Bank of India Japan Branches Privacy Policy (1.11.2022)

To protect our customers and provide them with the confidence to work with us in the knowledge that their personal data is fully protected, we observe the Act on the Protection of Personal Information (hereinafter referred to as the "Act"), the Guidelines for the Protection of Personal Information in the Financial Sector, and other related Japanese laws and guidelines (hereinafter referred to as the "Laws and Regulations") with respect to the personal information of customers. We aim to maintain the accuracy and confidentiality of personal information by properly managing personal information in accordance with the following principles and in accordance with the Bank's relevant rules and regulations.

1. Purposes of Acquiring Information

(1) We acquire personal information from customers in a lawful and appropriate manner to promote safe and reliable business transactions with customers and to provide better products and services. We will use personal information of customers within the scope of the following purpose of use, and will not use such information for other purposes, except as otherwise provided by Laws and Regulations, nor by any means that encourages or threatens to induce illegal or unjust acts.

(a) Description of business

• Businesses concerning deposits, foreign exchange and loans, and operations incidental thereto; and

• In addition to the above, the businesses that are permissible for the branch office of foreign banks pursuant to the act and other business incidental thereto.

(b) Purpose of Use

- 1) Soliciting, opening accounts, accepting, managing and implementing our products and services related to various transactions;
- Facilitating confirmation and management at the time of transactions based on the Act on Prevention of Transfer of Criminal Proceeds and other Laws and Regulations, the exercise of rights and the performance of obligations based on contracts or Laws and Regulations, and other legal procedures;
- 3) Management of continuous transactions, such as the management of dates in various transactions conducted by us;
- 4) Making decisions on offers for various transactions, confirming the qualifications for using instruments and services, and continuous transactions, etc.;
- 5) Judging the appropriateness of our products and services;
- 6) Providing personal information to third parties to the extent necessary for the performance of our business, including where personal information is provided to a personal credit information agency, etc. in the course of credit business;
- 7) Appropriate performance of the entrusted business in the cases where the processing of personal information is entrusted in whole or in part by other companies, etc.;
- 8) For exercising rights and performing obligations under contracts and Laws and Regulations with customers;
- 9) For research and development of products and services through market research, data analysis, and questionnaire surveys;
- For making proposals concerning products and services by means of direct mail, e-mail, etc. (including the distribution of advertisements on products and services in line with customer interests by analyzing customer transaction records, web site browsing records, and other methods);
- 11) For providing individual proposals and information on various instruments and services of affiliated companies in the marketing area including advertising (including the distribution of advertisements on products and services in line with customer interests by analyzing customer transaction records, web site browsing records, and other methods);
- 12) Cancellation of various transactions and post-cancellation management of transactions;
- 13) Appropriate and smooth performance of other transactions with customers.
- 14) Management of employment within the Bank

(2) We may change the Purpose of Use set forth in the preceding paragraph to the extent provided by Laws and Regulations. Should such a need arise, we will promptly notify the customer of the changed Purpose of Use or announce this publicly.

(3) We aim to keep the customer's personal information accurate and up-to-date within the scope necessary for the achievement of the Purpose of Use, and to erase any personal data we hold. without delay when it is no longer necessary to use it.

2. Type of Information to be Acquired

We acquire the personal information of the customer in the manner set forth in 3 below. We will not acquire sensitive information stipulated in the Guidelines on the Protection of Personal Information in the Financial Sector unless otherwise required by Laws and Regulations or provided for in the same guidelines, such as when the customer gives consent to the extent necessary for the performance of business.

3. Information Acquisition Method

To the extent necessary for the achievement of the Purpose of Use, we acquire personal information of the customer from the customer or third parties by appropriate and lawful means, orally, by mail, the Internet, telephone, facsimile, etc. We use an encryption communications protocol to securely transmit any personal information through our website.

4. **Provision of Information**

(1) We will not provide personal information of customers to any third party except as provided by law.

(2) We may entrust the handling of all or part of the customer's personal information to the extent necessary for the achievement of the Purpose of Use. When outsourcing, supervision of the outsourcee shall be necessary and appropriate.

(3) We may use your personal information jointly within the following scope:

(1) Items of Personal Data under Joint Use

Following is the information under joint use on the drawer of the dishonoured bill or cheque (as for bills of exchange, the underwriter; hereinafter the same shall apply) and the customers who requested for opening a current account.

- ① Name of drawer (in case of a legal entity, its name, the name and title of its representative)
- 2 Name of store (yago) of the drawer, if any
- ③ Address (in case of a legal entity, its location, including postal code)

④ Name of a person requesting for opening of a current account (in case of a legal entity, its name and the name and title of its representative and the name of store (yago), if any)

- 5 Date of birth
- 6 Occupation
- ⑦ Capital stock (only in case of a legal entity)
- 8 Type and face amount of the relevant bills and cheques

(9) Whether it is a report of dishonour (first time dishonour) or a report of suspension of bank transactions (order for suspension of business)

- 1) Date of clearing (date of presentation)
- (1) Paying bank (Branch name/department name)
- Presenting bank (Branch name/department name)
- 13 Reason for dishonour
- (1) Date of order for suspension of transactions

(Note) In case there are discrepancies between any of the information falling in 1003 above described in the relevant bills or cheques and those reported to the paying bank, such information described in the dishonoured bills and cheques shall be included.

(2) Scope of Joint Users

- ① Electronic clearing house (Japanese Bankers Association)
- 2 Participant financial institutions of the electronic clearing house

(3) Purpose of Use

The information will be used for procurement of the smooth distribution of bills and cheques and for judgement on credit transactions by financial institutions

(4) Name of Person in charge of Management of Personal Data General incorporated Association Japanese Bankers Association
Address: Ginko Kaikan 1-3-1 Marunouchi, Chiyoda-ku, Tokyo 100-8216
Name of Representative: Please visit <u>https://www.zenginkyo.or.jp/privacy/#c17175</u>

(4) We may provide a customer's personal information to third parties in foreign countries. Except as otherwise provided by Japanese laws and regulations, we shall provide necessary information in accordance with the provisions of such Laws and Regulations and obtain the prior consent of the Customer to permit the provision of such information to a third party in a foreign country.

(5) In the event that we provide "personal related information" with respect to customers to a third party and it is assumed that such third party will treat such "personal related information" as personal data, we will confirm this and provide information necessary for the customer as required in accordance with the provisions of Laws and Regulations, except as otherwise provided by Laws and Regulations.

5. Handling of Sensitive Information

We will not acquire, use, or provide a third party with sensitive information as stipulated in the Guidelines on the Protection of Personal Information in the Financial Sector, except in accordance with Laws and Regulations or in the event that the customer's consent is obtained to the extent necessary for the performance of its business, or otherwise as stipulated in the Guidelines.

6. Information Management Method

We take appropriate measures to ensure that our customers' personal information is accurate and upto-date. In order to prevent the leakage, loss, or damage (hereinafter referred to as "leakage") of personal information of our customers, we will implement organizational security management, human safety management, physical safety management, and technical safety management measures. When handling personal information of customers in foreign countries, we will appropriately manage such information after assessing the external environment.

(Development of Rules on the Handling of Customers' Personal Information)

We establish rules for the handling of personal information for each stage of Acquisition, Use, Storage, Provision, Deletion/ Disposal, etc.

(Organizational Security Control Measures)

We assign a person to be responsible for the handling of personal information of customers, clarifying the scope of employee handling personal data, the scope of personal information to be handled, and establish a system for reporting information to the person in charge in the event that any fact or sign of violation of laws or regulations governing the handling of personal data is identified.

We periodically conduct self-inspections of the status of the handling of personal information of customers and conduct audits by other departments and outside parties.

(Measures for Human Security Management)

We conduct periodic training for employees on the key issues in handling personal information of customers.

We include in the Rules of Employment matters concerning the confidentiality of personal information of customers.

(Physical Security Control Measures)

We implement measures to control the access and exit of employees to and from areas in our premises where personal information of customers is handled, and to prevent unauthorized persons from viewing any personal information of our customers.

We establish measures to prevent theft or loss of equipment, electronic media, documents, or similar, handling personal information of customers, and measures to prevent personal information from being easily identified when transporting such equipment, electronic media, etc., including transportation within the business office.

(Technical Security Control Measures)

We implement access control to limit the scope of employees in charge and the scope of personal information databases handled.

We have systems and controls that protect information systems that handle customer personal information from unauthorized access from outside or from unauthorized software.

(Understanding of External Environments)

When handling personal information of customers in foreign countries, security control measures shall be implemented after understanding the regime, etc. related to the protection of personal information in the foreign countries concerned.

7. Request for Suspension or Disclosure from Customers

If you wish us to notify you of the purpose of use, disclose, correct, add or delete the contents of, cease the utilization of, erase, cease the third-party provision, or disclose a record of provision to a third party, please contact us at the following address. We will, after confirming the identity of the customer, respond in accordance with the provisions of Laws and Regulations. Please note that notice or disclosure of the purpose of use may be subject to a fee as prescribed by us.

8. Customer inquiries and complaints

Contact Information:

We accept requests to notify the purpose of use, disclose, correct, add or delete the contents of, cease the utilization of, erase, cease the third-party provision, or disclose a record of provision to a third party, or other questions regarding the handling of personal information.

Tokyo Branch: 1F Marunouchi-Nakadori Bldg. 2-2-3 Marunouchi, Chiyoda-ku, Tokyo Telephone: 03-3212-0911 Osaka Branch:

4F Oak Sakaisuji-Honmachi Bldg. 1-8-12 Honmachi, Chuo-ku, Osaka Telephone: 06-6261-4035

Reception hours: 9:00 a.m. to 4:00 p.m. (Excluding weekends, national holidays, and the Year-End/New Year bank holidays)

9. Modifications

The above information may be modified as a result of amendments to the Laws and Regulations or other reasons to the extent stipulated by Laws and Regulations. In this case, the information will be posted at the branch or disseminated through this website, etc.

Bank of India 1F Marunouchi-Nakadori Bldg. 2-2-3 Marunouchi, Chiyoda-ku, Tokyo Name of Representative in Japan Amit Kumar