

Privacy Policy

Through the real estate development business, Ascot Corp.'s mission is to tirelessly explore ways to improve quality, design, and product planning, and in turn to enrich lifestyle settings for communities and individuals.

Handling a vast amount of personal information in this process, Ascot Corp. (hereinafter "the Company") believes that in order for customers to be able to entrust their personal information to the Company with peace of mind, the most important thing is to strictly comply with laws and regulations related to the protection of personal information, and to ensure thorough and appropriate collection, use, and management of this information in-house.

1. The Company will collect, use, and provide personal information on customers and the Company officers in an appropriate manner in line with the nature and scale of its businesses. The Company will not handle personal information beyond the scope necessary to achieve the specified purpose, and will take measures to ensure that personal information is not handled in said manner.
2. The Company will comply with laws and regulations related to the handling of personal information, as well as with guidelines and other standards established by the government.
3. The Company will take measures to prevent the leakage, loss, or damage of personal information, as well as measures to rectify such incidents.
4. The Company will appropriately respond to any complaints or concerns regarding the handling of personal information.
5. The Company will continue to improve its personal information management system to ensure appropriate handling and thorough protection of said personal information.

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Revised February 21, 2018

Revised October 21, 2020

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Revised April 19, 2022

Takeshi Nakabayashi
Representative Director

Ascot Corp.

3-1-30 Jingumae, Shibuya-ku, Tokyo

Handling of Personal Information

The Company has formulated this Privacy Policy to construct a personal information protection system that enables it to appropriately manage and protect the personal information it handles as part of its corporate activities and to offer the owners of said personal information peace of mind.

The Japanese version of this Privacy Policy is the original and will prevail over any versions translated into other languages.

1. Scope of Application and Purpose of Use

The Company will use the personal information it collects from the customers for buying and selling, brokerage, introduction, leasing, or management, etc., of real estate including condominiums, detached homes, and residential land (hereinafter “Real Estate Properties”) and to provide related services (hereinafter “Real Estate Businesses”). The personal information will also be used to provide services, etc., to customers who access and use the Company website, etc. (hereinafter “Services, etc.”).

This Privacy Policy applies to customers who use our Real Estate Businesses and Services, etc., clients and partners, shareholders, job applicants, employees, and all others concerned with the Company’s business activities (collectively “Customers, etc.”). The personal information will be used within the scope of the purposes set forth in the following items.

Personal information related to the customer

- (a) Procedures related to Real Estate Businesses
- (b) Procedures for the transfer of Real Estate Properties
- (c) Communication and reports following the transfer of Real Estate Properties
- (d) Provision of personal information to the relevant parties to ensure the smooth progression of procedures related to the transfer of Real Estate Properties
- (e) Formulation of plans, development, provision, and improvement of Services, etc.
- (f) Identity verification and contact when undertaking various procedures
- (g) Processing of invoices for Real Estate Businesses and Services, etc.
- (h) Necessary contact, such as important notifications related to Services, etc.
- (i) Responses to inquiries and requests, etc.
- (j) Sending of various questionnaires and analysis of customer needs
- (k) Distribution of information and advertisements for the Company’s products, services, various events, and marketing campaigns, etc.

Personal information related to clients and partners

- (a) Contact and negotiations, etc., related to transactions

- (b) Management of client information
- (c) Processing of invoices

Personal information related to shareholders

- (a) Exercising the rights of shareholders and fulfilling obligations in accordance with relevant laws, implementing various measures, and managing shareholder affairs

Personal information related to inquirers

- (a) Responses to inquiries and sending of materials, etc.

Personal information related to job applicants

- (a) Implementation of employee recruitment activities (contact related to screening, provision of information, etc.)
- (b) Creation of statistics and materials, etc.

Personal information related to employees (includes that related to officer or employee families, and retirees)

- (a) Personnel management, and salary payment and other labor procedures and management
- (b) Welfare and safety and health management
- (c) Implementation of education and training
- (d) Work-related contact and emergency contact
- (e) Creation of statistics and materials, etc.

2. Person Responsible for Personal Information Management

The person responsible for the management of personal information collected by the Company is as follows.

Corporate Headquarter Executive Officer

3-1-30 Jingumae, Shibuya-ku, Tokyo 150-0001

Please use [the inquiry form](#) for any questions, etc.

3. Compliance with Laws and Regulations, etc.

The Company will comply with the Act on the Protection of Personal Information, as well as other related laws, regulations, and guidelines, for all handling of personal information, including collection and use.

4. Collection of Personal Information

The Company will collect personal information using appropriate methods to the extent necessary to perform operations in line with the nature and scale of its businesses. The details of the personal information to be collected are as follows.

- (1) Personal information provided by Customers, etc.

Name, gender, address, date of birth, telephone number, email address, payment information, information for identity verification, etc.

The provision by Customers, etc., of all or part of the personal information above is necessary for the Company to be able to fulfil its contracts with Customers, etc., for Services, etc., or for legitimate interests such as the execution of the Company's operations. If the personal information cannot be provided, Customers, etc., may not be able to use all or part of the Company's Services, etc.

5. Sharing Personal Information with Third Parties

Excluding the following cases, the Company will not provide personal data to third parties without prior consent from the owner of the personal information.

(1) Group Companies

For personal information that has been collected directly or indirectly by the Company or its Group companies, the Company may share and jointly use personal information with its Group companies in document or email format. The scope and purpose of use for such information is outlined in "1. Scope of Application and Purpose of Use" and "4. Collection of Personal Information". Personal information that is jointly used will be responsibly managed by Ascot Corp. The address and representative of Ascot Corp. can be found at the end of this Privacy Policy. Note that "Group companies" refers to the consolidated subsidiary companies and equity-method affiliates listed in Ascot Corp.'s securities report, etc.

(2) Subcontractors

The Company may outsource all or part of its operations in order to conduct its Real Estate Businesses or to entrust operations to third parties including marketing companies and IT service providers (hereinafter "Subcontractors"). In such cases, the Company may provide personal information to its Subcontractors in order to achieve the purpose of use outlined in "1. Scope of Application and Purpose of Use". The personal information provided to Subcontractors will be used under the Company's instruction and in line with the original purposes of use.

(3) Legal Obligations

In line with laws and regulations, the Company may disclose personal information to public law enforcement agencies to respond to legal or regulatory requirements, court orders, or requests from government agencies or law enforcement agencies (including requests from government agencies and courts in countries in which we conduct business).

6. Requests for Disclosure, etc., of Personal Information

To request a notification on purposes of use of personal information, to request the disclosure, correction, addition, deletion, or suspension of use of personal information the Company possesses, or to request the suspension of provision to third parties (hereinafter "Disclosure, etc."), please follow the Company's prescribed procedures. For

more information on the procedures to request the Disclosure, etc., of personal information, please see Procedures to Request the Disclosure, etc., of Personal Information.

7. Security Management Measures

The Company will take necessary and appropriate security management measures to prevent and manage leakage, loss, or damage, etc., of personal information. The Company also conducts necessary and appropriate supervision of employees and subcontractors (including repeat subcontractors, etc.) responsible for handling personal data.

8. Changes to This Privacy Policy

The Company reserves the right to change this Privacy Policy at any time to reflect the latest privacy practices. In the event that changes are made to this Privacy Policy, the Company will inform Customers, etc., of the change and post the updated Privacy Policy on its website, etc. The updated Privacy Policy will become effective on the specified date of revision.

9. Inquiries

For questions, complaints, or other inquiries concerning this Privacy Policy or the Company's handling of personal information, please contact the below.

(1) Corporate Headquarter Executive Officer, Ascot Corp.

[Inquiry Form](#)

(2) Personal Information Protection Consultation Service Office, JIPDEC

Roppongi First Building, 1-9-9 Roppongi, Minato-ku, Tokyo 106-0032

Tel: 03-5860-7565/0120-700-779

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