東京共同会計事務所
TOKYO KYODO ACCOUNTING OFFICE

Tokyo Kyodo Risk Management Service Co., Ltd.

Privacy Policy

In consideration of the importance of personal information protection and in order to improve our clients' trust in the insurance industry, we will handle personal information strictly and appropriately in compliance with the Act on the Protection of Personal Information (Personal Information Protection Act), other applicable laws and regulations, guidelines of relevant government agencies, and the like and take appropriate security control measures.

We will provide our employees with education and guidance and perform other activities to ensure the proper handling of personal information. We will also speedily respond to complaints and consultations about the handling of personal information and review and improve, as needed, our handling of personal information and appropriate security control measures.

1. Acquisition and Use of Personal Information

We will acquire and use personal information by lawful and fair means to the extent necessary for our business.

2. Purpose of Use of Personal Information

We will use the acquired personal information to the extent necessary to perform the insurance services entrusted to us by an insurance company.

We also hold and perform various workshops and seminars and will use the acquired personal information to the extent necessary to perform these duties.

The specific purpose of use by us is specified below, and we will not use personal information for any other purpose.

Non-life insurance handled by us and provision of services incidental thereto or associated therewith

The purpose of use specified above may be changed, provided that the changed purpose of use is reasonably considered to be duly related to the original purpose of use. When changing the purpose of use, we will notify the relevant individuals of the content of the change in writing (including by means of electronic records; the same applies hereinafter), in principle, or publish it on our website.

The purpose of use by the insurance company entrusting insurance services to us is described on the insurance company's website (see below).

AIG General Insurance Company, Ltd. (https://www.aig.co.jp/sonpo)

3. Security Control Measures for Personal Data

In order to prevent any leakage, loss or damage of the personal data handled by us and ensure secure control of personal data, we will take adequate security measures such as the development of handling regulations and an implementation system for security control. We will also take appropriate measures to keep personal data accurate and updated as required for achieving the purpose of use. If any problem or issue arises, we will promptly take the appropriate corrective measures.

We have internal regulations for the secure control of personal data, the major provisions of which are shown below. For inquiries related to security control measures, please contact our contact for inquiries specified in 8 below.

(1) Development of the Basic Policy

In order to ensure the proper handling of personal data, we establish and review as needed the Basic Policy with regard to "compliance with applicable laws, regulations, guidelines, and the like," "matters concerning security control measures," "contact for inquiries and complaints," and other matters.

(2) Development of the handling regulations for the security control of personal data

We develop and review as needed the regulations for handling methods, persons responsible for or in charge of handling, their duties, and other matters for each stage of acquisition, use, retention, provision, deletion, and disposal of personal data.

(3) Organizational security control measures

- Appointment of the personal data administrator and other persons
- Development of security control measures in the rules of employment and other documents
- Operation in accordance with the handling regulations for the secure control of personal data
- Development of a means to confirm the status of handling of personal data
- Development and implementation of a system to inspect and audit the status of handling of personal data
- Development of a system to respond to leakage and other incidents

(4) Personnel security control measures

- Execution of non-disclosure agreements for personal data or the like with employees
- Clarification of employees' roles, responsibilities, and other matters
- Ensuring that employees are fully informed of security control measures and are educated and trained on security control measures
- Confirming the status of employees' compliance with the personal data management procedures

(5) Physical security control measures

- Management of the areas where personal data are handled and other matters
- Prevention of theft of devices and electronic media and other incidents
- Prevention of leakage and other incidents when carrying electronic media or other items
- Deletion of personal data and disposal of devices, electronic media, and other items

(6) Technical security control measures
- Identification and authentication of users of personal data
- Setting of personal data management categories and access control
- Management of personal data access rights
- Measures to prevent leakage, damage, and the like of personal data
- Recording and analyzing access to personal data
- Recording and analyzing the status of operation of information systems that handle personal data
- Monitoring and audits of information systems that handle personal data

(7) Supervision of outsourcing providers
- When we outsource the handling of personal data, we will select a person to handle personal data properly. We develop and regularly review the handling regulations for outsourcing to ensure that outsourcing providers take security control measures.

(8) Understanding the external environment
- We implement security control measures after understanding the personal information protection system of the country in which personal data are handled.

4. Provision of Personal Data to a Third Party

We will not provide personal data to any third party without the consent of the relevant individual, except for the following cases:

(i) Where personal data are provided pursuant to laws and regulations;

(ii) Where the provision of personal data is necessary to protect the life, body, or property of a person and it is difficult to obtain the consent of the relevant individual;

(iii) Where the provision of personal data is particularly necessary to improve public health or promote the sound growth of children, and it is difficult to obtain the consent of the relevant individual; and

(iv) Where we are required to cooperate in the performance of duties stipulated by laws and regulations by government agencies, local governments, or persons entrusted by them, and obtaining the consent of the relevant individual is likely to interfere with the performance of those duties.

5. Handling of Sensitive Information

In principle, we will not acquire, use, or provide to any third party personal information requiring special care (which means information on race, creed, social status, clinical records, criminal records and personal history, fact of being a victim of a crime, and the like) and the information on participation in a labor union, family origin and legal domicile, health and medical treatment, and sex life excluding the information falling under the information requiring special care (sensitive information), except for the following cases:

(1) Where the information is acquired, used, or provided pursuant to laws and regulations;

(2) Where the acquisition, use, or provision of the information is necessary to protect the life, body, or property of a person;
(3) Where the acquisition, use, or provision of the information is particularly necessary to improve public health or promote the sound growth of children;
(4) Where we are required to cooperate in the performance of duties stipulated by laws and regulations by government agencies, local governments, or persons entrusted by them;
(5) Where we acquire, use, or provide to a third party the sensitive information of employees or other persons who belong or participate in a political, religious or any other organization or a labor union to the extent necessary to receive insurance premiums and perform other duties;
(6) Where we acquire, use, or provide to a third party the sensitive information only to the extent necessary to pay insurance benefits or perform other duties in association with inheritance procedures; and
(7) Where we acquire, use, or provide to a third party the sensitive information with the consent of the relevant individual to the extent necessary to perform our duties in order to ensure the appropriate operation of the insurance business.

6. Handling of Specific Personal Information

We will not collect, retain, use, or provide to any third party the specific personal information stipulated in the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures.

If the specific personal information is necessary in connection with insurance benefits, pension benefits, or other matters, the insurance company will notify the relevant individual to that effect.

7. Disclosure, Correction, Suspension of Use, etc., of Personal Data Retained by Us under the Personal Information Protection Act

With respect to a request for the disclosure, correction, suspension of use, or the like of personal data retained by us under the Personal Information Protection Act, we will perform the requested procedures after confirming that the person making the request is the relevant individual. If the personal data are retained by the insurance company or any other company, we will notify that company of the request. If we perform necessary investigation of the personal data retained by us and find that the information on the relevant individual is incorrect, we will correct the information based on the result of the investigation.

8. Contact for Inquiries

The contact for inquiries is specified below. Apart from the contact specified below, if your inquiry is about insured events, you may contact the insurance company's contact for consultation on insured events that is specified in the insurance policy.

Please understand in advance that we will respond to inquiries after checking that the person making the inquiry is the relevant individual.

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Tokyo Kyodo Risk Management Service Co., Ltd.

【Contact for Inquiries】
<Name of the agent> Tokyo Kyodo Risk Management Service Co., Ltd.
<Address> C/O Tokyo Kyodo Accounting Office, 1-4-1 Marunouchi, Chiyoda-ku, Tokyo, Japan
<Name of the representative> Ryutaro Uchiyama
<Telephone No.> 03-5220-6200
<Business hours> From 9:30 to 17:30 on weekdays
<E-mail> tomoko-kubosawa@tkrms.jp
<Website> http://www.tkao.com/about_tkrms/
※If you do not want to receive from us any information about new products and services by e-mail, direct mail or other means, please notify the contact for inquiries specified above.

Established on April 1, 2022
Tokyo Kyodo Risk Management Service Co., Ltd.