "Personal Information Protection Policy" and are working to protect personal information throughout the company.
- 2. Establishment of our company regulations regarding the handling of personal information
- We have established and put in place regulations for the handling of personal information, including the handling methods, persons responsible and persons in charge and their duties, etc., for each stage of the process, such as acquisition, use, storage, provision, deletion, and disposal.
- 3. Organizational safety management measures
- Regarding the handling of personal information, we regularly conduct self-inspections and have audits conducted by the department in charge of risk as well as external organizations.
- We have appointed those responsible for handling personal information, clarified the employees who handle personal information and the scope of personal information handled by said employees, and established a system for reporting and contacting the person responsible in the event that we become aware of any facts or signs of violations of laws or handling regulations.
- 4. Human safety management measures
- We provide regular training to our employees on important points to note regarding the handling of personal information.
- The company's work regulations stipulate matters regarding confidentiality of personal information and disciplinary action in the event of a violation.
- 5. Physical safety management measures
- In areas where personal information is handled, we manage employee entry and exit to and from the premises and restrict the devices that can be brought in, and we also take measures to prevent unauthorized persons from viewing personal information.

- We have taken measures to prevent theft or loss of information devices, electronic media, documents, etc. that handle personal information.
- When carrying information devices, electronic media, etc., including when moving within the workplace, we take measures to prevent personal information from being easily identified.

### 6. Technical safety management measures

- Access control is implemented for information systems that handle personal information, limiting the
  employees who can access the information systems and the scope of the personal information
  databases that are handled, thereby preventing unnecessary access.
- We have installed a system to protect information systems that handle personal information from unauthorized external access or software.