

Privacy Policy for BMO Japan Securities Ltd.

BMO Japan Securities Ltd. (the “Company”) is committed to respecting and protecting the personal information of our customers and we have established the following policy on the handling of personal information of our customers (the “Customer”).

We obtain our customers’ personal information for the purposes of developing safe and reliable transactions and providing you with better financial products and services. Specifically, we use such information for the purposes of identification, confirming the terms and conditions of transactions and the provision of information in relation to new products and services. The Customer addresses, names, dates of birth, gender and phone numbers are the most common types of information obtained. In addition, there is other information which is obtained upon the commencement of a transaction. The Company’s officers and employees shall be subject to, and comply with, the Act on the Protection of Personal Information (the “APPI”, including amended APPI) and Guidelines for Protection of Personal Information in the Finance Sector in Japan, and any other relevant laws, regulations and guidelines stated above shall hereinafter collectively be referred to (the “Relevant Laws and Regulations”) and strive for maintaining accuracy and confidentiality of Customers’ personal information by appropriate handling, and management and protection, of such information in accordance with the following policy as well as the Company’s internal rules.

1. Policy on Measures to Protect Personal Information:

The Company’s policy on protecting personal information is as follows:

- a) Personal information will be managed in accordance with Relevant Laws and Regulations and managed appropriately.
- b) Personal information will not be used beyond the scope necessary to achieve the purpose of use.
- c) Personal information will not be used in a manner that may encourage or induce illegal or unjustified activities.
- d) For the purposes of this Policy, Customers includes executives and employees of corporate customers. We do not manage individual personal identity numbers or “My Number Card.”
- e) We will not disclose or provide personal data to third parties without obtaining the consent of the Customer, except in cases where it is acceptable in accordance with the provisions of Relevant Laws and Regulations.
- f) When outsourcing the handling of personal data to another company, we will appropriately monitor the management system for protecting personal information of the outsourcing company.
- g) We will sincerely and appropriately address complaints and consultations regarding the handling of personal information.
- h) We will continuously review the appropriate management system for personal information.

2. Purpose of use of personal information

We will use personal information for the following type of business and purposes as outlined below. When changing the purpose of use, this document will be revised and announced.

Type of Business

- a) Type 1 Financial Instruments Business Operators, and Related Businesses.
- b) In addition to the above, business that Type 1 Financial Instruments Business Operators can perform and business incidental thereto.

Purpose of use

- a) For providing information related to solicitation, sales and service of securities and various financial instruments of the Company under the Financial Instruments and Exchange Act ("FIEA") and their related services.
- b) To confirm the identity of the Customer under the Act on Prevention of Transfer of Criminal Proceeds, and related laws and regulations.
- c) For compliance with laws and regulations, risk management, enhancement of services, promotion of internal business and internal control.
- d) For contacts and references regarding settlements, deliveries, transaction reports, account balances, with Customers.
- e) For obtaining necessary information to respond inquiries from Customers.
- f) For sending greetings, and information related to various seminars and receptions.
- g) To report transaction results and details.
- h) To exercise rights and fulfill obligations based on contracts with Customers.
- i) For handling various clerical work with Customers.
- j) To conduct the joint use described in section 3 below; and
- k) In addition to the above, in order to conduct transactions with Customers appropriately and smoothly.

3. Methods of obtaining personal information

We may, upon taking sufficient protective measures, obtain your personal information by means of the postal system or electronically through the internet and by telephone.

4. Joint use of Personal Data

We may jointly use your personal information in accordance with the following policies:

- a) We will not use personal data jointly unless we obtain a consent form from a Customer, or when permitted by the Relevant Laws and Regulations including the Financial Instruments and Exchange Act ("FIEA").
- b) Items of personal data to be jointly used.

Name, home address, telephone number, e-mail address, date of birth, occupation/position description, job title, office work address, information contained in CVs for hiring/recruiting, etc.,

- c) Scope of persons to jointly use the personal information.

- Companies belonging to the Bank of Montreal Financial Group (please refer to [BMO's website](#) for the scope of the applicable companies).

d) Purpose of use relating to joint use

- For integrated risk management, compliance, business management, and other internal management as the Bank of Montreal Financial Group; and
- To provide comprehensive services as the Bank of Montreal Financial Group

e) Those who are responsible for personal data management and the management of personal data to be jointly used.

The person responsible for personal data management
Chief Compliance Officer, Hisashi Suzuki

The person responsible for the management of personal data to be jointly used and the representative of the Company, Hidetoshi Hikawa

Office Address:

9F TOKYO TORCH Tokiwabashi Tower, 2-6-4 Otemachi, Chiyoda-ku, Tokyo,
100-0004, Japan

5. Safety Management measures

We will implement organizational, human, physical and technical Safety Management measures as follows. We will review these measures on an ongoing basis, as necessary.

- a) Establishment and publication of Privacy Policy as the basic policy for ensuring various measures prescribed by relevant laws and regulations for the proper handling of Personal Data.
- b) Establishment of rules and regulations setting out how Personal Data shall be managed, etc., when it is obtained, used, and stored, etc.
- c) Establishment of Organizational Safety Management measures such as appointment of the person responsible for personal data management, supervision / verification framework by the responsible person, reporting / communication framework for occurrence of leakage, etc.,
- d) Establishment of Human Safety Management measures, such as provision of periodic trainings and stipulations, of confidentiality clauses in the employment contracts, rule of employment, etc.,
- e) Establishment of Physical Safety Management measures, such as access control of employees, restrictions on equipment brought in, and restrictions and controls on the removal of information equipment, media, etc.,
- f) Establishment of Technical Safety Management measures, such as implementation of systems to protect against unauthorized external accesses to information systems or unauthorized software.
- g) Establishment of Safety Management measures based on understanding of the frameworks for the protection of Personal Data in certain countries outside Japan (Canada, Hong Kong, Singapore, India and USA) where personal data is stored or handled under outsourcing and excludes EU countries, Liechtenstein, Iceland, Norway and United Kingdom based on notification of the Ordinance for Enforcement of the Act on the Protection of Personal Information.

6. Procedures for disclosure, etc., of personal information which the Company held

We will appropriately disclose, correct, add, or delete, erase, suspend the use of personal information which the Company held, suspend the provision to the third parties and disclose the record of provision to the third parties in accordance with relevant laws and regulations at the request of the customer.

7. Request for Disclosure of Personal Information

When the principal request disclosure, correction, suspension of use, etc., of his/her personal information, the Company will promptly respond to such request after verification of the identity of applicant. For such request, please contact the Compliance Department as specified below 10.

8. Provision of Personal Information to Third Party

The Company will not provide personal information with any third party except for the case were.

- a) The prior consent of the principal is obtained,
- b) Such provision is permitted under applicable laws or ordinances,
- c) The disclosure request from a body that has a legitimate authority under applicable laws or ordinances, such as a tax office, a court, Police Department, and other organization,
- d) If necessary for the protection of human life, safety, or property, and when it is difficult to obtain the consent of the principal,
- e) In case of outsourcing all or partial of handling of personal information within the extent of the implementation of the purpose of use,
- f) Providing personal information for continuity of business due to merger/acquisition of company,
- g) Providing personal information based on this policy article 4 (Joint Use of Personal Data),
- h) In other cases, authorized by relevant laws and regulations.

9. Provision of Personal Data to Third Parties in Foreign Countries

The Company shall not provide Personal Data to any third party in foreign countries, except the cases listed below:

- a) Cases where such third party is in a country set forth in the Enforcement Rules having a personal information protection system accepted to be of the equivalent standards to that of Japan.
- b) Cases where such third party develops its system, adapting it to the standards set forth in the Enforcement Rules of a system necessary to continuously implement measures equivalent to the measures to be implemented by personal information handling business operators; or
- c) Cases set forth in (a) through (d) of “8. Provision of Personal Information to Third Party”.

10. Contact for inquiries and complaints regarding the handling of personal information

BMO Japan Securities Ltd.
Compliance Department

BMOCMComplianceJP@bmo.com

Office Address:

9F TOKYO TORCH, Tokiwabashi Tower, 2-6-4 Otemachi, Chiyoda-ku, Tokyo 100-0004, Japan
Phone Number: 03-3274-6562 (Business Hours: 9:00 – 17:30, closed on Sat, Sun, Public Holidays)

Japan Securities Dealers Association (“JSDA”)

The Company is a member of the Japan Securities Dealers Association, which is an Authorized Personal Information Protection Association certified by the Personal Information Protection Commission. The Association's Personal Information Consultation Office receives complaints and consultations about the handling of personal information by association members.

Japan Securities Dealers Association Personal Information Consultation Office
Phone: 03-6665-6784

<https://www.jsda.or.jp/privacy/index.html>

11. Alterations

We may alter or modify the contents hereof in accordance with the amendments to applicable laws and regulations or for other reasons. In any such case, such alteration or modification will be made available at the reception area of the Company.

Established: 28 July 2022

Last revised: 11 Dec 2024