

Efforts to protect personal information

The Society handles personal information in compliance with the following laws, regulations, and guidelines. For this reason, it has established and implemented a personal information protection management system.

- a) Personal Information Protection Law (2003 law no. 57)
- b) The Ministry of Health, Labour and Welfare's Guidelines for Health Insurance Societies and Similar Organizations on Appropriate Handling of Personal Information
- c) The Ministry of Health, Labour and Welfare's Guidelines for Medical and Long-Term Care Service Providers on Appropriate Handling of Personal Information
- d) Other laws, regulations, norms, etc., concerning the protection of personal information

The management system shall be audited and reviewed at least once annually and efforts made to achieve continual improvements to the system. In addition, any deficiencies discovered will be responded to immediately.

Although in principle personal information shall be handled in accordance with items 1 to 7 below, when exceptional cases such as the following apply, such handling shall be conducted under the responsibility of the Personal Information Protection Supervisor:

- a) Cases subject to laws and regulations
- b) Emergencies that threaten life or property
- c) Other unavoidable cases

Parties with questions concerning the Society's Fundamental Policy on the Protection of Personal Information and its protection of personal information, or parties that have discovered any deficiencies or other concerns in connection with the Society's protection of personal information, are requested to contact the Society's General Affairs Section.

Phone 0493-22-0890 Hours: weekdays, 9:00 am–5:00 pm

Fax 0493-23-7466 Faxes accepted 24 hours/day

E-mail bosch-kenpo@bosch-kenpo.or.jp E-mails accepted 24 hours/day

1. Organization

The society shall appoint one chief privacy officer (CPO) to serve as the Personal Information Protection Supervisor and one chief administrative officer (CAO) as the Personal Information Protection Auditor.

- a) Each section shall have a designated Personal Information Protection Manager. A staff member in charge of personal information protection shall be appointed for each type of operation. He or she shall implement personal information protection efforts for the relevant operations.
- b) A Training Supervisor and a Complaints Processing Supervisor shall be appointed in connection with the protection of personal information. They shall handle in-house education and training efforts and the processing of complaints, respectively.
- c) All employees, including temporary personnel and those on assignment at other companies, shall comply with the management system for protection of personal information and shall quickly report any deficiencies or incidents.

3. Obtaining personal information

- a) When the Society is to obtain personal information directly from the person concerned, the information shall be obtained only after providing advance notice of the purpose of use, along with an explanation of how such personal information will be handled, and his or her consent has been obtained.

4. Retention and use of personal information

- a) Personal information shall be handled in accordance with the purpose of its use. If this purpose changes, the consent of the person concerned must be obtained again.
- b) The Society shall endeavor to protect personal information from external threats by implementing safety measures for the information systems it uses, in accordance with the risks inherent to each item of personal information.
- c) Within the Society's organization, the personnel using and processing personal information shall be limited in accordance with the operations handled by such

personnel, and a system shall be established and managed to ensure that unnecessary access to or use of personal information does not take place.

- d) Measures shall be implemented in all aspects of the management of personal information, including its transportation and removal, in accordance with its purpose of use and any associated risks.

5. Subcontracting

The Society shall not subcontract the handling of personal information except in cases where it has notified the person concerned in advance and the person has voiced no objections. When it does subcontract the handling of personal information, the Society shall notify the subject of the information in advance and obtain his or her consent.

6. Provision of personal information to third parties

The Society shall not provide personal information to third parties without first notifying the person concerned. When it does provide personal information to a third party, the Society shall obtain the consent of the person concerned, either when obtaining the information or at some point before it provides the information to the third party.

7. Where to address requests for disclosure of personal information, etc., and other inquiries

The patient may request notification of the purposes of use of, disclosure of, revision of, addition to, partial deletion of, cessation of use of, full deletion of, and cessation of provision to third parties of his or her personal information. Please direct inquiries on personal information using the contact information provided below.