

Personal Information Protection Policy

SAGAWA EXPRESS Co., Ltd. (hereinafter referred to as the "Company") recognizes the importance of protecting personal information. The Company has established this policy and has familiarized officers and employees with its content, to ensure strict implementation of the following.

1. Definition

The definitions of terms used in this Policy are as follows.

- -"personal information" means personal information set forth in Article 2, Paragraph 1 of Act on the Protection of Personal Information (specific personal information set forth in Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures include.).
- -"personal data" means personal data set forth in Article 16, Paragraph 3 of Act on the Protection of Personal Information (specific personal information set forth in Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures include.).
- -"retained personal data" means retained personal data set forth in Article 16, Paragraph 4 of Act on the Protection of Personal Information (specific personal information set forth in Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures include.).

2. Use of personal information

The Company will only use personal information within the scope of the purpose of use provided for in "Purpose of Use of Personal Information." If personal information is to be used for purposes other than those stated in the purpose of use, the Company will clearly indicate such use upon receipt of such personal information.

3. Provision of personal data to third parties

The Company will not provide personal data to third parties, except in the following cases.

- -Cases in which a person gives consent to the handling of his or her personal data
- -Cases in which the handling of personal data is based on laws and regulations
- -Cases in which the handling of personal data is necessary for the protection of the life, body, or property of an individual and in which it is difficult to obtain the consent of such person
- -Cases in which the handling of personal data is specially necessary for improving public health or promoting the sound growth of children and in which it is difficult to obtain the consent of such person

- -Cases in which the handling of personal data is necessary for cooperating with a state organ, a local government, or an individual or a business operator entrusted by either of the former two in executing the affairs prescribed by laws and regulations and in which obtaining the consent of such person is likely to impede the execution of the affairs concerned
- -Cases in which personal data is provided as a result of the succession of business by way of a merger or otherwise
- -Cases in which the Company entrusts the handling of personal data in whole or in part within the scope necessary for the achievement of the Purpose of Use

The Company will not provide specific personal information to any third party unless otherwise permitted by laws or regulations.

4. Personal data sharing with third parties

-Purpose of data sharing

The Company will only share personal data (except specific personal information) in the following manner within the necessary scope for the achievement of the <u>Purpose of Use</u> of Personal Information

- (1)Personal data relating to customers and business connections
- -Scope of data sharing:

Domestic companies of SG holdings group.

-Items to be shared:

Full name; address; email address; telephone number; fax number; date of birth; gender

distinction; department name; job title; responsibilities; entries and receipt stamp on invoice; and any other data necessary to achieve the said purposes of shared use.

-Person in charge of administering shared use:

Masahide Motomura

President

SAGAWA EXPRESS CO.,LTD

68 Tsunoda-cho, Kamitoba, Minami-ku, Kyoto, Japan

- (2)Personal data relating to the Company's officers and employees
- -Scope of data sharing:

<u>Domestic companies of SG holdings group</u>. SG Holdings Group Employee Shareholding Association, SGH Mutual Aid Society named "SGH Family Kyousaikai" and other groups related to SG holdings group in Japan

-Items to be shared:

Name, date of hire, sex, date of birth, company name, department name, e-mail address,

telephone number, job title, address, commutation route, personal history and work experience, qualification, employee evaluation, honor, salary and bonus, employment information, skill development, insurance status, family information (name, sex, date



of birth, relationship, live-in and employment) and other data necessary to achieve the purpose of data sharing, of officers and employees (including retirees) of the

Company and its group

-Party in charge of data sharing

Masahide Motomura

President

SAGAWA EXPRESS CO.,LTD

68 Tsunoda-cho, Kamitoba, Minami-ku, Kyoto, Japan

(Please contact Personal Information Office for inquiries regarding data sharing.)

The Company does not share specific personal information with any third party unless otherwise permitted by laws or regulations

5. Protection of personal data

The Company will take safety measures, such as information security measures, to ensure the accuracy and safety of personal data, and to prevent unauthorized access to, leakage or loss of personal data.

6. Supervision of consignees

When entrusting personal data to outside consignees, the Company will conclude a nondisclosure agreement with each consignee, and will supervise the consignee appropriately.

7. Personal information management system

For handling personal information, the Company has established a personal information in-house management system. In abiding by in-house regulations, the Company strives for appropriate and careful handling of personal information. For instance,

-Not only stipulating rules based on Act on the Protection of Personal Information, related government ordinances and guidelines but also setting provisions regarding the management of personal information in SG Holdings Group's Code of Ethics and Conduct

and ensure the thorough management by familiarizing it on a regular basis.

- -Regarding the handling of personal data, the Company will ensure to reduce the risk of leakage by such measures as preventing inappropriate use and deleting retained personal data that is no longer necessary.
- -When entrusting the handling of personal data, the Company will entrust only to the extent necessary. When entrusting, the Company will select an entrustee with a sufficient safety management system, conclude a necessary contract regarding the protection of personal data and will continue to supervise the entrustee thereafter.

The Company will establish an organizational structure with a person in charge of managing personal information, promote appropriate management of personal information, and establish rules for appropriate measures in the event of leakage.

8. Compliance with pertinent laws and regulations

To ensure reliable personal information protection, the Company complies with all laws and regulations pertaining to such information.

9. Changes to Personal Information Protection Policy

The contents of our Personal Information Protection Policy are subject to continuous review, with improvements made as needed, to maintain the optimum level of personal information protection.

10. Use of cookies

The Website uses "cookies." Cookies are small text files that are placed on your computer (such as smartphone, tablet or internet connectable device) by websites that you visit. Cookies are used for your convenience when revisiting this Website, and for the improvement of contents. Cookies do not infringe on your privacy. Cookies do not contain any information which allows identification of individual users.

11. Personal Information Office

If you have any questions regarding this Policy, or inquiries regarding your own personal information, please contact the <u>Personal Information Office</u>.

12. Disclosure, etc. of retained personal data

To request disclosure, correction, addition, termination of use, deletion, etc. of your own retained personal data, contact the <u>Personal Information Office</u>. The Company will inform you personally as to the details of the procedure.

February 13.2023 Masahide Motomura President SAGAWA EXPRESS CO.,LTD.