

## CUSTOMER DATA PRIVACY PROTECTION POLICY

Speed Money Transfer Japan (SMTJ) will comply with relevant laws and ordinances and other standards relating to customer's personal data in order to obtain the trust and confidence of the customers and for SMTJ to become the money remittance company of choice in Japan. SMTJ shall comply with various regulations to the protection of personal data and make every effort to implement appropriate management and maintain accuracy and confidentiality as specified below:

### 1. PURPOSE OF USE OF PERSONAL INFORMATION

SMTJ acquires and shall use collected personal information of customers within the extent necessary for attaining the following purposes stated so that transactions of customers can be securely executed and provide better remittance service to customers.

- (1) To record membership registration and information and provide international money transfer service.
- (2) To confirm the identity of the customer and qualification for use of the services in accordance with the "Act on Prevention of Transfer of Criminal Proceeds", "the Foreign Exchange and Foreign Trade Act", "the Law on Reporting Requirements on Cross Border Payments and Receipts for the Tax Law".
- (3) To exercise rights or perform obligations based on agreements with customers, laws and etc.
- (4) To conduct research and development of services by carrying out market surveys, data analysis and questionnaire, etc.
- (5) To send various items such as direct mail shipping, etc.
- (6) To make various proposals of products and services of partner companies, etc.
- (7) To cancel various transactions and carry out subsequent management after cancellation of transaction.
- (9) In addition, and in order to fulfill dealings properly and smoothly with customers:

SMTJ also acquires the individual number (My Number) of customers for the purpose of necessary documents as required by the "Law on Reporting Requirements on Cross Border Payments and Receipts for the Tax Law".

### 2. TYPES OF PERSONAL INFORMATION TO BE ACQUIRED

SMTJ need to acquire general types of information such as the individual number (My Number), address, and name, date of birth, occupation, gender, nationality and telephone number of the customer. In addition to the above information, the customer may be requested for additional information during transaction.

### 3. COLLECTING PERSONAL INFORMATION THROUGH LAWFUL MEANS

SMTJ will properly acquire customers' personal information. SMTJ may acquire personal information from the following sources, namely:

- When such information is directly provided by a customer through an application for registering remittance membership or other documents which the customer fills out and submits to SMTJ (or enters necessary data in the website);
- When the information is provided directly by the customer through the provision of our products and services (such as incoming calls to SMTJ from customer).

### 4. PROVIDING PERSONAL INFORMATION TO THIRD PARTIES

SMTJ shall not provide any personal information outside except in the following cases:

- (1) When there is consent from the customer.
- (2) When the situation falls under the exceptional cases specified by laws or ordinances.
- (3) When the handling of personal information is outsourced to an outside service provider (whether within or outside Japan) to the extent required for achieving the purpose of use set forth in the "Purpose of Use of Personal Information" upon concluding an outsourcing contract. In this case, SMTJ shall establish appropriate criteria or standards to strictly select outside service providers. SMTJ shall also supervise these providers appropriately in order to prevent use of such information for purposes other than the original intent, leakage, loss or damage of such information, etc.

SMTJ entrusts handling of personal data/information to outside service providers in the following cases, for example:

- Execution of the money transfer transaction to the designated account or designated person through the network of financial institutions;
- Administrative operations for dispatching direct mail (including e-mail, SMS)
- Operation related to information system operation and maintenance;
- Call center operations, and;
- Storage of slips, vouchers, and other various documents.

## 5. PERSONAL INFORMATION MANAGEMENT METHOD

Appropriate measures will be undertaken to keep customer information accurate and up-to-date. In addition, SMTJ shall take appropriate information security measures to prevent loss, damage, falsification and leakage of customer's personal data information. SMTJ will ensure that any company handling the personal data of customers, etc. on consignment from SMTJ shall also enforce rigorous management.

## 6. CUSTOMER INQUIRIES AND COMPLAINTS

When SMTJ receives any complaints concerning the handling of personal information, etc., SMTJ will investigate and make efforts to process the complaints appropriately and promptly within a reasonable period of time.

The customer may contact SMTJ for any inquiries, complaints, requests for disclosure, suggestions, correction of data, discontinuation of the use of personal information, etc., to the following address and contact telephone/fax numbers mentioned below.

### Speed Money Transfer Japan K.K.

Kinshicho City Bldg. 9F,  
2-13-4 Kotobashi, Sumida-ku,  
Tokyo 130-0022  
Tel; +81-3-6869-8555  
Fax; +81-3-3635-8625

## 7. CUSTOMERS' APPLICATION FOR DISCLOSURE, CORRECTION OR DISCONTINUATION OF PERSONAL INFORMATION

In accordance with the Personal Information Protection Act, SMTJ accepts requests for disclosure and revising customers' Personal Information held by SMTJ after verifying that the customer is really the one and the same person applying for disclosure. Customers may request the disclosure or revision of their own Personal Information at any time through the procedures prescribed by SMTJ. If a request is made to disclose whether or not an Individual Number is possessed, SMTJ's reply shall be limited to whether it is possessed or not. In the event of inaccurate information of the customer, SMTJ undertakes to make the necessary correction.

### About Disclosure Request

1. Contact Point	Speed Money Transfer Japan K.K.
2. Required Document	Application form as prescribed by SMTJ (Disclosure request form for personal information)
3. Identity Verification	The method prescribed by SMTJ
4. Fee	It should be noted that actual costs may be billed for disclosure. SMTJ shall advise the customer of the amount of the actual costs in advance.
5. Notification	Send to the registered address by postal mail
6. Required lead time	One (1) week or more (depending on the items to be disclosed)
7. Non-compliance	Disclosure of information will not be made in the following cases: If we decide not to disclose the relevant information, we will notify you with a reason of our decision. Also, in the case that you do not disclose and we decide non-compliance, we will charge a prescribed fee. 1. When we cannot confirm your identity; 2. When we cannot confirm your proxy's authority and right to represent you; 3. When there is insufficiency in the prescribed request document/form; 4. When there is no payment of the relevant fee within the prescribed payment period; 5. When the requested information item does not correspond in the personal data held; 6. When the disclosure could harm the life, body, property or other rights or interests of yourself or a third party; 7. When the disclosure can seriously hinder the proper implementation of our business; 8. When the disclosure would violate other laws and regulations.

## 8. MODIFICATIONS

Any and all information listed above may be modified at any time without prior announcement to SMTJ's customers. Appropriate announcement will be made (e.g. posting on SMTJ's customer area and on website).