# Niigata Expressway Pass Privacy Protection Policy

Established on July 1, 2024 Niigata Branch of East Nippon Expressway Company Limited

East Nippon Expressway Company Limited (hereinafter referred to as NEXCO East), operator of the Niigata Expressway Pass (hereinafter referred to as "the Pass") places a great deal of importance on the protection of personal information to maintain the trust of customers. Therefore, NEXCO East makes the utmost efforts to protect customers' personal information in accordance with laws related to the protection of personal information and in accordance with the basic policy prescribed below.

# (1) Measures for Management of Personal Information

NEXCO East strictly manages customers' personal information by thoroughly training staff in the appropriate handling of information, constructing an internal management system through the establishment and use of internal regulations and manuals, and implementing safety measures for information systems.

### (2) Acquisition of Personal Information

NEXCO East acquires the necessary amount of personal information such as name and nationality to provide the Pass to the customer.

### (3) Use and Provision of Personal Information

NEXCO East will not use personal information acquired from customers for any reasons other than those listed below.

- (a) Provision of the Pass
- (b) Business related to the provision of the pass
- (c) Marketing activities/product development purposes of NEXCO East
- (d) Creation of information that cannot identify individuals to understand how the Pass is being used
- (e) Analysis of questionnaire information about the Pass for trend research purposes NEXCO East will not disclose or supply personal information acquired from customers to third parties unless in the following situations.
- (a) When a part of the work is outsourced to a third party when analyzing usage trends.
- (b) When analysis of usage trends is partly commissioned to a third party
- (c) When required under law

# (4) Appropriate Management of Personal Information

NEXCO East strives to maintain accurate and up to date personal information to provide excellent services related to the Pass to customers.

NEXCO East implements the necessary measures for appropriately managing personal information to prevent leaks, loss, damage, or illegal access to personal information.

## (5) Responsibility of Persons Engaged in Processing Personal Information

Employees who are currently or previously engaged in processing personal information shall not inform a third party or unlawfully use the details of any personal information learned through the course of their duties.

#### (6) Disclosure and Amendment of Personal Information

In cases where a customer requests disclosure of their own personal information kept by NEXCO East, NEXCO East shall promptly disclose the personal information to the customer unless doing so would substantially interfere with the execution of duties related to the Pass or would constitute a violation of the law.

In cases where a customer requests the amendment of a personal information file disclosed to a customer as prescribed in the preceding paragraph, NEXCO East shall promptly investigate the request, implement the necessary measures, and then report the results to the customer.

# (7) Administrator of Personal Information

NEXCO East shall appoint an Administrator of Personal Information to ensure the appropriate management of personal information.

The Administrator of Personal Information shall clarify the range of duties and responsibilities of employees responsible for processing personal information.

# (8) Handling of Inquiries

NEXCO East strives to provide appropriate and swift responses to customer opinions regarding the use, provision, disclosure and amendment of personal information, and any other inquiries regarding the handling of personal information.