

DKS Co. Ltd. ("We") recognizes the importance of personal information handled for business purposes and strives to protect such personal information that can identify customers (hereinafter referred to as "Personal Information") in accordance with the following policy in order to comply with the Personal Information Protection Act (Act No. 57, 2003) and related laws, regulations, guidelines, etc. and to properly manage and protect such Personal Information.

### **1. Acquisition of Personal Information**

We shall obtain Personal Information required for the execution of business through legal and fair means.

### **2. Publication of Purpose of Use of Personal Information**

We shall make appropriate use of Personal Information to the extent required to achieve the purposes stated at the end.

### **3. Measures to ensure the safe management**

In order to prevent unauthorized access to and leakage, theft, destruction, loss and falsification of Personal Data (this includes personal information that we have acquired or are attempting to acquire, and that is planned to be treated as Personal Data; the same applies to the following), We will take appropriate safety measures as follows.

#### **[Formulation of basic policies]**

We have established these policies in order to ensure proper handling of Personal Data and to publish contact points for handling questions and complaints.

#### **[Establishment of discipline regarding handling of Personal Data]**

Personal Information Management Regulations are in place for handling procedures, persons in charge and their duties, etc. at each stage of acquisition, use, preservation, provision, deletion and disposal.

#### **[Organizational security control measures]**

- We have established persons in charge of handling Personal Data.
- Employees who handle Personal Data and the scope of Personal Data handled by such employees are clearly defined.
- We have established a reporting system to the persons in charge in the event that any facts or signs of violation of laws and/or handling regulations are recognized.

- The handling status of Personal Data is inspected on a regular basis to be reviewed and/or improved.

#### **[Human security control measures]**

- Regular training programs are in place regarding handling of Personal Data.
- Rules on confidentiality of Personal Data are listed in the Personal Information Management Regulations and Employment Regulations.

#### **[Physical security control measures]**

- In areas where Personal Data are handled, entry and exit of employees are controlled and equipment that can be brought into is restricted.
- Access to Personal Data by unauthorized persons is prohibited.
- Measures are in place to prevent theft or loss of equipment, electronic media and/or documents that involve Personal Data.
- Measures are in place to ensure that no Personal Data are easily identified during transfer of equipment, electronic media, etc. that involve Personal Data including transfer within a single business site.

#### **[Technical security control measures]**

- Access to information is controlled in order to limit persons who handle Personal Data and the scope of the Personal Information databases, etc.
- A mechanism is in place to protect the information systems that handle Personal Data from unauthorized access from outside and/or malware.

### **4. Assignment**

We may assign certain clerical work to third parties such as distribution of goods and/or documents to customers and shareholders and management of Personal Information obtained by exchanging business cards. In this case, We will conduct necessary and appropriate supervision of the assignees in accordance with the Personal Information Protection Act.

### **5. Provision to Third Parties**

Except as otherwise provided by law, We shall not provide Personal Information to any third party without obtaining the prior consent of the principal.

### **6. Joint Use**

We may share your personal data\* as follows:

\*Personal data refers to personal information that can identify a specific person by descriptions, records, or by checking with other information and constitutes a database that enables easy retrieval of specific person's information and that falls under the category of "personal data" on the Personal Information Protection Act.

Personal data items to be shared	Personal name, address, date of birth, sex, occupation, telephone number, fax number, email address, name of organization to which the person belongs, history of inquiries, history of participation in exhibitions, seminars, and other events, information to send or not to send direct mail, history of business negotiations for and purchase of Our products, history of accessing the website of Our group companies, and information on family members
Scope of joint users	We and the consolidated companies and companies accounted for by the equity method in Japan appearing in Our financial statements
Purpose of utilization of the jointly used personal data	Same as "2. Publication of Purpose of Use of Personal Information" above
Who to be responsible for managing jointly used personal data	YAMAJI Naoki, President COO DKS Co. Ltd. 55 Nishi-shichijo Higashikubocho, Shimogyo-ku, Kyoto 600-8873, Japan
Acquisition method	Documents, Internet (web, email), etc.

## 7. Request for Disclosure

We will respond legally and appropriately to requests for disclosure, correction, suspension of use, deletion and/or discontinuance of provision to a third party, etc. of the retained personal data and/or their disclosure record to a third party when such request has been submitted by the person who such personal data belong to or his/her agent. Please contact the following "Personal Information Desk" for inquiries.

As for disclosures and changes in Personal Information of Our shareholders, We receive them from Mizuho Trust and Banking Co., Ltd., the administrator of Our shareholders register. Please refer to "9. For Inquiries about Personal Information of Shareholders" below.

## **8. Contact Information on Personal Information Protection**

For questions and inquiries about our efforts to protect Personal Information, please contact Our Personal Information Desk.

Inquiries are received by phone from 9:00 to 17:00 on weekdays (excluding Saturdays, Sundays, national holidays, year-end and New Year holidays and summer holidays).

Personal Information Desk, DKS Co. Ltd.

Address 5 Kisshoin Ogawara-cho, Minami-ku, Kyoto 601-8391, Japan

Phone +81-75-323-5635

## **9. Inquiries about Personal Information of Shareholders**

Securities Department, Mizuho Trust & Banking Co., Ltd.

Address 2-8-4, Izumi, Suginami-ku, Tokyo 168-8507, Japan

Phone 0120-288-324 (toll-free from Japan)

Reception hours: 9:00 to 17:00 (excluding Saturdays, Sundays and holidays)

For shares held in an account of a securities company, please contact your securities company.

## **10. Handling cookies**

Cookies are small text files containing characters that are exchanged between a web server and a viewer's browser when browsing a website and stored on the viewer's device. By setting a browser, a viewer can see that the website s/he is viewing is using cookies in advance and refuse to receive them. We also use Google Analytics (GA) to keep track of website usage, and GA uses cookies and identifiers to gather users' information. For more information, please visit Google website. For more information about how GA collects and processes data, see Google data usage by users when they use Google partners' sites or apps below.

Google Analytics Terms of Service

<https://marketingplatform.google.com/about/analytics/terms/us/>

Google Privacy Policy

<https://policies.google.com/privacy>

## **11. Remarks**

We may revise our Personal Information Protection Policy without notice in order to protect Personal Information of the customers more appropriately and to respond to changes in laws and regulations.

### **[Purposes of Use]**

(1) Purposes of use of Personal Information related to medical professionals and researchers such as doctors, pharmacists and pharmacies

- Provision and collection of information on the proper use of pharmaceuticals and medical devices
- Provision and collection of information on the quality, safety, or efficacy of pharmaceuticals and medical devices
- Understanding, communication and provision of delivery destinations of bio-derived products
- Provision of urgent safety information, revised package inserts, etc.
- Survey and analysis of the actual use and users' needs of pharmaceuticals and medical devices
- Communication and information provision of adverse reactions, recall, etc.
- Survey, research and development in the fields of medicine and pharmacology
- Provision and collection of medical and academic information
- Membership certification and communication to members of Internet sites for healthcare professionals
- Request for and implementation of clinical trials and post-marketing surveys, etc.
- Ensuring safety in the application of pharmaceuticals and medical devices
- Safety information exchange with overseas subsidiaries
- Notification and report to government offices and affiliated organizations
- Collection and management of information on payment processing
- Provision and disclosure of information to ensure transparency in payment.
- Other appropriate and smooth communications with healthcare professionals and researchers

(2) Purposes of use of Personal Information related to business partners and other

companies in the same industry

- Communication with business partners, contractors, and other companies in the same industry
- Contribution to publications
- Communication of information on Our products and sales policies
- Understanding information related to credit management
- Other appropriate and smooth communications with persons related to business partners and other companies in the same industry.

(3) Purposes of use of Personal Information related to contractors

- Providing, receiving, and communicating information on technology, equipment, etc. with contractors
- Other appropriate and smooth communications with contractors

(4) Purposes of use of Personal Information related to shareholders

- Fulfillment of Our obligations and exercise of shareholder rights stipulated in the Corporate Law and other related laws and regulations
- Sending convocation notices, shareholder communications and other handouts
- Implementing surveys to improve relations with shareholders
- Implementing various measures to help understanding of Our group's business and to improve relations with shareholders
- Data collection and statistical processing such as preparation of data based on the prescribed standards under the Companies Act and other related laws and regulations
- Other appropriate and smooth communications with shareholders

(5) Purposes of use of Personal Information related to public and/or investor relations

- Releases to investors and the media and the distribution of event information
- Examination, investigation, and response to inquiries, communications, etc.
- Public relations activities inside and outside the company
- Membership certification, communication to members and confirmation of access status of Internet sites for journalists
- Other appropriate and smooth communications with persons related to the public and/or investor relations

(6) Purposes of use of Personal Information related to customers

- Provision of information on various products and services, including provision of samples and pamphlets, and sales activities
- Email delivery services and shipment of publications
- Responding to inquiries and requests for documents
- Development and improvement of various products and services

- Conducting questionnaire surveys such as satisfaction surveys
- Investigation and analysis of customers' hobbies and preferences using Personal Information of customers obtained through browsing history, purchase history and satisfaction survey results, and distribution of advertisements based on the investigation/analysis results
- Provision of information and management of various events, such as seminars and forums, campaigns, and membership services
- Admission and exit control for visits to our facilities
- Ensuring security in Our facilities by checking information recorded on security cameras
- Provision of information on the experiences of patients and their families with the aim of raising awareness of illness
- Other matters incidental or related to the above

(7) Purposes of use of Personal Information related to the users of Our contact desk (Details of the telephone call to Our contact desk are recorded for the purposes stated below.)

- Understanding, examining, investigating, and responding to inquiries and communications
- Improvement of telephone service skills and the realization of better customer service
- Feedback to Our person in charge of pharmaceutical information about the content of inquiries and responses
- Communication and provision of medical information to manufacturers and distributors of products
- Other appropriate and smooth communications with the users of Our contact desk

(8) Purposes of use of Personal Information related to recruitment candidates and applicants, including internships

- Consideration and determination of acceptance/rejection
- Other appropriate and smooth communications, information provision, notification, and recruitment selection procedures with recruitment candidates and applicants, including internships

(9) Purposes of use of Personal Information related to employees, employees' families, former employees, etc.

- Providing and communicating personnel services such as employment management and employee benefits
- Implementation of statutory medical examinations and other measures to promote

health and secure safe working status

- Wage payment and pension benefits administrative procedures
- Labor policies and labor management such as social insurance and health insurance administrative procedures
- Business communication in the event of an emergency such as a disaster
- Making admission/exit magnet cards and entry/exit log management
- Tax related procedures such as income tax and resident tax
- Use, maintenance, and management of telephony infrastructures such as telephones, personal computers, groupware and mail systems
- Issuance and communication of various certificates
- Preparation, management and maintenance of the membership list of the retiree association
- Communication, consultation and inquiries related to the management of the retiree association

(10) Purpose of use of genomic data that can authenticate individuals

- Implementation of drug discovery and clinical researches to create efficacy and safety of pharmaceuticals and medical devices

(11) Purpose of use of specific Personal Information related to healthcare professionals, corporations or organizations with which we do business

- Submission of statutory documents to tax offices related to income tax applications for payment of remunerations, etc.

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