

Privacy policy

Alternative Investment Capital Limited (hereinafter referred to as "the Company") shall appropriately protect personal information (personal information as set forth in Paragraph 2 of Article 2 of the Act on the Protection of Personal Information (Act No. 57 of 2003; hereinafter referred to as "the Act"); the same shall apply hereinafter) and each director and employee shall be responsible for appropriate information management in order to respond to the trust of shareholders, fund investors, and investee companies, and shall endeavor to ensure that this Policy functions effectively.

1. The Company shall, in order to realize value creation through private equity, use Personal Information for the following purposes in relation to the formation of funds, investments, increasing the value of the companies we have invested in, and collecting the return of investments.
 - (1) Formation and operation of funds and the business operations related or ancillary thereto
 - (2) Investment advisory business, business operations concerning investment advisory agreements, and other business operations the Company is permitted to conduct by relevant laws and regulations and guidelines from supervising authorities, as well as the business operations ancillary thereto
 - (3) Other business operations the Company is permitted to conduct by relevant laws, regulations and guidelines from supervising authorities and the business operations ancillary thereto (including business operations that the Company will be permitted to conduct in the future)
 - (4) Otherwise for appropriate and efficient performance of transactions with our clients

2. In the event of acquiring personal information for purposes other than the above, the Company shall promptly notify the person with the purpose of use in writing, by mail, e-mail, or by posting such notice on the Company's website. Should the Purpose of Use is changed at the time of acquisition, the Company shall notify or publicly announce as such. In addition, we will not use the acquired personal information for purposes other than the intended purpose, and handle complaints in accordance with the Act. We will not acquire, use, or provide a third party with sensitive information defined in the Guidelines for the Protection of Personal Information in the Financial Sector (such as personal information requiring consideration and information on membership registration in labor unions, family origin, registered domicile, health and medical care, etc.), except as permitted by laws and regulations.

3. In the event personal information is provided to a third party in a foreign country with the consent of the customer, if the third party to whom the personal information is provided can be identified ex post facto, the specified information will be provided upon request of the customer.
4. We will keep personal information accurate and up-to-date, and will strive to erase such personal information without delay if it is no longer necessary to use it. In addition, we will implement necessary and appropriate safety management measures to prevent the leakage of personal information and conduct appropriate supervision of officers and employees.
5. We will respond to the request of the employee without delay with regard to the security control measures for personal data.
6. To ensure proper handling of personal information, we will review this policy from time to time and strive for continuous improvement.
7. **Method of Acquisition of Personal Information**

We will obtain personal information of our customers in an appropriate manner in accordance with laws and regulations.

Specifically, we will acquire information related to transaction-related documents such as confirmation forms and contracts, questionnaires, Internet, postcards, telephone, etc., and the principles of conformity based on the consent of the customer.
8. Except in the following cases, we will not provide personal information provided by customers to third parties without obtaining the prior consent of the individual.
 - (1) cases based on laws and regulations
 - (2) cases in which there is a need to protect human life, body or fortune, and when it is difficult to obtain a principal's consent
 - (3) cases in which there is a special need to enhance public hygiene or promote fostering healthy children, and when it is difficult to obtain a principal's consent.
 - (4) cases in which there is a need to cooperate with a central government organization or a local government, or a person entrusted by them performing affairs prescribed by laws and regulations, and when there is a possibility that obtaining a principal's consent would interfere with the performance of the said affairs
 - (5) cases in which the handling of personal data is entrusted to a third party in whole or in part within the scope necessary to achieve the Purpose of Utilization
 - (6) cases in which information is provided to a person within the scope of the following joint users

A. Items of Personal Data to be Shared

Basic information such as name, address, telephone number, e-mail address, etc., and investment information such as the number of shares held

B. Scope of joint users

The scope of parties with whom the Company jointly uses the information is as follows:
(Company Names)

- AIC shareholders (click [here](#) for our shareholders)
- T&D Asset Management Co., Ltd.
- Sumitomo Mitsui DS Asset Management Co., Ltd.
- AIC Private Equity Fund General Partner Limited

C. Purpose of joint use

As with the purpose of use stated in 1 in the above.

D. Information manager in the case of joint use

Alternative Investment Capital Limited (Reijiro Samura, President and CEO, Tekko Building 6F, 8-2 Marunouchi 1-chome, Chiyoda-ku, Tokyo)

9. When subcontracting the handling of personal data to a third party, the Company shall conduct a strict investigation of the third party and supervise the third party to ensure it thoroughly conducts appropriate management of personal data, such as maintaining confidentiality.
10. The Company accepts client requests for disclosure, correction, suspension of use, and suspension of provision to third parties (hereinafter referred to as “Disclosure”) in relation to the personal data acquired by the Company. Concerning the specific procedures for requesting Disclosure, please see [“Procedure for requesting disclosure, correction, deletion, and suspension of use.”](#) Please refer to the above for questions and complaints regarding our handling of personal data.