

# Handling Policy of Personal Information

We, Japan Remit Finance Co., Ltd. (“We” or “Company”) disclose the following matters based on the "Act on the Protection of Personal Information" (hereinafter referred to as the "Act").

## 1. Matters concerning the Publication of the Purpose of Use of Personal Information

When obtaining personal information directly or indirectly, we will use personal information of customers to the extent necessary to achieve the following purposes of use.

Provided, however, that in the event personal information in writing is obtained directly from a customer, the purpose of use shall be clearly indicated in advance.

In addition, we shall specify the purpose of use in a concrete manner so that the purpose of use is clear for customers. For example, when responding to various questionnaires, we shall endeavor to limit the purpose of use in accordance with the circumstances of acquisition, for example, by using the questionnaire only for the aggregation purposes.

1. For membership registration and service provision of international remittance services
2. In order to confirm the qualifications for using the services, etc. pursuant to the Criminal Proceeds Transfer Prevention Act, the Foreign Exchange Act, Act on Submission of Statement of Overseas Wire Transfers for Purpose of Securing Proper Domestic Taxation, and other relevant laws and regulations
3. For the purpose of properly performing the entrusted operations in cases where all or part of the processing of personal information is entrusted by another entity, etc.
4. For the exercise of rights and fulfillment of obligations under contracts and laws with customers
5. For research and development of services through market research and data analysis and questionnaire surveys, through which we shall be able to offer our products and services suitable for your interests and preferences
6. For various proposals related to services such as direct mailing to advertise our products and services suitable for your interests and preferences
7. To propose various products and services of affiliated companies suitable for your interests and preferences
8. For cancellation of various transactions and a post management subsequent to cancellation of transactions
9. For proper and smooth execution of transactions with customers

Provided, however, that in the event the purpose of use of specific personal information is limited in accordance with laws and regulations, the Company will not use such information for any purpose other than the said purpose. To be more concrete, pursuant to Article 26 of the Cabinet Office Ordinance on Funds Transfer Service Providers, when a Funds Transfer Service Provider handles information on the race, creed, family origin, domicile of origin, health and medical care, criminal background, or any other special non-public information (meaning unpublished information that has come to be known in the course of its business), it shall not use or provide such information for any purpose other than for ensuring the appropriate operation of its business or for any other purpose that is found to be necessary.

In accordance with the Act on the Use of Numbers to Identify Specific Individuals in Administrative Procedures, we will not obtain, use, or provide personal information that contains the customer's Individual Numbers and Individual Numbers to a third party for purposes other than the purpose of use permitted by the Act.

## **2. Proper Acquisition and Maintenance of Personal Information**

We will properly obtain the personal information of our customers.

For example, we may obtain personal information from the following sources, and maintain personal information at the localized servers with the adequate security protection implemented by our Company.

(Examples of Information Sources to be Obtained)

In the event you are directly provided with data entered on our website by the customer and documents to be completed and submitted by the customer, such as the membership registration application form.

### **3-1. Provision of Personal Information to Third Parties**

We will not provide personal information in our possession to a third party without the consent of the customer, except when entrusting such information to a third party, when providing such information upon succession of business due to a merger or other reason, when sharing such information, or in the following cases:

1. Cases based on laws and regulations
2. The case where it is necessary to protect the life, body, or property of an individual and it is difficult to obtain his or her consent

3. When it is particularly necessary for the improvement of public health or the promotion of the sound upbringing of children and it is difficult to obtain the consent of the relevant person
4. Cases in which it is necessary to cooperate with a state agency, a local government, or a person entrusted by the said agency in executing the affairs prescribed by laws and regulations and in which obtaining the consent of the person in question is likely to impede the execution of the affairs in question
5. Cases in which a third party needs to handle said personal data for academic research purposes (including cases in which a part of the purpose of handling said personal data is for academic research purposes, and excluding cases in which there is a risk of unjustifiable infringement of the rights and interests of individuals)

In addition, we conclude a contract with a contractor to establish the information security system to strictly handle personal information in accordance with our information security standards and will ensure appropriate security control measures.

For example, we entrust the handling of personal data with respect to the following operations.  
(Example of Entrusted Affairs)

- Processes related to sending documents related to various procedures
- Affairs related to the dispatch of direct mail
- Operations with respect to system operation and maintenance
- Operations involved in receiving our international remittance service
- Office work in response to customer inquiries

### **3-2. Provision of Personal Information to a Third Party in a Foreign State**

1. Information on the name of the foreign state and the system for the protection of personal information in the foreign state obtained by an appropriate and reasonable method

We may provide personal data in our possession to the following entities depending on the country to which the money is transferred.

Serial	Name of Institutions	Name of State
3-2-1-1	National Credit and Commerce Bank Ltd.	Bangladesh
3-2-1-2	Bank of Ceylon	Sri Lanka
3-2-1-3	Bank of the Philippine Islands	Philippines

3-2-1-4	Prabhu Group Inc	USA
3-2-1-5	DongA MTC Money Transfer Company	Vietnam
3-2-1-6	BDO UNIBANK, INC.	Philippines
3-2-1-7	PT Bank Rakyat Indonesia (Persero) Tbk.	Indonesia
3-2-1-8	IME Limited	Nepal
3-2-1-9	MASTERCARD TRANSACTION SERVICES (US) LLC	USA
3-2-1-10	Land Bank of the Philippines	Philippines
3-2-1-11	Allied Bank Limited	Pakistan
3-2-1-12	Ceylon Exchange Pty Ltd	Australia
3-2-1-13	Rupali Bank Limited	Bangladesh
3-2-1-14	Worldwide Elite Express Company Limited	Hong Kong
3-2-1-15	EIGHT UNDER PER (Palawanshop Operator), Inc.	Philippines
3-2-1-16	LBC Express, Inc.	Philippines
3-2-1-17	Uttara Bank Limited	Bangladesh
3-2-1-18	Cebuana Lhuillier Services Corporation	Philippines
3-2-1-19	PT. Intrajasa Teknosolusi	Indonesia
3-2-1-20	Dong Phoungtong Hop Dich VU Trading Company Limited	Vietnam
3-2-1-21	Asia Commercial Bank	Vietnam
3-2-1-22	Sampath Bank Plc	Sri Lanka
3-2-1-23	Everest Bank Limited	Nepal
3-2-1-24	VIETNAM JOINT STOCK COMMERCIAL BANK FOR INDUSTRY AND TRADE	Vietnam
3-2-1-25	Tranglo SDN.BHD.	Malaysia
3-2-1-26	BANCO RENDIMENTO S.A.	Brazil
3-2-1-27	KOTAK MAHINDRA BANK LTD.	India
3-2-1-28	NATIONAL SAVINGS BANK	Sri Lanka
3-2-1-29	PEOPLE'S BANK	Sri Lanka
3-2-1-30	United Bank Limited	Pakistan
3-2-1-31	TransferTo Mobile Financial Services Ltd	United Kingdom
3-2-1-32	World First Asia Pte. Ltd.	Singapore
3-2-1-33	bKash Limited	Bangladesh
3-2-1-34	eSewa Money Transfer Pvt. Ltd.	Nepal

3-2-1-35	MICHEL J. LHUILLIER FINANCIAL SERVICES (PAWNSHOPS), INC.	Philippines
3-2-1-36	RD CASH PADALA, INCORPORATED.	Philippines
3-2-1-37	GLOBAL IME BANK LIMITED	Nepal
3-2-1-38	SAMSARA REMIT PVT. LTD.	Nepal
3-2-1-39	Union Bank of the Philippines	Philippines
3-2-1-40	UnionPay International Co., Ltd.	China
3-2-1-41	MONEYGRAM PAYMENT SYSTEMS, INC.	USA
3-2-1-42	Metropolitan Bank & Trust Company	Philippines
3-2-1-43	G-Xchange, Inc.	Philippines
3-2-1-44	MUTHOOT FINSERVE USA INC.	USA
3-2-1-45	Japan Remit Finance (Korea)	Republic of Korea
3-2-1-46	HO CHI MINH CITY DEVELOPMENT JOINT STOCK COMMERCIAL BANK (HD BANK)	Vietnam
3-2-1-47	PETNET, Inc.	Philippines
3-2-1-48	Islami Bank Bangladesh Limited (IBBL)	Bangladesh
3-2-1-49	Bank AL Habib Limited	Pakistan
3-2-1-50	Agrani Bank Limited	Bangladesh
3-2-1-51	Jamuna Bank Limited	Bangladesh
3-2-1-52	Nepal Remit International Pvt. Ltd.	Nepal
3-2-1-53	Banco Daycoval S.A.	Brazil
3-2-1-54	Shahjalal Islami Bank Limited	Bangladesh
3-2-1-55	Zhenxing Technology Limited	Hong Kong

Please refer to the following pages published by the Personal Information Protection Committee for the systems related to the protection of personal information in the countries where the aforementioned entities are located.

<https://www.ppc.go.jp/personalinfo/legal/kaiseihogohou/#gaikoku>

Please also refer to UNCTAD panel evaluating the legislative status of countries regarding the matters of Personal Information.

<https://unctad.org/page/data-protection-and-privacy-legislation-worldwide>

The table below summarizes JRF’s own scoring analysis on the selected countries to evaluate the legislative strength about the matters of personal information and we have nominated 16 countries being the most relevant countries to our businesses.

(4=Strongest; 0=Weakest)	JRF Scoring	Electronic Transactions	Customer Protection	Privacy and Data Protection	Cybercrime
Australia	4	Legislation	Legislation	Legislation	Legislation
Bangladesh	3	Legislation	Legislation	No Legislation	Legislation
Bhutan	4	Legislation	Legislation	Legislation	Legislation
Brazil	4	Legislation	Legislation	Legislation	Legislation
China	4	Legislation	Legislation	Legislation	Legislation
India	3	Legislation	No Data	Legislation	Legislation
Indonesia	4	Legislation	Legislation	Legislation	Legislation
Malaysia	4	Legislation	Legislation	Legislation	Legislation
Nepal	4	Legislation	Legislation	Legislation	Legislation
Pakistan	2	Legislation	No Data	Draft Legislation	Legislation
Philippines	4	Legislation	Legislation	Legislation	Legislation
Republic of Korea	4	Legislation	Legislation	Legislation	Legislation
Singapore	4	Legislation	Legislation	Legislation	Legislation
Sri Lanka	3	Legislation	Legislation	No Legislation	Legislation
United States	4	Legislation	Legislation	Legislation	Legislation
Vietnam	4	Legislation	Legislation	Legislation	Legislation

2. Information on measures for the protection of personal information to be taken by the third party

The measures taken by the above-mentioned business entities at 3-2-1 to comply with the eight principles of the OECD Privacy Guidelines (<http://oecdprivacy.org/>) are summarized in our matrix sheet below.

- 1) Collection Limitation Principle
- 2) Data Quality Principle
- 3) Purpose Specification Principle
- 4) Use Limitation Principle
- 5) Security Safeguards Principle
- 6) Openness Principle
- 7) Individual Participation Principle
- 8) Accountability Principle

Serial#	1)	2)	3)	4)	5)	6)	7)	8)	Country
3-2-1-1	Met	Not Met	Not Met	Met	Not Met	Not Met	Not Met	Not Met	Bangladesh
3-2-1-2	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Sri Lanka
3-2-1-3	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-4	Met	Met	Met	Met	Met	Met	Met	Met	USA
3-2-1-5	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Not Met	Vietnam
3-2-1-6	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-7	Partly Met	Partly Met	Partly Met	Not Met	Partly Met	Partly Met	Partly Met	Partly Met	Indonesia
3-2-1-8	Met	Not Met	Met	Met	Partly Met	Partly Met	Met	Met	Nepal
3-2-1-9	Met	Met	Met	Met	Met	Met	Met	Met	USA
3-2-1-10	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-11	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Pakistan
3-2-1-12	Met	Met	Met	Met	Met	Met	Met	Met	Australia
3-2-1-13	Met	Not Met	Not Met	Met	Not Met	Not Met	Not Met	Not Met	Bangladesh
3-2-1-14	Met	Met	Met	Met	Met	Met	Met	Met	Hong Kong
3-2-1-15	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-16	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-17	Met	Not Met	Not Met	Met	Not Met	Not Met	Not Met	Not Met	Bangladesh
3-2-1-18	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-19	Partly Met	Partly Met	Partly Met	Not Met	Partly Met	Partly Met	Partly Met	Partly Met	Indonesia
3-2-1-20	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Not Met	Vietnam
3-2-1-21	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Not Met	Vietnam
3-2-1-22	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Sri Lanka
3-2-1-23	Met	Not Met	Met	Met	Partly Met	Partly Met	Met	Met	Nepal
3-2-1-24	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Not Met	Vietnam
3-2-1-25	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Not Met	Malaysia
3-2-1-26	Met	Met	Met	Met	Met	Met	Met	Met	Brazil
3-2-1-27	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Not Met	India
3-2-1-28	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Sri Lanka
3-2-1-29	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Sri Lanka
3-2-1-30	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Pakistan
3-2-1-31	Met	Met	Met	Met	Met	Met	Met	Met	United Kingdom
3-2-1-32	Met	Met	Met	Met	Met	Met	Met	Met	Singapore
3-2-1-33	Met	Not Met	Not Met	Met	Not Met	Not Met	Not Met	Not Met	Bangladesh
3-2-1-34	Met	Not Met	Met	Met	Partly Met	Partly Met	Met	Met	Nepal
3-2-1-35	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-36	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-37	Met	Not Met	Met	Met	Partly Met	Partly Met	Met	Met	Nepal
3-2-1-38	Met	Not Met	Met	Met	Partly Met	Partly Met	Met	Met	Nepal
3-2-1-39	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-40	Met	Met	Met	Met	Met	Met	Met	Met	China
3-2-1-41	Met	Met	Met	Met	Met	Met	Met	Met	USA
3-2-1-42	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-43	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-44	Met	Met	Met	Met	Met	Met	Met	Met	USA
3-2-1-45	Met	Met	Met	Met	Met	Met	Met	Met	Republic of
3-2-1-46	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Partly Met	Not Met	Vietnam
3-2-1-47	Met	Met	Met	Met	Met	Met	Met	Met	Philippines
3-2-1-48	Met	Not Met	Not Met	Met	Not Met	Not Met	Not Met	Not Met	Bangladesh
3-2-1-49	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met	Pakistan
3-2-1-50	Met	Not Met	Not Met	Met	Not Met	Not Met	Not Met	Not Met	Bangladesh
3-2-1-51	Met	Not Met	Not Met	Met	Not Met	Not Met	Not Met	Not Met	Bangladesh
3-2-1-52	Met	Not Met	Met	Met	Partly Met	Partly Met	Met	Met	Nepal
3-2-1-53	Met	Met	Met	Met	Met	Met	Met	Met	Brazil
3-2-1-54	Met	Not Met	Not Met	Met	Not Met	Not Met	Not Met	Not Met	Bangladesh
3-2-1-55	Met	Met	Met	Met	Met	Met	Met	Met	Hong Kong

## 4. Shared Use of Personal Information

We may share the personal information described in Item 1 held by us with the persons described in Item 2. In the event joint use is restricted by the Financial Instruments and Exchange Law, Insurance Business Law, and other relevant laws and regulations, the Company shall handle such restriction in accordance with such laws and regulations.

### 1. Items of Personal Information to be Shared

- 1) Name, address, date of birth, telephone number, e-mail address, information on business needs, public information, and other information on personal attributes
- 2) Transaction history, point information, types of products and services traded, and other transaction information
- 3) Information necessary for transaction management, such as customer numbers, transaction numbers, etc.
- 4) Information on the name, sex, e-mail address, date of birth, address, telephone number, academic background, employment career, motivation, etc. of applicants for employment with JRF Group companies

### 2. Scope of Joint Users

The JRF Group companies are below listed (hereinafter referred to as "JRF Group Companies") and the Joint User may be changed at any time.

#### DOMESTIC GROUP COMPANIES:

- JRF Global Capital Investments Co., Ltd.  
Suzuki Bldg. 7F, 1-2-11, Hamamatsu-cho, Minato-ku, Tokyo, Japan (TEL: 03-6450-1133)
- JRF Intelligence Co., Ltd.  
1-9-13-8B Omachi, Koriyama-shi, Fukushima, Japan (TEL: 0249-83-6618)

#### OVERSEAS GROUP COMPANIES:

- Japan Remit Finance Philippines Representative Office – Unit717, BSA Twin Towers Julia Vargas corner Bank Drive, Ortigas Center, 1550, Mandaluyong City, Metro Manila, Philippines (TEL +63-917-676-0070)
- The Representative office of Japan Remit Finance Co., Ltd in Ho Chi Minh - 3/8 Phan Van Suu Street, Ward 13, Tan Binh District, Ho Chi Minh City, Vietnam. (Tel +84-28-3849-7898)
- JRF Korea Office - Dongyoung bldg 3F, 14-12, Teheran-ro, 78-gil, Gangnam-gu, Seoul, 06194 Republic of KOREA (TEL +82-2-6927-3477)
- JRF Global Malaysia SDN. BHD. - Unit 50-12-3 Level 12, Uoa Damansara 1,50 Jalan Dungun, Damansara Heights, 50490, Kuala Lumpur WP
- Japan Remit S.R.L - Frascati (RM) Piazza Del Mercato 18 Cap 00044, ITALY
- Japan Remit Finance Co., Ltd. (Canada) - 3-535 Millway Avenue, Concord, ON L4K, 3V4, Canada



### 3. Purpose of joint use

- 1) When using a service as a member of a service provided by an JRF group company

In order to improve the convenience of members, for example, by automatically displaying user authentication at the time of login and after login and member information on various screens when using the service as a member registered with an JRF Group company.

- 2) Carrying out transactions with JRF Group companies

In the event that an JRF Group company receives an application for a product or service reservation, purchase, or prize competition, or for any other transaction, delivery of the product, provision of the service, payment settlement, response to inquiries, inquiries from JRF Group companies, related after-sales service, or any other business required for the execution of the transaction

- 3) Advertising or marketing of JRF Group companies

- For JRF Group companies to provide various e-mail newsletters and other information
- To provide information about the JRF Group's services via e-mail, postal mail, or telephone
- To provide content and advertisements offered by JRF Group companies, depending on their attributes or purchase history, such as gender, age, place of residence, hobbies and preferences, and the browsing history of the website operated by JRF Group companies
- To analyze the use of JRF Group companies' services and develop new services and improve existing services
- For the purpose of sending out lotteries and prizes for questionnaires, campaigns, sweepstakes, etc., and communicating with applicants related thereto

- 4) Responding to inquiries

To respond to inquiries from JRF Group companies via e-mail, mail, or telephone

- 5) Job openings and hiring

Personal information submitted by those who wish to be employed by an JRF Group company, such as resumes and work resumes, is used for the JRF Group's recruiting activities.

- 6) Other business incidental cases  
Uses required to provide JRF Group companies' services in association with 1) to 5) above
- 7) Other  
Personal information may be used for purposes other than 1) through 6) above for each service provided by an JRF Group company. In such a case, a notice to that effect shall be posted on the website of the services provided by the JRF Group company concerned.

4. Name of person responsible for management of personal information

Japan Remit Finance Co., Ltd.  
1-2-15 3F, Hamamatsucho, Minato-ku, Tokyo, Japan  
Hossain MD. Sarwar, Representative Director

5. Inquiry on joint use of personal information

Japan Remit Finance Co., Ltd.  
Personal Information Consulting Office (at Compliance Department)  
TEL: 03-5860-1588  
Email: [compliance@jpremit.com](mailto:compliance@jpremit.com)

## 5. Retained Personal Data

1. Name and address of the business operator handling personal information and the name of the representative

Japan Remit Finance Co., Ltd.  
1-2-15 3F, Hamamatsucho, Minato-ku, Tokyo, Japan  
Hossain MD. Sarwar, Representative Director

2. Purpose of use of retained personal data

As prescribed in 1. above in the first page

3. Procedures

The procedures to disclose retained personal data are stipulated in this link.

<https://www.jpremit.com/uploads/retained-personal-data.pdf>

## **6. About Our Inquiry Counter**

Contact the following for inquiries, consultations, complaints, etc. regarding the handling of personal information.

Japan Remit Finance Co., Ltd.

Personal Information Consulting Office (at Compliance Department)

TEL : 03-5860-1588

Email: [compliance@jpremit.com](mailto:compliance@jpremit.com)

This policy statement was established on April 1, 2022. Any abolishment and modification shall be made by Senior Compliance Officer subject to the approval of management meeting.

Revised on June 30, 2022

Revised on December 10, 2022

Revised on May 1, 2023

Revised on November 16, 2023

Revised on October 7, 2024