

Kenedix Real Estate Fund Management, Inc. Privacy Policy

1. Basic Policy on Personal Information Protection

Kenedix Real Estate Fund Management, Inc. (hereinafter, “KFM”) is committed to the appropriate processing and management of personal information in accordance with the Act on the Protection of Personal Information and other related laws, regulations and guidelines, etc.

2. Acquisition of Personal Information

Where personal information is to be acquired, KFM will do so through appropriate means. Where personal information is to be acquired directly from the person in writing or via a screen of the website, etc., KFM will clearly indicate the purposes of use in advance. However, where the purposes of use are clear given the circumstances of the acquisition of personal information or where omission of clear indication of the purposes of use is permitted under laws and regulations, etc., a clear indication of the purposes of use may be omitted.

3. Purposes of Use of Personal Information

KFM uses the acquired personal information for the following purposes.

- (1) For conducting any business operations pertaining to exercise of the rights of the unitholders of the investment corporations that KFM manages (hereinafter, the “unitholders”) and performance of the obligations of KFM pursuant to the Act on Investment Trusts and Investment Corporations and other laws and regulations as well as regulations of administrative agencies and financial instruments exchanges (hereinafter “Investment Trusts Act, etc.”); such as providing asset management reports and issuing notices of convocation of the general meeting of unitholders or notices of payment of distributions to the unitholders;
- (2) For managing information of the unitholders, such as preparation of data of the unitholder’s register, etc. prepared pursuant to the Investment Trusts Act, etc., and for providing information to unitholders;
- (3) For handling and confirming inquiries and visits concerning businesses conducted by KFM;
- (4) For implementing asset management businesses such as acquisitions, sales and leases of customers’ assets under management (customers shall include investment corporations, corporations or associations functioning as vehicles for investments in the form of special purpose companies (SPCs) and others, and trustees of trusts), lease management businesses, building management businesses and any other businesses, and for conducting survey analyses, data collection and various introductions required in such businesses;
- (5) For confirming the identification of the persons stated on application forms, contracts, etc. for performance of the businesses conducted by KFM; and
- (6) In addition to what is provided for in the preceding items, for performing business operations related or incidental to the businesses conducted by KFM

4. Management of Personal Data

KFM strives to maintain personal data accurate and up-to-date within the scope necessary to achieve the purposes of use and delete personal data that are no longer necessary.

KFM takes necessary and appropriate safe management measures according to each stage of acquisition, use, storage, etc. of personal data to prevent leakage, loss or damage, etc. of personal data. KFM establishes the internal regulations necessary for safe management of personal data, provides its officers and employees with relevant education and training, and

carries out necessary and appropriate supervision.

5. Handling of Sensitive Information

With respect to Sensitive Information (“Special care-required personal information” defined in the Act on the Protection of Personal Information and sensitive information provided for in the “Guidelines for Personal Information Protection in the Financial Field”), KFM will not acquire, use or provide to any third party the Sensitive Information without the principal’s consent, unless permitted under the Act on the Protection of Personal Information and other related laws, regulations and guidelines, etc.

6. Disclosure and Provision of Personal Data to Third Parties

KFM will not disclose or provide personal data to third parties except in the following cases.

- (1) The principal has given his/her consent;
- (2) The disclosure or provision of personal data is based on laws and regulations;
- (3) The disclosure or provision of personal data is required to protect the life, health or assets of a person and it is difficult to obtain the principal’s consent;
- (4) It is particularly necessary in order to enhance public health or to promote the sound nurturing of children, and it is difficult to obtain the principal’s consent;
- (5) Cooperation is requested by national or local government agencies, or service providers contracted by those agencies to conduct matters prescribed by laws and regulations, and obtaining the principal’s consent may hinder the conduct of such matters;
- (6) KFM provides personal data to outside service providers under appropriate supervision by KFM within the scope necessary to carry out the applicable purpose of use of the personal data; and
- (7) The disclosure or provision of personal data is permitted under the Act on the Protection of Personal Information and other laws, regulations and guidelines, etc.

7. Supervision of Contracted Service Providers

Upon disclosing or providing personal information to contracted service providers, KFM conducts necessary and appropriate supervision of such contracted service providers to prevent loss, misuse, modification, etc. of the personal data handled and in their possession.

8. Inquiries Concerning Personal Information

Please contact the following if you have questions and inquiries on disclosure, correction, suspension of use, etc. concerning the personal information that has been provided to KFM:

Kenedix Real Estate Fund Management, Inc.

2-1-6 Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-0011 Japan

Phone: +81-3-5157-6300

Business hours: 9:00 to 17:00 Japan Standard Time (closed on weekends, national holidays and year-end/new year holidays)

However, please contact the following administrator for unitholders’ register if you have inquiries about unitholders’ register entry items and administrative affairs:

[Questions and inquiries concerning Kenedix Office Investment Corporation, Kenedix Residential Investment Corporation and Kenedix Private Investment Corporation]

Stock Transfer Agency Business Planning Department of Sumitomo Mitsui Trust Bank, Limited

2-8-4 Izumi, Suginami-ku, Tokyo 168-0063 Japan
Phone: 0120-782-031 (toll-free, domestic only)
Business hours: 9:00 to 17:00 Japan Standard Time (closed on weekends, national holidays and year-end/new year holidays)

[Questions and inquiries concerning Kenedix Retail REIT Corporation]

The Stock Transfer Agency Department of Mizuho Trust & Banking Co., Ltd.
2-8-4 Izumi, Suginami-ku, Tokyo 168-8507 Japan
Phone: 0120-288-324 (toll-free, domestic only)
Business hours: 9:00 to 17:00 Japan Standard Time (closed on weekends, national holidays and year-end/new year holidays)

KFM is subject to the procedures established by The Investment Trusts Association, Japan and Japan Investment Advisers Association, which are both Accredited Personal Information Protection Organizations. Such associations accept complaints and inquiries concerning the processing and management of personal information by the entities subject to their procedures.

Member Inspection Department, Investor Enquiry Section of The Investment Trusts Association, Japan
6F Tokyo Stock Exchange Building, 2-1, Nihonbashi-kabutocho, Chuo-ku, Tokyo 103-0026 Japan
Phone: +81-3-5614-8440
Business hours: 9:00 to 11:30 and 12:30 to 17:00 Japan Standard Time (closed on weekends, national holidays and year-end/new year holidays)

Secretariat Office Complaints Desk (Personal information officer) of Japan Investment Advisers Association
7F Tokyo Shoken Kaikan Building, 1-5-8, Nihonbashi-kayabacho, Chuo-ku, Tokyo 103-0025 Japan
Phone: +81-3-3663-0505
Business hours: 9:00 to 17:00 Japan Standard Time (closed on weekends, national holidays and year-end/new year holidays)

* Revision of this Policy

KFM will review and revise this Privacy Policy pursuant to amendments to and/or abolition of laws and regulations, etc. or when such revisions are necessary, and strive to protect personal information.

End

Enacted on October 1, 2013
Amended on October 15, 2013
Amended on January 28, 2014
Amended on January 21, 2015
(Enforced on February 10, 2015)
Amended on June 5, 2017
Amended on November 6, 2017