

Keio Prelia Hotel Kyoto Privacy Policy

Established March 31, 2019

Revised April 1, 2022

Revised September 29, 2023

Keio Prelia Hotel Kyoto Co., Ltd. (“we” or “us”), as a member of the Keio Group, which aims to become the “Top Brand in Trust” as set forth in the Keio Group Philosophy, considers the protection of personal information an important social responsibility. We carry out appropriate procedures when we handle personal information by placing our relationship of trust with our customers first and foremost. We have therefore set out our privacy policy (“Policy”) as stated hereinafter for protecting personal information.

In compliance with Japan’s Act on the Protection of Personal Information (Personal Information Protection Act) and related laws and guidelines, and in accordance with this Policy, our executives and employees endeavor to handle and manage personal information properly.

1. Personal Information, etc. to be Obtained

The personal information, etc. that we obtain and retain includes the following.

- (1) Basic information on customers, etc. (name, address, gender, date of birth, e-mail address, telephone number, fax number, etc.)
- (2) Additional information on customers, etc. (occupation, place of employment (company name, address, department/position), family information, membership information of various membership organizations, etc.)
- (3) Service use information (status and details of facility and service use, status and details of product purchases, reservation and application methods and details, status and details of campaign applications, status and details of payments, etc.)
- (4) Details of inquiries, opinions, and requests (telephone calls, e-mail, written communications, survey responses, reviews, contact information, etc.)
- (5) Information automatically collected via the website/application (IP address, cookies, location information, browser type, access date and time, etc.)
- (6) Other information on customers, etc. collected and retained in the course of transactions, etc.

2. Purpose of Use of Personal Information

We use personal information for the following purposes.

- (1) Personal information obtained from customers, etc.

- a. Registering customer information according to laws and regulations
- b. Providing services related to our business and services, and performing transactions in general
- c. Sending information about various special offers, product plans and events
- d. Providing services for member organizations we offer
- e. Responding to opinions, requests, and inquiries we receive
- f. Understanding and analyzing the usage of the services we provide, and improving our services
- g. In addition to the above, providing information related to the Group's business
- h. Other operations incidental or related to the above purposes of use

(2) Personal information obtained from employees, applicants for employment, retirees, and their families

- a. Providing recruitment-related information, operations related to recruitment (identity verification, checking of application history), and procedures for joining the company
- b. Operations related to employment management (including secondment and transfers)
- c. Services related to payment of salaries and other benefits, welfare and health management, etc.
- d. Post-retirement procedures
- e. Procedures, communications, etc. required by laws and regulations
- f. Other necessary business procedures, communications, etc.

3. Shared Use of Personal Information

We may share the personal information of our customers, etc. as follows.

(1) Items of personal data to be shared

- a. Information listed in 1. *Personal Information, etc. to be Obtained*
- b. Information on business cards, including name, company name, address, postal code, telephone number, and e-mail address

(2) Purpose of shared use and scope of shared users

	Purpose of shared use	Scope of shared users
(1) a of this article	Purposes stated in 2. <i>Purpose of Use of Personal Information</i>	Keio Prelia Hotel Sapporo
(1) a of this article	We analyze the attribute information and service usage history of customers, etc., and use it for the following purposes. a. Improvement and enhancement of services and products b. Examination of measures based on	Keio Group companies (click here for details)

	<p>data, measurement of effectiveness</p> <p>c. Study of area strategies and new store openings, comparison of human flow, understanding of customer trends</p>	
(1) b of this article	<p>a. Notification, communication, information sharing, etc. in the course of business related to 2. <i>Purpose of Use of Personal Information</i></p> <p>b. Provision of information on products and services handled by Keio Group companies</p>	Keio Group companies (click here for details)

(3) Persons responsible for the management of personal data to be shared

- a. Scope and purpose of shared use of personal data in (1) a of this article
Keio Prelia Hotel Kyoto Co., Ltd. (click [here](#) for the address and name of the representative)
- b. Scope and purpose of shared use of personal data in (1) b of this article
 - (i) Cases in which data is shared by our company and Keio Group companies
Keio Prelia Hotel Kyoto Co., Ltd. (click [here](#) for the address and the name of the representative)
 - (i) Cases in which data is shared by Keio Corporation and Keio Group companies
Keio Corporation (click [here](#) for the address and the name of the representative)

4. Cookies

Cookies are used for some content on the website and application we provide (the “website, etc.”). A cookie is a small text file sent to the device or web browser of a customer or other user of the website, etc. for recording purposes. Cookies identify customers’ devices and web browsers, but they do not identify customers as individuals.

(1) Purpose of use of cookies

We use cookies for the following purposes.

- a. To perform statistical analysis to understand how the website, etc. is used and to improve the structure and content of the website, etc.
- b. To analyze or statistically process the collected information and to provide better services that are closer to the interests and needs of customers, etc.
- c. To analyze or statistically process the collected information and to provide information on services, etc. to customers, etc. based on this information, or to conduct sales promotion activities

(2) Disabling cookies

It is possible to disable cookies (“opt-out”).

If you wish to opt-out, please visit the opt-out page of each service provider. Cookies are set by each browser.

If you use a different browser, delete cookies, or change your PC or smartphone after opting out with your current browser, you will need to opt-out each time.

Please note that if you disable cookies, some functions of the website, etc. may be limited.

If you opt-out, the use of cookies for advertising will be stopped, but this does not mean the ads themselves will no longer be displayed.

(3) Information to be sent, destination and purpose of use

a. Essential cookies

Essential cookies are required to provide services to customers, etc., such as maintaining login functions. As described in (2) above, it is possible to block essential cookies by changing the settings of your browser, etc., but some functions may be restricted.

b. Performance cookies

Performance cookies are used to collect information about the usage of websites, etc. Google Analytics provided by Google Inc. is used to monitor access to certain content on the website, etc.

For information about the collection and handling of information by Google Analytics cookies, as well as Google Inc.’s intended use and terms of use, privacy policy, and opt-out option for the services it provides, please see the following pages.

[Google Analytics Terms of Service](#)

[Google Privacy Policy](#)

[Google Analytics/Google Tag Manager Opt-Out](#)

c. Targeting cookies

Targeting cookies are used for marketing purposes, such as optimizing the content of websites, etc. and targeted advertising. Targeting cookies record information about access to websites, etc., and attribute information at the time of login. Our website, etc. may use the following targeting cookies for the purpose of delivering advertisements, etc. For information on opting out of each social media outlet that may set cookies, please see the following pages.

Google Inc.: [Opting out of displaying personalized ads](#)

Yahoo Japan Corporation: [About opt-out](#)

Meta Platforms, Inc. (Facebook and Instagram): [How can you control your information](#)

X Corp. (X): [Privacy restrictions on personalized advertising](#)

LINE Corporation: [Opt-out of behavioral targeting advertising by LINE Corporation](#)

5. Security Control Measures

We have taken the following measures to prevent leakage, loss or damage of personal information, and to manage personal data appropriately.

(1) Establishment of a basic policy

- a. We have established this basic policy to ensure the proper handling of personal information and to inform you of the point of contact that handles questions and complaints.

(2) Maintaining discipline regarding the handling of personal data

- a. We have established personal information protection rules that stipulate the roles and responsibilities of managers responsible for the handling of personal information and the personnel who handle it as well as the handling methods for each stage such as acquisition, use, storage, provision, deletion and disposal.

(3) Organizational security control measures

- a. We have appointed managers (a compliance officer and compliance leader) responsible for the handling of personal data.
- b. Personnel who handle personal information are limited to the minimum necessary.
- c. We have prepared a system to report to compliance leaders when someone is aware of the fact or signs of a violation of laws and internal regulations, the occurrence of leaks, etc.
- d. We regularly conduct self-inspections on the status of the handling of personal information, and conduct audits by other departments and external parties.

(4) Human security control measures

- a. We conduct employee training on matters to note regarding the handling of personal information.
- b. We have described matters related to confidentiality of personal information in our rules of employment.
- c. We obtain a pledge from employees to protect personal information.

(5) Physical security control measures

- a. We take measures to prevent theft or loss of devices, electronic media, documents, etc. used in the handling of personal information.
- b. We have introduced a remote wipe system in case of theft or loss, to supplement limits on devices and electronic media being carried out of the workplace.
- c. We use pulverization to dispose of electromagnetic recording media and shredding and

dissolving for documents used for handling personal information.

(6) Technological security control measures

- a. We set access controls to limit the personnel who handle personal information and the scope handled.
- b. We have introduced systems to restrict access to our corporate network and to protect against unauthorized external access and malware.
- c. We monitor and manage the operation history of devices used to handle personal information and restrict inappropriate operations.

(7) Understanding the external environment

- a. When handling personal information outside Japan, we implement security control measures based on a proper understanding of the regulations for the protection of personal information in the country concerned.

6. Provision of Personal Information to Third Parties

We do not provide personal information to third parties without obtaining your consent, except where permitted by law.

7. Outsourcing

We may outsource operations related to the provision of accommodation and ancillary services, the sending of notifications to customers, business partners, and job seekers, the implementation of campaigns, and the analysis of information such as purchase histories to a third party. In these cases, we conduct necessary and appropriate supervision of the contractor in accordance with the Personal Information Protection Act.

8. Pseudonymously Processed Information

We create pseudonymously processed information so that customers cannot be identified unless collated with other information, and analyze it for the purpose of developing new products and services.

We take measures for the secure management of pseudonymously processed information in compliance with relevant internal rules.

9. Requests for Disclosure, etc., of Retained Personal Data

When a request for disclosure of retained personal data is received from you or your agent, we respond without delay, except in the cases indicated below. Furthermore, if we will not disclose it or if the retained personal data does not exist, we respond to that effect.

- a. When there is a risk of harming the life, body, property or other rights and interests of you or a third party
- b. When there is a risk of causing a significant hindrance to the proper execution of our business
- c. When doing so would violate the law
- d. We will also respond in accordance with the law after investigating requests from you or your agent for correction, addition or deletion of the retained personal data, discontinuation of its use, erasure, or discontinuation of provision to third parties.

To find out the documents to be submitted when requesting disclosure, etc., how to make the request, and how we will confirm that the person who requested disclosure, etc., is you or your agent, please contact us by postal mail or telephone using the contact information regarding personal information protection given below.

10. Website-Related Matters

This Site is operated with diligence to ensure proper handling and protection of personal information in accordance with this Policy so that all users may use this Site comfortably and safely. However, we are not responsible for the security of users' personal information on third-party websites linked to this Site.

We recommend that you carefully examine the contents of the handling standards for personal information protection on websites other than ours, and if there are no handling standards, we recommend that you check the safety of your personal information by directly checking with the department or person in charge of the pertinent website.

11. Privacy Policy Revisions

Important revisions to this Policy will be announced on this Site. We may revise this Policy without notice, however, so please confirm the latest version on this Site. Please note that we shall bear no responsibility for any issues caused by failure to confirm the Policy in advance.

12. Inquiries on Our Privacy Policy

For inquiries regarding our handling of personal information, please contact us by postal mail or telephone using the contact information below.

*Please note that we cannot accept any requests from direct visits to the company.

Personal Information Management Department, Keio Prelia Hotel Kyoto Co., Ltd.

396 Gojo Karasuma-cho, Karasuma-dori Matsubara-sagaru, Shimogyo-ku, Kyoto 600-8418

Tel: +81-75-352-5111

Hours: Weekdays 9:30 a.m. to 12:00 noon, 1:00 p.m. to 6:00 p.m. (excluding Saturdays, Sundays,

public holidays, and the New Year's holiday)

Osamu Yoshida, Chief Executive Officer

Keio Prelia Hotel Kyoto Co., Ltd.

396 Gojo Karasuma-cho, Karasuma-dori Matsubara-sagaru, Shimogyo-ku, Kyoto