

# Basic Policy on the Handling of Personal Information

## □ Basic Concept

Shikoku Railway Company (hereafter referred to as the “Company”) complies with the laws, internal rules and regulations, and other norms regarding personal information. The Company aims to earn customers’ trust by properly acquiring, using, and managing the personal information that it handles.

## □ Handling of Personal Information

### (1) Compliance with laws and regulations

- 1) The Company complies with the laws and regulations concerning personal information.
- 2) The Company has formulated the internal rules and regulations of handling personal information, makes them known to its employees and others concerned, implements them, and provides the necessary guidance and supervision.

### (2) Security management

- 1) A manager is assigned to each operation that handles personal information.
- 2) The Company takes safety control measures to prevent unauthorized access to personal information and the loss, destruction, falsification, or leakage of personal information.

### (3) Collection of personal information

The Company uses legal and fair means of collecting personal information after clarifying the following matters:

- 1) The purposes of collection and use.
- 2) The purposes and scope of providing personal information if the Company plans to provide collected personal information.

### (4) Use, provision, and outsourcing of personal information

- 1) The Company will use personal information, if necessary, within the scope of the purposes for which the personal information is used.
- 2) The Company may provide all or part of the personal information in its possession to a third party or may outsource the processing of such information to a third party. In that case, the Company will properly select the party to which the information is provided or entrusted and provide the necessary guidance and supervision to ensure that the party properly manages the information in the same manner as the Company.

### (5) Ensuring accuracy

The Company strives to keep personal data accurate and up-to-date.

### (6) Respect for the rights of each individual

The Company respects customers’ rights regarding personal information. If requested to disclose, correct, stop using, or delete information, the Company will comply with the requests within a reasonable period and to a reasonable extent.

### (7) Continuous improvements

The Company strives to improve the handling of personal information as appropriate.

□ Items Published under the Act on the Protection of Personal Information

(1) Name of the business operator handling personal information

Company Name: SHIKOKU RAILWAY COMPANY

Name of Representative: President NISHIMAKI Tsuguhiro

Head office: 8-33 Hamano-cho, Takamatsu, Kagawa, Japan

(2) Purposes of use

The purposes of use of personal information and data that the Company obtains and keeps are as follows:

- To be used for procedures necessary for the provision of products and services offered to customers
- To operate various membership services
- To send prizes, rewards, etc.
- To provide information related to the Company's various business operations
- To improve the Company's products and services
- To recruit and select employees
- To provide the Company's employment information
- To contact each individual as necessary

(3) Security control measures for personal data

I. Matters related to organizational safety management

The Company appoints personnel responsible for the handling of personal data. The Company also clarifies the personnel handling personal data and the scope of personal data handled by the personnel. A reporting and liaison system is in place for reporting to the supervising staff in charge if a fact or indication of a violation of the laws or internal rules and regulations is detected.

II. Matters related to personnel safety management measures

The Company supervises the handling of personal information within the Company at all times. Furthermore, the Company provides timely and appropriate guidance on department rules and other necessary matters.

III. Matters related to physical safety management

The Company controls its employees' access to areas where personal data is handled and restricts equipment, devices, etc., to be taken out of the areas. Furthermore, the Company implements measures to prevent unauthorized people from viewing personal data.

IV. Matters related to technical safety management

The Company implements access control to limit the range of personnel who handle personal information and the range of accessible personal information databases and the like. Furthermore, the Company has a system to protect personal information from outsiders' unauthorized access or unauthorized software.