

Personal Information Protection Policy

Chi-X Japan Limited

July, 2012

Personal Information Protection Basic Policy

Chi-X Japan Limited and its employees comply with the Personal Information Protection Law, and related ordinances and regulatory guidelines, thus set the following basic policy.

1. We will obtain personal information in a compliant method and endeavor to maintain the information correct and updated.
 - (1) Method of obtaining personal information
 - ① Participants to fill in the account opening forms or questionnaires.
 - ② Collect information from the publicly available media such as Japan Company Handbook, Japan Company Management Handbook or newspapers.
 - ③ Through communication with clients when providing services.
2. We shall utilize personal information within the scope of the stated purposes of use. Personal information shall not be provided to third parties except where otherwise permitted in advance by the individual concerned or where expressly prescribed as an exception in an applicable law or set of regulations.
3. We shall conduct employee education in order to prevent leakage or unlawful usage of personal information. Manager to control and inspect personal information will be appointed, and proper control structure will be set up.
4. We shall ensure that personal information to be protected when handling of such information is outsourced. Following is the outsourcing business which may be outsourced:
 - Operation and maintenance of information systems.
5. We shall disclose, correct or discontinue use of personal information upon request from the relevant individual in compliance with laws and regulations. In such cases, we may charge prescribed costs to the claimant.

Any queries regarding personal information handling including purpose of use, please contact:

Chi-X Japan Limited
Compliance Department
4-9-25 Akasaka, Minato-ku, Tokyo
Telephone: 03-6366-8800

We shall endeavor to review our personal information management program taking into consideration of our clients, and continuously improve such program.

Chi-X Japan Limited is a member of the Japan Securities Dealers Association (JSDA) which is authorized by the Financial Services Agency as an Authorized Personal Information Protection Organization. Personal Information Consultation Desk at the JSDA accepts complaints and consultations regarding personal information handling by JSDA members.

Japan Securities Dealers Association
Personal Information Consultation Desk : 03-3667-8427
(<http://www.jsda.or.jp/>)

Purposes of use regarding personal information

1. To solicit, participate in trade at our proprietary trading system (hereinafter called as PTS), and provide service information related to our PTS business operation.
2. To provide information/service of Chi-X Japan Limited or its affiliates, and introduce such affiliates.
3. To judge appropriateness of the provision of products or services in comparison to the Know Your Customer principle.
4. To verify that you are the person in question or a person acting on behalf of the person in question.
5. To provide the transaction results, etc.
6. To perform operational activity for clients or counterparts.
7. To exercise legal rights or execute contracts with the participants.
8. To conduct market research, data analyses or send questionnaires to study or develop/improve our services.
9. To appropriately manage business when partial or whole personal information handling is entrusted by other corporations.
10. To conduct transactions of the participants or trade with counterparts properly and smoothly.

By law, sensitive information (i.e. political or religious belief, trade union membership, race and other ethnic information, family origin, domicile of origin, medical and sexual information, and criminal history) shall not be obtained, utilized or provided to third parties other than the purposes necessary to appropriate conduct of business or other purposes deemed

necessary. Domicile of origin stated on a copy of official ID will be blacked out immediately before filing the document.

We may use phone recordings for the communications with the clients.

Shared use of personal information

We may at times use personal information jointly with the designated parties.

1. Items of the personal information for shared use
 - Information regarding our participants including name, address, date of birth, phone number, occupation, need for transactions
 - Information regarding transactions, etc. of our participants
2. Scope of shared use
Chi-X Global Holdings LLC, Chi-X Global Technology LLC, Chi-X Australia PTY LTD,
3. Purposes of use
To implement integrated compliance and risk management such as business administration or internal control within Chi-X Group.
4. Responsible party of personal information management
Chi-X Japan Limited