

## Processing of EU Personal Data

In order to strictly protect customers' information (hereinafter referred to as "EU personal data"), Kinki Nippon Tourist Co. Ltd. (hereinafter referred to as "this company") is implementing the following measures.

1. Measures for protecting customers' EU personal data
  - (1) This company will manage customers' EU personal data appropriately.
  - (2) This company has a security manager for each department that manages customer's EU personal data, and the manager properly manages the customer's EU personal data.
  - (3) The data this company acquires from customers is the customer's EU personal data which is necessary for providing the services such as customer's name, e-mail address, telephone number, address. This company may ask other questions for the purpose of providing customers with the desired services; however, this will be offered by the customer arbitrarily except for the minimum necessary items.
  - (4) <For inquiries and consultation >  
Depending on the contents of inquiry and consultation (hereinafter referred to as "consultation"), this company may notify third parties of EU personal data of customers in advance with consent. For example, if the contents of inquiries are not handled by this company, it is a case to confirm with the group company which handles this matter.
  - (5) <For application>  
Depending on the type of service, this company may notify third parties of EU personal data of customers; for example, when notifying the customer's name and other information needed for shipping and accommodation agencies.
  - (6) In order to strictly store customers' EU personal data, this company has established internal rules and has been conducting education for employees and audit related to the protection of EU personal data on the regular basis.
  - (7) In the case where customers wish to inquire or modify their own EU personal data, this company will respond within a reasonable range after confirming the customers' identification.
  - (8) On this company's website, this company may use "cookie" to provide better service, but this company does not acquire any data to identify individuals by this. "Cookie" is a function to store on the computer of the person who viewed the website. Although it is possible to refuse receipt according to the settings of the browser, some of the services

may not be available by this.

- (9) This company will comply with the laws and regulations applicable to customer's EU personal data, and this company will review and improve these efforts as necessary. In connection with the occurrence of incidents, this company may cooperate in the publication of EU personal data due to the provision of data at the time of police investigation and requests from relevant organizations.

2. The purpose of processing EU personal data acquired from customers

< For inquiries and consultation >

This company will use EU personal data provided during inquiries and consultation for contacting with customers. In addition, in the content of customer's inquiries and consultation, this company may use it within the necessary range for contact and confirmation with the related organizations.

<For application>

For EU personal data provided at the time of travel application, in addition to using it for contacting customers, this company will use it within the range necessary for the arrangement and receipt of services provided by transportation and accommodation organizations on customer's travel.

In addition, this company may use customer's EU personal data at this company and dealers in order to develop better travel products and inform customers about the information on travel products, as well as the damage insurance of each company which is entrusted by each insurance company, and to provide incidental and related services.

Providing EU personal data is essential for fulfillment of the contract, and if customers cannot provide EU personal data on their own judgment, provision of service to customers and so forth may be interfered and it may cause damage or loss.

3. For the conditions of handling of EU personal data

This company shall deal with EU personal data only if this company obtains consent from the customer and in any one of the following cases.

- (1) When handling is necessary for the performance of the contract where the customer is a party concerned (e.g., in the case where to notify customer's information such as address to the hotel to arrange a hotel designated by customer).

Or when handling is necessary according to customer's request before the contract is concluded.

- (2) When handling is necessary to comply with the legal obligation that this company shall abide by (When following information disclosure orders based on laws from government

agencies, etc.).

- (3) When handling is necessary to protect the serious interests of customers or other individuals (e.g., in the event that the life of customer or accompanying person falls into a serious crisis due to an accident during the trip, provide customer's or accompanying person's data to relevant organizations such as police and hospitals).
- (4) When it is deemed appropriate to investigate, prevent, or take measures against illegal acts or suspicious acts.

4. For the special categories of EU personal data

In order to carry out various procedures concerning customers' travels, and to manage the itinerary for participation in special tours (extreme tour such as Antarctica, and climbing tours), in principle, this company shall obtain consent from the customer in advance, and acquire, use, relocate customers' special categories of EU personal data (health condition, physical characteristics, etc.) within the necessary scope of purpose. The EU personal data shall not be processed other than for this purpose.

5. For international transfer of EU personal data

EU personal data may be stored in servers after they are transferred to the group companies and outsourcing contractors, etc. in Japan. Japan has not been determined to be adequacy on data protection from the European Commission, however this company shall manage customer's EU personal data appropriately.

6. For safety management measures

In order to properly manage the EU personal data of customers, and prevent from leakage, loss or damage of EU personal data and so forth, this company shall implement technical and physical / organizational / personal safety management measures for them.

7. Joint Use of EU Personal Data

EU personal data received from customers will be jointly used only for the following purposes.

<For inquiries and consultation >

Among EU personal data provided by customers for inquiries and consultation, this company will jointly use items within the minimum range necessary for contacting and responding to customers such as name, telephone number and address, with the group companies listed below.

<For application>

This company may use EU personal data this company holds jointly with the group companies for the purpose of product development, promotion such as product guidance, and contact or response to customer and so forth.

Regarding joint use of EU personal data with group companies, this company will define the scope of responsibility for handling EU personal data and inquiry contact clearly.

EU personal data used jointly by the group companies

Address, Name, Phone number, Age, Date of birth, Sex, Item purchase history, E-mail address, and Passport number

Group companies

KNT-CT Holdings Co., Ltd.	Kinki Nippon Tourist Blue Planet Co., Ltd
Kinki Nippon Tourist Okinawa Inc.	Tourist Experts Inc.
United Tours Co., Ltd.	KNT Business Create Co., Ltd.
Event & Convention House, Inc.	and other Group Companies

8. EU personal data provided by customers will be transferred only for the following purposes.

<For inquiries and consultation >

In order to respond to customer inquiries and consultation, this company may transfer customers' EU personal data to transportation and accommodation organizations (including organizations overseas) within the range necessary.

<For application>

This company will transfer customers' EU personal data to transportation and accommodation organizations (including organizations overseas) within the range necessary.

In addition, for the convenience of customers' shopping at the travel destination, etc., this company will transfer the customer's EU personal data to the organizations such as the duty free shop of the destination. In this case, this company will relocate EU personal data related to customer's name, and passport number sent by electronic method, etc.

This company shall transfer customer's EU personal data to group companies and outsourcing contractors, etc. that have subcontracted. This company shall request proper handling of the transferred EU personal data to the corresponding outsourcing contractor, and this company also shall properly manage it accordingly.

9. Customer's EU personal data will be kept for 2 years and then properly erased and

discarded.

#### 10. For the customer's rights

Customers have the following rights regarding EU personal data concerning themselves.

- (1) Right to know customer's EU personal data and relevant information
- (2) Right to correct the incorrect EU personal data concerning customers without undue delay
- (3) Right to eliminate EU personal data on customers without undue delay
- (4) Right to restrict handling of EU personal data concerning customers
- (5) Right to receive EU personal data provided by customers in a general format that computer is readable, and the right to relocate (shift) the EU personal data to the management of other organizations without disturbing
- (6) Right to object to public interest or handling for the interests of this company or third parties and handling for direct marketing for EU personal data of the customers
- (7) Right to not undergo assessment / decisions that have serious impact including legal effects on individuals through automatic processing such as profiling etc.  
\*This company does not perform profiling.

#### 11. Liability

Use of this website is at customers' own responsibility.

With respect to all damages caused by the use of various information acquired from this website and other web pages with links to this website, Kinki Nippon Tourist Corporate Business Co. Ltd. assumes no responsibility.

#### 12. Governing law

This homepage is under the control of Kinki Nippon Tourist Co. Ltd. This homepage can be accessed from all countries of the world with different laws; however, both the customer who accessed this homepage and Kinki Nippon Tourist Co. Ltd., agree to be bound by the laws of Japan concerning the use of this website regardless of the difference in legal principle.

Also, Kinki Nippon Tourist Co. Ltd. will not describe or display anything such as whether the content of this homepage is appropriate in the customer's environment on this page. Access to this homepage is based on the customer's free will and the customer shall be responsible for the use of this page.

### 13. Data Protection Officer

As a group data protection officer (DPO), this company and group companies have appointed director in charge of general affairs department of KNT-CT Holdings Co., Ltd.

The contact information of the data protection officer is as follows.

Director in charge of general affairs department

KNT-CT Holdings Co., Ltd.

2-6-1, Nishi-Shinjuku, Shinjuku-ku, Tokyo Japan 163-0236

Phone number: +81-3-5325-8512

E-mail: [privacysomu@or.knt.co.jp](mailto:privacysomu@or.knt.co.jp)

For inquiries regarding this matter, please contact the inquiry desk below.

< Inquiry Desk >

EU Personal Data Management Officer

General Manager of General Affairs Department

Kinki Nippon Tourist Co.,Ltd.

Shinjuku-Sumitomo Bldg, 36F

2-6-1, Nishi-Shinjuku, Shinjuku-ku, Tokyo Japan 163-0236

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

E-mail: [knt-kanri-somu@or.knt.co.jp](mailto:knt-kanri-somu@or.knt.co.jp)