

## TCI GLOBAL PERSONAL INFORMATION MANAGEMENT POLICY

**Objective: to avoid breaches of legal, statutory, regulatory or contractual obligations relating to the security of personal information.**

**Policy:**

- a) The purpose of this policy is to protect personal information assets from all threats, whether external or internal, deliberate or accidental in TCI globally.
- b) TCI Global Personal Information Management Policy has been approved by Tokyo Chemical Industry Co. Ltd (HQ of TCI Group).
- c) Personal information means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person – GDPR Article 4, Clause 1.
- d) It is the policy of the organisation to ensure that:
  - Personal Information is processed only when it is strictly necessary for legal and regulatory purposes, or for legitimate organisational purposes;
  - Only the minimum personal information required for these purposes is processed;
  - Clear information is provided to Data Subjects about how their personal information can be used and by whom;
  - Only relevant and adequate personal information is processed;
  - Personal information is processed fairly and lawfully;
  - A documented inventory of the categories of personal information processed is maintained;
  - Personal information held is accurate and, where necessary, up to date;
  - Personal information is retained only for as long as is necessary for legal and regulatory reasons or for legitimate organisational purposes and disposed of appropriately and in a timely manner;
  - Data Subjects' rights are protected in relation to their personal information;
  - Personal information is kept securely;

- Personal information is only transferred outside the entity in circumstances where it can be adequately protected;
  - Roles are identified for specific responsibility and accountability for personal information;
  - Records of processing of personal information are maintained;
  - A documented procedure for managing security breaches is in place;
  - Confidentiality of information will be assured;
  - Integrity of information will be maintained;
  - Availability of information is ensured as required by the business processes;
  - Personal information security training will be available to all staff.
- e) Further policies, procedures and plans may exist in regions and subsidiaries to support this policy.
- f) Business requirements for the availability of personal information and personal information systems will be met.
- g) General Administration in headquarters has direct responsibility for maintaining the policy and providing advice and guidance on its implementation.
- h) All managers are directly responsible for implementing the policy within their business areas, and for adherence by their staff.
- i) It is the responsibility of each member of staff to adhere to the policy.

Signed;  .....

Satoshi Kondo

Title; Global Head of Human Resources & General Administration Date; 1<sup>st</sup> May 2018

This policy will be reviewed by General Administration in headquarters on an annual basis.

Definitions:

Confidentiality – *“Information is not made available or disclosed to unauthorized individuals, entities, or processes.”*

Integrity – *“Maintaining and assuring the accuracy and completeness of information over its entire lifecycle.”*

Availability – *“Information must be available when it is needed.”*