

個人情報取扱について 改訂版  
Privacy Policy (Handling of Personal Information) - Revision

This is English translation of the privacy policy of Mercer Japan Ltd. prepared only for reference purpose. Please refer to Japanese effective version to the link: [個人情報取扱について | マーサージャパン \(mercer.co.jp\)](https://www.mercer.co.jp/privacy)

Mercer Japan Ltd. (“Mercer”, “we” or “us”) handle(s) your personal information as below.

1. Management of Personal Information

Following person is responsible for handling and management of your personal information.

Chief Privacy Officer of Mercer Japan Ltd.

TEL 03-6775-6500

2. Utilization Purposes of Personal Information

We collect and use your personal information, to the extent necessary to the below. In case that we exceptionally use the personal information beyond its purpose, we will make prior notice to you and obtain your consent.

- (1) providing information about our events or seminars relating to our products and services such as consulting (This includes transmission of emails from Mercer group companies and Marsh and McLennan Companies, Inc. and its affiliates provided in Article 4. below, which may contain advertisement),
- (2) providing of and providing information about our products and services or other useful business supporting information (This includes transmission of emails from Mercer group companies and March and McLennan Companies, Inc. and its affiliates provided in Article 4. below, which may contain advertisement),
- (3) managing clients or perform statistical analyses on client’s data
- (4) requesting for cooperation to take part in our surveys or questionnaires
- (5) responding to inquiries about our business, products, and services
- (6) performing our billing procedure

3. Providing Personal Information to Others

Except as described below, we will not provide personal information to others:

- (1) We obtain prior permission from the individual.
- (2) We provide personal information to service providers to achieve the purposes listed in Article 2 above.
- (3) We provide data to others, which we processed personal information in a form no particular individual (data subject) can be identified (such as statistical analysis).

個人情報取扱について 改訂版  
Privacy Policy (Handling of Personal Information) - Revision

- (4) We provide personal information to third party pursuant to opt-out process in Article 27 (2) of the Act of Personal Information Protection.

We will cease to provide identifiable personal data to third party upon request from individual (data subject). Please refer to II. 1. 5 of Privacy Policy (Disclosure Requirement for Personal Information under the Act on the Protection of Personal Information (“Law”)) for the procedures.

- **Utilization Purpose:** Provision of information regarding estimated compensation to officers to users of Executive Pay Intelligent Data Service from officers estimated compensation database of publicly listed companies.

Outline of Executive Pay Intelligent Data: We provide officers estimated compensation amount data in data report form which is calculated using our original statistics model based on Annual Securities Reports and reports relating to corporate governance disclosed by publicly listed companies.

- **Data Items of Personal Data:** Name of company, title, estimated compensation amount (not including name of individual) (Such personal data is updated upon renewal of original data such as Annual Securities Reports, etc.)
- **Method to Provide to Third Party:** By email or file transmission on internet.
- **Method to acquire Personal Data:** Annual Securities Reports from Electronic Disclosure for Investor’s NETwork (EDINET), and reports relating to corporate governance form respective companies’ website (IR page).
- **Method of Renewal of Personal Data:** Regarding the database created based on the information acquired by the method as above, at the end of June of every year, we acquire new information and confirm consistency with existing data and update the database.

4. Joint Use of Personal Information

We may use personal information jointly with March McLennan Companies, Inc. and its affiliates having common policy with Mercer which you can find in our website (<http://www.mmc.com/>). The terms of joint use are as follows:

- (1) Items of personal information jointly used: individual’s name, company name, company address, department, business telephone number, business e-mail address, office and information relating to the past transactions with Mercer,
- (2) Utilization purpose of joint users: the same as provided as in Article 2. above,
- (3) Individual or business operator responsible for the management of personal information: Mercer Japan Ltd.
- (4) Method of acquisition: electronic data, verbally or in writing.

個人情報取扱について 改訂版  
Privacy Policy (Handling of Personal Information) - Revision

5. How We Protect Personal Information

We apply appropriate measures, manage and store personal information under the supervision of Chief Privacy Officer as well as in accordance with Mercer's standards, to avoid the divulgence. If you desire to know specific appropriate measures, please contact to "Contacts (Chief Privacy Officer)" as below.

6. Your rights

Regarding your personal information, you may request Mercer to inform you of the purposes of use, disclose, correct, add, or remove, suspend to use, delete, or cease to provide to third parties. Please call us or send an email as described in the below contact information if you have such a request.

7. Others

Please note that if you do not provide us your basic contact information such as your name, company name, company address, department, business telephone number and business email address, Mercer may not provide you with information relating to our products or services.

Contacts (10:00 to 17:00 (except for Saturday, Sunday, national holiday, and Mercer designated office closure day))

1. Contact except for the case under Article 3 (4) "opt-out process in Article 27 (2) of the Act of Personal Information Protection"

Mailing Address: Midtown Tower 9-7-1, Akasaka, Minato-ku, Tokyo 107-6216

Mercer Japan Ltd. Attn: Chief Privacy Officer

Telephone: 03 6775 6500 FAX: 03 6775 6501

Email: [privacy.japan@mercer.com](mailto:privacy.japan@mercer.com)

2. Contact for the case under Article 3 (4) "opt-out process in Article 27 (2) of the Act of Personal Information Protection"

We will cease to provide identifiable personal data to third party upon request from individual (data subject). Please refer to II. 1. 5 of Privacy Policy (Disclosure Requirement for Personal Information under the Law for the procedures).

Mailing Address: Midtown Tower 9-7-1, Akasaka, Minato-ku, Tokyo 107-6216

Product Solutions, Mercer Japan Ltd. Attn: Privacy Protection

Telephone: 03 6775 6521 FAX: 03 6775 6501

Email: [TRS.Japan@mercer.com](mailto:TRS.Japan@mercer.com)