

Nippon Kayaku Co., Ltd. (Address: 1-1, Marunouchi 2-chome, Chiyoda-ku, Tokyo 100-0005, Japan, President: Atsuhiko Wakumoto, hereafter, "KAYAKU") recognizes the importance of personal information. KAYAKU handles personal information properly, complying with all applicable laws and regulations, and follows the policy outlined below.

The definitions of "Personal Information," "Personal Data," and "Retained Personal Data" used below are based on Article 2 of the Act on the Protection of Personal Information.

## 1. Basic Policy

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- **Obtaining Personal Information**  
KAYAKU obtains Personal Information in an impartial and lawful manner. KAYAKU notifies the individual concerned of the purposes of use in advance when obtaining Personal Information.
- **Using Personal Information**  
KAYAKU handles Personal Information within the scope of the purposes of use provided by notification or disclosure in advance.
- **Disclosing Personal Data**  
KAYAKU does not disclose Personal Data to third parties in principle, except when the individual concerned agrees to disclosure or when authorized by law.
- **Managing Personal Data**  
KAYAKU will make every effort to keep Personal Data accurate and up to date. KAYAKU also takes necessary and appropriate measures such as formulation of this policy and rules for handling Personal Data as Security Control Action to prevent the leakage, loss or damage, and to otherwise implement security controls over Personal Data.
- **Disclosing, Correcting, and Discontinuing Use of Retained Personal Data**  
If KAYAKU receives a request from the individual concerned to disclose, correct, or discontinue use of Retained Personal Data, KAYAKU takes the necessary and appropriate action, in good faith, and in accordance with applicable laws and regulations after confirming the identity of the individual concerned.
- **Handling of Complaints**  
KAYAKU has established a contact point which manages complaints about the handling of Personal Information, and will respond in good faith if a complaint is received from the individual concerned.
- **Education and Training on Personal Information**  
KAYAKU implements proper handling of Personal Information in its daily business by training and educating its officers and employees to enhance their understanding of the importance of and the need to protect Personal Information.

## 2. Purpose of Use of Personal Information

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KAYAKU obtains Personal Information that is necessary to conduct business in the course of conducting the various types of business specified in the Articles of Incorporation. KAYAKU uses such Personal Information and Personal Information already obtained, for the following purposes.

KAYAKU also outsources some operations so that operations proceed smoothly, and provides Personal Information to subcontractors, within the scope of information required. In these cases, KAYAKU exercises appropriate oversight of such subcontractors; for instance, by concluding an agreement on handling of such information with the subcontractors.

(1) Purposes of use for Personal Information on physicians, dentists, pharmacists, registered nurses, or other healthcare providers

- To collect and provide information concerning the proper use of KAYAKU's pharmaceutical products, etc.
- To collect and provide information concerning the quality, safety, and efficacy of KAYAKU's pharmaceutical products, etc.
- To conduct or support investigation and research as well as research conferences, lectures, and other academic activities in the medical and pharmacological fields
- To collect and provide medical information and academic information
- To operate a website for healthcare providers and to authenticate members and provide information and communications to members
- To request and conduct clinical trials, post-marketing surveillance, etc. on pharmaceutical products, etc.
- To provide notifications and reports to government authorities and participating groups

(2) Purposes of use for Personal Information concerning individuals who contact the Corporate Communications Division, the Medical Information Service Center, or other customer support contact points within KAYAKU

- To provide public relations and IR materials, etc. from KAYAKU
- To provide invitations to and notices about KAYAKU's public relations and IR events (briefings, etc.)
- To consider, research, and respond to the content of consultations, notifications, etc.
- To communicate and provide to product manufacturers, importers, sellers, healthcare providers, etc.
- To provide notifications and reports to government authorities and participating groups

(3) Purposes of use for Personal Information concerning business partners and users of KAYAKU's products

- For negotiations, communication, consultation, settlement, and response concerning transactions
- To fulfill obligations under an agreement with a business partner
- To improve and develop products and services
- To provide useful information on products and services
- To provide notifications and reports to government authorities and participating groups

(4) Purposes of use for Personal Information concerning shareholders

- To fulfill obligations and respond to the exercise of shareholders rights pursuant to the Companies Act
- To perform various tasks to ensure a smooth relationship with shareholders
- For shareholder management in producing a shareholder database, etc. according to the standards specified in the various laws and regulations

(5) Purposes of use for Personal Information concerning job applicants

- To provide and communicate corporate information, employment information, hiring decisions, and other corporate information about KAYAKU
- For hiring decisions and determining work placement

(6) Purposes of use for Personal Information concerning officers, employees, family members of employees, and retirees

- To fulfill obligations under applicable laws and regulations and perform labor management, including attendance management, payment of wages, personnel assignments, evaluations, skill development, provision of benefits, monitoring of health and safety, etc.
- To provide information to and communicate with the KAYAKU labor union, the KAYAKU mutual aid association, the KAYAKU health insurance association, the officers' and employees' stock ownership associations, and subsidiaries and affiliated companies
- To publish in internal and external corporate relations publications, post on the website, etc.
- To send company newsletters and other materials for distribution, and communicate in an emergency
- For notifications about the alumni club and other social activities
- To provide notifications and reports to government authorities and participating groups

\*KAYAKU may revise the above-noted purposes of use within the scope specified in laws and regulations.

### 3. Disclosure and Provision to Third Parties

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KAYAKU does not disclose or provide Personal Data to third parties except when providing Personal Information for the outsourcing described in the items in 2. and 8. or for the shared use described in 4 and when the following cases apply.

1. When the individual concerned has provided consent
2. When provided pursuant to laws and regulations
3. When it is necessary to protect human life, physical safety, or property and it is difficult to obtain consent of the individual concerned
4. When absolutely necessary to improve public health, or promote healthy development of a child and it is difficult to obtain the consent of the individual concerned
5. When necessary to cooperate with public administrative tasks performed by national or local government organizations, etc. and obtaining the consent of the individual concerned could interfere with the execution of the administrative task

### 4. Shared Use of Personal Data

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KAYAKU uses Personal Data on a shared basis as follows.

#### Mainly the Personal Data of Business Partners and Others outside of KAYAKU

Parties using Personal Data on a shared basis with KAYAKU	Group companies of KAYAKU
Items of Personal Data to be used on a shared basis	Personal names, company names, affiliations, job titles, addresses, telephone numbers, e-mail addresses, dates of birth, gender and educational background (only employees)

Purpose of shared use	As described in (1) to (5) in "2. Purpose of use of Personal Information"
Party responsible for management	Nippon Kayaku Co., Ltd. Address: 1-1, Marunouchi 2-chome, Chiyoda-ku, Tokyo 100-0005, Japan President: Atsuhiko Wakumoto

### Mainly the Personal Data of KAYAKU Employees and Their Family Members

Parties using Personal Data on a shared basis with KAYAKU	Group companies of KAYAKU, Nippon Kayaku labor union, Nippon Kayaku health insurance association and Nippon Kayaku mutual aid association
Items of Personal Data to be used on a shared basis	Personal names, company names, affiliations, job titles, addresses, telephone numbers, e-mail addresses, dates of birth, gender and bank account numbers (confirmation)
Purpose of shared use	As described in (6) in "2. Purpose of use of Personal Information"
Party responsible for management	Nippon Kayaku Co., Ltd. Address: 1-1, Marunouchi 2-chome, Chiyoda-ku, Tokyo 100-0005, Japan President: Atsuhiko Wakumoto

### Mainly the Personal Data of Physicians and Pharmacists

Party using Personal Data on a shared basis with KAYAKU	Nihon Ultmarc Inc.
Items of Personal Data to be used on a shared basis	Please see the website of Nihon Ultmarc Inc. <a href="https://www.ultmarc.co.jp/privacy/shared_use/index.html">https://www.ultmarc.co.jp/privacy/shared_use/index.html</a>
Purpose of shared use	

Party responsible for management

Nihon Ultmarc Inc.  
Address: Morinaga Plaza Main Building 15F, 5-33-1, Shiba 5-Chome, Minato-ku, Tokyo, Japan  
President: Tomohiko Umeda

## 5. Disclosure

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If the individual concerned wishes to disclose his or her own information that is included in Retained Personal Data, KAYAKU will respond within a reasonable amount of time and scope, after confirming that the person who made the request is the individual concerned.

## 6. Correction, etc.

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If the individual concerned wishes to correct, add to, or delete his or her own information that is included in Retained Personal Data, KAYAKU will correct, add to, or delete the information within a reasonable amount of time and scope, after confirming that the person who made the request is the individual concerned, if the content differs from the facts.

## 7. Discontinuance of Use and Deletion

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If the individual concerned wishes to discontinue use of or delete his or her own information that is included in Retained Personal Data, KAYAKU will discontinue use of or delete the information within a reasonable amount of time and scope, after confirming that the person who made the request is the individual concerned; with the caveat that KAYAKU may not be able to respond to a request to discontinue use of or delete the information in accordance with applicable laws and regulations.

## 8. My Number and Specified Personal Information

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KAYAKU uses My Numbers and Specified Personal Information (hereinafter collectively "Specified Personal Information, etc.") for the following purposes. KAYAKU also outsources some operations so that they proceed smoothly and provides Specified Personal Information, etc. to subcontractors within

the scope required. In these cases, KAYAKU exercises appropriate oversight of such subcontractors; for instance, by concluding an agreement on the handling of such information with the subcontractors. At the same time, KAYAKU otherwise appropriately handles the Specified Personal Information, etc. by complying with the Personal Information Protection Law and Guidelines for the Proper Handling of Specific Personal Information (for Business Operators). KAYAKU also handles the Specified Personal Information, etc. in the same way for the items in 3., 5., 6., 7. and 9.

(1) Purpose of use for Specified Personal Information, etc. concerning physicians, dentists, pharmacists, registered nurses and other healthcare providers

- For the administrative process of producing payment records

(2) Purpose of use for Specified Personal Information, etc. concerning business partners and users of KAYAKU's products

- For the administrative process of producing payment records

(3) Purpose of use for Specified Personal Information, etc. concerning shareholders

- For the administrative process of producing payment records

(4) Purposes of use for Specified Personal Information, etc. concerning directors, employees, family members of employees, and retirees

- Administrative tasks relating to tax withholding
- Administrative tasks relating to individual inhabitant taxes
- Administrative tasks relating to unemployment insurance
- Administrative tasks relating to health insurance
- Administrative tasks relating to employees' pension insurance
- Administrative tasks relating to asset-building
- Administrative tasks relating to group insurance, etc.
- Administrative tasks relating to benefits from the defined benefit corporate pension plan, etc.
- Administrative tasks involving provision of information to the officers' and employees' stock ownership associations for producing payment records
- Administrative tasks relating to use of My Number in other administrative processes

\* KAYAKU may revise the above-noted purposes of use within the scope specified in laws and regulations.

## 9. Contact and Method of Receipt for Notification, Disclosure, etc.

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Requests for inquiries concerning Retained Personal Data are received according to the following methods:

### (1) Contact

[Designated Contact]

Corporate Communications Division, Nippon Kayaku Co., Ltd.  
1-1, Marunouchi 2-chome, Chiyoda-ku, Tokyo 100-0005, Japan  
Tel.: +81-3-6731-5237

[Inquiry Form](#)

### (2) Method of contact for complaints and other inquiries on Retained Personal Data

Contact the designated contact via post, telephone, or email.

### (3) Method for receiving requests relating to disclose, correct, add, delete or discontinue using or erase of Retained Personal Data or disclose a record of the Third-Party provision of Retained Personal Data

1. Download the designated company form and enter the requisite information. Enclose a self-addressed envelope with the form and send it to the designated contact by post via return-receipt registered mail (kakitome) with a 500-yen stamp affixed.
2. Submit the following documentation together with the form to confirm that the request is from the individual concerned or the representative of the individual concerned.

[Confirmation of Identity of the Individual concerned]

A copy of your driver's license or passport and an official copy of your family register or an official copy of your certificate of residence

If you do not have a driver's license or passport, submit a copy of your health insurance card or pension book and an official copy of your family register or official copy of your certificate of residence

[Representative Confirmation]

Confirmation of identity of the representative

Same as the confirmation of identity of the individual concerned described above

Confirmation of delegation by individual concerned

Legal representative → Official copy of family register and copy of notice of appointment



Agent → Power of Attorney with the registered seal of the individual concerned and the seal registration certificate for the individual concerned

Click below to obtain KAYAKU's designated form:

[Requests Concerning Retained Personal Data \[61KB\]](#)

Please understand that we may not be able to respond to requests that do not conform to this reception method.

## 10. Authorized Personal Protection Organization for KAYAKU

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The Federation of Pharmaceutical Manufacturers' Associations of Japan (hereafter, "FPMAJ") is recognized as an authorized personal information protection organization by the Personal Information Protection Commission. KAYAKU is a member of FPMAJ. FPMAJ receives complaints and answers inquiries regarding the handling of Personal Information by KAYAKU.

[Contact for Inquiries]

The Federation of Pharmaceutical Manufacturers' Associations of Japan  
Personal Information Protection Center

Address: Pharmaceutical Industry Health Building, 1-5 Honcho 2-chome, Nihonbashi, Chuo-ku, Tokyo  
103-0023, Japan

Tel.: +81-3-3270-1810

Reception hours: 10:00 a.m. to 4:00 p.m. (excluding Saturdays, Sundays, holidays, and designated holidays around year-end/New Year)

Website: <http://www.fpmaj.gr.jp/>

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