

Position of Nikkei Inc. on the Handling of Personal Information

Nikkei Inc. (“Nikkei”) is an opinion and information media organization with newspaper publishing business at its core. In handling personal information, which constitutes a key element in the operation of its business, Nikkei considers it to be necessary, as well as its duty, to respect and to give due consideration to avoiding any unfair infringement upon the rights and interests of each principal who is identifiable by any given personal information, to the greatest extent possible. Based on such perspective, Nikkei will further develop its internal systems and comply with relevant laws and regulations, such as the Act on the Protection of Personal Information (the “Personal Information Protection Act”).

Nikkei properly handles personal information, by classifying personal information in the following manner in accordance with the relevant laws and regulations, as well as based on the characteristics of the respective business activities in which personal information is to be handled.

Naotoshi Okada
President and CEO
Nikkei Inc.

1. Handling of personal information for purposes of use thereof in the press and written works

(Areas to which the obligations prescribed in the Personal Information Protection Act do not apply)

The obligations of a “business operator handling personal information” prescribed in the Personal Information Protection Act do not apply to personal information to be used in the press and written works. Nevertheless, Nikkei voluntarily takes thorough measures to ensure proper handling of personal information, by respecting the purport of the Personal Information Protection Act and also in view of reporting ethics, etc.

More specifically, the foregoing relates to personal information which is used for purposes such as:

- (1) Editing and publishing newspapers;

- (2) Editing and publishing various types of publications; and
 - (3) Distributing and providing online newspaper editions and other works, as well as article databases, via the Internet and electronic media, etc.
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2. Handling of personal information for purposes other than the purposes of use thereof in the press and written works

(Areas to which the obligations prescribed in the Personal Information Protection Act apply)

Being fully aware of its social role as a media organization, Nikkei strictly handles the personal information which is to be used in a variety of business activities operated across an extensive range of areas to support Nikkei's activities as a media organization, but which is not to be used for press or written-work purposes. Nikkei will basically handle such personal information in accordance with the following handling policy:

- (1) Nikkei will identify the purposes of use of personal information to the extent possible, and use personal information solely within such scope.
- (2) In the event of acquiring any personal information, Nikkei will give notice concerning, or specify, the purposes of use of personal information to the relevant principal, or make the purposes of use of personal information public on its website, etc. in advance, except in the cases of exceptions as prescribed in applicable laws and regulations;
- (3) Nikkei will acquire personal information in an appropriate manner and strive to ensure that the content of data is kept up-to-date and correct at all times;
- (4) Nikkei will suitably take security management measures from an organizational, personnel, physical and technical perspective, including taking data security measures to prevent the leakage, etc. thereof and conducting management and supervision, etc. of its employees and contractors;
- (5) Nikkei will not provide personal data to any third party without the consent of the principal, except where such provision is otherwise permitted by applicable laws and regulations or an opt-out procedure has been duly carried out in relation to the provision of personal data to a third party, such as by way of notification of such procedure to the Personal Information Protection Commission;

- (6) Nikkei will not acquire any “special care-required personal information” except where the principal has given consent to the acquisition thereof or such acquisition is permitted by applicable laws and regulations;
 - (7) Although Nikkei may provide “anonymously processed information” to a third party, Nikkei will only do so after having deleted the names, addresses, etc. of the principals and having processed the personal information in a manner to make such principals unidentifiable;
 - (8) Nikkei will make responses to requests for disclosure, etc. of retained personal data received from the principal in accordance with applicable laws and regulations. Furthermore, Nikkei will strive to further develop internal systems and to make appropriate responses to complaints which may be received concerning personal information; and
 - (9) Nikkei will suitably check its internal management systems and take necessary measures.
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3. Handling of individual numbers and specific personal information (“Specific Personal Information, etc.”) as prescribed by the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (the “My Number Act”)

- (1) Nikkei will properly handle Specific Personal Information, etc. in accordance with the My Number Act.
- (2) Nikkei may outsource the acquisition of Specific Personal Information, etc. and other related affairs in accordance with the My Number Act. If Nikkei acquires any Specific Personal Information, etc., Nikkei will use the same solely for the purposes of use as prescribed in the My Number Act, and will not use such Specific Personal Information, etc. for any other purpose.

Matters Made Public in accordance with the Personal Information Protection Act, etc.

With regard to the handling of personal information for purposes other than the purposes of use thereof in the press and written works, Nikkei specifies, in the sections below, all of the matters which are required to be made public in accordance with the applicable laws and regulations. Some of such personal information may constitute personal information handled for the purposes of use thereof in the press and

written works, in which event no legal obligations will be assumed by Nikkei (the Personal Information Protection Act shall hereinafter be referred to as the “Act”).

■ Making the Purposes of Use of Personal Information Public (in accordance with Article 18 of the Act)

The purposes of use which Nikkei makes public in advance are as listed below. Nikkei may separately give notice concerning, or specify, the applicable purposes of use to the relevant principal, prior to the use of the relevant personal information.

- (1) Management of subscribers/purchasers (including applicants for subscription), performed in connection with the publishing of newspapers, books, etc.;
- (2) Advertisement business performed in relation to newspapers, books, magazines and other publications or via the Internet, etc.
- (3) Holding of various seminars, exhibitions, concerts, etc.;
- (4) Business of providing electronic media and database information (including provision of personal information to third parties);
- (5) Questionnaires and research with readers, etc. for marketing purposes;
- (6) Data processing and other services entrusted by third parties;
- (7) Promotional and solicitation activities, etc. concerning the respective products/services performed in connection with any of the foregoing business activities;
- (8) Customer management (wherein personal information such as the names of the persons in charge at, or the heads of, Nikkei’s corporate customers are used for communications, or the like, performed in relation to the relevant transactions); and
- (9) Employment management and personnel measures taken in respect of employees, etc.

- Nikkei has separately established detailed rules concerning the handling of personal information of its employees, etc. With regard to the handling of personal information of its former employees.