

Kenedix Real Estate Fund Management, Inc.

Privacy Policy

Company name: Kenedix Real Estate Fund Management, Inc.

Location: 2-1-6 Uchisaiwaicho, Chiyoda-ku, Tokyo

Representative: Hikaru Teramoto, President & CEO

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. Purposes of Use of Personal Information

(1) KFM uses the acquired personal information for the following purposes.

- ① For conducting any business operations pertaining to the exercise of the rights of the unitholders of the investment corporations that KFM manages (hereinafter, the “unitholders”) and to the 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 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. necessary for the 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
- (2) KFM will not alter the purpose of use of personal information beyond the scope recognized reasonably relevant to the pre-altered purpose of use.
- (3) KFM will not use the personal information in a manner that may encourage or induce illegal or unjust acts.

3. Acquisition of Personal Information

When acquiring personal information, KFM will use appropriate and fair means to the extent necessary to achieve the purpose for which the information is to be used. 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 website page, 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. In addition, when obtaining personal information through third parties, KFM will not obtain personal information suspected of having been obtained illegally.

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 to delete personal data that are no longer necessary.

In accordance with the guidelines for the protection of personal information set forth by the Personal Information Protection Commission and/or Financial Services Agency, at each stage of the acquisition, use, storage, etc. of personal data, KFM takes the following necessary and appropriate safe management measures in order to prevent leakage, loss or damage, etc. of personal data:

- ① Establish and comply with policies and regulations to ensure the proper handling of personal data;
- ② Establish and comply with rules and regulations regarding the handling of personal data at each stage of the acquisition, use, transfer, storage, deletion, etc., including handling methods, responsible persons/persons in charge and the definition of their duties;
- ③ Appoint an information management officer and periodically inspect and audit the status of the handling of personal data. The results of the inspection and audit shall be reported to the Board of Directors and a system established for the Board of Directors to evaluate, review and improve security control measures;

- ④ Stipulate the confidentiality of personal data in its employment regulations, etc., and ensure that employees are thoroughly informed, educated, and trained in security control measures;
- ⑤ Take measures to prevent theft or loss of personal data in areas where personal data is handled;
- ⑥ Install in the information systems handling personal data tools for the identification of, and protection against, unauthorized access from outside or the installation of unauthorized software. In addition, set access privileges as necessary, record, analyze, and store access to personal data, and monitor record of suspected fraud on a regular basis; and
- ⑦ When handling personal data in foreign countries, implement the necessary security control measures based on an understanding of the systems for the protection of personal data in the countries and regions where personal data is handled

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.

When handling pseudonymized information, anonymized processed information and personality-related information, KFM will comply with the obligations stipulated in relevant laws, regulations, and guidelines.

6. Disclosure and Provision of Personal Data to Third Parties

(1) 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.
- (2) When providing personal data or personality-related information to a third party situated in a foreign country, KFM will comply with the obligations stipulated by the relevant laws, regulations, and guidelines.

7. Supervision of Contracted Service Providers

When 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. Joint Use of Personal Data

KFM jointly uses certain personal data with the registered investment corporations for which KFM provides asset management business service, etc. in the following manner within the scope necessary to achieve the purposes of joint use:

Personal data to be jointly used	<ul style="list-style-type: none"> (a) Information on the unitholders <ul style="list-style-type: none"> • Attribute information such as name, address and number of units of investment held • Content of feedback, requests and complaints, etc. and information related thereto • Any other information necessary to achieve the purposes of use stated in the “Purposes of use by joint users” row below (b) Information on the tenants, etc. (including prospective tenants, former tenants and guarantors) of the properties held or considered for acquisition by the investment corporations <ul style="list-style-type: none"> • Attribute information such as name and address • Content, etc. of feedback, requests and complaints, etc. and information related thereto • Status of performance, etc. of lease agreements, etc. with the tenants, etc. and information related thereto • Any other information necessary to achieve the purposes of use stated in the “Purposes of use by joint users” row below (c) Information on other co-contracting parties and business
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	<p>partners, etc.</p> <ul style="list-style-type: none"> • Name, address, and other attribute information (of the subject person, or in the case of a corporation, the representative, etc., or the person in charge) • Content of feedback, requests and complaints, etc. and information related thereto • Status of performance, etc. of agreements, etc. and information related thereto • Any other information necessary to achieve the purposes of use stated in the “Purposes of use by joint users” row below
<p>Scope of joint users</p>	<ul style="list-style-type: none"> • KFM and the registered investment corporations for which KFM provides asset management business service, etc. * For information on the applicable registered investment corporations, please refer to the following. • KDX Realty Investment Corporation https://www.kdx-reit.com/eng/ • Kenedix Private Investment Corporation https://www.kpi-reit.com/
<p>Purposes of use by joint users</p>	<p>(a) Information on the unitholders</p> <ul style="list-style-type: none"> • To respond to feedback, etc. from the unitholders of each investment corporation and to otherwise respond appropriately to the unitholders • In addition to the above, to properly manage the affairs of the unitholders <p>(b) Information on the tenants of properties held or considered for acquisition by the investment corporations</p> <ul style="list-style-type: none"> • To perform assessment of the tenants, etc. of each investment corporation • To respond to feedback, etc. from the tenants, etc. • In addition to the above, to properly manage the investment properties, etc. <p>(c) Information on other co-contracting parties and business partners</p> <ul style="list-style-type: none"> • To respond to feedback, etc. from co-contracting parties and

	<p>business partners, etc.</p> <ul style="list-style-type: none"> • In addition to the above, to properly manage the affairs of co-contracting parties and business partners, etc.
Person responsible for the management of personal data	The personal data handled by KFM is managed under the responsibility of KFM, and the personal data handled by other joint users is managed under the responsibility of such other joint users.

9. Inquiries Concerning Personal Information

Please contact the following if you have requests to notify the purpose of use or other inquiries regarding disclosure, correction, addition, deletion, or suspension of use, etc. of the personal data that has been provided to KFM, or require disclosure of records of the personal data provided to third parties:

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 the unitholders' register if you have inquiries about unitholders' register entry items and administrative affairs:

[Questions and inquiries concerning KDX Realty 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)

KFM is subject to the procedures established by The Investment Trusts Association, Japan, which is an Accredited Personal Information Protection Organizations. The association accepts complaints and inquiries concerning the processing and management of personal information by 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)

* Revision of this Policy

KFM will review and revise this Privacy Policy pursuant to amendments to and/or the abolition of laws and regulations, etc. or whenever such revisions are necessary, and will 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

Amended on March 1, 2018

Amended on November 8, 2018

Amended on August 4, 2021 (Enforced on September 1, 2021)

Amended on April 7, 2022

Amended on January 4, 2023

Amended on August 23, 2023

Amended on November 1, 2023