



## **Banking Secrecy and Personal Data Protection**

At Union de Banques Arabes et Françaises, Tokyo Branch (“**U.B.A.F. Tokyo**”), we recognize the importance of your information and personal data you have entrusted to us, and we take our responsibilities to protect the privacy and confidentiality of your information very seriously. As a branch of a French bank located in Japan, U.B.A.F. Tokyo is committed to uphold and to comply with the highest level of obligations in protecting your information specifically under the Act on the Protection of Personal Information (“**APPI**”) in Japan and the European General Data Protection Regulation (“**GDPR**”) deemed to be equivalent to APPI.

### **Data collection**

Your information and personal data entrusted to us may be collected and used for the following business purposes:

- Complying with all applicable laws, regulations, rules, directives, orders, instructions and requests from any local or foreign authorities, including regulatory, governmental, tax and law enforcement authorities or other authorities;
- Providing banking facilities, products or services (whether made available by us or through our head office, branches and representative offices);
- Carrying out credit reviews, due diligences or other screening activities (including background checks) in accordance with legal or regulatory obligations or in accordance with our risk management procedures;
- Preventing, detecting and investigating crime, offences or breaches including, but not limited to, fraud, money-laundering, counter-terrorist financing and bribery;
- Enforcing obligations owed to us;
- Reporting obligations to relevant supervisory authorities, revenue agencies, Head Office and/or other relevant bodies for risk management, audit and record keeping



purposes;

- Seeking professional advice, including legal advice;
- Hosting and maintenance of systems and IT infrastructure
- Archival and storage of banking data and records; and
- Purposes which are reasonably related to the aforesaid.

U.B.A.F. Tokyo shall not use customers' information beyond the above mentioned "purpose" nor provide to external parties except where the customer has given his/her prior consent.

### **Data Sharing**

U.B.A.F. Tokyo may, from time to time, on a strict need-to know basis, disclose your information and personal data to any persons within the U.B.A.F. Group and with service providers, who may or may not be affiliated to U.B.A.F. Group in order to enable us to carry out the business purposes as set forth above.

All entities of UBAF Group (Head Office, 3 branches and 4 offices) are subject to GDPR requirements which are considered as equivalent as the Japanese requirements.

### **How is the security of data ensured?**

Ensuring the security of the data you entrust to us is one of our most important responsibilities. To ensure the security and confidentiality of the personal data we collect and use, we have been implementing technical and organizational measures for a long time, including:

- Control of access and authorizations for IT equipment relative to the processing of personal data;
- Measures to secure technical infrastructure (workstation, network, server) and data (backup, business continuity plan);
- Taking data security and processing into account in the design of a product or



solution;

- Restricting the persons authorized to process personal data according to purpose and the processing means provided for in each case;
- Strict confidentiality obligations imposed on our subcontractors;
- Raising the awareness of all our employees worldwide and training those employees most concerned by the collection or management of personal data;
- The establishment of procedures making it possible to react promptly in the event of a personal data security incident.

### **How long we keep the data**

Regarding to our clients and partners, we keep Data Subjects' personal data for the duration necessary to achieve the intended purpose.

We only keep this information for the time during which we need it. This length of time depends on why we use it, such as to provide our services, to pursue our legitimate interests, to comply with our legal and regulatory obligations, or to exercise or defend our rights in court. It may also be kept or archived for statutory limitation periods.

### **Request from customer for disclose, amend or withdraw their information**

When the customer request disclosing or amending own information, U.B.A.F. Tokyo will handle your request soon after we confirm request is done by appropriate person. Then we found the information is needed to amend, we will do the necessary amendment.

In case the disclosure of information meets following conditions, we may refuse your request.

- Disclosure has the possibility to make some damage to customer themselves or third parties' life, body or property right.
- Disclosure has the possibility to make serious damage for UBAF Tokyo's business
- Disclosure has possibility to against the regulations

You reserve your rights to request to amend and/or withdraw such consent previously provided to U.B.A.F. Tokyo for one or more of the business purposes as set forth above. For avoidance of doubt and depending on the extent and nature of the request, U.B.A.F. Tokyo may not be in a position to continue to provide our products and services to you.



### **Complain/Comments**

If you have any comments, questions or concerns about any of the information in this declaration, or any other issues relating to the processing of your personal information by U.B.A.F Tokyo, please contact your regular U.B.A.F. Tokyo relationship manager or

Compliance Department (Data protection officer)  
Union de Banques Arabes et Francaises – U.B.A.F. Tokyo  
Sumitomo Fudosan Kudanshita Building 4<sup>th</sup> Floor,  
3-5, Kanda Jinbocho, Chiyoda-ku, Tokyo 101-0051 Japan  
Telephone 81-3-3263-8821

We are the member of “All Bankers Personal Data Protection Council” which is authorized by JFSA. They will handle complaint or consultation about member banks.

All Bankers Personal Data Protection Council  
Address; Ginko kaikan1-3-1, Marunouchi, Chiyoda-ku, Tokyo Japan  
Telephone 81-3-5222-1700

For personal data entrusted to U.B.A.F. where (i) the services are provided directly by U.B.A.F.France; or (ii) the data subjects are in the European Union, please refer to our group Personal Data Protection Notice: <http://ubaf.fr>