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# HANDLING OF PERSONAL INFORMATION RELATED TO Speak-Up Desk

## 1. INTRODUCTION

This document sets forth the handling of personal information by Pigeon Corporation's (hereinafter referred to as the "Company") internal reporting window, the Speak-up Desk website (hereinafter referred to as the "Speak-up Desk").

The Speak-up Desk is designed to identify fraud and other issues affecting the Company and its Group companies (hereinafter referred to as the "Pigeon Group") in advance and to ensure sound management. At the same time, we are very concerned about the protection of personal information received at the Speak-up Desk and will do our utmost to protect personal information at the Speak-up Desk.

## 2. DEFINITION

Speak-up Desk: this whistleblower contact

Acts in violation of laws and regulations, etc.: acts in violation of laws and regulations, etc., acts in violation of various internal rules established by Pigeon Group; and other acts related to Pigeon Group's business activities that are in serious violation of compliance rules or social norms, by Pigeon Group and Pigeon Group employees and officers

Acts subject to reporting: acts in violation of laws and regulations, or acts that are highly likely to be in violation of laws and regulations, etc.

Reporting: notifying acts subject to reporting by Pigeon Group and Pigeon Group employees and officers.

Consultation: receiving necessary advice prior to or in connection with the reporting.

Personal Information: Information that can be used to identify an individual and is contained in a report registered with the Speak-up Desk.

Target case: a case related to an act subject to reporting which was reported or consulted with the Speak-up Desk.

Informant: a person who makes a report to the Speak-up Desk.

Reported person: a person who was reported for having conducted an act subject to reporting or intended to conduct such an act.

Persons involved in the report: persons or organizations mentioned in the report.

Data manager: a person who has primary responsibility for the handling of personal information and determines the methods and policies for its processing.

Data processor: a person who actually collects, stores, and processes data under the direction of the data manager on behalf of the data manager.

Sensitive data: personal information that, under the laws of each country, could seriously affect an individual's personality if known to a third party, including racial or ethnic origin, political, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sexual life, etc., as defined by each country.

### **3. LAW GOVERNING HANDLING OF PERSONAL INFORMATION**

The personal data at the Speak-up Desk is processed based on the legitimate interests of the data manager to investigate and correct fraudulent activities within the Pigeon Group, in compliance with the privacy protection laws established in each country.

### **4. CONSENT**

In order to use the Speak-up Desk, you must consent to the processing of your personal information in accordance with our Personal Information Protection Policy as described in this document.

However, even if you do not disclose your name because you do not agree with the terms of the agreement and thereby have some negative impact on the Company or others, you will not be punished or treated unfavorably based on that fact.

The Speak-up Desk can also be used anonymously without providing your name or other personal information.

### **5. ORGANIZATION WITH JURISDICTION OVER THE SPEAK-UP DESK**

The parties operating the Speak-up Desk are as follows

#### **5-1. ESTABLISHER OF SPEAK-UP DESK**

Pigeon Corporation

#### **5-2. JURISDICTIONAL DIVISIONS**

Pigeon Corporation

Legal Dept.

Address: 4-4, Nihonbashi Hisamatsucho, Chuo-ku, Tokyo Japan

As the data manager, we are responsible for the handling of personal information in the Speak-up Desk and are in a position to determine and implement its policies and protection measures. Our Legal Department will handle personal information at the Speak-up Desk in accordance with the attached document.

#### **5-3. OPERATOR**

D-Quest, Inc.

Address: Ryumeikan-Honten Bldg., 3-4 Kanda-Surugadai, Chiyoda, Tokyo, Japan

As the data processor, D-Quest will maintain and operate the Speak-up Desk system on behalf of Pigeon Corporation, and will perform translations and other processing.

## 6. PROCESSING OF PERSONAL INFORMATION

### 6-1. LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

We collect personal information at the Speak-up Desk in accordance with the personal information protection laws of each country as a legitimate interest of employers and others to ensure the sound management of the Pigeon Group by detecting fraud and other non-compliant activities in advance and responding to them promptly.

### 6-2. PURPOSE OF PERSONAL INFORMATION PROCESSING

Personal information registered with the Speak-up Desk will be processed for the purpose of conducting internal investigations into fraud within the Pigeon Group. It may also be processed for reporting and other purposes at the request of national authorities.

### 6-3. TYPES OF PERSONAL INFORMATION TO BE PROCESSED

The Speak-up Desk handles the following types of personal information. Personal information is only collected and processed on the Speak-up Desk Reporting and Consultation Website and not by any other tools or methods.

- Name
- Department
- Position
- Contact
- Company Name
- Sensitive data, only when reasonably necessary
- The above information of the reported person
- The above information of the persons involved in the report
- Other information about the individual that may be mentioned in the report

### 6-4. PROCESSING METHODS

Personal information received at the Speak-up Desk will be processed as follows.

- Translation of report content into Japanese
- Pseudonymization during internal research and sharing
- Prepare reports of survey results

### 6-5. LOCATION WHERE PROCESSING IS PERFORMED

The processing will be carried out in Japan.

## **6-6. PROCESSING PERIOD**

The case will be processed for a reasonable period of time to the extent necessary to complete the investigation and response to the target case.

## **6-7. COUNTRIES WHERE PERSONAL INFORMATION IS TRANSFERRED ACROSS BORDER**

Personal information will be transferred into Japan, where our head office is located.

## **7. MANAGEMENT OF PERSONAL INFORMATION**

### **7-1. STORAGE PERIOD**

Personal information will be retained for a reasonable period of time necessary to respond to the target case, not to exceed the period required by the laws of each country.

### **7-2. STORAGE LOCATION**

The server which stores personal information is located in Japan. Reports from European countries, including the European Union (EU) and the United Kingdom, are stored on a server in the Republic of France, while those from countries on the North and South American continents are stored on a server in the United States, and then transferred to and stored on a server in Japan.

### **7-3. SHARING OF PERSONAL INFORMATION**

Personal information may be shared with related group companies, departments other than the Legal Department, employees, officers, etc., as necessary to investigate reports. In addition, personal information may be disclosed to the lawyer in charge at City-Yuwa Partners, our Consulting Lawyer's Office, for the purpose of investigation.

### **7-4. PURPOSE OF CROSS-BORDER TRANSFER OF PERSONAL INFORMATION**

Personal information will be transferred across the border to Japan for the investigation of the target case by our head office in Japan.

In addition, information is not crossed to any country other than Japan, nor is it transferred from Japan to another country.

### **7-5. PROVISION TO THIRD PARTIES**

In principle, personal information of the Speak-up Desk will not be transferred or sold to outside companies or other parties. However, personal information may be provided to outside parties in the following cases.

- Providing information to courts and other public institutions in each country at the request of the authorities in that country
- Providing information to our legal counsel and affiliated law firms for investigation of the target case

## 8. RIGHTS REGARDING THE PROTECTION OF PERSONAL INFORMATION

### 8-1. LIST OF RIGHTS

All individuals associated with the Speak-up Desk are legally entitled to:

- The right to access your personal information that is being processed
- The right to correct or delete any inaccuracies in your information
- The right to have your information deleted, or to have its processing restricted or suspended, if the processing of your information would have a material adverse effect.
- The right to reproduce your information
- The right to demand protection of your information
- Right to object to the processing of personal data
- Right to withdraw your consent
- The right to receive information about yourself in a structured, commonly used and readable format and the right to transfer that information to other data managers.
- The right not to be discriminated against for exercising these rights

### 8-2. RESTRICTIONS ON THE RIGHTS OF THE REPORTED PERSON

In order to protect the personal information of the informant and to prevent danger to his/her body or mind, the reported person is not allowed to access the content of the report or the informant's personal information, even if the informant reveals his/her identity. It is also not possible to confirm whether or not you are a reported person.

### 8-3. EXERCISE OF RIGHTS

To exercise any of the above rights, please contact the respective contact person listed below from the Speak-up Desk. Please include your 13-digit "Reporting Number" in the form.

- When a report or consultation is made to the Contact point to Audit & Supervisory Board Members the Contact point to Audit & Supervisory Board Members
- When a report or consultation is made to the Contact point to Legal Dept. Contact person in charge of the Contact point to Legal Dept.
- When a report or consultation is made to the Consulting Lawyer's Office Consulting Lawyer's Office

The response will be made through the respective contact person, in accordance with the attached sheet.

In such cases, you may be asked to provide personal information necessary to exercise your rights, and the handling of such personal information shall comply with this document.

## 9. POTENTIAL UNDESIRABLE OUTCOMES OR DAMAGES RELATED TO THE PROCESSING

Although robust security and operational rules are in place for the use of the Speak-up Desk, the following potential undesirable outcomes may occur.

- Temporary closure of the counter without prior notice due to disasters or infectious diseases
- Insufficient access due to system failure
- Large-scale investigations or disclosure of facts to authorities, media, etc. (but not including personal information) regarding matters that have serious adverse effects on the Pigeon Group, its stakeholders, or society, beyond the informant's intention.

## 10. COOKIE

Cookie is used on the Speak-up Desk Reporting and Consultation website.

Cookie is a small amount of text data exchanged between a user's terminal and a server. The Speak-up Desk uses a mandatory cookie that only handles the session ID necessary for communication, and the information collected by the cookie is never stored beyond the session. At the end of the session, the collected cookies are automatically deleted.

## 11. ANONYMOUS REPORTING

The Speak-up Desk accepts anonymous reporting. However, in the case of anonymous reporting, the person in charge of the Speak-up Desk may confirm the affiliation and name of the informant for the purpose of formulating and implementing adequate investigation and preventive measures.

## 12. COMPLIANCE WITH THE LAWS OF EACH COUNTRY

The Speak-up Desk complies with the privacy laws of each country, as well as the laws that protect whistleblowers, if any.

## 13. REVISION TO THIS DOCUMENT

This document is subject to change without notice. If you continue to use the Speak-up Desk after the change, you will be deemed to have agreed to the revised terms.

## 14. UPDATE

2024/10/1	First Edition
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Attached sheet

## Personal Information Protection Policy

Pigeon Corporation (hereinafter referred to as "Pigeon"), based on its corporate creed "Love", has been engaged in business focused in providing supportive products and services for all who need such indispensable products and services in their pregnancy, child birth, child rearing, and nursing care. For protection as to personal information belonged to every stakeholders toward Pigeon, from its obvious importance and social significance, we has established "Personal Information Protection Management System" that complies with "Requirements on Personal Information Protection Management System" (namely JIS Q 15001, one of the Japanese Industrial Standards). All executives and employees belonged to Pigeon shall comply with this "Personal Information Protection Management System", as well as laws, regulations, and other statutory on Personal Information protection. We shall also sustain solid reliability on protecting personal information, through implementation of the following measures.

1. By appointing such executive(s) in charge of whole the process in utilizing the personal information (hereinafter referred to as "Personal Information") belonged to our customers and employees (hereinafter referred to as "To-Be Covered"), including, but not limited to, acquisition, provision, or disclosure, of Personal Information, for proper management preventing such Personal Information from being unlawfully accessed, leaking, losing, or damaging.
2. On clarifying and prefixing the purpose for usage of Personal Information (hereinafter referred to as "Purpose"), and contact address for inquiry from To-Be Covered, we shall conduct appropriate collection and utilization of such Personal Information within the Purpose.
3. For implementing proper management on Personal Information disclosed by To-Be Covered, beyond the Purpose we shall never utilize, and for any third party, never provide or disclose Personal Information without the consent from To-Be Covered, provided, however, the following cases shall be excluded; (1) when such the provision or disclosure of Personal Information shall be publicly required by authorities under law or statutory; (2) when such the provision or disclosure of Personal Information shall be inevitable for the sake of public welfare, namely, restoring life, health, or property of To-Be Covered or any third party; or (3) when such the provision or disclosure of Personal Information may be especially admitted for us by authorities under law or statutory.
4. For preventing Personal Information from leaking or re-providing to any third party, we shall engaged ourselves in proper management on any companies including manufacturer or logistics companies, with whom we provide such Personal Information on fulfilment of the conditions described in article 3. above.
5. By responding sincerely and promptly to claim or inquiry on Personal Information.
6. By applying ourselves to laws, statutory, guidelines, or any other standards enforced by authorities, on Personal Information.
7. By continuously revising our current Personal Information Protection Management System whenever needed.

## Related matters on Personal Information

Disclosure Request Destination



Please refer to "8-3. Exercise of Rights."

Procedure in response to inquiry for disclosure

1. Acceptance of inquiry for disclosure and confirmation of personal identity of inquirer

( i ) Inquirer shall designate the concrete contents of to-be-disclosed, as well as inquirer's name.

( ii ) Pigeon shall scrutinize IDs (copies of residential certification or other public certifications issued by authorities, before expiration) inquirer brings, then confirm personal identity of inquirer.

( iii ) When inquiry is made by proxy, as well as those described in above ( iii ), inquiry form made by the original inquirer, and IDs (copies of residential certification or other public certifications issued by authorities, before expiration) for proxy shall be needed..

2. Notification of results against inquiry for disclosure

(a) We will notify you of our response within five business days from the business day following the day on which we receive your request for disclosure, by the method designated by you. We will destroy or delete the copies of residence certificate and official identification card that you sent to us. We may consult with you separately in cases where we believe that a considerable amount of time is required for the preparation of the notification method you have specified, etc.

( ii ) When it falls on even one of the following conditions, all of, or part of Personal Information inquired for disclosure shall never disclosed.

(a) Possibility of the inquirer or third party's life, body, property, or other interests may be damaged

(b) Possibility of Pigeon's proper conduct of business may be severely bothered

(c) Such disclosure shall be violation of any other laws or statutory

3. Measures for correction inquiry

( i ) When correction inquiry has made on the reasons of such disclosed Personal Information should be incorrect, Pigeon shall promptly engage necessary scrutinization and correction, if any.

( ii ) Results arising from such the scrutinization above described shall be sent inquirer by registered mail within the next business day from the day correction has conducted, or the day it decided not to make correction.

4. Disclosure, correction, discontinuation of usage of registered matters

Pigeon shall, to the extent that our proper conduct of business may never be bothered, disclose Personal Information on the inquiry from the person such the Personal Information belong to; provided, however, prior to such disclosure, Pigeon shall confirm personal identity of inquirer by its internally designated methods. When there should be differential in disclosed Personal Information, Pigeon shall promptly correct such the differential; meanwhile Pigeon shall promptly discontinue such the usage, on inquiry for discontinuation of Personal Information from the person such the Personal Information belong to.

Actual expenses for disclosure

The actual cost of disclosure request may be charged separately.

Contact address for any claim on Personal Information managed by Pigeon and to-be-disclosed on certain inquiry

Please refer to "8-3. Exercise of Rights."

END