

April 1, 2019

Basic Policy on Protection of Personal Information, etc.

Idemitsu Kosan Co.,Ltd.

The Group has established a basic policy on the handling of personal information including specific personal information (i.e. personal identification numbers and other personal information that includes personal identification numbers) as well as anonymously processed information (information relating to an individual that can be produced from processing personal information so as neither to be able to identify a specific individual nor to be able to restore the personal information) (hereinafter collectively referred to as “Personal Information, etc.”) as described below. The Group will comply with the basic policy and manage all the Personal Information, etc. it handles in a safe and appropriate manner.

1. Compliance with Laws and Regulations

The Group will comply with the Act on the Protection of Personal Information, the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures, other applicable laws, related government and ministry ordinances, guidelines, etc.

2. Matters Concerning Acquisition

The Group will acquire Personal Information, etc. by lawful and fair means. Unless otherwise permitted by applicable laws, the Group will either explicitly explain or announce the purpose of use of Personal Information, etc. to the person in advance, or give notice or announce to the person immediately after acquisition thereof. In addition, the Group will, when acquiring special care-required personal information, obtain the prior consent of the person, unless otherwise permitted by applicable laws.

3. Matters Concerning Use

The Group will use the Personal Information, etc. only within the scope necessary for achieving the purposes of use thereof, unless otherwise permitted by applicable laws.

4. Matters Concerning Provision and Disclosure

Unless otherwise permitted by applicable laws, the Group will not disclose or provide without the consent of the person any Personal Information, etc. to any third party other than outsourcing companies, companies sharing Personal Information, etc., and business successors.

5. Matters Concerning Safety Control Measures

The Group will take the necessary and appropriate safety control measures to prevent unauthorized access to, and loss, destruction, falsification, leakage, etc. of, Personal

Information, etc., and strive to improve personal information protection and management systems on an ongoing basis. The Group will clarify who has the responsibility to protect and manage personal information at each organization and provide the necessary and appropriate education, training and supervision to those employees and outsourcing companies which handle Personal Information, etc.

Furthermore, the Group will keep the Personal Information, etc. accurate and updated. Any Personal Information, etc. with regard to which the purposes of use have been achieved and whose retention period prescribed by applicable laws has expired will immediately be destroyed or eliminated. In the event of leakage, etc., the Group will immediately take case-by-case correction measures.

6. Matters Concerning Disclosure, etc. of Personal Information, etc.

The Group will respond in accordance with applicable laws to requests for disclosure and correction, etc. (i.e. correction, addition, deletion, suspension of use, elimination, and suspension of provision to a third party), of retained personal data and specific personal information files.

If such data and files are not disclosed or do not exist, the Group will notify the requesting person to that effect.