

*Note: This document has been translated from Japanese original for reference purposes only. In the event of any discrepancy between this translated document and the Japanese original, the original shall prevail.*

## Personal Information Handling Policy

Nippon Koei Co., Ltd.

The Company shall handle any personal information of stakeholders in compliance with Japan's Act on the Protection of Personal Information and other relevant laws and regulations, as well as the ID & E Group Personal Information Protection Policy (Group Privacy Policy), as follows.

### **1. Name, Address, and Name of the Representative of the Business Operator Handling Personal Information**

See [Company Profile](#).

### **2. Acquisition and Use of Personal Information**

In case of acquiring personal information, the Company shall disclose to the public or notify the provider of the purpose of use and shall acquire such information properly.

The Company shall utilize the acquired personal information properly within the scope necessary to achieve the purpose of use.

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

The Company shall use the retained personal data concerning the following personal information acquired in the course of business within the scope of the following purposes of use.

#### **(1) Personal information acquired for various communications**

- Responding to inquiries, correspondence, and registrations
- Analysis and use for sales and marketing activities and business improvement
- Information on and provision of after-sales services for provided products and services,
- Public relations activities of the Company, including provision of information about new products and services, and invitations to events and seminars, and other external public relations, and
- Other matters concerning or associated with the above.

#### **(2) Personal information of clients/customers and business partners (including officers and employees if the client/customer or business partner is an organization such as a corporation)**

- Performance of contractual obligations and exercise of contractual rights, including provision and acceptance of products and services,
  - Performance of activities required for business operations, including business communications and meetings and response to inquiries,
  - Information on and provision of after-sales services for provided products and services,
  - Public relations activities of the Company, including provision of information about new products and services, and invitations to events and seminars, and other external public relations, and
  - Various responses including implementation of questionnaire surveys concerning or associated with the above-mentioned business activities.
- (3) Personal information acquired for contracted works
- Surveys, statistical data processing, analysis and fact-findings, preparation of relevant documents and reports, etc. for the performance of contracted works,
  - Implementation of questionnaire surveys, interview surveys, and public meetings as part of contracted works, and
  - Other matters related to or associated with contracted works.
- (4) Personal information of applicants for employment
- Contacting, accepting applications for, and conducting seminars, events, and company briefings, etc. related to recruitment and recruiting activities,
  - Administrative work concerning recruitment activities, including the selection of recruits, and notification of the selection process and result to applicants,
  - Provision of information on health check-ups and paperwork for employment, and employment management after employment,
  - Improvement of recruitment activities and selection process, and
  - Other administrative matters concerning or associated with the above.
- (5) Personal information concerning employees of the Company
- The handling of personal information of the Company's officers, employees, dispatched workers provided by temporary employment agencies and other people (including retired persons) who are or were engaged in the operations of the Company (hereinafter referred to as "employees") shall be in accordance with this policy as well as the Handling of Personal Information of Group Employees set forth by the Personnel Dept. of the company.
- (6) Personal information of shareholders (including officers and employees in the case of a corporation)
- Various formalities concerning exercise of the rights of shareholders,
  - Management of General Meeting of Shareholders,
  - Delivery of various documents from the Company
  - Preparation of a shareholder database in accordance with the applicable laws and

- regulations, and
  - Other administrative matters concerning or associated with the above.
- (7) Personal information concerning specific personal information (personal information including individual number) stipulated by the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (My Number Act)
- Preparation of withholding certificates,
  - Preparation and submission of declarations, notifications, and applications concerning property accumulation savings for house construction and property accumulation pension savings,
  - Notification, application, and requests for payment concerning health insurance, employees' pension insurance, and corporate pension,
  - Notification, application, and requests for payment concerning employment insurance,
  - Notification of Category III insured persons under the National Pension system,
  - Reparation and issuance of legal documents for the members of executive and employee shareholder associations,
  - Other administrative matters stipulated by laws and regulations, and
  - Other administrative matters concerning or associated with the above.

#### **4. Joint Use**

The Company shall use certain personal information jointly with others as described below.

##### **(1) Personal Data to be Used Jointly**

Basic information such as the name, date of birth, sex, address, telephone number, affiliation, position, and e-mail address of employees of the ID & E Group.

Basic information such as name, date of birth, sex, address, telephone number, affiliation, position, and e-mail address of employees and job applicants of the ID & E Group, as well as the information such as the name, affiliation, position, e-mail address, etc. of individuals involved in various inquiries and transactions.

##### **(2) Scope of Persons Jointly Using Personal Data**

ID & E Holdings Co., Ltd. and its Group Companies (See the List of [Group Companies page](#) available on the Company's website.)

##### **(3) Purpose of Use**

See 3. Purposes of Use of Personal Information above.

##### **(4) Name, Address, and Name of the Representative of the Company Responsible for Management of the Said Personal Data**

Integrated Design & Engineering Holdings Co., Ltd.

Personnel Dept.

Phone number: +81-3-3238-8030

\*Address and representative are listed on the Company's website.

## **5. Provision to Third Parties**

In principle, the ID&E Group shall not provide personal information to any third party without obtaining the consent of the person concerned in advance. However, personal information may be provided to a third party without consent of data holder in the following cases and other cases permitted by laws and regulations.

- 1) Cases based on laws and regulations,
- 2) Cases in which there is a need to protect the life, body, or property of a person and when it is difficult to obtain the consent of the person concerned,
- 3) Cases in which there is a particular need to improve public health or promote the sound growth of children, and when it is difficult to obtain the consent of the person concerned, or
- 4) Cases in which there is a need to cooperate with a central government organization or a local government, or a person entrusted by them to perform affairs prescribed by laws and regulations, and when there is a possibility that obtaining the consent of the person concerned would interfere with the performance of the said affairs.

In addition, in foreign countries where the Company and Group Companies have business or sales offices, personal information may be provided to third parties such as Group Companies, project owners, and JV partners in those countries as necessary for business purposes.

See the Company's website for the [business and sales offices of the Company and Group Companies](#).

See the website of the Personal Information Protection Commission for the laws and regulations of each country where such offices are located.

<https://www.ppc.go.jp/enforcement/infoprovision/laws/>

The Company and Group Companies take measures to protect personal information by complying with the Group's unified information-related regulations.

## **6. Outsourcing of Personal Information Processing**

The Company may outsource the handling of personal information, in whole or in part, to a third party such as a company with which it has concluded a non-disclosure agreement (including Group companies). The Company shall provide necessary and appropriate supervision over the handling of personal information by the outsourced company.

## **7. Assurance etc. about the Accuracy of Data Contents**

The Company shall strive to keep personal data accurate and up to date within the scope necessary to achieve the purpose of use and to delete such personal data when its use is no longer required without delay.

## **8. Security Control Measures for Retained Personal Data**

The Company has implemented the following measures for security control of retained personal data:

### **(1) Formulation of Basic Policy**

- The Company has formulated ID&E Group Privacy Policy to ensure proper handling of personal information.

### **(2) Formulation of Regulations on the Handling of Personal Data**

- The Company has formulated internal regulations, stipulating the methods of handling personal data and responsible persons at each stage of data acquisition, use, retention, provision, etc.

### **(3) Organizational Security Control Measures**

- The Company has appointed a responsible person at each stage of handling personal data, defined the scope of employees who can access personal data, and established a reporting and response system in the event of suspected or confirmed leakage of personal information.
- The handling of personal data is checked periodically.

### **(4) Security Control Measures for Employees**

- The Company provides employees with training in the management of information, including personal information.
- The Company requires new employees to submit a written pledge concerning information management.

### **(5) Physical Security Control Measures**

- The Company controls entry to and exit from office buildings and the offices therein, confirms that all doors and windows are locked, and patrols the office buildings.
- The Company limits unnecessary taking of the personal information outside the Company.
- The Company has taken security measures against theft or loss of information devices and memory media.

### **(6) Technological Security Control Measures**

- The Company provides each employee with an individual ID and password to log in to the in-house network and limits the scope of employees who can access information, including personal information.
- The Company has taken measures to prevent unauthorized access to the in-house network by third parties, including measures against malware.

## **9. Response to Requests for Disclosure, etc. of Retained Personal Data**

Please contact the following contact point regarding questions, complaints, or requests for disclosure, suspension of use, deletion, etc. of retained personal data.

Management Operations General Affairs Dept.

Contact Us

However, the Company shall refuse data disclosure in any of the following cases.

- 1) When it is impossible to confirm the identity of the applicant, for example, because of discrepancy between the name and/or address on the application form and on the identity verification document
- 2) When the application is made by an agent but his/her authority of representation cannot be confirmed
- 3) When the entries on the application form are incomplete
- 4) When the personal data of the applicant are not retained or the retained personal data of the applicant are not subject to disclosure
- 5) When disclosure may harm the life, body, property, or other rights and interests of the applicant or a third party
- 6) When disclosure may have a serious negative influence on the proper business operations of the Company
- 7) When disclosure would violate laws and regulations, or when laws and regulations permit nondisclosure

#### **10. Establishment, revision and abolition**

The company may revise this policy as necessary.

The department in charge of this policy is the Legal and Compliance Department, and any revision or abolition of this policy shall be proposed by the said department and carried out by a decision of the President which is the establishing authority.

However, formal changes shall be implemented by the decision of the General Manager of the department in charge.

Established    Apr 1, 2022

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