

Privacy Policy

I. Basic Policy

Recognizing the protection and management of personal information to be its important responsibility as a financial instrument business and money lending business operator, Diamond Realty Management Inc. (DREAM) has established the following policy in order to ensure execution of protection and management of personal information; and executives and employees of DREAM strive to properly handle and manage personal information under this policy. Policies on protection of personal numbers and specific personal information are provided in the basic policy concerning protection of personal number and specific personal information separately established.

1. Matters concerning collection, use and provision of personal information

1. DREAM collects personal information by proper means and uses such information within in the scope necessary to achieve the purpose of use specified in II, except in the cases where DREAM has obtained the prior consent of the individual or it is exempted by statute. (However, DREAM may provide personal information to third parties within the scope necessary to achieve the purpose of use.)
2. DREAM will not handle personal information in a manner that may encourage or induce illegal or improper activities.
3. Concerning personal information DREAM has collected, any request for disclosure, correction or deletion by the individual will be handled in accordance with provisions in III.

2. Matters concerning personal information security measures

DREAM designates a person responsible for handling of personal information and limits the number of persons handling personal information to minimum. In addition, DREAM strives to prevent/remedy leakage, loss of or damage to personal information, and takes necessary and appropriate security measures.

3. Matters concerning complaints and inquiries from the individual

When complaints, requests or consultations concerning personal information protection activities of DREAM are filed by the individual, the administrator for personal information protection and management will take appropriate measures.



4. Matters concerning laws and regulations, guidelines set forth by the government and other rules on handling of personal information

DREAM abides by laws and regulations, guidelines set forth by the government and rules related to ordinance, etc. on handling of personal information. In establishing in-house rules to comply with such, DREAM conducts review as necessary, regular improvement and appropriate implementation of the rules.

5. Matters concerning continuous improvement of personal information protection management system

1. Implementation status of items 1 through 4 above will be continuously improved through periodical verification as well as correction measures taken in case of non-compliance found.
2. DREAM will post the policy in its office to keep all employees including executives informed and aim to raise awareness for personal information protection by educating and enlightening employees.

II. Purpose of Use of Personal Information

Purpose of use of personal information DREAM collects is as follows.

1. To execute contracts and provide information/services concerning acquisition, management and disposition of real estate, etc. (including trust beneficiary interest; the same applies hereinafter)
2. To execute contracts and provide information/services concerning transactions such as sale/purchase, brokerage, leasing, management, etc. of real estate, etc.
3. To execute contracts and provide information/services concerning advisory services for real estate, etc.
4. To execute contracts and provide information/services concerning due diligence services (appraisal of real estate, claims, etc.).
5. To confirm the identity of the individual as the party described in an application form, contract, etc.



6. To contact individuals in writing, by post, phone, FAX, e-mail, etc. to achieve the purposes described above.
7. To disclose or provide personal information to third parties within the scope necessary for achieving the purposes described above.

Information to be used is as follows.

1. Attribute information of the individual
2. Information required for a real estate contract including the name, address, date of birth, gender, telephone number and place of employment.
Date of contract, contract terms, status of execution, etc. concerning a lease agreement, real estate sale/purchase agreement, real estate financing, etc.
3. Other information incidental to the above, etc.

In the following cases, however, DREAM is permitted to handle personal information for purposes other than those described above.

1. When reporting a suspicious transaction under Article 8, Paragraph 1 of the Act on Prevention of Transfer of Criminal Proceeds
2. When responding to investigation by an official of Securities and Exchange Surveillance Commission of a criminal case under Article 210, 211, etc. of Financial Instruments and Exchange Act
3. When responding to inquiries regarding matters related to investigation under Article 197 of Code of Criminal Procedure
4. When responding to questions and inspections conducted by tax authorities under Article 234, Paragraph 1, etc. of Income Tax Act and to voluntary investigation of a criminal case by tax collectors under Article 1, etc. of National Tax Rules Violation Control Act
5. When responding to inquiries by the Bar Association under Article 23-2, Paragraph 2 of Attorney Act



6. When sharing among companies information on antisocial forces such as organized crime groups, on malicious persons who obstruct business operations, on accounts used for bank transfer fraud; among other cases

III. About Requesting Disclosure, Correction, Suspension of Use, Etc.

1. When requested to disclose, correct, suspend use of, etc. personal information of an individual, as well as requested to disclose the records of provision to third parties, DREAM will respond to such request without delay in accordance with laws and regulations after confirming that the requester is the individual, unless there is any special reason not to do so. However, if responding to request for disclosure of personal information collected by the individual violates other laws (such as Article 8, Paragraph 3 of Act on Prevention of Transfer of Criminal Proceeds (leaking to a client the fact of reporting suspicious transactions)) or falls under other prescribed cases, DREAM will not disclose all/part of the information requested. When a decision against disclosure is made, DREAM will notify such to the individual without delay and explain by presenting applied laws and regulations or clauses as well as the fact on which the decision was made without delay.
2. For request procedure and other inquiry on personal information, please contact the following desk.
3. The method of disclosure, etc. will be handled by the method selected by the requestor, from providing electromagnetic records or other methods prescribed by law (in cases where disclosure by the selected method requires a large amount of cost or it is difficult to disclose by such method, the method of disclosure will be delivery of written documents by post).

IV. Contact for Matters Concerning Handling of Personal Information

Contact for matters concerning personal information at DREAM is as follows.

Address: 10F, Hirakawacho Mori Tower, 2-16-1, Hirakawacho, Chiyoda-ku, Tokyo
102-0093

Department in charge: Personnel and Administration Department

TEL: 03-5212-4811



DREAM is a member of the following organizations. The organizations accept complaints/consultation regarding handling of personal information at a member company.

**Complaints & Consultation Section (officer for personal information), Japan
Investment Advisers Association**

TEL: 03-3663-0505

Hours: Monday through Friday (except public holidays), 9:00 a.m. – 5:00 p.m.

Investors Consultation Office, The Investment Trusts Association, Japan

TEL: 03-5614-8440

Hours: Monday through Friday (except public holidays),
9:00 a.m. – 11:30 a.m. / 0:30 p.m. – 5:00 p.m.

