

# Privacy Policy

Our corporate mission is to create a world filled with smiles by inspiring encounters among people around the world. To achieve this end, in our travel and travel-related services businesses we will continue to tell stories that inspire, that bring a smile, and that foster confidence.

Believing that protecting the personal information of our customers and all those affiliated with our company is a major responsibility as we put our mission into practice, in addition to declaring our intent to take all possible measures to protect personal information based on the amended Act on the Protection of Personal Information, the Act on the Use of Numbers to Identify a Specific Individual in the Administrative Procedure, and the Specific Personal Information Protection Assessment Guidelines enacted by the Japanese Government, the General Data Protection Regulation (GDPR) enacted by the European Union, and other laws and regulations, we will engage in the following efforts:

## 1. Name, address, and name of representative of the business operator

Kinki Nippon Tourist Corporate Business Co., Ltd.  
1-13 Kandaizumi-cho, Chiyoda-ku, Tokyo  
101-0024 Japan  
President Yuji Takagawa

## 2. Collection and use of personal information

We will acquire and use personal information by appropriate means, taking into account the nature and scale of our business. When obtaining personal information, we will specify the purpose of use and obtain the express consent of the relevant person as necessary. In addition, we will establish an in-house management system and take safety measures to prevent the use of personal information beyond the scope of the purpose of use, except with the consent of the relevant person or as permitted by law.

## 3. Matters relating to safety management measures for personal information

We will carefully manage personal information and will not disclose or provide/transfer such data to third parties except in cases where the customers have given their consent.

We will also implement safety measures and take corrective action to prevent personal information from being leaked, lost or damaged. The details of these measures are as follows:

### (1) Formulation of the basic policy

- In order to ensure the proper handling of personal data, we have formulated this policy with regard to “Observance of laws and norms”, “Matters relating to safety management measures for personal information”, “Handling of complaints and inquiries”, etc.

### (2) Development of disciplines regarding the handling of personal data

- The Personal Information Management Implementation Regulations have been established for each stage, including acquisition, use, storage, provision, deletion, and disposal, with respect to the handling methods, responsible persons, persons in charge, and their duties, in order to establish disciplines for the handling of personal data.

### (3) Systematic security control measures

- Concerning the handling of personal data, we have appointed the top officer, the personal information manager, the internal audit manager, and the department personal information managers. We have also clarified the employees who handle

personal data, their roles, and the scope of personal data handled by such employees, and have established a system to report to the personal information manager in the event that any facts or signs of violation of the Act on the Protection of Personal Information, the Personal Information Management Implementation Regulations, and other internal regulations, are identified.

- We conduct periodic self-inspections of the status of the handling of personal data and conduct audits by other departments.

(4) Human security control measures

- We regularly train employees on matters of concern regarding the handling of personal data.
- Matters concerning the confidentiality of personal data are described in the Work Rules.

(5) Physical security control measures

- In areas where personal data is handled, employees are controlled to enter and leave the premises, and measures are taken to prevent unauthorized persons from viewing personal data.
- We control devices, electronic media, and documents that handle or contain personal data to prevent theft or loss, and take measures to prevent leakage when carrying such devices, electronic media, etc.

(6) Technical security control measure

- We limit the information systems and devices that can handle personal information databases, etc., and the employees who can use such information systems and devices.
- We have introduced a mechanism to protect information systems and devices that handle personal data from unauthorized access from outside sources or from unauthorized software.

(7) Understanding of the external environment

- In view of the fact that the privacy protection system in some countries is less strict than the provisions of the Act on the Protection of Personal Information of Japan, we conclude an outsourcing contract with land operators and other contractors requiring them to comply with the eight principles of OECD Privacy Guidelines.

4. Observance of laws and norms

We will abide by laws that apply to the personal information held by us, guideline and other norms enacted by each nation and region.

5. Handling of complaints and inquiries

We have established a system and procedures for accepting and handling inquiries and complaints with respect to the personal information held by us and will respond to them promptly. The contact point for inquiries and complaints regarding the handling of personal data held by us is as below.

[Contact point for opinions and inquiries about personal information]

General Manager

Administration Department Insurance Department

Kinki Nippon Tourist Corporate Business Co., Ltd.

1-13 Kandaizumi-cho, Chiyoda-ku, Tokyo 101-0024, Japan

Telephone Number: 03(6891)9311

Business Hours: 9:30 a.m. to 5:00 p.m. (Closed on Saturdays, Sundays, national holidays, substitute holidays, and December 29 through January 3)

6. Continuous improvement of management system and mechanisms for protection of personal information

We will carry out continuous improvement of our management system and mechanisms for the protection of personal information.

January 1, 2013 Enacted

January 1, 2015 Revised

September 28, 2015 Revised

April 1, 2018 Revised

October 1, 2021 Revised

April 1, 2022 Revised

Kinki Nippon Tourist Corporate Business Co., Ltd.

President Yuji Takagawa

(For EU residents)

[Processing of EU Personal Data](#)

[Consent Form of Acquiring EU Personal Data](#)

[Application Form of Request of Disclosure, etc. of EU personal data](#)

Note : This application is accepted only by airmail.

< Inquiry Desk >

General Manager

Administration Department Insurance Department

Kinki Nippon Tourist Corporate Business Co., Ltd.  
1-13 Kandaizumi-cho, Chiyoda-ku, Tokyo 101-0024, Japan

Phone number: +81-3-6891-9311

Reception hours: 9: 30 ~ 17: 00 (excluding weekends, holidays and from 29 Dec. to 3 Jan.)

E-mail: ecc-somu@or.knt.co.jp