

# PRIVACY POLICY

## Privacy Policy: Personal Information Protection Policy

ARCALIS (ARCALIS, Inc.), recognizing the importance of protecting personal information, hereby establishes the Personal Information Protection Policy (this “Basic Policy”) in order to ensure the proper protection of personal information.

### 1. Policy

ARCALIS complies with the Act on the Protection of Personal Information (Act No. 57 of 2003, the “Act”) and other laws and regulations, as well as the guidelines of the Personal Information Protection Commission and other guidelines. In addition, ARCALIS complies with this Basic Policy and handles personal information in an appropriate and safe manner.

### 2. Acquisition and Use of Personal Information

#### (1) Acquisition of personal information

ARCALIS acquires personal information within the scope of business conducted by ARCALIS, for clearly defined purposes of use and by appropriate means. When ARCALIS directly acquires personal information stipulated in a contract or other written documents (including electronic records) from each person, the purpose of use shall be clearly stated in advance, and the information shall be acquired by lawful and fair means.

#### (2) Use of personal information

ARCALIS will use personal information to the extent necessary for the purpose of use. Personal information will not be used for any purposes other than the stated purpose of use, without the consent of the person concerned.

### 3. Purpose of Use of Personal Information

ARCALIS will use the personal information listed below for each respective purpose of use. If personal information is acquired for a purpose not listed below, the purpose will be clearly stated each time of acquisition.

(1) Personal information of members of entities or organizations that have business relationships with ARCALIS

- To solicit, propose and carry out business and transactions
- To contact, provide and exchange information in relation to our business and services
- To perform contracts with our business partners
- To manage access to our facilities

(2) Personal information of visitors to our consultation service, website and webinars.

- To examine, investigate and respond to consultation or enquiries
- To contact and provide information to manufacturers, sellers, medical professionals, etc.
- To provide information of our events, campaigns, webinars, etc.

(3) Personal information relating to media representatives, securities analysts, investors etc.

- To collect and provide information for public relations and investor relations purposes
- To manage access to our facilities

(4) Personal information of shareholders

- To fulfill our obligations under the Companies Act and to enable the shareholders to exercise their rights when necessary
- To implement shareholder policies in the context of the relationship between shareholders and the company
- To manage shareholder information in accordance with laws and regulations

(5) Personal information of applicants for employment

- To contact the applicant regarding the selection and results of the recruitment process
- To carry out pre-employment procedures
- To manage access to our facilities

(6) Personal information of directors and employees (including retired employees) and their families

- To ensure the proper implementation of payroll payments, labor management, benefits, health and safety measures and related measures for employees
- To provide education and training to employees
- To contact and provide information to labor unions, health insurance associations, affiliates and other related parties
- To contact retired employees and respond to enquiries
- To submit notifications and reports relating to social insurance, labor insurance, etc., to government offices
- To contact and provide information in the event of emergency
- To carry out other procedures and communications necessary in the course of business

## **4. Provision of Personal Information**

ARCALIS will not provide personal data to third parties except in one of the following cases.

- When the consent of the person concerned has been obtained.
- Disclosure to subcontractors to the extent necessary to achieve the purpose of use.
- When necessary in order to protect the rights and interests of ARCALIS and its officers and employees, including their life, body and property, as well as the rights and interests of ARCALIS' s customers (including for the purpose of detection and prevention of irregularities).
- When ARCALIS sells or transfers all or part of its business or assets to its affiliates or other third parties.

- When provided pursuant to laws and regulations, or when there are other legitimate reasons.

## **5. Sharing of Personal Information within ARCALIS**

### **group**

ARCALIS may share personal information within ARCALIS only to the extent necessary to achieve the purposes of use set out in Section 3 and within the following scope.

- Items of personal information to be shared  
Items described in Section 2(1) “Acquisition of personal information” of this Basic Policy
- Scope of joint users  
ARCALIS group
- Purpose of use  
Items described in Section 3 “Purpose of use of Personal Information” of this Basic Policy
- Name or title, address and representative of the entity responsible for the management of personal data  
Name: ARCALIS, Inc.  
Address: 320-20 Kawauchisaku, Shimoota aza, Haramachi, Minamisoma, Fukushima  
Representative Director, President and CEO: Satoshi Takamatsu

## **6. Provision of Personal Information to Third**

### **Parties in Foreign Countries**

ARCALIS may provide personal information to third parties located in countries or regions with personal data protection legislation equivalent to that of Japan (e.g. countries or regions that are recognized by the European Economic Area or the European Commission as having an adequate level of protection) or in countries that are members of the APEC framework for the protection of cross-border personal rules (CBPR system). ARCALIS may also provide personal information to third parties located in countries that do not have personal data protection legislation equivalent to that of Japan, but in such cases, ARCALIS will take necessary

measures to ensure that such personal information is properly protected in accordance with ARCALIS' s security standards, such as requiring appropriate security management by such third parties through delegation agreements, etc., and management and supervision of such third parties, and taking appropriate encryption measures during the transfer of personal information.

## **7. Supervision of Contractors**

ARCALIS may outsource the management of personal information to third parties in order to achieve the purpose of use of such personal information. In such cases, ARCALIS will require the appropriate management of personal information by such third party and supervise such third party.

## **8. Disclosure, Correction and Deletion of Personal Data**

If ARCALIS receives a request for disclosure, correction or deletion of personal data from the person concerned or from a legally designated representative, ARCALIS will handle such request without delay within a reasonable time in accordance with the law, subject to the prescribed and proper identification procedure.

## **9. Contact**

Enquiries regarding personal information can be made at the following contact points.

ARCALIS, Inc.  
226-39 Wakashiba, Kashiwa, Chiba  
Phone: 81-4-7137-1811

## **10. Management of Personal Information**

(1) ARCALIS appoints a person responsible for the management of personal information and strictly manages personal information to prevent the improper use within the company. ARCALIS also takes appropriate and reasonable security measures against risks such as unauthorized external access or the loss, destruction, falsification or leakage of personal data.

(2) ARCALIS will endeavor to keep the personal data in its possession as accurate and up-to-date as possible.

## 11. Review of Basic Policy

ARCALIS will review this Basic Policy from time to time and improve it as necessary. Any changes will be promptly published in a reasonable manner.

Adopted on April 27, 2026.

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\* This website is managed by ARCALIS, Inc.

ARCALIS, Inc. complies with the above Basic Policy as one of the companies belonging to ARCALIS. Matters specific to personal information handled by ARCALIS, Inc. are as follows.

### **(1) Name or title, address and representative of the entity handling personal information (the “Handling Entity”)**

Name: ARCALIS, Inc.

Address: 320-20 Kawauchisaku, Shimoota aza, Haramachi, Minamisoma, Fukushima

Representative Director, President and CEO: Satoshi Takamatsu

### **(2) Purpose of use of all retained personal information**

See Section 3 of ARCALIS Privacy Policy.

### **(3) Procedures for handling requests for disclosure, etc.**

See Section 8 of ARCALIS Privacy Policy.

**(4) Contact for complaints regarding the handling of retained personal information by the Handling Entity**

See Section 9 of ARCALIS Privacy Policy.

**(5) If the Handling Entity is a covered business operator of an accredited personal information protection organization, the name and contact for resolution of complaints of such accredited personal information protection organization**

The Company is not a covered business operator of an accredited personal information protection organization.