Bloomberg Tradebook

PRIVACY

PRIVACY POLICY

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Please note that this opt-out process make take up to thirty (30) days to complete.

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Bloomberg Tradebook may disclose your personal information to affiliates or unaffiliated third parties if we believe in good faith that such disclosure is necessary: (a) to comply with the law or in response to a subpoena, court order, or other legal process, subject to Bloomberg’s Law Enforcement Data Request Statement below; (b) to protect the interests, rights, safety, or property of Bloomberg Tradebook or others; (c) to enforce any terms of service on this Web site; (d) to provide you with the services or products requested by you (including allowing a purchaser of Bloomberg Tradebook to continue to serve you), and to perform other activities related to such services and products, including billing and collection; (e) to provide you with information, special offers, or promotions from Bloomberg Tradebook to which you consented; or (f) to operate Bloomberg Tradebook's systems properly. Bloomberg Tradebook makes reasonable efforts to limit its designated service providers' disclosure of your personal information in the same manner as set forth in this paragraph.

Accuracy and Security of Personal Information

Any personal information you provide to Bloomberg Tradebook is kept on secure servers. Bloomberg Tradebook uses reasonable administrative, technical, personnel, and physical measures (a) to safeguard personal information against loss, theft, unauthorized use, disclosure, or modification; and (b) to ensure the integrity of the personal information.

Bloomberg Tradebook

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Bloomberg Tradebook may provide links to third-party Web sites. Since we do not control third-party sites and are not responsible for any personal information you may provide while on such sites, we encourage you to read the privacy policies on those Web sites before providing any of your personal information on such sites.

Bloomberg Tradebook

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Bloomberg L.P.
Attn: Legal Department 731
Lexington Avenue New York,
NY 10022

Modifications To This Privacy Policy

Bloomberg Tradebook reserves the right to change this privacy policy at any time by posting revisions on this Web page. Such changes will be effective upon posting.

Last Updated: February 12, 2016

Bloomberg Tradebook

LAW ENFORCEMENT DATA REQUEST STATEMENT

Bloomberg will not disclose client data (which may include personal information, together "client data") in response to requests from law enforcement, governmental, or regulatory agencies except where required to do so by law (for example, in response to valid and properly-served legal process such as a subpoena or search warrant). Bloomberg will attempt to notify its client prior to disclosing client data unless: (1) prohibited by applicable law from doing so, or (2) there are clear indications of unlawful conduct in connection with the client's use of Bloomberg services. Notwithstanding any of the foregoing, Bloomberg reserves the right to respond to urgent law enforcement requests if Bloomberg believes in good faith that an emergency involving imminent danger of death or serious physical injury justifies such disclosure.

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Bloomberg Tradebook

INTRA-GROUP PERSONAL DATA PROTECTION STATEMENT

Intra-Group Personal Data Protection Statement

January 28, 2016

Bloomberg L.P. and its affiliates ("Bloomberg") are committed to compliance with their privacy obligations in the United States and throughout the world. This Intra-Group Personal Data Protection Statement ("Statement") sets out the privacy principles Bloomberg follows with respect to personal information that it transfers from the European Union, European Economic Area, and Switzerland (collectively, "EU") to the United States ("U.S.").

The relevant Bloomberg group companies have entered into an Intra-Group Personal Data Protection Agreement ("IGA") in order to ensure that responsibility for personal information transferred from the EU to the U.S. is clearly identified. The parties to the IGA are considered as data controllers, or data controller and data processor under applicable law.

As relevant Bloomberg companies are located in the U.S., the group companies involved in the processing shall be known as a Data Exporter and a Data Importer respectively, although there may be more than one company involved in the processing of personal information.

The IGA incorporates unchanged EU Commission Standard Contractual Clauses for controller to controller, and controller to processor transfers, and the relevant Data Exporter and Data Importer will abide by these EU Commission Standard Contractual Clauses where personal information is transferred to or accessed from Bloomberg group companies in the U.S.

Contact Information

Questions or comments regarding this Statement should be submitted to Bloomberg's privacy director at the following address:

Assistant Chief Legal & Compliance Officer
731 Lexington Avenue
New York, NY 10022
United States

This Statement may be amended from time to time, consistent with the requirements of applicable law, and will be effective immediately.

PRIVACY

PRIVACY POLICY

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Bloomberg Tradebook Japan may also disclose your information to unaffiliated third parties if we believe in good faith that such disclosure is necessary: (a) to comply with the law or in response to a subpoena, court order, government request, or other legal process; (b) to produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigations, or other legal or administrative proceedings; (c) to protect the interests, rights, safety, or property of Bloomberg Tradebook Japan or others; (d) to enforce any terms of service on this Site; (e) to provide you and the other users of this Site with the services or products requested by you and/or the other users (including allowing a purchaser of Bloomberg Tradebook Japan to continue to serve you), and to perform other activities related to such services and products, including billing and collection; (f)

to provide you with special offers or promotions from Bloomberg Tradebook Japan that may be of interest to you; or (g) to operate Bloomberg Tradebook Japan's systems properly.

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Accuracy and Security of Personal Information

Any of your personal information collected by Bloomberg Tradebook Japan through this Site is kept on secure servers. Bloomberg Tradebook Japan uses reasonable administrative, technical, personnel, and physical measures to protect your personal information on such servers.

Accessing and Updating Your Personal Information

To access, review, rectify, or delete personal information collected about you through this Site, please send us an e-mail message at: privacy@bloomberg.com and include Bloomberg Tradebook Japan in the subject line. All requests must include the following information: first name, last name, e-mail address, and "Privacy" in the Subject line. While Bloomberg Tradebook Japan will make reasonable efforts to accommodate your request, we also reserve the right to impose certain restrictions and requirements on such access requests, if allowed or required by applicable laws.

Transfer of Personal Information To Other Countries

Some of the uses and disclosures mentioned in this privacy policy may involve the transfer and processing of your personal information to various countries around the world that may have different levels of privacy protection than your own country. By submitting your personal information, you consent to such transfers and processing, including to and in the United States.

Links To Third-Party Web Sites

Bloomberg Tradebook Japan may provide links to third-party web sites. Since we do not control third-party sites and are not responsible for any information you may provide while on such sites, we encourage you to read the privacy policies on those web sites before providing any of your information on such sites.

Questions Regarding This Privacy Policy

If you have questions regarding this privacy policy, please contact us at privacy@bloomberg.com and include Bloomberg Tradebook Japan in the Subject line of your inquiry.

Modifications To This Privacy Policy

Bloomberg Tradebook Japan reserves the right to change this privacy policy at any time by posting revisions on this web page. Such changes will be effective upon posting.

Last Updated: August 21, 2015

Personal Information Protection Declaration

Bloomberg Tradebook Japan Limited

BLOOMBERG TRADEBOOK has developed and announces this Personal Information Protection Declaration as its policy for handling of the personal information of customers.

1. **Compliance with Relevant Laws, Regulations and Guidelines**

   Our company shall comply with all applicable laws and regulations concerning the protection of personal information including the "Law concerning the Protection of Personal Information" (Law No. 57 of 2003, as amended), the guidelines of those state ministers with competency thereover and the guidelines of the Accredited Personal Information Protection Organization, as well as this Personal Information Protection Declaration.

2. **Purposes of Use**

   Our company, unless the customer agrees or except as applicable laws, regulations and guidelines permit it as an exception, shall handle the personal information of customers solely to the extent of the achievement of the purposes of use of personal information within our company as described in the annex hereto (the "Purposes of Use").

   Furthermore, the Purposes of Use shall be displayed in our headquarters, in addition to being published on the website and the like of our company. In the event that the Purposes of Use are modified, such modification shall also be published in the same manner. Please click here for the online privacy policy.

3. **Safe Management Measures**

   Our company shall strive so that the content of the personal information of customers is accurate and current. Furthermore, in order to prevent the disclosure, loss or damage of the personal information of customers and to manage the safety of such personal information, the necessary and appropriate safe management measures shall be implemented and, in addition, the appropriate supervision of executives, staff and delegatees shall be carried out.

4. **Continuous Improvement**

   Our company, in order to strive for the appropriate handling of the personal information of customers, shall carry out the appropriate review of this Declaration and strive for continuous improvement.

5. **Provision of Personal Information to Third Parties**

   Personal information may be made available to Bloomberg L.P. and its affiliates in order to enhance the services it provides as far as applicable laws, regulations and guidelines allow.

The personal information provided to the third parties may include such persons' names, addresses, telephone/facsimile numbers, email addresses, employers' names, titles, career history and information about the use of its service, such as generic types of information accessed, times and volume of use of the service and traffic information as far as applicable laws, regulations and guidelines allow.

Our company may disclose personal information or other information to Bloomberg L.P. and its affiliates, its and their service providers, and others, including the subscriber of relevant account or other party who authorized the use of the service, such as the employer of the individual (or to its parent company or authorized affiliate(s)). Our company makes available some of the personal information above it collects to subscribers, employees, and Bloomberg L.P. and its affiliates via its proprietary electronic network over which the BLOOMBERG TERMINAL is provided as far as applicable laws, regulations and guidelines allow.

6. Matters concerning Personal Information held and handled by Our Company

Purposes of Use of All Personal Data Held

Same as the Purposes of Use described in Section 2.

Procedure for Requesting Disclosure, Etc.

Relevant law may permit customers to request to be informed of the purpose of use of the personal information, to request disclosure of personal information, to request amendments, additions or deletions of personal information, or to request suspension of use of personal information. If customers would like to exercise any of these rights with respect to personal information held by our company about them, they may contact the person as set forth below with sufficient particulars to identify the information involved. We will inform customers of the procedures that may be required, including the payment of any necessary fees.

Questions, Opinions, Etc.

Our company shall strive to make prompt and good faith responses to questions, opinions and the like concerning personal information received from customers. Customers may contact in writing our company via the contact information provided below with your questions, opinions and the like:

Address: Marunouchi Bldg. 21F
2-4-1 Marunochi, Chiyoda
Tokyo, Japan, 100-6321

Telephone: 03-3201-8898

Office hours: 9:00 am to 5:00 pm

E-mail: privacy@bloomberg.com and include Bloomberg Tradebook Japan in the subject line

Accredited Personal Information Protection Organization

Our company is a member of the Japan Securities Dealers Association, an Accredited Personal Information Protection Organization that has received the authorization of the Financial Services Agency. Complaints and consultation concerning the association member's handling of personal information are accepted at the Securities Mediation and Consultation Center of the Association.

(Complaints and Consultation Counter):
Japan Securities Dealers Association
Securities Mediation and Consultation Center
Telephone (03-3667-8008)
(http://www.jsda.or.jp/) or each branch department of the Securities Mediation and Consultation Center near you

7. Handling of Sensitive Information

Our company shall not handle information concerning political thought, race and nationality, religious beliefs (including religion, thought and creed), entry into labor union, family status and original domicile, healthcare and medical care, sexual life or criminal record and other special nondisclosed information, in accordance with Cabinet Office Ordinances concerning regulation of the acts and the like of securities companies and the like.

8. Transfer of Personal Information To Other Countries

Some of the uses and disclosures mentioned in this privacy policy may involve the transfer and processing of your personal information to various countries around the world that may have different levels of privacy protection than your own country. By submitting your personal information, you consent to such transfers and processing, including to and in the United States.

End

(Annex)

Purposes of Use of the Personal Information of Customers

August 21, 2015

Bloomberg Tradebook Japan Limited

Our company shall handle the personal information of customers solely to the extent necessary to achieve the purpose of implementing the business content and achieving the purposes of use below:

1. **Business Content:**

   Purchase and sale of negotiable securities, futures transactions such as a negotiable securities index, negotiable securities options trading or foreign market securities futures trading

   Mediation, agency or proxy for the purchase and sale of negotiable securities, futures transactions such as a negotiable securities index, negotiable securities options trading or foreign market securities futures trading

   Mediation, agency or proxy for the delegation of the purchase and sale of negotiable securities, futures transactions such as a negotiable securities index, negotiable securities options trading in the market for negotiable securities, as well as mediation, agency or proxy for the delegation of the purchase and sale of negotiable securities or foreign market securities futures trading

   Other services relating to securities business

   Intermediation of OTC derivatives transactions

2. **Purposes of Use:**

   In order to provide solicitation, sale and service for the electronic Bloomberg trading platforms pursuant to the Financial Instruments and Exchange Act (including those related to PTS and OTC derivatives trading)

   In order to carry out solicitation, sale and service guidance for the electronic Bloomberg trading platforms pursuant to the Financial Instruments and Exchange Act (including those related to PTS and OTC derivatives trading)

   In order to carry out solicitation, sale and service guidance for the electronic Bloomberg trading platforms of our company, affiliates or associated companies

   In order to judge the appropriateness of the providing of the electronic Bloomberg trading platforms and services to the customer

In order to confirm whether a customer is the actual party concerned or the agent of the party concerned

In order to carry out notice of transaction results and the like to the customer

In order to carry out administrative matters related to transactions with the customer

For the purpose of the research and development of financial products and services by means of the implementation of market surveys as well as data analysis and questionnaires and the like

In order to properly perform delegated work, when all or part of the processing of the personal information has been delegated from another business entity or the like

Such other matters in order to appropriately and smoothly perform other transactions with the customer (including PTS and OTC derivatives trading work based on the Financial Instruments and Exchange Act)

In order to make personal information available to Bloomberg L.P. and its affiliates to support our company's provision of the electronic Bloomberg trading platforms and to enhance and promote the services Bloomberg L.P. and its affiliates provides as far as applicable laws, regulations and guidelines allow

In order to enhance and promote the services Bloomberg Tradebook Japan provides as far as applicable laws, regulations and guidelines allow

Bloomberg Tradebook Japan may also disclose your information to unaffiliated third parties if we believe in good faith that such disclosure is necessary: (a) to comply with the law or in response to a subpoena, court order, government request, or other legal process; (b) to produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigations, or other legal or administrative proceedings; (c) to protect the interests, rights, safety, or property of Bloomberg Tradebook Japan or others; (d) to enforce any terms of service on this Site; or (e) to provide you and other customers with the services or products requested by you and/or the other customers (including allowing a purchaser of Bloomberg Tradebook Japan to continue to serve you) and to perform other activities related to such services and products, including billing and collection.

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