

**Privacy Policy**

This Privacy Policy sets out how Aozora North America, Inc. (the "**Company**", "**we**", "**us**" or "**our**"), as a data controller, processes the personal data of our customers and their employees (collectively "**you**" or "**your**").

**Lawful Processing**

We will only process your personal data:

- (a) Where the processing is necessary to provide our services to you/your employer;
- (b) Where the processing is necessary to respond to a request from you/your employer;
- (c) Where the processing is necessary to maintain our relationship with you/your employer; and
- (d) Where the processing is necessary for compliance with our legal and regulatory obligations.

**What personal data we collect**

The types of personal data which we may collect about you include your personal details (such as nationality, country of residence, and personal identifiers) and contact details (such as email addresses and phone numbers).

**How we collect personal data**

We usually collect your personal data from the information you/your employer submit to us through our website or through other means. This will typically be through:

- (a) applications, emails and letters, telephone calls and conversations, registering for services, customer surveys, signing up to promotions, our website, financial reviews, and interviews;
- (b) analysis of your/your employer's payments and other transactions (for example, the amount, frequency, location, origin, and recipient) and your/your employer's use of services involving the Company and what we know from operating your/your employer's bank account (including the creation of profiles used to uniquely identify you when you use our online, mobile, and telephony services) which helps us combat fraud, terrorism, and other illegal activities; and
- (c) information we receive from our group companies or other organizations (for example, card associations, credit reference agencies, insurance companies, retailers, comparison websites, social networks, and fraud or terrorism prevention agencies).

It may be mandatory for you to provide us with your personal data to enable us to provide our products and services to you/your employer, or to comply with our legal and regulatory obligations. If you fail to provide your personal data, we might be unable to provide our products or services to you/your employer.

**How long we will hold your personal data for**

We will only retain your personal data as long as necessary to maintain your/your employer's account with us or to comply with legal, regulatory, or internal policy requirements.

**How we use personal data**

We may use your personal data for the purposes set out below and for other directly related purposes:

- (a) to communicate with you, including responding to your queries or feedback to us;

- (b) for business administration, business reporting, and statistical analysis purposes;
- (c) to maintain and provide our products and services to you/your employer, including risks management;
- (d) to confirm the identity of you/your employer or their agents;
- (e) to send season's greetings and invitations for seminars or conferences to you/your employer; and
- (f) any purpose relating to or in connection with compliance with any applicable laws and/or regulations, including any law, rule, regulation, directive, code, guideline, circular, court order, order, instruction, or request of any relevant regulatory bodies, tax or law enforcement authorities, or stock exchanges, or guidelines or guidance given or issued by any self-regulatory or industry bodies, anywhere in the world.

**When we may disclose your personal data**

We will keep your personal data confidential, but we may share your personal information with the following parties:

- (a) any members and affiliates of the Aozora Group of which the Company is a member;
- (b) agents, contractors, professional advisors, or third-party service providers (or their group companies) that provide administrative, telecommunications, IT, payment, debt collection, data processing, or other services to the Company, or any other member of Aozora Group, necessary for the operation of the Company's business;
- (c) courts, regulatory bodies, tax or law enforcement authorities, stock exchanges, or self-regulatory and industry bodies anywhere in the world in connection with compliance with any applicable law, rule, regulation, code, guideline, circular, court order, order, or request.
- (d) any actual or potential assignee, participant, sub-participant, or transferee to whom the Company or any other member of Aozora Group assigns or transfers any of their rights, if your personal data is related to those rights; and
- (e) any companies approved or designated by you.

We will always strive to ensure the safety and security of your personal data using means conforming to best industry practices.

**Direct Marketing**

If you tell us that you do not wish the Company or any of its affiliates to provide you with information about our products and services and other marketing materials, we will not contact you further for the purpose of direct marketing. You can contact us regarding direct marketing using the contact details set out below.

**Information Collected via the Website's Server Logs**

When you access our website, we may obtain various usage data including the type of internet browser you are using or the IP address of your computing device to collect statistical information such as how often our website is visited. This information does not identify you personally. Information collected for this purpose is only used internally to improve user experience of our website.

**Third-Party Websites**

The Company is not responsible for the content or the privacy policies of, or the processing of your personal data by, any third-party websites hyperlinked from our website.

**Changes to this Privacy Policy**

We may change or update this Privacy Policy in order to maintain our compliance with applicable laws and regulations or following an update to our internal practices. We will do this by updating this Privacy Policy on this website. You will not necessarily be directly notified of such a change. Therefore, we suggest that you regularly check this Privacy Policy so that you are fully aware of any changes or updates.

**Requests, queries or complaints**

We are committed to protecting your privacy and safeguarding your personal data. If you have any queries or wish to make a request or complaint in relation to the processing of your personal data, please contact us using the details set out below.

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