

October 1, 2009

**BASIC POLICY CONCERNING PROTECTION OF PERSONAL INFORMATION
(PERSONAL INFORMATION PROTECTION DECLARATION)**

CITIGROUP Global Markets Japan Inc.

1. (Policy)

Citigroup Global Markets Japan Inc. (hereinafter referred to as the “Company”) hereby declare that it will strive for the protection of personal information by properly handling such information, in compliance with the Law concerning Protection of Personal Information and other related laws and ordinances, and by having all employees comply with this basic policy and related laws and ordinances.

2. (Acquisition of Personal Information)

The Company will not acquire personal information through illegal means.

3. (Purpose of Use of Personal Information)

The purposes of use of personal information that the Company acquires shall be as listed below. The Company will use personal information only for the implementation of such purposes and the business as listed below and the provision of useful measures, and will not change the purposes of use of such personal information beyond the reasonable extent.

(Purpose of use)

- (1) Guidance for solicitation of transactions of securities, financial product that the Company deals with and invitation of other transactions, sale and trade in securities, services
- (2) For the settlement of transactions, management of securities and fund, management of transactions and securities account control of the securities/financial product that the Company deals with and other transactions.
- (3) Payment of dividends on, interests on, or redemption money, etc. of securities and financial products,
- (4) To determine appropriateness of providing products and services in light of the principle of suitability,
- (5) To verify identities of individual customers and identities of the persons or proxies, in charge of transactions with the Company on behalf of institutional clients,
- (6) To report to and confirm with customers trade details and safekeeping,
- (7) To handle requests for and queries regarding disclosure of the personal data in custody
- (8) To study and develop financial products and services via market research, customer surveys and data analysis;
- (9) To conduct internal control management of the Company (regulatory compliance, treasury, accounting and tax, etc.).

The Company will not use information concerning an individual’s race, beliefs, family origin, domicile of origin, health treatment record/criminal record and other information which is not disclosed publicly (but which the company acquired through its course of business) beyond the scope of use for maintenance of its business management and other purpose necessary under the Cabinet Ordinance regarding the business conduct etc. of a financial instruments company.

4. (Assurance of Accuracy of Personal Data)

To the extent necessary for the implementation of the purpose of use, the Company will make efforts to keep the personal data accurate and up-to-date. Unless a retention period is set forth under applicable laws or ordinances, the Company will establish the retention period for personal

data in custody according to its purpose of use, and will erase or dispose of the relevant personal data after elapse of the applicable period.

5. (Management of Personal Information)

The Company shall take all measures necessary to ensure the security of personal information and conduct proper management of such personal information and supervise its officers and employees.

6. (Provision of Personal Data to Contractor)

To the extent necessary for the implementation of the purpose of use, the Company may delegate, wholly or partially, the handling of personal data. In such event, the Company shall conduct all necessary and appropriate supervision over the service provider to ensure the security of the personal data, which the company outsourced its handling to the provider.

7. (Sensitive Information)

The Company will not acquire information concerning an individual's political views, religion (religion, idea and belief), membership of labour unions, ethnic groups and/or race, family origin and/or domicile of origin, health history/records and sex life, and/or criminal record (hereinafter referred to as the "Sensitive Information"), except in the following cases:

- (1) When required under applicable laws and ordinances;
- (2) When it is deemed necessary to protect the life or ensure the safety of individuals or protect property;
- (3) When it is deemed especially necessary for the improvement of public health and the promotion of the well being of children;
- (4) When it is deemed necessary to cooperate with national governmental agencies, local municipal bodies or their proxies in order to perform the operations prescribed by laws and ordinances;
- (5) When Sensitive Information of the employees, etc. relating to the affiliation with or membership of political or religious groups, labour unions is acquired, used or provided to third parties to the extent necessary, for the tax withholding process, etc.;
- (6) When Sensitive Information is acquired, used or provided to third parties to the extent necessary to perform the transfer, etc. of rights and obligations in the inheritance procedures;
- (7) When Sensitive Information is acquired, used or provided to third parties to the extent necessary for the performance of the business of the Company and with the principal's consent, in light of the need to ensure the appropriate operation of the securities business and other financial business of the Company;
- (8) When biometric information which qualifies as Sensitive Information is used for identification purpose with consent of the Principal.

8. (Joint Use of Personal Data)

Citigroup Global Markets Japan Inc. may use the Personal Data jointly with certain other parties as follows:

- (1) With Nikko Cordial Securities Inc.
 - ① Items of Personal Data for Joint Use

- Information of customers such as the name, address, date of birth, occupation,
- ② Scope of Joint Users
- Citigroup Global Markets Japan Inc. and Nikko Cordial Securities Inc.
- ③ Purpose of Joint Use
- For research, development, proposal and supply of products and services by a collaboration of Nikko Cordial Securities Inc. and any of the joint users described above.
 - For management controls and internal controls of Nikko Cordial Securities Inc. and its subsidiaries taken as a whole
- ④ Party Responsible for Administration of Personal Data for Joint Use
- Citigroup Global Markets Japan Inc.
- (2) With Citigroup Inc.
- ① Items of Personal Data for Joint Use
- Information of accounts of customers of individuals at Citigroup Global Markets Japan Inc. (such as the name, address, date of birth, occupation account number),
 - Information of transactions, custody balances and other relevant matters in relation to accounts of customers of individuals at Citigroup Global Markets Japan Inc.
 - Information of names, addresses, telephone numbers, sections and other relevant matters for officers and employees of companies and enterprises which are the Citigroup Global Markets Japan Inc.'s customers, transaction parties, etc.
- ② Scope of Joint Users
- Citigroup Global Markets Japan Inc.
 - Citigroup Inc and its consolidated subsidiaries
 - Subsidiaries and affiliates of Nikko Cordial Group Corporation listed on the Securities Report
- ③ Purpose of Joint Use
- For research, development and supply of products and services by a collaboration of Citigroup Global Markets Japan Inc. and any of the joint users described above.
 - For management controls and internal controls of Citigroup Inc and its subsidiaries taken as a whole
- ④ Party Responsible for Administration of Personal Data for Joint Use
- Citigroup Global Markets Japan Inc.
- (3) Description above is concerned with the joint use of personal data based on the law concerning the protection of personal information. Besides it, the company will comply with the firewall restriction (restriction on customer information sharing between parent and child company), which is applicable to NCL and the obligation of secret maintenance on customer information as a securities company.

9. (Request for Disclosure of Personal Information)

When the principal requests disclosure, correction, suspension of use, etc. of his/her personal information, the Company will promptly respond to such request after verification of the identity

of the applicant. For such request, please contact the Information Security Office as specified below.

10. (Provision of Personal Information to Third Party)

The Company will not provide personal information with any third party except for the case where;

- (1) The prior consent of the principal is obtained,
- (2) Such provision is permitted under applicable laws or ordinances,
- (3) The disclosure request from a body that has a legitimate authority under applicable laws or ordinances, such as a tax office, a court, Police Department and other organization,
- (4) If necessary for the protection of human life, safety, or property, and when it is difficult to obtain the consent of the Principal,
- (5) In case of outsourcing all or partial of handling of personal information within the extent of the implementation of the purpose of use,
- (6) Providing personal information for continuity of business due to merger/acquisition of company,
- (7) Providing personal information based on this policy article 8 (Joint Use of Personal Data),
- (8) In other cases authorized by relevant laws and regulations,
- (9) In cases specified in “Provision of Personal Data to Third Parties”

11. (Queries concerning Personal Information)

The Company will establish a point of contact for handling queries and complaints from the principal. For queries concerning the handling of personal information, please contact the following:

Citigroup Global Markets Japan Inc.

Information Security Office

Shin-Marunouchi Building

1-5-1 Marunouchi, Chiyoda-ku, Tokyo 100-6520

Telephone: 03 (6270) 5930

Office Hours: From 9:00 a.m. through 5:00 p.m. (From Monday through Friday)

Except: Saturday, Sunday, National Holiday and Year-end and Year start

E-mail: PIPL@citi.com

12. (Approved Personal Information Protection Organization)

The Company is a member of the Japan Securities Dealers' Association which has been approved as a personal information protection organization by the Financial Services Agency. The Securities Mediation and Consultation Center of the Japan Securities Dealers' Association accepts complaints and consultation regarding the handling of personal information by its member firms.

[Contact for Complaints and Consultation]

Japan Securities Dealers' Association Securities Mediation and Consultation Center

Telephone: 03 (3667) 8008

Website: (<http://www.jsda.or.jp>)

Or a nearby branch office of Securities Mediation and Consultation Center

13. (Review and Amendment of This Basic Policy)

The Company may review and amend this basic policy without prior notice when it deems it to be necessary.