

California Privacy Notice2023

This California Privacy Notice provides information about how SPARX Asset Management Co., Ltd. collects, uses, discloses and otherwise processes personal information of individual residents of the State of California within the scope of the California Consumer Privacy Act of 2018, as amended by the California Consumer Privacy Rights Act (collectively, the “CCPA”). This California Privacy Notice applies solely to the individual residents of the State of California (“consumers”).

Information on the categories of California Personal Information collected and/or whether we sell or share personal information is contained in Sections “1. Categories of California Personal Information collected by us” and “4. Disclosure and Sale of California Personal Information” below. Information on the length of time the business intends to retain California Personal Information is contained in Section “6. Retention Period.” below. Information on your rights regarding your California Personal Information is contained in Section 8 . “Your Rights Concerning California Personal Information” below.

Unless otherwise expressly stated, all terms in this California Privacy Notice shall have the same meaning as defined in the CCPA.

Scope of Notice

When we use the term “personal information” in this California Privacy Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. It does not include information that is made publicly available from government records, that is deidentified or aggregated such that it is not reasonably capable of being associated with an individual, or that is otherwise excluded from the CCPA’s scope.

1. Categories of California Personal Information collected by us

We have collected the following categories of personal information under the CCPA (“**California Personal Information**”) from and about you in the preceding 12 months:

- **Identifiers** (e.g. real name, email address, SNS account name, IP address)
- **California Customer Records (Cal. Civ. Code § 1798.80(e))**, (e.g. name, mobile phone number, home address, business address, email address)
- **Commercial information** (e.g., investment history).
- **Internet or other electronic network activity** (e.g., strictly necessary cookies, technical and device information).

- **Professional or employment-related information** (e.g. name of the company your work for, your title, job experience and track record data)
- **Education information** (e.g. records of educational organization, degree information, awards) Inferences drawn from any of the above (e.g., preferences or characteristics)
- **Inferences** drawn from personal information above

2. Categories of sources of California Personal Information

In the preceding 12 months we have collected the California Personal Information specified in Section 1 above directly from you or indirectly from third parties, including companies your work for and our service providers, such as through executed agreements, applications pertaining to opening accounts, applications for lecture sessions, examinations of investment candidates, business cards, the due diligence process, and the KYC process.

3. How We Use Personal Information

3. Our Use of California Personal Information

Our purposes of use of California Personal Information are as set forth below.

- (1) To solicit or sell the products and services of the Company such as securities, investment advisor contracts, and discretionary investment contracts under the Financial Instruments and Exchange Act, or to introduce services related thereto.
- (2) To introduce the group companies of the Company (the parent company of the Company and consolidated subsidiaries stated in its annual securities report thereof) to customers.
- (3) To determine the appropriateness of providing products and services in light of the principle of suitability and other factors.
- (4) To confirm the identity of a customer or a customer's representative.
- (5) To report to a customer the results of a transaction, the balance of an account, the status of management activities, and the like.
- (6) To carry out administrative tasks related to a transaction with a customer or a party to a transaction (including conducting due diligence and monitoring after investment)
- (7) To execute rights or fulfill duties based on a contract with a customer or laws and regulations
- (8) To research or develop financial products or services by implementing market research, data analysis, questionnaires, and the like.

- (9) To appropriately execute entrusted businesses when, for example, the Company is entrusted with processing all or part of Personal Information, Etc. and the like from another business entity or similar party.
- (10) Other matters in order to appropriately and smoothly fulfill transactions with a customer or a party to a transaction.
- (11) To carry out the Company's business management or internal controls.

Our commercial purposes as identified in the CPRA include advancing a person's commercial or economic interests, such as by inducing another person to buy our products and services, or enabling or effecting, directly or indirectly, a commercial transaction.

Our business purposes as identified in the CPRA include (i) helping to ensure security and integrity to the extent the use of California Personal Information is reasonably necessary and proportionate for these purposes, (ii) debugging to identify and repair errors that impair existing intended functionality, (iii) short-term, transient use, (iv) performing services on behalf of the business, and (v) providing advertising and marketing services.

4. Disclosure and Sale of California Personal Information

Disclosure for Business Purposes

In the last 12 months, we have disclosed for business purposes all categories of personal information outlined above to the following categories of recipients: Affiliates, Service Providers, and certain other third parties where we are complying with law or protecting our rights (such as to our legal advisors).

Sale of Personal Information

We have not sold and/or shared California Personal Information in the preceding 12 months.

5. Sensitive Personal Information

We do not collect "Sensitive Personal Information" as defined by the CCPA.

6. Retention Period

We retain California Personal Information for as long as necessary to fulfil our commercial and business purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for compliance and protection purposes. To determine the appropriate retention period for California Personal Information, we consider the amount, nature, and sensitivity of the California Personal Information, the potential risk of harm from unauthorized use or disclosure of your California

Personal Information, the purposes for which we process your California Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

7. Your rights concerning California Personal Information

California residents have certain rights with respect to California Personal Information we collect. If you are a California resident, you may exercise the following rights regarding your California Personal Information, subject to certain exceptions and limitations:

- The **right to know** any or all of the following information relating to the personal information we have collected about you or disclosed in the last 12 months, upon verification of your identity:
 - The specific pieces of personal information we have collected about you;
 - The categories of personal information we have collected about you;
 - The categories of sources of the personal information we have collected about you;
 - The categories of personal information that we have disclosed about you to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;
 - The categories of personal information we have sold about you (if any), and the categories of third parties to whom this information was sold; and
- The business or commercial purposes for collecting or, if applicable, selling personal information about you. The **right to request that we delete** the personal information we have collected from you or maintain about you, subject to certain exceptions;
- The **right to correct inaccurate** personal information we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.;
- The **right to opt out of our sale(s) or sharing** of your personal information. You have the right to direct us not to “sell” your personal information to third parties for monetary or other valuable consideration, or “share” your personal information to third parties for cross-context behavioral advertising purposes. If you are under the age of 16, you have the right to opt in, or to have a parent or guardian opt in on your behalf, to such sales or sharing. (As explained above, we do not sell or share your personal information as those practices are defined under the CCPA);
- **The right to limit the use and disclosure of sensitive personal information.** You have the right to direct us to limit the use of your sensitive personal information to certain purposes, including to perform the services or provide the goods reasonably by an average consumer who requests those goods or services. As explained above, we do not collect your sensitive personal information as part of the Services.
- **The right not to receive discriminatory treatment** for the exercise of the privacy rights conferred by the CPRA. However, please note that if the exercise of the rights described above limits our ability to process personal information (such as in the case of a deletion

request), we may no longer be able to provide you our products or services or engage with you in the same manner.

- **Shine the Light.** Under California’s “Shine the Light” law (Civil Code Section § 1798.83), California residents that have an established business relationship with us have rights to know how their information is disclosed to third parties for their direct marketing purposes.

How to Exercise Your California Privacy Rights

To exercise the above rights, please submit a request by:

- Emailing us at SAM_CCPA@sparxgroup.com.

Verification procedures and necessary information: We may request that you provide additional information to verify your identity or to correctly understand, evaluate and respond to your request, but you are not required to create an account with us in order to have it fulfilled. We ask you to provide specific personal information for our records and reference. We will require you to provide, at a minimum name and email address. Although we try to limit the personal information collected in connection with a request to exercise the right to know and/or the right to deletion to the categories of personal information identified above, certain requests may require us to obtain additional personal information from you. In certain circumstances, we may decline a request to exercise the right to know and/or right to deletion, particularly where we are unable to verify your identity.

Authorized Agent: If you are a California resident, in certain circumstances, you may designate an authorized agent to submit requests on your behalf through the designated methods set forth above where we can verify the authorized agent’s authority to act on your behalf by:

- For requests to know or delete personal information:
 - Receiving a power of attorney valid under the laws of California from you or your authorized agent; or
 - Receiving sufficient evidence to show that you have:
 - Provided the authorized agent signed permission to act on your behalf;
 - Verified your own identity directly with us pursuant to the instructions set forth in this California Privacy Notice; and
 - Directly confirmed with us that you provided the authorized agent permission to submit the request on your behalf.
- For requests to opt out of personal information sales: Receiving a signed permission demonstrating your authorized agent has been authorized by you to act on your behalf.

We may deny a request in the event we are not able to verify the authorized agent’s authority to act on your behalf.

8. Minors

We do not and will not “sell” the personal information of consumers we know to be less than 16 years of age, unless we receive affirmative authorization (the “Right to Opt In”) from either the minor who is between 13 and 16 years of age, or the parent or guardian of a minor less than 13 years of age.

9. California Do Not Track Disclosure.

Our websites, apps and other online services are not designed to respond to “Do Not Track” requests from browsers.

10. Changes to this California Privacy Notice

We reserve the right to amend this California Privacy Notice at our discretion and at any time. When we make changes to this California Privacy Notice, we will post the updated notice on the Website and update the notice's effective date.

11. Contact Information

You may contact us with questions or concerns about our privacy policies or practices and your choices and rights under California law at here.

- E-mail : SAM_CCPA@sparxgroup.com