

Security control measures we take in handling personal data in possession

	Measures which must be taken	Methods
Establishment of basic policy	Development of rules in handling personal data	We have published a Privacy Policy as the basic policy to protect our customers' information. In addition, we specify matters concerning appropriate management of the customers' information and use of it to business activities in the in-house regulations as part of efforts in handling the customers' information appropriately in order to put into practice the contents specified in the basic policy and protect customers' important information entrusted to us.
Organizational security control measures	Development of organizational system	We have the Personal Information General Management Officer in place to superintend the affairs concerning the protection of personal information. We also appoint the Head of each Division as the person in charge of handling the personal information to manage the handling, etc. of security control measures concerning the personal information at each Division, thereby ensuring that the personal information is handled by the employees and officers authorized to do so, in accordance with the in-house regulations.
	Operations in accordance with rules for handling of personal data	With respect to a variety of systems handling personal data in accordance with the in-house regulations concerning the handling of the personal data, we have developed a mechanism to inspect how the personal data is handled through measures including appropriate management of their IDs and maintenance of access logs.
	Development of framework to respond to incidents including data leakage	Methods to respond to data leakage or any other incidents occurred are specified in the in-house regulations. These regulations include guidelines for activities including investigation of the accident, identification of the cause of the accident, establishment of the recurrence prevention measures, notification to the person involved and report to the relevant authorities.
	Recognition of handling conditions and revision of safety	We have developed a framework to inspect the handling of the personal data, have each Division carry out the inspection, as well as developing and implementing an inspection framework under which a person from another department.

	management measures	
Personal security control measures	Employment, training, etc. of officers and employees	We conclude a non-disclosure agreement, etc. regarding the handling of personal data with an officer or employee when we employ him/her and have developed the standards for disciplinary penalties in the case of a violation of the non-disclosure, agreement, etc. In addition, we have established the safety management practical standards, clarified roles and responsibility of the officers and employees, and ensured that they are well informed about, thoroughly implement, and receive training for, the safety measures.
Physical security control measures		We apply the following physical measures to the areas, equipment, etc. which handle the personal data: <ul style="list-style-type: none"> •Limitation on entry to controlled areas •Encryption of records •Discarding in an irrecoverable manner and other measures
Technical security control measures		We apply the following technical measures to the information system, etc. which handles the personal data: <ul style="list-style-type: none"> •Limitation on the right to access •Establishment of system firewalls •Update of the system security measures •Monitoring of accesses, etc. and other measures
Recognition of outside circumstances	In the case of handling personal data in a foreign country	We get well acquainted with legislative system, etc. for the personal information protection in the foreign country and then take necessary and appropriate measures for safe management of the personal data.