## Information Management Policy of Medico's Hirata Inc.

Based on our company's guiding principles, which are "Learning and Dealing in Medical Care" and "Creating New Value", we have set our motto as "serving human life". With this motto in mind, we continue to grow in step with the evolution of new medical technologies because we believe this is how we fulfill our social duties to serve the society.

Personal information of patients, healthcare professionals, and our clients (hereafter referred to as "Customer Information"), our company's trade secrets (hereafter referred to as "Inside Information"), and other kinds of information collected as a result of fulfilling this social duty are our valuable assets. For this reason, all our employees must abide with applicable laws in handling the information assets we possess in an appropriate manner.

Any leak, alteration, loss, abuse, etc. of Customer Information would lead to losing trust from our customers and clients, cause damages to our company, and in some cases be subject to law enforcement.

All our employees hereby acknowledge the importance and responsibility regarding management of information assets, and seek to act accordingly with faith and goodwill. To do so, we practice the following information management approach:

- 1. Medico's Hirata considers appropriate management of Customer Information, Inside Information, and other information assets to be an important business task which is to be carried out by the whole organization, and works to achieve this.
- 2. Medico's Hirata appoints Privacy Officers and Information Management Supervisors, and sets up rules to allow appropriate handling of Customer Information and Inside Information.
- 3. Medico's Hirata conducts systematic education and training to familiarize employees with information management.
- 4. Medico's Hirata abides with applicable laws and guidelines applying to personal information set up by relevant authorities such as the Japanese Ministry of Health, Labor and Welfare, and periodically audits its personal information protection approach for ongoing improvement.
- 5. Medico's Hirata lawfully and appropriately gathers client information to the extent needed in the course of its work, and will not use Personal Information unless otherwise a prior consent is given by the client, or if required by law which would be regarded as exceptions; the information will only be used for notices or disclosure purposes, or when information was gathered explicitly for disclosure purposes.
- 6. Medico's Hirata will not disclose personal data to a third party unless a prior consent has been given by the client, or if required by law which would be regarded as exception.
- 7. Medico's Hirata will take reasonable safety measures against any invalid access to, or loss, damage, alteration, and leak of client information.
- 8. Medico's Hirata will make references, corrections to, or suspend the use, etc. of a Personal Information with no delay and to a reasonable extent, when requested by that person upon verifying his/her identity.