Privacy Policy (Handling of Personal Information)

<u>Click here</u> for the Privacy Policy of ORIX Real Estate Corporation, the operating company of Sumida Aquarium

The aim of ORIX Aquarium Co., Ltd. (the "Company") is to establish a relationship with our customers firmly built on trust by providing high-quality service that meets a myriad of requests, employing the collective strengths of the ORIX Group. Deeming our customers' personal information to be a critically important information asset, the Company will accumulate such information through fair and legal practices, and ensure that it is appropriately used, controlled and protected in accordance with the following policies. The purpose of this document is to publicize the purposes of use of personal information and explain the methods by which it is handled in the handling of personal information, pursuant to the provisions of the Act on the Protection of Personal Information.

•Purpose of use of personal information

All customer personal information retained by the Company will be used for the following purposes only. The Company will not use any personal information of customers beyond the scope necessary for the achievement of the following purposes of use without the consent of the customer:

- 1. To respond appropriately to inquiries from customers and to provide various services in connection with the Company's aquarium operation business and other related businesses.
- 2. To present information about the Company, ORIX Group companies, and other companies and inform about their various products and services through direct mail, e-mail, telephone calls, and other methods.
- 3. For utilization in marketing analysis in order to provide customers with better products and services and greater customer satisfaction;
- 4. To conduct various administrational and control tasks necessary for the management of the Company.
- 5. For the purpose of shared use with ORIX Group companies.

If customer personal information retained by the Company is the personal information of a person who has applied for employment at the Company ("employment applicant"), it will be used for the following purposes. The Company will not use personal information of the employment applicant beyond the scope necessary to achieve this purpose without the

applicant's consent.

- 1. To provide various information (information about websites, etc.) and to contact the applicant regarding the Company's recruitment activities.
- 2. For the Company to make employment selections.
- 3. To conduct statistical and data analysis on employment applicants.
- 4. To conduct all matters related to human resource development, employee welfare schemes and other personnel management after employment applicants' have joined the Company.

If the Company intends to use any personal information for any purposes other than those listed above, the purpose of such usage will be specified and prior consent obtained from the customer(s) in question.

Shared Use of Personal Data

The ORIX Group responds to and meets the various needs of its customers by employing its collective strengths under its consolidated management; therefore, the Company may share the use of personal data of customers retained by the Company with ORIX Group companies. Please refer to the following:

1. Shared Users

Companies of the ORIX Group in Japan

(ORIX Corporation and all companies that, based in law, have consolidated accounts with ORIX Corporation or are accounted for by the equity-method)

Some of these companies have "ORIX" in their name and some do not. For details on the latter, please refer to the "List of Shared Users."

- * Companies that share the use of personal information are subject to change.
- 2. Purposes of shared use of personal information

Shared Users will use customers' personal data for the following purposes.

- (1) For the Company and ORIX Group companies to perform various control tasks as required as part of company management, including understanding of the state of receivables, assets and risks.
- (2) To perform marketing analysis and develop products and services in order to provide our customers with better products and services, and greater customer satisfaction.
- (3) To present and propose the products and services offered by ORIX Group companies (for full details, please see "Introduction to Business and Services"(https://www.orix.co.jp/grp/en/business/)).

3. Personal data items subject to shared use

Items required within the scope of 2. Purposes of shared use of personal information above, including name, address, date of birth, telephone number, e-mail address, and transaction details (including type of transaction and transaction amounts, etc.)

 Party responsible for control of personal data Nissay Hamamatsucho Crea Tower, 2-3-1 Hamamatsu-cho, Minato-ku, Tokyo, 105-0013 ORIX Aquarium Co., Ltd.

• Compliance with laws

The Company recognizes that, for the purposes of protecting personal information and ensuring its security, it is necessary that all directors and employees adequately understand and comply with the laws, regulations, and other standards concerning the handling of personal information, and will strive to ensure that said understanding and compliance are thoroughly realized.

• Continuous improvement of compliance program

The Company will create a compliance program that includes details on the handling of personal information, and will periodically review, maintain and improve that program.

• Protection and control of personal data

Based on the company regulations etc. established by the Company, the personal data of customers is controlled appropriately under the custody of a compliance officer designated in each department, taking the utmost care to prevent such information from being leaked to the outside. Furthermore, the Company takes security measures of an adequate and reasonable level against risks such as unauthorized access from outside, loss, destruction, and falsification.

• Entrusting of handling of personal data to external parties

To provide better services for our customers, the Company may entrust external parties to perform its business operations. In such cases, the Company may also entrust such parties to perform all or part of the handling of personal data. For the selection of such trustees, the Company performs careful assessments based on its standards for appropriate handling that it has established regarding the control of personal data, confidentiality, and restrictions on sub-entrustment, prevention of leaks of customers' personal information, and other matters. The trustees selected on the basis of that assessment are supervised and controlled by the Company. Examples of trustees:

• Information processing companies, direct mail posting companies and other companies which are necessary for our business operation.

• Provision of personal data to a third party

The Company will not disclose or provide any personal data of customers retained by the Company to any third party without the consent of the customer; However, personal data may be disclosed without the customer's consent in the following cases:

- 1. Where it is necessary pursuant to any provision of laws or regulations;
- 2. It is necessary to protect a human life, body or property (including a corporation's property) and it is difficult to obtain the consent of the customer;
- 3. It is especially necessary for the improvement of public health or promotion of sound development of children and it is difficult to obtain the consent of the customer; or
- 4. It is required in order to cooperate with a national or local authority or a person appointed by such an authority in the execution of its affairs as required by law or regulation, within which seeking the consent of the relevant customer may hinder the execution of said affairs.

• Notification of purpose of use, disclosure, amendment, and suspension of use of retained personal data

1. Notification of purpose of use of retained personal data

A customer may request that the Company provide notification of the purpose of use of any personal data relating to them that is retained by the Company (hereafter "retained personal data"). If a customer requests notification of the purpose of use of any retained personal data relating to them, the Company shall respond promptly and in accordance with all applicable laws.

2. Disclosure of held personal data

Any customer is entitled to request the Company to disclose the personal data relating to them retained by the Company to the customer. If a customer requests us to disclose such personal data to them, the Company will respond appropriately without delay and in accordance with all applicable laws and regulations.

3. Amendment of retained personal data

If, as a result of the disclosure under the preceding item, it is determined that there is an error or errors in the retained personal data in question, the customer may request of the Company that the retained personal data in question be corrected, added to or deleted (hereafter "amendment"). If a customer requests the amendment of any retained personal

data relating to them, the Company shall respond promptly and in accordance with all applicable laws and regulations.

4. Suspension of use of retained personal data

If a customer requests that the Company cease the utilization of or delete any retained personal data related to them for the reasons (1) or (2) below, or requests that provision to a third party be ceased for the reason (3) below (hereafter "suspension of use"), in cases where it is determined that the reasons behind the request are valid, the Company shall respond promptly and in accordance with all applicable laws and regulations.

- (1) If the Company uses the customer's personal data for a purpose other than that stated.
- (2) If the customer's personal data has been obtained in a manner that is not fair and appropriate.
- (3) If the provision of the customer's personal data is in violation of the aforementioned "Provision of personal data to a third party."

If a request has been received from a customer for the notification of purpose of use, disclosure, amendment, or suspension of use of retained personal data, after undertaking the prescribed procedures to verify the identity of the requesting customer, the Company will request the customer to undertake the application procedures as stipulated by the Company. The customer may also be requested to pay a processing fee. For details of the procedures and fees required, please contact the "Personal Information Inquiry Service" as shown below.

Personal Information Inquiry Service
ORIX Real Estate Corporation
ORIX Aquarium Corporation (Sumida Aquarium)
Personal Information Inquiry Service
Service Hours: 9:00 a.m. to 9:00 p.m. (except national holidays and year-end/New Year holidays)

Phone: +81-3-5619-1821

• Scope of application of Privacy Policy and links to other companies' websites The Company's website contains links to the websites of other companies for the purpose of providing customers with useful information. However, the Company does not assume any responsibility for the protection of privacy of those other companies' websites. Please confirm the privacy policy and other information on each linked website. • Updating of Privacy Policy

This privacy policy is subject to updates. Please check the date of the latest update.

Date of latest update: March 22, 2019

Operation company of this website: ORIX Aquarium Co., Ltd.