

# Privacy Policy

January 2026

Laser Digital Japan Co., Ltd. (hereinafter referred to as "the Company") takes its responsibilities regarding data protection and privacy protection seriously.

This policy sets out how the Company acquires, uses, and shares personal information, including personal identification numbers (hereinafter referred to as "specified personal information"). Personal information and specified personal information are collectively referred to as "personal information, etc." in this policy. This policy complies with the Act on the Use of Numbers for Identifying a Specific Individual in Administrative Procedures (hereinafter referred to as the "Personal Identification Number Act"), the Act on the Protection of Personal Information (hereinafter referred to as the "Personal Information Protection Act"), relevant laws and regulations, and guidelines issued by supervisory authorities.

The acquisition, use, and sharing of personal information, etc., handled by us when performing work entrusted by the Laser Digital Group shall comply with the Laser Digital Group's [Privacy Policy](#).

The Company may amend this policy. Any amendments will be notified on the Company's website. Where an amendment may have a significant impact on customers, prior notification will be provided.

## [Basic Policy on Personal Information Protection]

The Company and its officers and employees shall comply with the Personal Information Protection Act, the Personal Identification Number Act, relevant laws and regulations, and guidelines issued by supervisory authorities, and hereby establish the following basic policy.

1. Personal information shall be acquired in accordance with laws and regulations, and we shall endeavour to ensure its content is accurate and up-to-date.
2. Personal information shall not be used beyond the scope necessary to achieve the purpose of use, except where permitted by the Personal Information Protection Act or other laws and regulations. Furthermore, personal information shall not be used in any manner that may encourage or induce illegal or improper acts. In particular, specified personal information shall only be handled within the scope prescribed by

law. Furthermore, we shall not disclose or provide personal information to third parties without the consent of the individual, unless there is a legitimate reason, such as a legal obligation to disclose.

3. To prevent the leakage or unauthorised use of personal information, we shall thoroughly educate our officers and employees. Furthermore, we shall appoint a Personal Information Management Supervisor and establish an appropriate management system.
4. When outsourcing the handling of personal information to external contractors, we shall take responsibility for supervising that the protection of personal information is also ensured at the contractor's premises.
5. Regarding personal information, we shall disclose, correct, suspend use, etc., in accordance with laws and regulations upon request by the individual concerned. In such cases, we may charge a prescribed fee.

**[Method for Requests for Disclosure, etc.]**

Should a customer or their authorised representative submit a request (hereinafter referred to as a "Request for Disclosure, etc.") to our Personal Information Consultation Desk regarding personal information held by our company (hereinafter referred to as "Personal Information Subject to Disclosure"), concerning notification of the purpose of use, disclosure, correction, addition or deletion of content, suspension of use, erasure, cessation of provision to third parties, or disclosure of records of provision to third parties, we shall respond without delay after receiving the necessary documents and verifying the identity of the requester. Please note that we may decline such requests in accordance with relevant laws and regulations.

**【Company Overview】**

Please refer to our website for details of our head office location, Representative Director, and other company information. <https://www.laserdigital.com/japan>

**【Personal Information Consultation Desk】**

For requests for disclosure, etc., regarding personal information, enquiries, complaints, or other matters concerning the handling of personal information, please contact the following office:

Toyosu Bayside Cross Tower, 2-2-1, Toyosu, Koto-ku, Tokyo 135-0061

Laser Digital Japan Co., Ltd. Planning and Management Department

[Contact Form Link](#)

**【Primary Methods of Acquisition and Types of Personal Information Collected】**

1. We may acquire personal information through the following methods.
  - (a) When customers directly complete transaction application forms, contracts, or similar documents
  - (b) When registering for or using our website or online services
  - (c) When acting as a representative or transaction handler for a corporate customer
  - (d) When conducting business with us as a service provider
  - (e) When collected from external information vendors
  - (f) When visiting our premises or registering to participate in our events
  - (g) When we obtain information from you through the provision of goods or services
2. The personal information we collect may include the following:
  - (a) Basic information about you, such as your name, address, date of birth, telephone number, occupation, and transaction needs, etc.
  - (b) Identification data and other customer identification information
  - (c) Financial and transaction information (financial information, transaction information, credit information, account authentication information)
  - (d) Contract-related information
  - (e) Statistical information (including information regarding your occupation, profession, nationality, or educational background)
  - (f) Technical information (including information about devices used to access our services, such as IP addresses)
  - (g) Information regarding the usage of our services
  - (h) Location Information
  - (i) Information obtained through calls and communications with you (we may record or transcribe calls and communications with you)
  - (j) Publicly available information and other generally accessible information
  - (k) Sensitive information (Note: Sensitive information shall not be used or provided to third parties for any purpose other than those deemed necessary for the proper conduct of business operations or other purposes permitted by law.)

**【Purpose of Use of Personal Information】**

We shall use your personal information for the following purposes. Furthermore, specific personal information shall only be used for "application and notification procedures for

opening accounts related to cryptocurrency transactions", "preparation and provision of statutory documents related to cryptocurrency transactions", and other related administrative tasks.

1. To manage our business relationship with you
  - (a) To manage relationships with customers or their affiliated companies (e.g., managing the most appropriate method of contact with customers)
  - (b) For market research, and for the research and development of cryptocurrency-related transactions and other products and services through data analysis and surveys
  - (c) To develop and implement marketing activities for providing customers with information about our services
  - (d) To solicit, sell, manage, and provide information on services related to cryptocurrency-related transactions and other products we handle (including displaying optimal websites, delivering advertisements, and other sales activities utilising analysis results such as your browsing history)
  - (e) To introduce cryptocurrency-related transactions and other products and services offered by our company, affiliated companies, or partner companies, and to introduce affiliated companies
  - (f) To assess the appropriateness of providing products and services in accordance with the suitability principle and other relevant principles
2. For the management of services provided by our company
  - (a) To report transaction results and other matters to customers
  - (b) To perform administrative tasks related to transactions with customers and counterparties
  - (c) To exercise rights and fulfil obligations under contracts with customers and counterparties, and in accordance with laws and regulations
3. To prevent and detect crime
  - (a) To verify that you are the customer or an authorised representative (including screening to prevent association with anti-social forces and to combat money laundering and terrorist financing)
  - (b) To comply with applicable laws and regulations
4. To protect our business and customer interests
  - (a) Risk management for our company and our customers
  - (b) Complaint handling
5. To comply with laws and regulations
  - (a) Protection of IT systems, networks and infrastructure

- (b) To efficiently operate our business (including financial management, planning, corporate governance, auditing, etc.)
- 6. To properly and smoothly execute transactions with customers and business partners
- 7. For other purposes incidental to the above purposes of use

We may use personal information beyond the conclusion of a transaction within the scope of the aforementioned purposes. However, when the need to use personal information ceases, we endeavour to delete such personal information without delay.

#### **【Joint Use of Personal Data 】**

We may jointly use customers' personal data as outlined below.

Please note that where joint use is restricted by the Personal Information Protection Act or other laws and regulations, we will not engage in joint use except in cases permitted by law, such as when consent has been obtained from the customer.

##### **1. Items of Personal Data Subject to Joint Use**

- Information concerning the customer, such as name, address, date of birth, telephone number, occupation, transaction needs, company/organisation name, position, email address, etc.
- Information concerning your transactions, such as transaction details

##### **2. Scope of parties sharing the data**

- Nomura Holdings, Inc., our ultimate parent company, and its consolidated subsidiaries listed as cross-border transfer destinations in [Cross-Border Transfer of Personal Data].
- Consolidated subsidiaries and equity-method affiliates of Nomura Holdings, Inc., our ultimate parent company, as listed in its securities reports ( , etc.)

##### **3. Purpose of use**

- To develop, introduce, and provide comprehensive services as the Nomura Group
- To conduct integrated compliance, risk management, and other management and internal control activities for the Nomura Group

##### **4. Party responsible for managing personal data subject to joint use**

- Laser Digital Japan Co., Ltd.

For the head office location, representative, and other company information of Laser Digital Japan Co., Ltd., please refer to our website:

<https://www.laserdigital.com/japan>

### **【Examples of Main Outsourced Operations】**

The following are examples of operations for which we entrust the handling of personal information to external contractors.

- Printing or dispatch of documents to be sent to customers
- Providing specialised advice on legal, accounting, and other matters
- Preparation and storage of business-related ledgers and documents
- Administrative processing, including contract execution with customers
- Information system operation and maintenance

Where outsourcing occurs, we shall appropriately manage and supervise external contractors.

### **【Cross-border Transfer of Personal Data】**

※ Cross-border transfer refers to placing personal data in a state where it can be accessed by third parties in foreign countries. This includes situations where personal data is not physically provided but can be accessed via networks or similar means.

Our company, along with our parent company Laser Digital Holdings AG and its affiliated companies (hereinafter referred to as the "Laser Digital Group"), provides comprehensive global cryptocurrency trading services through and with the support of affiliated companies and service providers worldwide. Furthermore, when providing cryptocurrency-related trading services, there may be instances where we must provide personal data to third parties in accordance with prescribed procedures. This is necessary to comply with the laws and regulations of the countries where the Laser Digital Group operates, or to facilitate the smooth execution of your transactions. In such instances, failure to comply with the timeframes and procedures stipulated by laws and regulations may ultimately result in disadvantage to the customer. Therefore, after regularly confirming the implementation status of security management measures at the following recipients, we will provide the items of personal data within the scope of the purposes of use described in [Shared Use of Personal Data].

(Cross-border recipients)

- Laser Digital Holdings AG (Swiss Confederation)
- Laser Digital Switzerland AG (Swiss Confederation)
- Laser Digital UK Ltd. (United Kingdom)
- Laser Digital Middle East FZE (Dubai)
- Laser Digital (AD) Ltd. (Abu Dhabi)

For information regarding the protection of personal data in the foreign countries to which data is provided, please refer to the Personal Information Protection Commission website under "Legal Systems of Foreign Countries and Regions" (<https://www.ppc.go.jp/enforcement/infoprovision/laws/>)

As the products you may transact with us in the future remain undetermined, we are unable to provide in advance a complete list of all countries to which personal data may potentially be transferred in the future, nor details of the personal information protection systems in those countries. However, information regarding the personal information protection systems in foreign countries to which personal data may potentially be transferred can be found on the Personal Information Protection Commission website (<https://www.ppc.go.jp/enforcement/infoprovision/laws/>).

Should we subsequently identify a third party recipient, you may request that we provide information regarding the name of the relevant foreign country, the information protection system in that country, and the measures taken by that third party to protect personal information. Please contact our Personal Information Consultation Desk for such requests. Please note that we will require you to submit the necessary documents and verify your identity when making such a request.

#### **【Use of Cookies and Other Technologies】**

This website uses cookies, web beacons, or similar technologies (hereinafter referred to as "cookies") to enhance service convenience, statistically analyse browsing patterns for website improvement, provide optimal site display for customers, and deliver advertisements.

Cookies are small pieces of data written to your device when you visit this website, enabling the identification of users who visit the site. In addition to the purposes stated above, we analyse the information collected via cookies to customise the services we provide through our website and other means to suit each customer.

Please note that you may configure your browser to prevent the storage of cookies. However, in such cases, you may be unable to use some of the services provided by this website. We kindly ask for your understanding in this matter.

#### **【Third-Party Websites】**

Our website contains links to third-party sites (including social media bookmark buttons that allow sharing of specific content from our website). Some of the entities operating these websites have contracts with us, but not all do. Therefore, we recommend that you

carefully review the privacy policy, cookie notice, and other terms of each linked website before submitting any personal data. We are not responsible for these terms or privacy policies, nor are we responsible for the content, use of cookies, or handling of personal information on these websites.

#### **【Security Measures for Personal Data】**

We implement the following security measures for personal data in accordance with personal information protection laws, regulations, and relevant guidelines.

##### **(Establishment of Rules Governing the Handling of Personal Data)**

- We have established regulations concerning the protection of personal information and strive to ensure the appropriate safeguarding of information assets and information security.

##### **(Organisational Security Management Measures)**

- The Company appoints a Chief Personal Information Management Officer from among its officers. This officer assumes the responsibilities of the "Personal Data Management Officer" as stipulated in the "Practical Guidelines on Security Management Measures, etc. Concerning Personal Information Protection in the Financial Sector" (hereinafter referred to as the "Financial Sector Guidelines Practical Guidelines") established by the Personal Information Protection Commission and the Financial Services Agency, and endeavours to ensure information security. Furthermore, the Head of the Department is designated as the "Personal Data Manager" as stipulated in the Financial Sector Guidelines Practical Guidelines. This role involves ensuring appropriate information security within each department, managing the handling of information assets, and providing appropriate advice and guidance to employees and others.
- A system is in place to promptly report any leaks or breaches to the Chief Personal Information Management Officer. Furthermore, regular self-inspections are conducted regarding the handling of personal data, and inspections and audits are carried out by the Internal Audit Department.

##### **(Physical Security Measures)**

- The scope of information assets accessible to employees and others is strictly managed, and measures are implemented to prevent unauthorised access to personal data. Measures are also taken to prevent theft or loss of equipment, electronic media, documents, and other items handling personal data.

##### **(Technical Security Measures)**

- Access control is implemented to limit the scope of personal information

databases handled by personnel. Mechanisms are also introduced to protect information systems handling personal data from unauthorised access, whether internal or external, and from malicious software.

**(Human Resource Security Measures)**

- We conduct regular training for employees and others on matters requiring attention regarding the handling of personal data. Furthermore, matters concerning the confidentiality of our company's and our customers' confidential information are stipulated in our work regulations and similar documents.

**(Understanding the External Environment)**

- When handling personal data overseas, we ascertain the personal information protection systems of each country and implement necessary and appropriate measures.

**【Handling of Specified Personal Information】**

We shall not acquire or handle specified personal information beyond the scope necessary to achieve its purpose of use. Furthermore, we shall not provide specified personal information to third parties except in cases permitted by the Personal Identification Number Act.

**【Amendments to This Policy】**

Should our company change the purpose of use of personal information (such changes shall be made within a scope reasonably deemed to have a substantial connection to the original purpose of use) or make other amendments to this policy, we shall announce such changes by updating this page.