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Revised on April 1, 2022

## **Privacy Policy**

### **1. Name of the Business Operator**

TOKYU REIT, Inc.

### **2. Basic Policy**

With respect to personal information provided to the Company by relevant parties, TOKYU REIT, Inc. (“TOKYU REIT” or “the Investment Corporation”) shall comply with the Act on the Protection of Personal Information (hereafter the “Personal Information Protection Act”), the Act on the Use of Numbers to Identify a Specific Individual in the Administrative Procedure (hereafter the “Numbers Act”), other laws and ordinances and related rules and regulations (including administrative guidelines, hereafter “laws and ordinances”) and shall properly handle, protect and manage personal information in line with the following policies.

- (1) TOKYU REIT will never acquire personal information by deception or other wrongful means.
- (2) With the exception of cases permitted under laws and regulations, TOKYU REIT will not collect personal information requiring special care without prior consent of the relevant party.
- (3) Upon acquisition of personal information from third parties, TOKYU REIT will not engage in unjust infringement of the interests of the individual for which personal information was acquired, nor will it acquire the information knowing that the information is personal information that has been leaked, etc. from third parties that are engaged in wrongful acquisition of personal information or other unjust acts.

- (4) Personal information shall be acquired only to the extent necessary for the conduct of business.
- (5) With the exception of cases permitted under the Personal Information Protection Act, TOKYU REIT will never go beyond the scope of the “purpose of use of personal information” (hereafter, “purpose of use”) as described in the next section, nor will it provide personal information to third parties.
- (6) TOKYU REIT will not use personal information in a manner that may encourage or induce illegal or unjust acts.
- (7) Personal information that TOKYU REIT has acquired shall be maintained so that is accurate and up-to-date to the extent necessary to fulfill its purpose of use. At the same time, strict security management measures will be taken to prevent mishaps, including the loss, misuse and alteration of such information.
- (8) TOKYU REIT will delete collected personal information without delay when its use is no longer necessary.
- (9) TOKYU REIT will constantly assess the circumstances surrounding the acquisition and management of personal information and shall review measures for protecting personal information on an as-needed basis.
- (10) When TOKYU REIT receives inquiries or complaints concerning the handling of personal information, it investigates them and tries to respond appropriately and swiftly within a reasonable period of time. Inquiries, complaints and other queries concerning the handling of personal information are handled by the Inquiry Desk described under item 9. below.

### **3. Purpose of Use of Personal Information**

With the exception of cases permitted under the Personal Information Protection Act and other laws and ordinances, TOKYU REIT will never use personal information for purposes other than those listed below without the consent of the relevant party.

- (1) Exercise of rights of unitholders and fulfilling the obligations of the Investment Corporation under the Act on Investment Trusts and Investment Corporations.
- (2) Management of unitholder information, which includes generating

such data as the list of unitholders in accordance with the Act on Investment Trusts and Investment Corporations.

- (3) Performance of duties related to the issuance of investment units and the issuance of investment corporation bonds.
- (4) Performance of duties, including the verification of and response to inquiries from unitholders and people who are considering the purchase of investment units and investment corporation bonds issued by the Investment Corporation.
- (5) Research analyses and studies related to the asset management of the Investment Corporation.
- (6) Performance of duties related to acquisition, transfer and borrowing and lending of assets and the management of real estate by the Investment Corporation.
- (7) Performance of IR activities and general business duties related to the Investment Corporation.
- (8) Performance of duties incidental or directly related to (1) through (7) above.

#### **4. Acquisition of Personal Information**

To the extent required for business, TOKYU REIT acquires personal information through proper means. Moreover, in acquiring personal information, the Investment Corporation pays attention to the following points. However, this is not limited to cases that are permitted under laws and ordinances.

- (1) When personal information has been acquired, except for cases in which the purpose of use has been announced in advance, the relevant party is promptly informed of the purpose of use through an appropriate means or by public announcement.
- (2) When acquiring personal information through direct written correspondence (including correspondence that has been electronically or magnetically recorded and stored) from the relevant party, the relevant party either receives advance clarification of the purpose for which the information will be used or their consent for use is obtained. However, there is no need for clarification or the obtaining of consent when the information is urgently needed to protect a person from death, physical harm or to safeguard their

property.

- (3) When the purpose of use has been changed, the relevant party is informed or an announcement is made regarding the new purpose of use.

## **5. Provision of Personal Information to Third Parties**

Except for the cases cited below, TOKYU REIT never provides personal information that it has acquired to third parties without the prior consent of the relevant party.

- (1) In cases dictated by laws and ordinances.
- (2) In cases where the information is needed to protect a person from death, physical harm or to safeguard their property and when it is difficult to obtain the relevant party's consent.
- (3) In cases where the information is needed in order to improve public health or provide solid protection for children and circumstances make it difficult to obtain the relevant party's consent.
- (4) In cases where it is necessary to cooperate with a person who has been commissioned by a national institution or a local public authority for the performance of legal duties and when obtaining the consent of the relevant party could potentially interrupt the performance of said duties.

Furthermore, with the exception of cases based on laws and ordinances, TOKYU REIT will never provide individual numbers or specific personal information it collects, uses or keeps for specific purposes based on the Numbers Act to third parties, regardless of the consent of the relevant party.

## **6. Personal Information Disclosure, Revision and Suspension of Use**

When TOKYU REIT is requested by the relevant person regarding retained personal data, upon recognizing this person as the actual person or the proxy of that person, TOKYU REIT will respond by notifying purpose of use or retained personal data that identifies the relevant party, disclosing (including disclosure by providing electromagnetic records, etc.), revising, supplementing, deleting, suspending the use of or removing (hereafter, "disclosure, revision or suspension of use") that information in keeping with laws and regulations.

However, if such action should violate other laws and ordinances, TOKYU REIT will not be able to respond to the request for disclosure, revision or suspension of use. In such a case, TOKYU REIT will explain the reason to the relevant party.

The same applies to the disclosure of records regarding the transfer of personal data TOKYU REIT provided to third parties.

## **7. Security Management of Personal Information**

To the extent necessary to fulfill its purpose of use, TOKYU REIT will make every effort to manage its retained personal data so that said information is accurate and up-to-date. TOKYU REIT entrusts Tokyu Real Estate Investment Management Inc. (hereafter, “Tokyu REIM”) with asset management and requires it to manage personal information in compliance with laws and ordinances in order to prevent the leakage, loss, damage, falsification or other corruption of that information and implement appropriate security management measures with regard to the organization, personnel, infrastructure and technology. Tokyu REIM has specifically implemented the following security management measures.

- (1) Organizational security management measures
  - (a) Tokyu REIM has appointed a general manager for company-wide handling of personal data, appointed a manager for each department, clarified which officers and employees handle personal data and the scope of personal data the relevant officers and employees handle and established a system for contacting and reporting to the relevant manager and general manager in the event that any fact or indication of a violation of the Personal Information Protection Act or internal regulations concerning personal information management (hereafter, “personal information protection regulations”) is detected.
  - (b) It conducts periodic self-inspections on the status of personal data handling as well as audits by the department in charge of internal audits.
- (2) Personnel security management measures
  - (a) Tokyu REIM enters into personal information non-disclosure agreements with officers and employees that include the roles and responsibilities of officers and employees regarding handling of personal data and disciplinary measures taken in the event of a

violation, or takes equivalent measures.

- (b) Tokyu REIM has established personal information protection regulations, ensuring that all officers and employees are aware of the security management measures, and implements education and training for all officers and employees.
- (3) Infrastructural security management measures
- (a) When personal data is input, it is done in a building or other location only accessible to authorized personnel.
  - (b) When documents or electronic media containing personal data are taken outside the company, measures are taken to prevent theft, leakage or damage.
- (4) Technological security management measures
- (a) Tokyu REIM controls access to limit personnel and the scope of the personal information database, etc. personnel handle.
  - (b) Tokyu REIM has installed systems to protect the information systems handling personal data from unauthorized external access or unauthorized software.

## **8. Outsourcing the Handling of Personal Information**

To the extent necessary to fulfill the purpose of use, TOKYU REIT may outsource all or a portion of the management of personal information. In such case, the Investment Corporation will verify the personal information protection system of the outsourced company and take measures to protect personal information with formal agreements while also providing proper supervision of the outsourced company.

## **9. Inquiries Concerning Personal Information**

With respect to questions or complaints regarding personal information as well as inquiries and other requests for the disclosure, revision or suspension of use of retained personal data held by the Investment Corporation, please contact the Inquiry Desk below for instructions regarding the necessary procedures.

### **Inquiry Desk**

Tokyu Real Estate Investment Management Inc.  
1-12-1, Dogenzaka, Shibuya-ku, Tokyo 150-0043

TEL: +81-3-5428-5790

URL: <https://www.tokyu-reim.co.jp/en>

With respect to inquiries regarding entries in the list of unitholders and other queries, please contact the Administrator of the Register of Unitholders below.

**Administrator of the Register of Unitholders**

1-1, Nikkocho, Fuchu City, Tokyo, Japan

Mitsubishi UFJ Trust and Banking Corporation

Corporate Agency Division

Toll-free number (Japan only): 0120-232-711

URL (Japanese) : <https://www.tr.mufg.jp/daikou/>

(Address)

Post-office box 29, Shin-Tokyo Post Office, 137-8081, Tokyo, Japan

Mitsubishi UFJ Trust and Banking Corporation

Corporate Agency Division

**10. Continuous Improvement of the Personal Information Protection System**

In addition to acting when changes are made, such as in laws and ordinances, TOKYU REIT will review its privacy policy as necessary and take steps to strengthen and improve personal information protection.