national australia bank

Declaration on Protection of Personal Information
(Privacy Policy)

1 October, 2026
National Australia Bank Limited, Tokyo Branch
Head of Tokyo Branch: Ken Tomisaki

National Australia Bank Limited, Tokyo Branch (hereinafter referred to as the "Branch") shall strictly manage our customers' personal information and individual numbers (hereinafter referred to as the "Personal Information, Etc.") in accordance with the Act on the Protection of Personal Information (Personal Information Protection Law) and this Declaration on Protection of Personal Information (Privacy Policy), as the Company gives primary consideration to our customers' trust.

1. Compliance with Applicable Laws and Regulations, Etc.

In handling our customers' Personal Information, Etc., the Branch shall comply with various applicable laws and regulations concerning the protection of Personal Information, Etc., guidelines published by competent ministers and the guidelines established by any Accredited Personal Information Protection Organization, as well as other rules and this Declaration on Protection of Personal Information.

2. Proper Acquisition

When the Branch receives any Personal Information, Etc. from any of our customers, the Branch shall accurately inform such customer of the purpose of use thereof, and shall acquire such customer's Personal Information, Etc. by any legitimate and fair means.

Meanwhile, please note that the Branch may record telephone conversations with our customers and conduct monitoring, etc. as to e-mail communications for the purpose of exactly grasping the details of the transactions with, and inquiries, etc. from, our customers.

3. Purpose of Use and Announcement Thereof

The Branch shall use our customers' Personal Information, Etc. to the extent as is necessary for execution of the following businesses and accomplishment of the following purpose of use and shall not use any of such information for any other purpose, except for the case where consent of relevant customers has been obtained or which is deemed as an exception pursuant to the laws and regulations. Individual numbers shall be handled by us only to such extent as is provided for in laws and regulations.

Further, the Branch shall not change the purpose of use of the Personal Information, Etc. beyond such scope as is deemed reasonable.

(1) Description of Business:

- Banking business and any other businesses incidental thereto;
- Other businesses permitted to be conducted by the Branch, and any other business incidental thereto (including any service to be permitted to be provided in the future).

(2) Purpose of Use:

The Branch shall use the relevant information for the following purposes, in connection with various products and services, etc. provided by the Branch and those which are provided by our group companies or partner companies and handled by the Branch:

- to conduct solicitation for and sale of marketable securities and financial instruments, provision of information concerning the services and other activities under the Banking Act or other laws and regulations;
- to confirm the name, address, birth date, place of work, telephone number, etc. of our customers in order to perform our obligations for identity verification procedures, etc., prevention of money laundering and counter-terrorist financing under the provisions of the "Act on Prevention of Transfer of Criminal Proceeds" and other related laws and regulations;
- to confirm if any person has relevant authorization to represent or act on behalf of a corporation, in the case where the title, personal name, etc. of any individual is required to be described for the execution of various contracts and transactions with our corporate customers;

- to provide the relevant information to any third party to such extent as is necessary for appropriately carrying out our business;
- to determine whether any financial product or service is adequate, including the case of making any decision, etc. in line with the principle of suitability, etc.;
- to appropriately carry out any entrusted service in the case where all or a part of the processing works for personal information have been entrusted by any other business operator or in any other cases;
- to exercise or perform our rights and obligations under contracts with our customers or under laws and regulations, etc., including the case of reporting on the results of trade, the balance of deposits, etc.;
- to grasp and manage various risks or otherwise to appropriately and smoothly perform transactions with our customers; and
- to appropriately grasp and manage the services to be performed by outsourcees to which any of our services have been entrusted.

(3) Notwithstanding the provisions of Paragraphs (1) and (2) above, we will handle individual numbers and specified personal information of our customers (each of which shall refer to the term defined in the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures; hereinafter referred to as the "Specific Personal Information, Etc.") only to such extent as is necessary to achieve the following purposes of use:

- to perform services for application/notification for opening of an account for financial instruments transactions, to perform services for preparation/provision of any statutory document for financial instruments transactions, and to perform services for provision of relevant information to a Book-Entry Transfer Institution, etc. in connection with financial instruments transactions;
- to perform services for preparation/submission of payment records for payment of any remuneration, charge, contract money, prize money or other consideration for any service or right, payment of rent, etc. or consideration for assignment of real estate, etc., payment of dividends, surplus or money interest, etc. or distribution of any other interest; or
- to prepare/submit any statutory document, etc. on which the relevant individual number is required to be stated under the provisions of applicable laws and regulations.

The Branch will not use nor provide to any third party any information concerning the race, religion, family origin, domicile of origin, health insurance or criminal history or any other special non-public information for purposes other than the purpose deemed necessary for the appropriate operation of our business activities, etc., under the Enforcement Ordinance of the Banking Act.

We will announce the foregoing purpose of use by placing this Declaration on Protection of Personal Information on our website. Provided, however, that if the purpose of use of any specific Personal Information, Etc. is limited by any law or regulation, etc., we will not use such information for purposes other than such limited purpose.

4. Measures for Safety Management of Personal Data

- The Branch is trying to update the information received from our customers with the latest information in order to keep our customers' personal information accurate and updated, and ask for our customers' cooperation therefor.
- The Branch has been taking appropriate measures to prevent unauthorized access, etc. to our customers' personal data.
- The Branch will take appropriate information security measures, such as countermeasures against unauthorized access, measures for computer viruses, in order to prevent any loss, damage, altering and divulge, etc. of our customers' personal data.
- The Branch has concluded confidentiality agreements with those companies which handle, or do any other work for, our customers' personal data on entrustment by the Branch, and has such companies strictly handle and manage such data.
- The Branch will appropriately manage our officers and employees and inspect their compliance, and will also seek to appropriately handle complaints.

5. Outsourcing

The Branch entrusts the handling of personal data to external contractors to such extent as is necessary for achieving the purpose of use of such data. Any entrustment of handling of Personal Information, Etc. to an external contractor is made within our purpose of use, and our customers' personal data shall be appropriately managed under applicable laws and regulations, etc., as well as this Declaration on Protection of Personal Information and the Branch will confirm, on a periodic basis, the status of appropriate supervision and compliance by our outsourcees.

In entrusting any of our services to an external contractor located overseas, we confirm that measures in line with the purpose of the provisions of Chapter IV, Section 1 of the Personal Information Protection Law of Japan under the contract, etc. concluded with each such outsourcee, as appropriate, except for the case where consent thereto was separately obtained from relevant customers.

6. Provision of Information to Third Parties

The Branch will not provide any of our customers' personal data to any third party, except for the following cases. Further, if the Branch entrusts handling of any personal data to any third party, we will conduct appropriate investigation into such party and will appropriately supervise such party so as to have such party maintain the confidentiality of all such data.

- if relevant customers have agreed to such provision;
- if such provision is made under applicable laws and regulations (including the case where such provision is required by any supervisory authority of any foreign country under applicable laws and regulations of such country, etc.);
- if such provision is necessary for the protection of human life, body or property and if it is difficult to obtain the consent of relevant individuals;
- if the Branch is required to cooperate with any national or local government organ or its entrustee in pursuing affairs under applicable laws and regulations and if the obtaining of consent from relevant individual would hinder the performance of such affairs;
- if any Personal Information, Etc. is provided to any third party for the entrustment of any service; or - any other case where any special reason exists for such provision.

7. Sharing for Use of Personal Data

The Company, as a member of NAB Group having operations all over the world, will share with NAB Group companies engaged in relevant business and our vendors, etc. from which NAB Group companies receive services related to their businesses, and appropriately manage, our customers' personal data, for the purpose of providing overall financial services and risk management. Besides this, we may share to use any personal information contained in our customers' personal data as follows, to the extent permitted under applicable laws and regulations and within the above- mentioned purpose of use:

(1) Item of personal data to be shared for use:

- information concerning our customers, including its name, address, birth date, occupation, etc., name of company (organization), title, business address, telephone number, facsimile number, e-mail address, information contained in resume;
- information concerning the transactions with our customers, including the details of transactions, balance of deposits; and - information concerning the needs of our customers for asset management, etc.

(2) Range of users by sharing:

- NAB Group companies (which shall mean all present and future domestic and overseas affiliated companies within NAB Group) and the vendors, etc. from which NAB Group companies receive services related to their businesses

(3) Purpose of Use:

- Within the range set forth in "3. Purpose of Use and Announcement Thereof" above.

(4) Name of the person responsible for the management of personal data to be shared for use:

- Chief Privacy Officer of National Australia Bank Limited, Tokyo Branch

In addition, while the foregoing provisions are related to the shared use of personal data under various laws and regulations for the protection of Personal Information, Etc., the Branch, nonetheless, will comply with the measures to prevent adverse effects and our confidentiality obligations as to our customers' information. Further, with respect to the shared use with NAB Group companies located overseas, the Branch confirms, as necessary, that measures in line with the purpose of the provisions of Chapter IV, Section 1 of the Personal Information Protection Law of Japan have been taken under contracts with such companies, privacy policies adopted by such companies, etc.

8. Request from Customers for Disclosure, Correction, Suspension of Use, Deletion, Etc.

In the case where the Branch receives a request from any of our customers for disclosure, correction, suspension of use, deletion or suspension of provision to third parties of his/her own personal data kept by us, the Branch will confirm the identity of each such customer and shall proceed with the necessary steps as follows. Please note that if we are requested to disclose whether or not any of our customers has his/her individual number, we will respond only as to whether he/she has or does not have such number:

- Point of Contact: Your customer representative of the Branch or the Compliance Department as mentioned below

- Method for Request: Application form prescribed by the Branch shall be filled in and submitted to the Branch
- Identity Confirmation: We will confirm the identity by checking two of identification documents, etc. to be separately specified by the Branch
- Fees: For any application for disclosure of personal data, we will collect 3,300 JPY (including consumption tax) from you. However, in the case of a request for correction, suspension of use, etc., we will not charge any fee.
- Method of Response: We will respond in writing addressed to the address set forth in the application form submitted by each applicant.

Further, if a request for disclosure, correction, suspension of use, deletion or suspension of provision to third parties of any personal data kept by the Branch is made by your agent, the following documents shall be submitted:

(1) In the case of legal representative:
any document to confirm that such agent has the power of attorney; and any document to confirm the identity of such agent.

(2) In the case of privately appointed agent:
a power of attorney in such form as is prescribed by the Branch; and a certificate of the registered seal impression to be used by the relevant customer.

In the following cases, the Branch will not disclose any of the personal data kept by us. If we determine not to disclose any data, we will notify the relevant customer of such determination, together with the reason therefor:

- if the identification of any relevant individual cannot be confirmed;
- if the agent's authority cannot be verified in the case of an application submitted by an agent;
- if any of the prescribed application documents is incomplete;
- if the object of any request for disclosure does not fall under the "personal data kept by us";
- if there is a possibility that any of the life, body, properties or other rights and interests of the relevant customer or any third party might be damaged;
- if there is a possibility that appropriate performance of our business operation might be impaired; or
- if any other law or regulation would be violated.

If the Branch received from any of our customers a request for disclosure, correction, suspension of use, deletion, suspension of provision to third parties, etc., we will conduct necessary investigations and make corrections and suspend the relevant use based on the outcomes of such investigations.

9. Procedures for Request from Customers for Disclosure regarding Provision of Personal Data to Third Parties in Foreign Countries

If the Branch provides our customers' personal data to any third party in foreign countries and it is possible for the Branch to identify the third party to whom the personal data has been provided after the fact, the customer may request that the Branch provide information on the name of the said foreign country, information on the systems relating to the protection of personal information in the said foreign country and information on the measures taken by the said third party to protect personal information.

In addition, if the Branch provides our customers' personal data to a third party in a foreign country that has established a structure conforming to the standards as necessary for continuously implementing measures equivalent to the ones that shall be taken by a personal information handling operator in regards to the handling of personal information (hereinafter referred to as the "Equivalent Measures"), consent of relevant customers is not required, but the customer may request the Branch provide following information; provided, however, that the Branch may not provide all or part of the information if there is a risk that the disclosure would substantially interfere with the proper implementation of the Branch's operations:

(1) method of establishment of structure by the third party;
(2) outline of the Equivalent Measures by the third party;
(3) method and frequency of the Branch's confirmation of the status of implementation of the Equivalent Measures by the third party and the existence or non-existence of a system that may affect the implementation of the Equivalent Measures and the details thereof;
(4) the name of the foreign country;

(5) existence or non-existence of a system in the foreign country that may affect the implementation of the Equivalent Measures by the third party, and an outline thereof;
(6) existence or non-existence of impediments to the implementation of the Equivalent Measures by the third party, and an outline thereof; and
(7) outline of measures to be taken by the Branch with respect to the impediments mentioned in (6) above.

10. Contact for Inquiries from Customers

If you have any request for or complaint about disclosure, correction, suspension of use, deletion or suspension of provision to third parties of the Personal Information, Etc. or any question on unclear points, please contact your customer representative or the following address:

Compliance Department of National Australia Bank Limited, Tokyo Branch
Address: Muromachi Higashi Mitsui Building, 2-2-1 Nihonbashi Muromachi,
Chuo-ku Tokyo 103-0022
Telephone: 03-3241-8781
Service Hours: Monday to Friday, 9:00am to 17:00pm
(excluding Japanese public holidays and year-end/New Year bank holidays.)

11. Affiliated Accredited Personal Information Protection Organization

The Branch is a member of the All Banks Personal Data Protection Council, an Accredited Personal Information Protection Organization in the financial sector. The Complaint/Consultation Counter of the All Banks Personal Data Protection Council accepts complaints and inquiries as to the handling of the Personal Information, Etc. by its members.

All Banks Personal Data Protection Council Website:
http://www.abpdpc.gr.jp/
If you have any complaint or inquiry, please call 03-5222-1700 or visit nearby Inquiries Offices of Banking Transactions.

12. Method of Announcement of/Amendment to Declaration on Protection of Personal Information (Privacy Policy)

Any of the foregoing information may change following the amendments to laws and regulations or for any other reason. In such case, the change shall be announced on our website, etc. and such change shall become effective at the time of announcement.
Our website: https://www.nab.com.au/japan