

Japan Privacy Policy

Raymond James & Associates, Inc.

Raymond James & Associates, Inc., (“Raymond James” or “we”) hereby declares and makes public the following privacy policy with respect to the protection of your personal information (kojin jouhou, as defined in the Act on Protection of Personal Information). This privacy policy is intended for natural person representatives of institutions with which we have a direct or indirect relationship.

1. YOUR PERSONAL INFORMATION

In the course of serving its corporate and institutional clients and other business relationships, Raymond James may obtain personal information about you, as an individual associated with such corporation or institution. This policy describes the types of personal information we may collect about you, the purposes for which we use the personal information, the circumstances in which we may share the personal information, and the steps that we take to safeguard personal information.

The personal information we collect about you comes primarily from contact information and other information you or the entity with which you are associated provide to us. The typical personal information we collect about you would include your name and business contact details, such as email address and phone number.

Also, in the course of providing services to your company and subject to strict compliance with all applicable laws and regulations, personal information may be collected about you indirectly through monitoring or other means (e.g., recording of telephone calls and monitoring of emails). In these circumstances, the information is not accessed on a continuous or routine basis, but it may be used for compliance or security purposes.

You are not required to supply any of the personal information that we may request. However, failure to do so may result in our being unable to provide services to your company. While we make every effort to ensure that all personal information we hold about you is accurate, complete and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information.

2. OUR USE OF YOUR PERSONAL INFORMATION

We may use your personal information within the scope of the business and purposes as specified below, as well as to the extent permissible under the relevant laws and regulations, or to the extent you agree otherwise. Further, individual numbers will be handled only to the extent permitted by applicable laws and regulations.

OUR BUSINESS

Raymond James is a broker/dealer registered with the United States of America Securities and Exchange Commission and a member in good standing of the Financial Industry Regulatory Authority. Raymond James conducts related financial services business, including the creation and distribution of research, analyses, and commentaries regarding economies or certain industries or economic sectors, completing sales and executing transactions of equity securities for institutional investors within and outside of the United States of America, providing other capital markets services and investment banking advisory services to entities doing business within and outside of the United States of America, and other financial services and business incidental to the above-mentioned business.

PURPOSE OF USE

- To facilitate services and transactions Raymond James will provide to institutions in Japan.
- To collect necessary information for replying to inquiries from clients.
- To send greeting cards, and for notifying about seminars, conferences, receptions, and similar events.
- To facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements (including checks related to anti-money laundering and identity verification).
- To comply with requests from regulatory agencies with proper authority, and also to comply with requests based on applicable foreign regulations.

3. DISCLOSURES OF YOUR PERSONAL INFORMATION TO RAYMOND JAMES AFFILIATES

Within the scope of purpose of use as described above, we might share your personal information with our affiliates. In such case, we will be responsible for the protection of your personal information protection and we will limit the items to be shared with our affiliates to the extent necessary for the relevant purposes.

4. PROVISION OF YOUR PERSONAL INFORMATION TO THIRD PARTIES

Raymond James does not provide your personal information to third parties except as below. Also, Raymond James never sells your personal information to third parties.

- When we have received prior consents from you;
- When required by laws and regulations;
- When required for the protection of human life, physical security, or property and it is difficult to obtain consent from you;
- When especially required for the promotion of public health or to ensure the sound development of children and it is difficult to obtain consent from you;
- When cooperation with a governmental agency, a local municipality, or an entity delegated by the governmental agency or local municipality is required to perform official duties required by relevant laws and regulations and obtaining your consent may obstruct the execution of these tasks;
- When required in relation to outsourcing of all or part of handling of the personal information to the extent necessary for the purpose of the use;
- When required in relation to the business acquisition including merger, corporate split, or business transfer; or
- When personal information is jointly used in accordance with Section 3 "Disclosures of Your Personal Information Among Affiliates" of this policy.

We will not provide Individual Numbers to third parties except for the cases required or allowed under the laws and regulations.

5. INFORMATION SECURITY: HOW WE PROTECT YOUR PERSONAL INFORMATION

Raymond James will make efforts to put necessary and appropriate security measures in place and to provide appropriate supervision of the employees and the outsourcers in order to prevent leakage of your personal information. We also make efforts to enforce appropriate information security measures to block unauthorized access and computer viruses, and maintain physical, electronic, and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure.

6. PERSONAL INFORMATION INQUIRIES AND REQUESTS

If you would like to request us to disclose, correct or cease the use of your personal information, we will verify your identity and endeavor to answer your requests appropriately and without delay. Further, in the event of a request for disclosure as to whether or not we hold an individual number, we will respond as to whether or not we hold such individual number. All requests should be made in accordance with the attached "Disclosure Procedure under Private Policy."

Please contact the following:

Privacy Office
Raymond James & Associates, Inc.
880 Carillon Parkway
Saint Petersburg, Florida USA 33716
1.800.647.7378
privacyaccessrequests@raymondjames.com

PROCEDURE FOR PERSONAL INFORMATION REQUESTS UNDER PRIVACY POLICY

I. We process your request to provide notification of purpose of use of your personal information, to disclose the personal information or to suspend the use thereof (including ceasing provision to third parties), in accordance with the provisions of Article 33(1), Article 34(1), or Article 35(1) or 35(3) of the Law concerning Protection of Personal Information (hereinafter referred to as the "Law") as follows:

(1) All requests for notification of purpose of use, disclosure, and suspension of use of your retained personal data shall be in writing and addressed to:

Privacy Office
Raymond James & Associates, Inc.
880 Carillon Parkway
Saint Petersburg, Florida USA 33716
privacyaccessrequests@raymondjames.com

(2) The written request shall contain the date of the request, name, address, telephone number, and the details of the relevant personal information such as place of employment (name of the place of employment, work telephone number, and work email).

(3) In order to verify your identity before fulfilling your request, we may require you to provide at least two kinds of documents that confirm your identity (e.g., a copy of your driver's license, passport, or otherwise).

(4) When you make a request through your agent, we may require one or more kinds of documents that confirm the identity of your agent as well as two kinds of documents that confirm your identity.

(5) When you make a request through your agent, you shall submit a power of attorney or other written authorization therefore. If there is any reason to doubt this authorization, we may confirm by telephone or other means your intention to authorize the agent.

(6) Our response will be given without delay by mail, email, or otherwise. When you have made a request for notification through your agent, our response will be sent to you unless otherwise requested by your legal agent or indicated in a written authorization that the agent is to receive our response.

(7) Notification of purpose of use, disclosure of personal information, or suspension of use may not be provided if any one of the events below occurs (in such cases, we will notify you of the reason why such notification or disclosure cannot be provided):

- a. Your authorization for the agent cannot be confirmed (in the case of making a request through your agent);
- b. There is a flaw in the document(s) submitted;

- c. The category of the information requested by you does not fall under the category of the personal information;
- d. The disclosure may cause death, personal injury, property damage, or other infringement of rights and interests of you or any third party;
- e. The disclosure may significantly interfere with the proper performance of our business operations; or
- f. The disclosure may breach any provision of other laws and regulations.

II. We process your request to correct (including to add, delete, or erase) your personal information in accordance with the provisions of Article 34(1) of the Law as follows:

- (1) When you request a correction of your personal information, you shall follow the disclosure procedure as described above in order to confirm that the Personal Information is not accurate and not true.
- (2) All requests for a correction of your personal information shall be in writing and addressed to the chief privacy officer at the address listed above in Section I.
- (3) The written request shall contain the date of the request, name, address, and telephone number, and the details of the relevant personal information such as place of employment (name of the place of employment, work telephone number, and work email) as well as a document certifying the accuracy of the information to be corrected.
- (4) In order to verify your identity before fulfilling your request, we may require you to provide at least two kinds of documents that confirm your identity (e.g., a copy of your driver's license, passport, or otherwise).
- (5) When you make a request through your agent, we may require one or more kinds of documents that confirm the identity of your agent as well as two kinds of documents that confirm your identity.
- (6) When you make a request through your agent, you shall submit a power of attorney or other written authorization therefore. If there is any reason to doubt this authorization, we may confirm by telephone or other means your intention to authorize the agent.
- (7) When we have corrected all or any part of the personal information according to your request or when we have decided not to correct the data, we will notify you of that fact in writing by mail or otherwise (if corrected, the details of the correction shall be included). If we decided not to correct the data, we will endeavor to explain the reasons thereof by showing the reasons and facts of the decision. When you have made a request for a correction through your agent, our response will be sent to you unless otherwise requested by your legal agent or indicated in a written authorization that the agent is to receive our response.

RAYMOND JAMES®

INTERNATIONAL HEADQUARTERS: THE RAYMOND JAMES FINANCIAL CENTER
880 CARILLON PARKWAY // ST. PETERSBURG, FL 33716 // 800.248.8863 // RAYMONDJAMES.COM