

Global Whistleblowing Privacy Policy (別紙)

Legal Professional Corporation One Asia and OAL International Pte. Ltd. (“OAL” or “we”) are dedicated to safeguarding your privacy and ensuring the protection of your personal data. This Privacy Policy explains how we process the personal data of our clients, including individuals affiliated with corporate entities such as employees, contact persons, and directors, in the context of providing whistleblowing services, whether you are the whistleblower or the individual being reported. Since the protection of your personal data is of great importance to us, we are committed to being transparent and ensuring that your personal data is handled securely.

We process personal data in compliance with the applicable data protection regulations, in particular the **General Data Protection Regulation (“GDPR”)**. This policy applies to all our branches worldwide.

1. Data Controller

OAL is the data controller responsible for the collection, use, and disclosure of personal data as described in this policy. For inquiries, please contact us at the following information.

- **Company Name:**
 - (1) Legal Professional Corporation One Asia
 - (2) OAL International Pte. Ltd.
- **Address:**
 - (1) 31F Kasumigaseki Building, 3-2-5, Kasumigaseki, Chiyoda-ku, Tokyo, Japan 100-6031
 - (2) 10 Anson Road, #17-20 International Plaza, Singapore 079903
- **Email:** gws-jpn@wb.oneasia.legal
- **Phone Number:** +81-3-6550-9000

2. Personal Data We Collect

We may collect the following categories of personal data from our clients, including individuals affiliated with corporate entities such as employees, contact persons, and directors, whether you are the whistleblower or the individual being reported:

- Name, surname, gender, address, email, phone number, identification (e.g., ID card or passport), tax registration number, date of birth, place of birth, photograph, signature, and social media contact details (e.g., Line ID).
- Name and address of your company, job title, and other relevant information related to the corporate entity.
- Whistleblowing report information, including data from individuals affiliated with our client corporate entities, such as employees, contact persons, and directors, whether you are the whistleblower or the individual being reported.

If your identification document contains special categories of personal data under the GDPR, we will either mask such information or obtain your consent before collecting it.

We may obtain your personal data directly from you, or it may be collected from other sources, such as your employer or corporate entity, government agencies, other individuals within your organization, or other branches of our offices.

Please be advised that other branches of our offices may serve as either a data controller or data processor, depending on their role in providing whistleblowing services to your company. Regardless of whether they act as a data controller or processor, these branches will comply fully with this privacy policy in handling personal data. If required or necessary by law, OAL will enter into a Data Processing Agreement or Data Sharing Agreement with our branches to ensure proper data protection measures are in place.

Purposes for Collecting Personal Data

OAL may collect and use your personal data, whether you are the whistleblower or the individual being reported, for the following purposes:

1. **Fulfilling Contractual Obligations:** To fulfill our obligations in providing whistleblowing services to your company.
2. **Employee Education and Training:** To provide our clients with training session for maintaining effective compliance across all countries for our clients, and ensuring the whistleblowing reporting system is well-known and properly implemented.
3. **Establishing External Reporting Channels:** To create external reporting channels tailored to the needs of the client (e.g., email, phone, mail).
4. **Creation of Reporting System Regulations:** To develop policies, guidelines, and other regulations for our clients related to the reporting system.
5. **Regulation Development for Internal and External Reporting Systems:** To establish regulations for internal and external reporting systems for our clients, especially when reports involve personal data being transferred across jurisdictions (e.g., to headquarters).
6. **Communication of System Implementation:** To communicate with our clients and host seminars and webinars where external reporting regulations are introduced and explained.
7. **Managing Whistleblowing Incidents:** To manage reports in a thorough and timely manner when a whistleblowing incident occurs. While reports are generally submitted in writing, urgent or critical matters may be addressed promptly via phone calls or online meetings. We may convene a meeting to evaluate the situation, discuss immediate actions, assess potential risks, and formulate an appropriate response strategy. If required, an investigation may be initiated. The details of the whistleblowing incident may be disclosed through the creation and management of a report, which may be submitted to the relevant branches and, where necessary, to your headquarters.
8. **Service Management:** To manage our service, verify details, and deliver relevant information or documents in accordance with our internal procedures.
9. **Compliance with Regulations:** To comply with relevant regulations, including corporate and tax laws, and to report information to government authorities as required by law or upon receiving an order from authorities. This may also involve conducting investigations in accordance with legal procedures.

We will ensure that your personal data is handled with the utmost **anonymity, confidentiality, independence, and impartiality**, in compliance with applicable data protection regulations.

3. Legal Basis for Processing Personal Data

We process personal data based on the following grounds:

- **Performance of a Contract:** Processing is necessary for the performance of a contract with you or to take steps prior to entering into a contract with you.

- **Compliance with a Legal Obligation:** Processing is necessary to comply with applicable laws or regulations.
 - **Legitimate Interests:** We process your personal data based on our legitimate interests, including providing services to your company, analyzing your whistleblowing report, and managing the relationship between you, your company, and OAL. We ensure that these legitimate interests are carefully balanced with your rights and freedoms, and we take steps to ensure they do not override them.
 - **Consent:** In certain cases, we may seek your explicit consent, which can be withdrawn at any time.
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4. Data Sharing and Transfers

We may share personal data with:

- **Internal Recipients:** Our employees or agents who need access for their duties.
 - **External Recipients:** Your company's responsible department, government authorities, or other relevant third parties.
 - **International Transfers:** Personal data may be transferred to your affiliates, group companies, head quarter, and our affiliates or group companies outside your jurisdiction for the purpose of managing your report, with appropriate safeguards in place to ensure protection.
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5. Data Retention

Personal data is retained only for as long as necessary for the purposes outlined in this policy, or as required by law. Once no longer needed, data will be securely deleted or anonymized. Retention periods depend on factors such as the duration of our relationship with you, legal obligations, and the need for legal claims.

6. Data Subject Rights

Under GDPR, you have the following rights regarding your personal data:

- **Right to be Informed:** You have the right to clear information on how your data is processed.
- **Right of Access:** You can request a copy of your personal data and details on its processing.
- **Right to Rectification:** You can request corrections to inaccurate or incomplete data.
- **Right to Erasure:** You may request deletion of your data in certain circumstances.
- **Right to Restrict Processing:** You can request restriction of data processing under specific conditions.
- **Right to Data Portability:** You can request your data in a machine-readable format and transfer it to another controller.
- **Right to Object:** You may object to processing on grounds related to your particular situation.
- **Rights Related to Automated Decisions:** You can object to decisions based solely on automated processing.
- **Right to Withdraw Consent:** If processing is based on consent, you can withdraw it at any time.
- **Right to Lodge a Complaint:** You can file a complaint with a supervisory authority if you believe your rights have been violated.

To exercise any of these rights, please contact us using the contact details provided above.

7. Security

We implement appropriate technical and organizational measures to protect your personal data from unauthorized access, use, or disclosure. This includes secure storage and restricted access. We ensure that our employees receive proper training and adhere to personal data protection requirements. Additionally, we ensure that any third-party processors we engage also comply with these standards and applicable laws.

8. Changes to This Whistleblowing Privacy Policy

This Whistleblowing Privacy Policy may be updated from time to time. Any changes will be posted on our website, and the latest version will reflect the revision date.

9. Contact Information

For any questions or concerns regarding this Whistleblowing Privacy Policy, please contact us at the contact details provided above.

By using our services or providing us with your personal data, you consent to the terms of this Whistleblowing Privacy Policy.