

Disclosure of purpose of use of personal information held by the Rakuten KENPO

The Rakuten KENPO (“Society” hereinafter) prepares personal information databases based on various information, including personal information provided on various notices, application forms, and other documents received from insured persons and their family members (“members” hereinafter), personal information provided in medical cost details (“Rezepts” hereinafter) used by medical care institutions or other facilities to bill the Society for the cost of examinations administered at such facilities, and other personal information such as the numerical results of health examinations. The Society uses this information in health insurance activities like those described below.

1. Notices and other materials related to eligibility for insurance coverage are used in Society operations as outlined below.

- Master databases such as membership registers are prepared by entering data, primarily the information appearing on Notifications of Eligibility as Insured Person and Notifications of Health Insurance Dependent (Change)(such as health insurance card symbols and numbers, names, dates of birth, gender, addresses, basic pension numbers, and monthly remunerations) and stored on Society administrative processing computers for use in general health insurance activities.
- The certification process after the Notification of Health Insurance Dependent (Change) is submitted is based on documented income and other information, such as certificate of taxation/nontaxation and certificate of school attendance.
- Any received Notification of Loss of Eligibility as Insured Person, together with returned health insurance card, will be checked and disposed of after retention for a fixed period of time.
- Any changes or additions to data stored in a master database are based on change (correction) notices concerning matters related to eligibility.
- Among other purposes, through linkage with benefits data, Rezept data, health examination data, and other data, master databases are used to confirm payment of benefits and other matters; issue medical care cost information; identify persons eligible for various health activities; and contact members.
- Names, addresses, and other contact information in master databases and obtained from notices or other documents may be used to contact members even after they have lost their eligibility as Society members.
- Upon receipt of inquiries from medical care institutions or other insurers (including

municipalities and pension offices) concerning verification of loss of eligibility, responses will be provided concerning whether or not the individual concerned remains eligible for insurance coverage, including the health insurance card symbol and number, name, date of birth, gender, date of eligibility, date of loss of eligibility, and other data from the master databases after first checking the identity of the inquiring party.

- In suspected cases of examinations undergone after loss of eligibility, data such as the health insurance card symbol and number, name, date of birth, gender, date of eligibility, and date of loss of eligibility of the person in question in the master databases will be checked against data from other insurers to make adjustments related to duplication of benefits with other insurers and medical care institutions.
- Documents are prepared for dependency checks (verification of health insurance cards) using the master databases to allow the members to properly receive insured medical consultation and treatment and for the sound operation of KENPO. Services related to the confirmation of information and collection of evidenced documents necessary for dependency checks are subcontracted to Houken Corporation.
- Health insurance card symbols and numbers, names, birth dates, gender, and address data of those applying for health examinations stored in master databases are provided to Seikokai, a company that coordinates contracted health examinations, and its partner health examination facilities, for use in confirming eligibility and sending examination results.
- For those who use benefits services, health insurance card symbols and numbers, names, gender, and birth dates stored in master databases are provided to Relo Club, Ltd., a contracted service provider, for use in processing service applications.

2. Application forms for claims for cash benefits and other benefits are used in Society operations as outlined below.

- Data is entered into administrative processing computers to verify claims and to ensure fair benefit decisions.
- Data on benefit records is entered and stored for use in verifying later claims.
- Data comprising health insurance card symbols and numbers, names, and addresses from master databases is used to send booklets on childrearing to those claiming the Childbirth and Childcare Lump-Sum Grant through the second childbirth.
- For those claiming the Childbirth and Childcare Lump-Sum Grant or Dependents' Childbirth and Childcare Lump-Sum Grant, data including health insurance card symbols and numbers, names, and dates of birth from master databases is checked

against information from other insurers to ensure fair benefit decisions in order to make adjustments related to duplication of benefits with other insurers.

- Upon receipt of inquiries from other insurers concerning a claim for Injury and Sickness Allowance, responses will be provided concerning whether such a claim has been received or payment of benefits made and the details thereof (name of the injury or illness constituting the grounds for payment, payment period, etc.) after first checking the identity of the inquiring party and obtaining the consent of the claimant.
- For those claiming the Injury and Sickness Allowance, transportation expenses, medical care expenses, and secondary dependent medical costs, Rezept data is used to check claims; in some cases, treatment status and other information are verified with the physician responsible or a visit is made to the hospital to ensure fair benefit decisions.

3. With regard to Rezepts, for claims submitted in CSV format from Health Insurance Claims Review & Reimbursement Services (HICRRS), the original Rezepts or images thereof are stored in a database. These are stored in Society administrative processing computers for use in health insurance operations.

- Member information is provided to allow Health Insurance Claims Review & Reimbursement Services (HICRRS) to correct a Rezept issued by a medical care institution, etc. that indicates a wrong insurer to claim and reflect a proper insurer using the online qualification confirmation system. Re-examination request will be made and member information will be provided by the Society, after inquiring about member information provided by the insurer, to allow Health Insurance Claims Review & Reimbursement Services (HICRRS) to correct a Rezept mistakenly delivered after loss of eligibility and reflect a proper insurer.
- Rezept data is verified; in the event of any doubts concerning claims, HICRRS is asked to undertake a follow-up review.
- If a follow-up review results in the suspicion that an examination was undergone after loss of eligibility, information concerning the person in question, including the name of the Society, health insurance card symbol and number, name, date of birth, date of loss of eligibility, and date of examination is communicated to the medical care institution for the purpose of verification.
- Similarly, information concerning patients scheduled to receive payment of High-Cost Medical Care Benefits, including the name of the Society, health insurance card symbols and numbers, names, and dates of birth is communicated to medical care institutions to verify whether they also receive assistance from public expenditure or

from local governments.

- Rezept data is used to analyze medical care costs for the purpose of moderating the Society's medical care costs and identifying those eligible for follow-up guidance and education on prevention of lifestyle-related conditions following health examinations.
- Rezept data is used in operations subcontracted to Taisho Audit Inc. to identify members examined by multiple medical care institutions during the same month and to provide relevant guidance.
- Decisions concerning payment of High-Cost Medical Care Benefits and additional benefits (Patient Cost-Sharing Reimbursements and Additional Benefits, Total High-Cost Medical Care Additional Sum, and medical care additional sum for dependents) are based on Rezept data.
- Decisions concerning payment of Injury and Sickness Allowance are made by referring to Rezept data.
- Decisions concerning payment of Funeral Expenses and Dependents' Funeral Expenses are made by referring to Rezept data.
- Rezept data is referred to in operations subcontracted to Taisho Audit Inc. to check on and provide guidance related to medical care expenses, including judo therapist expenses and secondary dependent medical costs, and to make decisions concerning payment of benefits.
- The cause of an injury will be inquired to the insured person to confirm whether payment of an insurance benefit is appropriate based on Rezept data.
- Rezept data is used to check on cases in which it appears that medical consultation and treatment paid for by insurance may result from actions involving third parties: for example, traffic accidents. In cases in which insured medical consultation and treatment is provided for injuries due to third-party actions, a copy of the patient's Rezept is submitted to the casualty insurer as proof of medical care costs. Rakuten KENPO subcontracts this series of operations to Taisho Audit Inc.
- Rezept data is output in response to a request for disclosure. If the request for disclosure is made by a person other than the individual in question, such data will be disclosed only if the requesting party is authorized to receive it, in accordance with disclosure request procedures.
- Translations into Japanese of documents such as details of medical care costs paid for those who received overseas medical care will be entrusted to external translators.
- Notification to members of medical care cost information based on Rezept data is subcontracted to the Kansai Institute of Information Systems, a vendor of health insurance management systems.

- Copies of Rezepts and application forms containing a portion of their content are sent to the High-Cost Medical Care Group of the National Federation of Health Insurance Societies (NFHIS) to apply for the joint undertaking for benefits for high medical care costs and receive assistance for medical care costs.
- Processing and analyzing of rezept data is subcontracted to JMDC Inc. to provide personalized information based on individual health status and use it for other health activities.

4. In health activities, information and data are utilized for operations related to the maintenance of the members' health, as follows.

- Provision of health examinations is subcontracted to Medical four clover Co., Ltd. (formerly Seikokai), a company that coordinates contracted health examinations. Members can view health examination results and use an information provision service on Pep Up, a website operated by JMDC Inc. Provision of health guidance based on health examination results is subcontracted to Sompo Health Support Inc., MEDIROM Healthcare Technologies Inc., and Sync Health Ltd.
- Following health examinations, the quantitative data obtained from the health examination service provider is provided to the members and entered into the Society's administrative processing computers and compared with Rezept data for provision of information following health examinations and for use in identifying those eligible for follow-up guidance and education on preventing lifestyle-related conditions.
- The Society provides health examinations jointly with employers. In principle, the employer is also notified of all quantitative results concerning the insured persons identified by the health examinations. The employer and the Society share this data to help manage the health of insured persons (employees).
- Data on results of health examinations are retained in master databases for use as reference points for comparison when conducting health management undertakings and health guidance in the future.
- Data concerning specific health checkup results is registered to the online qualification confirmation system.
- For Influenza Vaccination Subsidy Applications that cover dependents and insured persons with optional and continued coverage, the web-based application system of "Japan System Techniques Co., Ltd." is used to conduct subsidy examination/payment operations.

5. HR data on management and employees, lists of Society Committee members, and lists of employers' personnel responsible.

- Documents related to the appointment and hiring of Society management and employees will be stored under strict security.
- Documents related to the compensation of management and employees will be stored under strict security and used for processing withholding taxes and for other matters.
- Documents related to performance evaluations and other HR matters will be stored under strict security and used in personnel transfers and other activities.
- Lists of Society Committee members and directors will be used to communicate dates and times of Society Committee and Board of Directors meetings and related matters.
- Lists of employers' personnel responsible and contact information will be used for purposes such as communicating information on briefings for employers' personnel responsible, health management promotion committee meetings, and other individual matters.
- The employers' account information is used for electronic withdrawal of insurance premiums, payments of insurance and additional benefits, health project subsidies, and transfers of refunds and other payments.

6. Identifying personal information

Identifying personal information refers to personal information that includes Individual Numbers (Social Security and Tax Numbers; including numbers, codes, or other symbols used in place of Individual Numbers, other than certificate of residence codes).

The Act on the Use of Numbers to Identify a Specific Individual in the Administrative Procedure (“Act” hereinafter) specifies the permitted scope of use of identifying personal information, including coordination of information between parties that carry out administrative operations, such as administrative agencies

(e.g., obtaining information on taxation or non-taxation from municipal governments for use in certification of dependents by a KENPO). Such information may not be used beyond the scope of use specified in the Act.

If the scope of use specified in the Act is exceeded, appropriate measures will be taken, such as redacting or removing Individual Numbers from identifying personal information.

The Society handles tasks such as retention, administration, disposal, and deletion of personal information as outlined below.

(1) For personal information shown on various paper notices, application forms, Rezepts, or other documents, upon completion of input processing, such documents are retained in a safe for the retention period (years) specified in Society document control rules and are not removed from storage except when needed for checking or similar purposes.

Personal information appearing in media other than paper format is retained and administered appropriately in accordance with management and administration rules on retention in media other than paper format.

(2) Paper media containing personal data for which the specified retention period has expired or which is no longer needed because its processing is complete and health insurance cards, as well as the ink ribbons used to print these, will be shredded so as to render it impossible to decipher their content. Disposal of large volumes of personal data is done by dissolving the media. The subcontractors contracted to handle such tasks are Kaname Kogyo Co., Ltd., Mitsui-Soko Business Partners Co., Ltd., and Nihon Purple Co., Ltd.

In addition, in cases such as when disposing of personal computers or magnetic media, data destruction software is used to make any data stored on such devices or media unreadable.

Personal information held by the Society is not used for any purpose other than health insurance activities conducted by the Society.

■ Person responsible for personal information management

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The Rakuten KENPO

Person Responsible for Management, Managing Director

■ Point of contact

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