

## PRIVACY POLICY

Pinnacle Inc. ("Company") is committed to protecting the privacy and the confidentiality of personal information provided by inquirers or clients and the following Privacy Policy governing its handling of personal information.

### 1.Compliance with Laws and Regulations

The Company complies with laws and other norms concerning the handling and protection of personal information.

### 2.Acquisition of Personal Information

Upon acquiring personal information, the Company specifies the intended use of the information to the best of its ability and complies with all applicable laws and norms.

### 3.Use of Personal Information

Except with prior consent of clients or in case that comply with applicable laws, the Company shall only use personal information within the scope of the following.

Utilization Purposes:

To provide consulting and related services;

To provide guidance/information on products and services by the Company, its affiliates, or its business partners (refer to item 2 of Section 4: Scope of Joint Use);

To provide guidance/information on after-sale follow-up services by the Company, its affiliates, or its business partners;

To provide guidance/information on seminars sponsored or co-sponsored by the Company, its affiliates, or its business partners;

To send required materials, inquiries, or questionnaires;

To respond to a client's intention including proceeding with inheritance procedure;

To submit attendance records to qualification bodies;

To develop new products and improve services;

To recruit personnel and manage human resources;

To reply to client inquiries; and

To use such information within the scope of prior consent from clients.

#### 4.Scope of Joint Use

The Company may use a client's personal information jointly with its affiliates or business partners within the scope of necessity to provide specific services to the client. The Company

shall continue to bear all responsibility for the management and protection of personal information.

Personal Information Subject to Joint Use:

Personal information includes names, company names, titles, addresses, phone numbers, email addresses, survey responses, contents of inquiries submitted to the Company, and other information obtained by the Company in relation to services and business operations.

The Company's Affiliated Organizations that May Become the Co-users:

YAMADA Consulting Group Co.,Ltd.

YAMADA Investment Co., Ltd.

Souzoku Anshin Support Co., Ltd.

YAMADA Financial Services Co., Ltd.

Pinnacle Inc.

YAMADA Consulting & Spire Singapore Pte. Ltd.

YAMADA Consulting Group (Shanghai) Co., Ltd.

YAMADA Consulting & Spire (Thailand) Co., Ltd.

YC Capital Co., Ltd.

Yamada Consulting & Spire Vietnam Co., Ltd.

YAMADA Consulting Group USA Inc.

YAMADA Consulting Spire India Private Limited

PT Yamada Consulting Spire Indonesia

YAMADA Consulting Group Asia Pte. Ltd.

Takenaka Partners LLC

YAMADA Investment No.1 Investment Limited Partnership

Capital Solution No.4 Investment Limited Partnership

Yamada Legal Consulting Shiho-shoshi Office

Yamada Legal Consulting Gyosei-shoshi Office

Yamada Labor Consulting and Social Security Attorney Office

General Incorporated Association Yamada Research Institute of Economy and Management

Y&P Legal Professional Corporation

Kawada Tax Co.

Yamada & Partners Tax Co.

Yamada & Partners Accounting Co.,Ltd.

Y&P Consulting Co., Ltd.

Yamada & Partners Advisory

Yamada & Partners Singapore

Yamada & Partners Consulting Shanghai,Co.,Ltd.

Yamada & Partners Vietnam

Yamada & Partners USA, Inc.

Yamada & Partners Taiwan CPA

Purposes of Joint Use:

Providing consulting and related services and offering guidance/information on those services and events sponsored or co-sponsored by the Company, its affiliates, or its business partners.

Responsible Person for the Management of Personal Data:

Chairman, President & CEO Ikuo Yasuda

Pinnacle Inc.

Sumitomo Fudosan Landmark 4F

1-6-7 Shiba-koen, Minato-ku, Tokyo 105-0011

## 5.Provision of personal information to Third Parties

The Company shall not provide personal information to a third party without prior consent of the relevant person, excluding when the disclosure of such information is required by laws and regulations.

## 6. Handling of Personal Information by Third Parties

The Company may entrust the handling of personal information to a contractor. In this case, the Company obligates the contractor by contracts to ensure the appropriate security management of personal information in conformity to the terms of its policy and performs all necessary and appropriate supervision of the contractor.

## 7. Security Management Measures

The Company takes the following security management measures for personal information.

### Security Management Measures

#### Establishment of Privacy Policy

In order to ensure the proper handling of personal data, the Company has defined basic rules on relevant matters, including compliance with laws and regulations and contact information on privacy.

#### Establishment of Rules

The Company has established rules on handling methods, persons in charge, its duties, and other relevant matters at each stage of acquisition, use, storage, provision, deletion, and disposal of personal data, and periodically reviews them.

### Organizational Security Management Measures

In addition to appointing a person responsible for the handling of personal data, the Company has clarified its officers/employees, and the scope of personal data handled by such officers/employees, and has established a system to report to the responsible person when an officer/employee is aware of any facts or signs that violate laws and regulations.

The Company conducts periodical self-inspections and audits on the handling of personal data.

### Human Security Management Measures

The Company conducts periodic training for officers/employees on the handling of personal data, incorporates confidentiality obligations in the Company's Rules of Employment, and makes them aware within the Company.

### Physical Security Management Measures

In areas where personal data is handled, the Company controls the entry and exit of officers/employees and equipment, and implements measures to prevent unauthorized persons from viewing personal data.

In addition to taking measures to prevent theft or loss of equipment and electronic media that handles personal data, the Company has implemented measures to prevent the easy revealing of personal data when carrying such equipment and electronic media

## Technical Security Management Measures

The Company has introduced a system to limit the scope of officers/employees and the scope of personal information data handled by such officers/employees by controlling access, and to protect information systems that handle personal data from external unauthorized access or software.

## 8.Continuous Improvement

The Company shall strive to protect personal information by continuously improving its handling of personal information.

## 9.Provision of Information on Measures Necessary to Secure Relevant Measures by Third Parties in Foreign Countries

### Ensuring Relevant Measures

The Company may jointly use personal information with its subsidiaries and business partners in foreign countries, or entrust the handling of personal information to a third party in a foreign country who has taken relevant measures. In this case, the Company will take necessary measures to ensure the implementation of relevant measures, and will provide information on the necessary measures without delay upon the request by clients, except



when there is a risk of causing a significant hindrance to the proper execution of the Company's business.

#### 10.Disclosure of Retained Personal Information

##### Disclosure of Personal Information

The Company will, at the request of the relevant person or legal representative and with valid identification, release the personal information without delay except in the following cases where:

- i . There is a risk of harming the life, body, or property and interests of the relevant person or a third party;
- ii . Such a release would cause a risk of a significant hindrance to the proper execution of the Company's business; or
- iii . Such a release would be in violation of any laws.

#### 11.Contact Information on Privacy

Administration Department

Pinnacle Inc.

Sumitomo Fudosan Landmark 4F

1-6-7 Shiba-koen, Minato-ku, Tokyo 105-0011

September 20, 2024

Chairman, President & CEO Ikuo Yasuda

Pinnacle Inc.

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