

Privacy Policy

April 1, 2025

New York Life Investment Management Asia Limited

New York Life Investment Management Asia Limited (“NYLIM” or “we”) hereby adopts the Privacy Policy (“Policy”) described below and declares that we will comply with this Policy in terms of personal information protection for our customers. The basic policies of personal information protection described in this Policy will be continuously reviewed and updated as required.

1. Compliance with applicable laws and regulations

NYLIM will comply with the Act on the Protection of Personal Information ("Act"), other related laws and regulations regarding the protection of personal information, the guidelines of the Personal Information Protection Commission (“PPC”), the guidelines of accredited personal information protection organizations, and this Policy.

2. Purpose of use of Personal Information

We will use the personal information collected from customers within the scope necessary to achieve the intended purpose, except in cases where we have obtained the customer's consent or where exceptions are permitted by law. We will not use the personal information for any other purposes. The purpose of use of personal information by us will be clearly communicated through methods such as postings at our Japan branch.

3. Joint Use and Provision of Personal Data to Third Parties

We will not provide the personal information obtained to third parties without the prior consent of the individual, except as stipulated by relevant laws and regulations. We may share personal data among our group companies as described in the section "Joint Use and Provision of Personal Data to Third Parties" below.

4. Measures for the Safe Management of Personal Information

We will strive to keep your personal information accurate and up to date. To prevent the leakage, loss, or damage of your personal information, we have established internal rules concerning the protection of personal information. We will review and revise these rules as necessary to maintain an appropriate internal system and implement strict security measures. Additionally, we will conduct appropriate supervision and inspections of our officers, employees, and contractors to ensure compliance.

5. Main Sources of Personal Information and Outsourcing

The main sources of personal information and the primary outsourced operations are listed in the section "Main Sources of Personal Information and Outsourced Operations" below.

6. Requests for Disclosure, Correction, etc., and Inquiries Regarding the Handling of Personal Information

If we receive a request for disclosure, correction, etc., regarding the personal data we hold about our customers, we will promptly respond to such requests in accordance with our prescribed procedures. For more details, please contact your representative at NYLIM or the contact information provided below.

New York Life Investment Management Asia Limited
Compliance Department
Otemachi Building 9th Floor, 1-6-1 Otemachi, Chiyoda-ku, Tokyo 100-0004, Japan
Phone: +81 3 6550 9921 (Reception)

7. Accredited Personal Information Protection Organizations

NYLIM is a member of the Japan Investment Advisers Association and the Type II Financial Instruments Firms Association, both of which are accredited personal information protection organizations recognized by the PPC. These associations handle complaints and consultations regarding the handling of personal information by their member companies.

Japan Investment Advisers Association
Complaint Consultation Office
Phone: +81 3 3663 0505

Type II Financial Instruments Firms Association
General Affairs and Membership Dept., General Affairs Section
Phone: +81 3 6910 3980

Purpose of Use of Personal Information in Financial Instruments Business

We will handle your personal information within the scope necessary to achieve the following business activities and purposes of use:

Business Activities

1. Investment management business and related activities
2. Other activities that investment management companies are permitted to conduct, including those that may be approved in the future, and related activities
3. Investment advisory and agency operations and related activities
4. Other activities that investment advisory and agency companies are permitted to conduct, including those that may be approved in the future, and related activities

5. As a Type II Financial Instruments Business, handling private placements of securities as stipulated in Article 2, Paragraph 8, Item 9 of the Financial Instruments and Exchange Act, and related activities (including activities that may be approved in the future).

Purpose of Use

1. To handle administrative tasks related to investment advisory contracts and discretionary investment contracts
2. To provide investment advisory services
3. To provide services related to our Type II Financial Instruments Business
4. To handle administrative tasks related to other ancillary operations
5. To assess the appropriateness of providing products and services in light of the principle of suitability
6. To introduce services of NYLIM or its affiliated companies
7. To verify the identity of the customer, their agent, the representative of a corporate customer, the person in charge of transaction, or their agent
8. To report transaction results, balances, etc., to the customer
9. To conduct research and development of financial products and services through market research, data analysis, surveys, etc.
10. To appropriately and smoothly conduct transactions with customers and other business activities of NYLIM

Joint Use and Provision of Personal Data to Third Parties

To achieve the purposes mentioned above, we may jointly use your personal data among our group companies as described below, while implementing appropriate safety management measures.

1. Items of Personal Data for Joint Use

- Information about the customer (name, organization (company) name, address, job title, phone number, fax number, email address, etc.)
- Information related to the customer's transactions (transaction details, account balances, etc.)
- Other information obtained within the necessary scope to ensure the proper execution of business operations

2. Scope of Joint Use

Subsidiaries and investment management companies of New York Life Insurance Company in the United States ("NYLI Group Companies"). For example, the following companies fall under NYLI Group Companies:

- Ausbil Investment Management Limited
- Candriam SCA
- Candriam Switzerland LLC
- NYL Investments Europe Limited

- MacKay Shields LLC
- MacKay Shields UK LLP
- New York Life Insurance Company
- New York Life Investment Management LLC
- New York Life Investment Management Holding LLC
- NYL Investors (U.K.) Ltd.
- NYL Investors LLC
- Tristan Capital Partners
- Apogem Capital LLC
- Kartesia Management S.à.r.l.
- NYLIFE Distributors LLC
- NYLIFE Securities LLC

All international transfers of personal data are conducted in accordance with the Act, including the use of data protection agreements and the framework for mutual transfer of personal data between Japan and the European Union.

3. Purpose of Use by Joint Users

- To collaboratively provide comprehensive financial services as a group
- For risk management, business management, and corporate management as a group

4. Manager Responsible for Shared Personal Data

New York Life Investment Management Asia Limited

We will not use or provide to third parties any special non-public information, such as information about race, creed, family origin, registered domicile, medical history, or criminal record, for purposes other than the appropriate operation of business or other purposes deemed necessary.

Requests for Disclosure and Correction of Retained Personal Data

For requests regarding the disclosure or correction of personal data held by NYLIM, we will verify your identity and accept such requests through our prescribed procedures.

1. Contact Information

Please contact your representative at NYLIM or our Compliance Department.

2. How to Request

Please fill out and sign the Personal Information Disclosure/Correction Request Form (“Form”) and submit it.

3. Identity Verification

You may be required to submit identity verification documents along with the Form.

4. Fees for Request

Depending on the content of your request, we may charge actual costs.

5. Specification of Retained Personal Data for Request

Please specify the details of your request (relevant items, reasons for the request, time, period, etc.) in the Form.

6. Our Response

Upon confirmation of the arrival of the Form and payment of fees (if applicable), we will promptly respond in writing. Please note that the response will be mailed to your registered address.

Main Sources of Personal Information and Outsourced Operations

1. Main Sources of Personal Information

The sources from which we collect personal information include, but not be limited to, the following:

- Information directly provided by customers through surveys conducted by NYLIM
- Information published in commercially available books such as Japan Company Handbook, Japan Directors Handbook, as well as information disclosed in newspapers and on the internet
- Information obtained from customers through the provision of products and services

2. Primary Outsourced Operations

NYLIM outsources some of its operations. The operations for which we entrust the handling of personal information to external service providers include, but not be limited to, the following:

- Printing or mailing documents to be sent to customers
- Operation and maintenance of information systems
- Operations related to legal, accounting, and labor management