

PRIVACY POLICY

Date of Enactment: October 2, 2023

Date of Revision: December 15, 2023

3-6-11 Ariake, Koutou-ku, Tokyo

SBI Art Auction Co., Ltd.

Representative Director Tomohiro Fujiyama

3-6-11 Ariake, Koutou-ku, Tokyo

SBI Art Port Co., Ltd.

Representative Director Tomohiro Fujiyama

SBI Art Auction Co., Ltd. ("SBIAA") and SBI Art Port Co., Ltd., a subsidiary of SBIAA ("SBIAP"), have established and implemented the following basic policy for the protection of customers' personal information and announced the matters concerning the processing of their personal information, to build an environment and system that enables customers to do business with SBIAA and SBIAP in peace, and in order to gain the trust of customers as companies that handle rare and highly valuable artworks, etc.

■ Compliance with Laws and Regulations

In addition to the Act on the Protection of Personal Information, SBIAA and SBIAP will comply with all laws, regulations and national guidelines and standards applicable to the processing of personal information held by SBIAA and SBIAP.

■ Acquisition and Use of Personal Information

In order to acquire customers' personal information in an appropriate and fair manner, SBIAA or SBIAP will disclose or expressly show the purposes of use in advance, or notify or disclose the purposes of use promptly after the acquisition.

In order to ensure that the scope and processing of personal information acquired by SBIAA or SBIAP does not exceed the scope necessary to achieve the purposes of use, SBIAA and SBIAP will not disclose or provide the acquired personal information to any third party without the relevant customer's consent, except when permitted to do so as an exception under the laws and regulations. In addition, SBIAA and SBIAP will not acquire any special care-required personal information, except when permitted to do so as an exception under the laws and regulations.

■ Security Management of Personal Information

SBIAA and SBIAP will strictly manage customers' personal information, and will establish and implement the necessary security control measures (see below) to prevent any leakage, loss or damage of personal information. SBIAA and SBIAP will also exercise the necessary and appropriate supervision over employees and contractors who handle such personal information.

■ Response to Inquiries and Complaints

SBIAA and SBIAP will establish the system and procedure for receiving inquiries and complaints regarding customers' personal information held by SBIAA and SBIAP, and will respond thereto within a reasonable period of time.

■ Continuous Improvement of Personal Information Protection System

In order to carry out operations based on this policy, SBIAA and SBIAP will establish an internal management system for the protection of customers' personal information and continuously strive to improve such system.

Processing of Personal Information

The following is an explanation regarding how SBIAA and SBIAP process the personal information that SBIAA and SBIAP will acquire from customers. Please read the following explanation before providing SBIAA or SBIAP with your personal information. If you are located in the European Economic Area or the United Kingdom, please see: <https://www.sbiartauction.co.jp/pdf/en/privacy-policy/privacy-eea-en.pdf>.

1. Purposes of Use

SBIAA and SBIAP will use customers' personal information for the purposes listed below. If SBIAA and SBIAP use the same

for purposes other than those in the following list, SBIAA and SBIAP will obtain the customers' consent.

- (1) To engage in trading the products SBIAA or SBIAP deals with
- (2) To hold and run auctions for sale
- (3) To assess artworks, etc.
- (4) To run a contracting business
- (5) To manage customers regarding new and repeat transactions (including credit services for customers), including making inquiries, confirmations and communications regarding matters related to the transactions
- (6) To distribute and send magazines and catalogues, etc. via e-mail or post
- (7) To introduce services and products, etc. from SBIAA and SBIAP and related group companies (see "(2) Scope of Joint Users" of "5. Joint Use among the SBI Group Companies") via e-mail or post
- (8) To respond to customer opinions, enquiries, etc.
- (9) To develop services and improve defects based on customer trends and order histories with respect to the products SBIAA or SBIAP deals with
- (10) To improve the convenience of web services: the technical information when the customers access and use the website
- (11) To engage in recruiting
- (12) To provide the same to third parties, such as financial institutions: SBIAA and SBIAP will provide the relevant customer's personal information, with the customer's consent, to the banks with which SBIAA and SBIAP have accounts for the purpose of investigating measures against money laundering and financing of terrorism

2. Subcontracting

SBIAA and SBIAP may subcontract the processing of customers' personal information, and provide the personal information to such subcontractor within the scope necessary to achieve the purposes of use. In this case, SBIAA and SBIAP will appropriately manage and supervise the subcontractor, including executing a contract with such subcontractor regarding the processing of customers' personal information.

3. Third-Party Disclosure / Provision

Except in those cases set forth below, SBIAA and SBIAP will not disclose or provide customers' personal information to any third parties:

- (1) cases where SBIAA and SBIAP obtain the relevant customer's consent;
- (2) cases based on laws and regulations;
- (3) cases in which there is a need to protect human life, body or property, and when it is difficult to obtain the customer's consent;
- (4) cases in which there is a special need to improve public hygiene or promote the fostering of healthy children, and when it is difficult to obtain the customer's consent; and
- (5) cases in which there is a need to cooperate with a central government organization or a local government, or a person or authority entrusted thereby to perform affairs prescribed by laws and regulations, and when there is a possibility that obtaining the customer's consent would interfere with the performance of such affairs.

4. Joint Use between SBIAA and SBIAP

SBIAA and SBIAP may jointly and mutually use the personal information held by SBIAA or SBIAP as described in (1) below; provided, however, that SBIAA and SBIAP will only use the personal information of the applicants for recruitment described in (1)(d) below for the purposes of personnel recruitment selection activities. In addition, in cases where the joint use of personal information is restricted by applicable laws and regulations, SBIAA and SBIAP will process the same in accordance with such laws and regulations.

- (1) Items of Personal Information to Be Jointly Used
 - (a) Information regarding personal attributes, such as name, address, date of birth, telephone number, e-mail address, information regarding transaction needs, and public information
 - (b) Information on possession of works and about entrusted works; information on listing and bidding for auctions (Estimate, Reserve Price, Successful Bid Price, status of successful bids, etc.); transactions history such as the purchase and sale

of works, and other transaction-related information, etc.; and information necessary for management of transactions, such as customer numbers, transaction numbers, and management number of the issuer of qualified invoices, etc.

(c) Information necessary for the management of transactions, such as customer numbers, transaction numbers, management number of the issuer of qualified invoices, etc.

(d) Information on applicants for recruitment at SBIAA or SBIAP, such as name, gender, e-mail address, date of birth, address, telephone number, educational background, employment history and motivation for applying.

(2) Scope of Joint Users

The joint use shall be made between SBIAA and SBIAP.

(3) Purposes of Joint Use

(a) Items described in “1. Purposes of Use”

(b) To properly execute the entrusted business if SBIAA and SBIAP mutually outsource services related to the provision of services to customers and transactions with customers

(c) To return personal information obtained through the performance of the entrusted business or provided by the customer to the trustee

(4) Name of Party for Management of Jointly-Used Personal Information

SBI Art Auction Co., Ltd.

Representative Director Tomohiro Fujiyama

SBI Art Port Co., Ltd.

Representative Director Tomohiro Fujiyama

(5) Contact Information for Joint Use

3-6-11 Ariake, Koutou-ku, Tokyo

SBI Art Auction Co., Ltd.

Telephone: +81-3-3527-6692 (Main telephone number)

5. Joint Use among the SBI Group Companies

SBIAA and SBIAP may jointly use the personal information held by SBIAA and SBIAP as described in (1) below, with the parties as described in (2) below; provided, however, that SBIAA and SBIAP will only use the personal information of the applicants for recruitment described in (1)(d) below for the purposes described in (3)(e) below. In addition, in cases where the joint use of personal information is restricted by the Financial Instruments and Exchange Act, the Insurance Business Act or other related laws and regulations, SBIAA and SBIAP will process the same in accordance with such laws and regulations.

(1) Items of Personal Information to Be Jointly Used

(a) Information regarding personal attributes, such as name, address, date of birth, telephone number, e-mail address, information regarding transaction needs, and public information

(b) Transaction-related information, such as transaction history, information on points, and types of traded products/services, etc.

(c) Information necessary for the management of transactions, such as customer numbers, transaction numbers and other control numbers

(d) Information on applicants for recruitment at SBI Group Companies, such as name, gender, e-mail address, date of birth, address, telephone number, educational background, employment history and motivation for applying.

(2) Scope of Joint Users

The scope of joint users is the SBI group companies listed on the following website (“**SBI Group Companies**”); provided, however, that such scope may be changed at any time.

<https://www.sbigroup.co.jp/english/company/group/>

(3) Purposes of Joint Use

(a) When a customer uses services as a member of the services provided by SBI Group Companies

When a customer uses services as a registered member of SBI Group Companies, to improve the convenience of the members, such as personal authentication at and after login, and automatic display of member information on various screens

(b) Execution of transactions with SBI Group Companies

When the customer applies to SBI Group companies for reservation or purchase of products or services, applications for prize competitions, etc., or other transactions, to deliver products or services, settle payments, respond to customer inquiries, provide inquiries from SBI Group Companies, provide related after-sales services, and perform other services necessary for the execution of transactions

(c) Advertising or marketing of SBI Group Companies

- To provide information such as various e-mail magazines delivered by SBI Group Companies
- To provide information on the services of SBI Group Companies via e-mail, post or telephone, etc.
- To enable SBI Group companies to provide the customer with information and advertisements based on the customer's attributes, such as gender, age, place of residence and hobbies/preferences, the customer's purchase history, and the customer's browsing history of websites operated by SBI Group Companies
- To develop new services and improve existing services by analyzing the usage of SBI Group Companies' services
- To draw lots and send prizes for questionnaires, campaigns, prize competitions, etc., and to contact the applicants in relation to these activities

(d) Responses to inquiries

To respond to customer inquiries to SBI Group Companies via e-mail, post, telephone, etc.

(e) Recruitment and employment

To use the personal information of those who have submitted their resumes and other personal information in order to apply for employment at SBI Group Companies for the recruitment and personnel selection activities of SBI Group Companies

(f) Other cases incidental to SBI Group Companies' operations

(g) Others

SBI Group Companies may use customers' personal information for purposes other than those listed in (a) through (f) above in each service provided thereby. In such case, the relevant SBI Group Company will post a notice to that effect on the website of the service provided thereby.

(4) Name of Party for Management of Jointly-Used Personal Information

SBI Holdings, Inc.

Representative Director, Chairman, President & CEO Yoshitaka Kitao

(5) Contact Information for Joint Use

SBI Holdings, Inc.

General Affairs and Human Resources Department

Telephone: +81-3-6229-0100 (Main telephone number)

6. Accepting Inquiries Related to Disclosure, etc.

If the customer or the customer's representative requests notification of the purposes of use, disclosure (including disclosure of records of third-party provision), correction(including addition and deletion), and/or suspension of use, erasure or suspension of third-party provision of the customer's personal information (having the same meaning as "Retained Personal Data" defined in the Act on the Protection of Personal Information. the same applies hereinafter) subject to disclosure held by SBIAA or SBIAP (collectively, "**Disclosure, etc.**"), SBIAA and SBIAP will accept such request through the department responsible for the management of personal information as an information desk (the "**Information Desk**"; see the details at the end) and handle such request as follows.

(1) Notification of Purposes of Use

If the customer requests notification of the purposes of use of its personal information subject to disclosure held by SBIAA or SBIAP, SBIAA and SBIAP will respond to such request within a reasonable period and scope after verifying the customer's identity.

(2) Disclosure

If the customer requests the disclosure of such customer's personal information or records of third-party provision in relation to personal information subject to disclosure held by SBIAA or SBIAP, SBIAA and SBIAP will respond to such request within a reasonable period and scope after verifying the customer's identity.

(3) Correction, etc.

If the customer requests the correction, addition or deletion of such customer's personal information in relation to personal information subject to disclosure held by SBIAA or SBIAP, SBIAA and SBIAP will do so within a reasonable period and scope after verifying the customer's identity.

(4) Suspension of Use, Erasure and Suspension of Third-Party Provision

If the customer requests the suspension of use, erasure, or suspension of third-party provision of such customer's personal information in relation to personal information subject to disclosure held by SBIAA or SBIAP, SBIAA and SBIAP will do so within a reasonable period and scope after verifying the customer's identity.

If SBIAA and SBIAP suspend the use of or erase all or part of such information, or suspend the third-party provision thereof, SBIAA and SBIAP may not thereafter be able to provide services which meet the customer's request, so SBIAA and SBIAP ask for customers' understanding and cooperation in this regard.

SBIAA and SBIAP may not be able to respond to requests for the suspension of use, erasure, or suspension of third-party provision of information held in accordance with relevant laws and regulations.

Information Desk Procedures

Details regarding the Information Desk procedures will be explained when a request is made; provided, however, that, after confirming the identity of the customer or the customer's representative through the methods outlined below, SBIAA and SBIAP will respond in writing, by providing electromagnetic records, or by other methods agreed to by the customer (in principle, the method of disclosure will be the one requested by the customer).

Alternatively, there may be occasions when SBIAA and SBIAP will ask the customer to provide a written application prescribed by SBIAA and SBIAP owing to the nature of the request.

Confirmation of the Identity of the Customer or the Customer's Representative

When a request is received from a customer, SBIAA and SBIAP will confirm the identity of such customer by confirming the original or a copy of the following identification documents: driver's license, passport, health insurance card, or seal registration certificate, etc. (provided, however, that this only applies to documents that are prior to their expiration date or have been issued within the past three months). In addition, SBIAA and SBIAP will confirm the customer's registered information, such as the name, address, and telephone number, by contacting the customer at the registered telephone number the customer has registered with SBIAA or SBIAP.

When a request comes from the customer's representative, in addition to confirming the identity of the representative in the same manner as above, SBIAA and SBIAP also will confirm that there is a proxy statement from the relevant customer and the seal registration certificate for the seal on such proxy statement. In addition, SBIAA and SBIAP will confirm the customer's registered information by calling the relevant customer in the same manner as indicated above.

Processing Fees

SBIAA and SBIAP do not receive any processing fees from customers regarding requests related to Disclosure, etc. However, the customer will be responsible for the fees generated when preparing materials for SBIAA and SBIAP related to confirming their identity as described above, and for any travel and communication expenses from the customer to SBIAA and SBIAP.

7. Complaints and Inquiries

If the customer has any comments or inquiries about such customer's personal information held by SBIAA or SBIAP, or if the customer wishes to make a complaint about the processing by SBIAA or SBIAP of such customer's personal information subject to disclosure, please contact the Information Desk (see the details at the end).

8. Voluntariness of Information Provision

SBIAA or SBIAP is able to provide appropriate services by obtaining personal information from customers to the extent and for the purposes necessary to carry out SBIAA's or SBIAP's business, so if SBIAA or SBIAP is unable to obtain the customer's personal information which SBIAA or SBIAP requests to be provided, SBIAA or SBIAP may not be able to provide a level of service which satisfies such customer, or conduct transactions or provide services to such customer.

9. Regarding the Use of Cookie Technology

SBIAA and SBIAP use cookies on the website for the purpose of user authentication, verification of login status and improvement of convenience. For the purpose of improving the usability of the website for customers, the website may record an access log of the customer's IP address, access date and time, link source, accessed files and browser used, etc. and user logs automatically saved on the server and a technology called "Web Beacons" for such records. While SBIAA and SBIAP do not use such technical information in relation to specific customers, the customer may disable cookies by changing the settings on their browser; however, please note that if the customer does so, their ability to use some of the services on the website may be limited. SBIAA and SBIAP use the Google Analytics service provided by Google, Inc. to help us understand how often customers visit the website. By using Google Analytics, Google, Inc. collects and records information about customer visits to the website based on the cookies SBIAA and SBIAP issue. SBIAA and SBIAP receive such results from Google, Inc. to understand customer visits to the website.

While the information collected and recorded by Google Analytics does not contain any information that identifies the customer as a specific individual, the customer may stop the collection of such information by disabling Google Analytics in their browser settings.

Security Control Measures

With regard to personal data, SBIAA and SBIAP have taken necessary and appropriate security control measures for security management, such as controlling access, restricting the means of removal, and preventing unauthorized access from outside SBIAA and SBIAP, as well as preventing leakage, loss or damage ("**Security Control Measures**") in accordance with the "Guidelines for the Act on the Protection of Personal Information (General Rules Edition)".

(1) Formulation of Basic Policy

SBIAA and SBIAP have formulated a basic policy to ensure proper processing as an organization as described at the beginning of this policy.

(2) Establishment of Rules for Processing of Personal Data

In order to implement the following measures, etc., SBIAA and SBIAP have formulated Processing Regulations, etc., regarding processing methods, persons responsible or in charge, and their responsibilities, etc.

(3) Systematic Security Control Measures

SBIAA and SBIAP have established a meeting body to decide on information management policies, appointed a "Personal Information Protection Manager" and "Information System Management Manager" as the persons in charge of personal information management, and clarified the responsibilities and authority of employees regarding security management.

SBIAA and SBIAP have established a system for reporting and contacting the person in charge in the event that SBIAA and SBIAP recognize any violation of the law or the handling regulations, or any signs of such violation.

SBIAA and SBIAP will establish processing rules and manuals for security control, and conduct evaluations (including audits) of the status of compliance therewith. In addition, SBIAA and SBIAP will conduct a review of the Security Control Measures.

(4) Personnel Security Control Measures

SBIAA and SBIAP stipulate the obligation of employees (including dispatched employees) to maintain confidentiality and supervise the status of processing thereof by employees. In addition, SBIAA and SBIAP provide regular training and development to employees on proper processing methods.

(5) Technical and Physical Security Control Measures

SBIAA and SBIAP have implemented access control measures to personal data (such as limiting authorized persons (including measures immediately disabling the accounts of employees who have changed positions or retired)) and monitoring access status (such as keeping access logs and managing entry and exit).

SBIAA and SBIAP have restricted the means by which personal data may be taken out of SBIAA and SBIAP, such as prohibiting recording on external storage media without permission and regulating e-mail between internal and external e-mail addresses. SBIAA and SBIAP also have taken protection measures against unauthorized access, such as through the introduction of virus detection systems and the installation of firewalls.

(6) Understanding of External Environment

For customers located in the European Economic Area or the United Kingdom, SBIAA and SBIAP have effected the Security Control Measures based on an understanding of the personal information protection systems in those countries.

Updates to Policy

SBIAA and SBIAP may revise or update this policy from time to time. SBIAA and SBIAP will post the revised policy via the website and update the date of revision.

Department Responsible for Management of Personal Information (Common Information Desk for SBIAA and SBIAP)

SBIAA and SBIAP have designated the department described below as the department responsible for the management of personal information, and strive to process the personal information of customers and employees in an appropriate manner in accordance with the Act on the Protection of Personal Information.

If you have any questions regarding this policy, any comments to SBIAA and SBIAP or seek consultation with SBIAA and SBIAP regarding personal information, any requests to SBIAA and SBIAP for disclosure of personal information subject to disclosure, or any complaints regarding the processing of personal information subject to disclosure by SBIAA and SBIAP, please contact this department via telephone, post or e-mail.

Administrative Department, SBI Art Auction Co., Ltd.

TFT Building East Wing, 3-6-11 Ariake, Koutou-ku, Tokyo 135-0063, JAPAN

Tel: +81-3-3527-6692

Telephone calls are received Monday through Friday from 10:00 a.m. to 5:00 p.m. (JST)

E-mail: artauction@sbigroup.co.jp

The Information Desk is closed on weekends, public holidays in Japan, and during the year-end and new-year period.