

PRIVACY NOTICE
VIDEO SURVEILLANCE
and
OFFICE VISITORS

Japan Fund Management (Luxembourg) S.A.

Last updated: April 2025

1. Purpose of the Document

Japan Fund Management (Luxembourg) S.A. ("JFML" or "the Company"), with registered address at 1B, rue Gabriel Lippmann, L-5365 Munsbach has implemented a video recording system and visitor register within its office for the purposes of security and personal safety.

This privacy notice is intended to inform you, as a data subject, about how personal data is collected, processed, and protected through our video surveillance system and visitor register. In this context, we are committed to ensure that such processing activities comply with the General Data Protection Regulation (GDPR) and the guidelines issued by the Luxembourg Data Protection Authority (CNPD).

2. Legal basis, processing purpose and categories of personal data

We register office visitors at the Company reception within a dedicated register and process video footage for the purposes of ensuring the security of individuals, property, and our infrastructure. This has wider public benefits, such as protection of public security, as well as crime prevention and deterrence, investigation and law enforcement support, enhanced customer security, protection of critical infrastructure, emergency response coordination.

The legal basis for processing this data is Article 6(1)(f) of the GDPR, which allows processing when it is necessary for the legitimate interests of the controller, provided these interests are not overridden by the rights and freedoms of the individuals concerned.

The categories of personal data collected via the:

- video surveillance system include video images of individuals (e.g. employees and visitors of the office, such as candidates and business partners) entering or moving through the areas where cameras are installed. Recorded images are not used for the purpose of surveillance of the employees or control of time management;
- office visitors register include name, surname, company, signature, car parking.

3. Change of purpose

Personal data collected via video surveillance and our visitor register will only be used for the purposes stated in this notice. If we need to process such data for any other purpose, we will ensure that such processing is compatible with the original purpose or provide you with a new notice explaining the new purpose and any other relevant information.

4. If you fail to provide personal information

Since video surveillance is carried out in specific, monitored areas, it is automatically triggered by your presence in those zones. You do not need to actively provide personal data; however, by entering these monitored areas, your image will be captured. If you do not wish being recorded, you should refrain from entering the monitored spaces.

Regarding the data collected via the visitor register at the reception, you are requested to provide such data to enter the Company premises. If you do not wish to provide such data, you should refrain from entering JFML office.

5. How the personal information is collected and securely maintained

Personal data is collected automatically through our video surveillance system, which consists of cameras strategically placed around our premises, both indoors and outdoors, in clearly signposted areas (namely, IT room, garage, main entrance, reception, and vault). The cameras operate continuously or during specific timeframes and are only installed in key critical areas of the Company with limited field of view. They do not directly and specifically record employees on an ongoing basis during their working duties.

We implement appropriate technical and organizational measures to safeguard the video surveillance data from unauthorized access, loss, or misuse. This includes restricted access to the footage, secure storage of the data, and

regular audits of our security protocols. Only authorized personnel in specific circumstances have access to the recorded footage.

With regard to the visitor register, data is collected at the moment of the registration at the Company reception by means of a dedicated register ensuring by design the confidentiality of provided personal data. Indeed, such data will not be accessed by any subsequent visitor of the office.

6. Personal information sharing

The video surveillance footage is collected by G4S Security Solutions S.A., which is also in charge of maintaining the visitors register, acting as data processor, and subject to dedicated privacy and security measures.

Video surveillance footage and visitor register information are kept confidential and accessed only by authorized personnel when strictly necessary. This information is shared only with our parent company, Mizuho Trust & Banking (Luxembourg) S.A.. Personal data is not shared with any other third party unless required by law or in response to a legitimate request from law enforcement authorities. Any sharing of personal data will be strictly limited to what is necessary and will comply with GDPR principles.

We do not transfer personal data collected via video surveillance or via the register to countries outside the European Economic Area. Should this become necessary in the future, we will ensure that appropriate safeguards are in place to comply with GDPR requirements regarding international data transfers.

7. Data Retention

Video surveillance footage is stored for a limited period, which typically does not exceed 8 days unless a longer retention period is required for a specific legal purpose, such as an ongoing investigation. Once the retention period has passed, the footage is securely deleted or anonymized, in compliance with applicable regulations.

Visitors register data is stored for the time necessary to ensure secure access to JFML premises, and monitoring activities. Once the retention period has passed, the information is deleted.

8. Your rights in connection with personal information

You have the right to access your personal data, be informed, and object to its processing. You can also request the erasure or restriction of your personal data's processing. Additionally, you will not be subject to decisions based solely on automated processing without human intervention.

To exercise these rights, you may contact the JFML Data Protection Coordinator at thierry.grosjean@jfml.lu. You also have the right to lodge a complaint with Luxembourg's data protection supervisory authority, the National Commission for Data Protection (CNPD).