

## Privacy Policy

[Personal information protection policy]

中川観光開発株式会社 ("Company") will prescribe this Policy, establish a personal information management system, and take responsible measures as a corporation based on its Code of Ethical Practice upon handling the personal information of customers and employees which is required for business operations.

Policy 1: Company will limit the purpose of use of personal information to the extent possible, and properly handle personal information only to the extent required for achieving such purpose of use. Furthermore, Company will take measures for preventing the unintended use of personal information.

Policy 2: Company will acquire personal information according to legitimate and proper methods.

Policy 3: Company will not provide your personal information to third parties without obtaining your consent.

Policy 4: When managing personal information, Company will exert efforts to take necessary and proper measures for preventing the divulgence, loss or damage of personal information and for other security control.

Policy 5: When handling personal information, Company will exert efforts so that the user who provided such personal information can become properly involved with the handling process, and endeavor to maintain such personal information in an accurate and up-to-date manner to the extent possible.

Policy 6: Company will comply with laws and ordinances related to the protection of personal information, formulate internal rules related to the protection of personal information, and continuously review and observe such internal rules.

Policy 7: Company will establish a contact desk for dealing with complaints and consultations related to the protection of personal information, and endeavor to take proper measures.

Company will respect your privacy, exercise extreme care in managing your personal information (as defined below), and thereby handle your personal information.

Company: 中川観光開発株式会社

Representative: 代表取締役 宮下健彦

(Supplementary Provision)

This Policy was formulated and enforced from November 25, 2019.

[Definition of personal information]

The term "personal information" refers to information related to you as an individual which can be used to identify you as an individual due to its inclusion of your name, address, phone number, email address, or any other description. Even if it is not possible to identify you as an individual with such information alone, any information that can be cross-checked against other information and thereby use to identify you as an individual is also included in the term "personal information".

[Purpose of use of personal information]

- The purpose of use of personal information in this Site is as follows. Company will not use your personal information beyond the following purpose of use without obtaining your consent:
  - (1) personal authentication of registered members of this Site and provision of various member services;
  - (2) execution of operations related to "Accommodation Reservation Service" and incidental services to be provided online or via phone;
  - (3) provision of your information and reservation information to Company based your reservation request in (2) above; and

- (4) provision of email service and distribution of information such as various messages to users who have separately agreed to such provision of email service and distribution of information.

Company may create statistical data, which is processed so that it cannot be used to identify individuals, based on the personal information provided by users. Company may freely use such statistical data which cannot be used to identify individuals.

[Arbitrariness of provision of personal information]

The items of personal information which are required for using the various services in this Site are indicated as "Required items" on the registration screen. If you do not enter information in these items, you may not be able to make reservations through this Site or use other services.

[Provision of personal information to third parties]

As a general rule, Company will not provide your personal information to third parties without obtaining your consent. Company will only provide your personal information to third parties upon specifying the recipients and details of the information to be provided, and obtaining your consent; provided, however, that, in the following cases, Company may provide your personal information without obtaining your consent to the extent that such provision is not in violation of laws and ordinances:

- A. you determine that the provision of your personal information may cause disadvantage to third parties;
- B. there is a special need for providing your personal information in order to improve public health or promote healthy child development, and it is difficult to obtain your consent;
- C. it is necessary to provide your personal information in order to cooperate with a national government organ, local government, or person or business operator entrusted thereby with performing the affairs prescribed by laws and regulations, and obtaining your consent is likely to interfere with the performance of those affairs;
- D. court, public prosecutor's office, police or any other organ with equivalent authority demands the disclosure of your personal information;
- E. you expressly request the disclosure or provision of your personal information to a third party;
- F. disclosure or provision of your personal information is permitted under laws and ordinances; or
- G. your personal information is provided pursuant to the succession of business based on merger or other reasons, and your personal information is handled within the scope of purpose of use before such succession of business.

[Scope of third parties]

In the following cases, the recipient of personal information shall not correspond to a third party:

- (1) Company outsources a part or all of the handling of your personal information to the extent required for attaining the purpose of use (Company will be responsible for the handling of your personal information by the outsourcee); and
- (2) your personal information is provided pursuant to the succession of business based on Company's merger or other reasons.

[Outsourcing of handling of personal information]

Company may outsource a part or all of the services related to the handling of personal information. Company will be responsible for the handling of personal information by the outsourcee.

[Change, etc. of personal information]

As a general rule, only you can request the disclosure, correction or discontinuation of use of your personal information. If you are registered as a member of this Site, you can peruse, change or delete your personal information at any time via the internet. Other users may contact Company's contact desk; provided, however, that Company may refuse to disclose your personal information if such disclosure may cause damage to the life, body, property or other rights and interests of users or third parties, or may considerably hinder the proper service operation of this Site, or will otherwise be in violation of laws and ordinances. Furthermore, if considerable expenses are required for the discontinuation of use of personal information or the suspension of provision of personal information to third parties (collectively, "Discontinuation of Use, etc.") or it is otherwise difficult to carry out such Discontinuation of Use, etc., and Company will take alternative measures required for protecting your rights and interests, Company may refuse your request for Discontinuation of Use, etc.

[Accuracy of personal information]

While this Site will endeavor to accurately process your personal information, you are responsible for making sure that your personal information is accurate and up-to-date.

[Restriction on acquisition of sensitive personal information]

As a general rule, this Site will not acquire personal information containing the following subject matter; save for cases where you personally provide such personal information:

- (1) matters related to thoughts, beliefs and religions;
- (2) matters related to race, ethnic group, lineage, legal domicile (excluding information related to prefectural location), body, mental disorder, criminal record, or other matters that may cause social discrimination;
- (3) matters related to workers' right to organize, collective bargaining and other group actions;
- (4) matters related to participation in group demonstrations, exercise of right of petition, and exercise of other political rights; and
- (5) matters related to healthcare and love life.

[Management of personal information]

Company is exerting efforts for taking proper security measures to prevent the loss, misuse and falsification of personal information under its control. Company will store personal information in a secure environment that cannot be accessed by general users.

[Identity verification]

Company will verify your identity based on information that can be used for identifying you as an individual (name, address, phone number, date of birth, email address, member number, etc.) when complying with your request of disclosure, correction, deletion or discontinuation of use of your personal information; provided, however, that Company will not be liable in cases where a person other than yourself acquires and uses information that can be used for identifying you as an individual.

[Use of statistically processed data]

Company may create statistical data, which is processed so that it cannot be used to identify individuals, based on the personal information provided by users. Company may freely use such statistical data which cannot be used to identify individuals.

[Cookies, etc. among attribute information, terminal information, position information, action history, etc. (collectively, "Action History, etc.")]

Company will use Cookies for the protection of your privacy, improvement of user-friendliness, distribution of advertisements, and acquisition of statistical data. Furthermore, through use of technologies such as Cookies and JavaScript, this Site may acquire attribute information such as age, gender, occupation and residential area, in which the individual cannot be identified, among the information that you provided (limited to information in which the individual cannot be identified even when such information is combined) and terminal information, your action history in this Site (accessed URL, contents, order of reference, etc.), and position information based on your approval and application upon the use of your smartphone. Matters regarding Cookies are separately described in "Use of Cookies".

[Business operator in charge of personal information protection]

Business operator: 中川観光開発株式会社 望岳荘

Personal information protection administrator: 藤井邦彦

[Contact desk]

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