

# Keio Prelia Hotel Kyoto Privacy Policy

Established June 19, 2018

Revised April 1, 2022

KEIO PRELIA HOTEL KYOTO INC. (“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.

If you are a resident of the European Economic Area (EEA), please also see Appendix 1, Additional Provisions Applicable to Processing of Personal Information of EEA Residents.

## 1. Purpose of Use of Personal Information

### (1) Personal information of customers

We use the personal information provided by customers for the following purposes.

- a. Registering customer information according to laws and regulations
- b. Sending newsletters, information about various special offers, product plans and events
- c. Providing services for member organizations we offer
- d. Responding to opinions, requests, and inquiries we receive
- e. Providing other general services

In addition, we analyze the personal information provided by customers and use it for the following purpose.

- a. Statistical information on usage trends, development of new products and customer satisfaction surveys, but without identifying particular individuals

### (2) Personal information of business partners

We use the personal information provided by business partners for the following purpose.

- a. To complete and manage transactions related to our business and services

### (3) Personal information of job seekers

We use the personal information provided by job seekers for the following purposes.

- a. To provide employment information, screen candidates for employment, confirm identity, confirm application history, and provide information on employment procedures
- b. For employment management after joining the company

## 2. 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, etc.

### (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.

3. 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.

4. 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.

5. Acquisition, Use, and Provision of Information Linked to Identifiers such as Cookies

Cookies are textual information sent from a website and stored in your web browser when you visit a website. A web beacon is a mechanism to send information when you view a web page or an email by embedding a small image in the web page or email. The website we operate (“this Site”) stores and uses customer information using cookies, web beacons or similar technologies (“cookies, etc.”).

We provide identifiers stored in cookies, etc., to ad delivery service companies and use them for

ad delivery.

With your consent, we acquire the web browsing history collected by cookies, etc., and the analysis results from a data management platform (DMP) operated by a third party, and use it for the purpose of ad delivery, etc., after connecting it to your personal data.

In addition, this Site uses Google Analytics provided by Google to understand the usage status of the website for the purpose of improving the hotel's services. Google Analytics uses cookies to collect information without identifying you personally. The collected information is managed in accordance with Google's privacy policy, and we use it to understand customers' usage of this Site, and aggregate and analyze it to improve services and products, and we do not use it for any other purpose. For more information about Google Analytics' terms of use and privacy policy, please visit the Google Analytics site. Also, we shall not be liable for any damages caused by the use of Google Analytics' services.

#### 6. 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.

#### 7. 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

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.

#### 8. 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.

#### 9. 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.

#### 10. 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 INC.

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 INC.

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

## **Appendix 1**

### **Additional Provisions Applicable to Processing of Personal Information of EEA Residents**

For individuals residing in the EEA, this Appendix outlines certain additional information that KPH is obligated to provide to you, as well as certain rights you have with respect to the processing of your personal information, based on the General Data Protection Regulation (GDPR). This Appendix will control to the extent it conflicts with any provision in the main body of this Policy.

#### **1. Processing of Personal Information**

The purposes, the categories and the sources of personal information that we handle, and the provision of the customer's personal information to third parties are set out in articles 1 through 6 of the Policy.

#### **2. Legal Basis**

We process customer's personal information based on the customer's consent in principle. The processing of personal information in the absence of the customer's consent shall be based on the necessity for the performance of the contract with the customer, the necessity to take steps at the request of the customer prior to entering into a contract, the necessity for the purposes of the legitimate interests pursued by us or a third party, or the necessity for compliance with a legal obligation to which we are subject. The legitimate interests pursued by us or a third party include an increase in operating income from marketing and improvement of services, and improvement of the convenience, security, etc. of our website.

#### **3. Transfer of Personal Information to a Third Country.**

For the purposes of fulfilling the contract with the customer, or for taking procedures according to the customer's request prior to entering into a contract, personal information acquired outside Japan will be transferred to Japan. We handle the customer's personal information with appropriate security and confidentiality measures.

#### **4. Retention Period**

We retain personal information for the period necessary to accomplish its purpose of processing. Following the retention period, we eliminate or anonymize such personal information in a secure way within a reasonable period of time.

## **5. Customer's Rights**

You have the following rights with respect to us based on laws and regulations. A customer may exercise these rights by contacting the Inquiry Desk for Personal Information stated in article 11 of the Policy. In the event that you exercise these rights, we will respond in good faith, barring statutory exceptions, after confirming that the requesting person is the person in question.

- ① The right of access The right to obtain confirmation as to whether or not personal information concerning you is being processed, and where that is the case, access to the personal information and the accompanying information
- ② The right to rectification The right to obtain the rectification of inaccurate personal information concerning you
- ③ The right to erasure The right to obtain the erasure of personal information concerning you in certain cases
- ④ The right to restriction of processing The right to obtain restriction of processing in certain cases
- ⑤ The right to object to processing The right to object the processing of personal information based on the purposes of the legitimate interests pursued by us or third parties.
- ⑥ The right to data portability The right to receive the personal information concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us.

## **6. Withdrawal of Consent**

You can withdraw consent on the processing of your personal information at any time. Withdrawing consent does not affect the lawfulness of the processing based on consent before the withdrawal. You can withdraw consent by contacting the Inquiry Desk for Personal Information stated in article 10 of the Policy.

## **7. Lodging a Complaint with an Authority**

Customers have the right to lodge a complaint on the processing of their personal information with the protection authority having jurisdiction over their residence.

## **8. Personal Information Necessary for Accommodations**

We require the following information to provide accommodation services to our customers. In particular, the laws of Japan require that we keep the information on the hotel register for three years. Should you be unable to provide the required information, we may not be able to

provide you with accommodation services.

- ① Basic information (name, telephone number, etc.)
- ② Hotel register items (name, address, occupation, nationality, passport number, sex, age, etc.)

#### **9. Personal Information from Children**

A guardians consent or permission must be obtained in the event that a customer under the age of 16 uses our service and consents to the Policy.

#### **10. Automated Individual Decision-Making, including profiling**

We do not make decisions based solely on automated processing, including profiling.