

## GDPR Privacy Policy

In order to strictly protect customer's information, our company is implementing the following measures.

### 1. Measures for protecting personal data

- (1) Our company will manage personal data appropriately.
- (2) Our company has a security manager for each department that manages personal data, and the manager properly manages the personal data.
- (3) Our company will strive to have employees and transaction partners take the precautions that are necessary for personal information protection.
- (4) The data that our company acquires from customers is the personal data which is necessary for providing the services such as customer's name, telephone number, address, e-mail address. Our 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.
- (5) Our company may notify third parties of the personal data of customers in advance with consent.
- (6) In order to strictly store personal data, the company has established internal rules and has been conducting education for employees and audit related to the protection of personal data on the regular basis.
- (7) In the case where customers wish to inquire or modify their own personal data, our company will respond within a reasonable range after confirming the customer's identification.
- (8) Our company will comply with the laws and regulations applicable to the personal data and our company will review and improve these efforts as necessary.

### 2. Purpose of processing personal data acquired from customers

Our company will use the personal data within the necessary range which provided during inquiries, consultations, and travel applications for contact with customers, as well as contacting and confirming related organizations in the content of customer inquiries.

In addition, we will use it within the necessary range for arranging and receiving services provided by transportation and accommodation agencies in the travel customers apply for.

Providing personal data is essential for fulfillment of the contract, and if customers do not provide personal data, travel service may be hindered.

### 3. Conditions for handling personal data

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

- (1) When handling is necessary for performance of the contract where the customer is a party concerned (e.g. in the case where to notify customer's information such as customer's name to the designated transportation and accommodation organizations).

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 our 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 deemed appropriate to investigate, prevent, or take measures against illegal acts or suspicious acts.

### 4. Transfer of personal data

Our company will transfer personal data that we received from customers, limited to the purposes below.

Our company may transfer customers' personal data to transportation and accommodations (including organizations overseas) within the range that is necessary in order to handle consultations with customers.

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

Our company shall transfer customer's personal data to outsourcing contractors, etc. that have subcontracted. Our company shall request proper handling of the transferred personal data to the corresponding outsourcing

contractor, and our company also shall properly manage it accordingly.

5. Records of data processing

Our company will keep record of processing of personal data, by following regulations formulated by the GDPR. For the records, we will comply with the GDPR, and if a request is made by a supervisory authority, we will share information as necessary.

6. Period of saving personal data

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

7. Rights for personal data

Customers have the following rights regarding personal data concerning themselves.

- (1) Right to know customer's personal data and relevant information
- (2) Right to correct the incorrect personal data concerning customers without undue delay
- (3) Right to eliminate personal data on customers without undue delay
- (4) Right to restrict handling personal data concerning customers
- (5) Right to make objections about our company's handling of personal data
- (6) Right to receive personal data provided by customers in a general format that computer is readable, and the right to relocate (shift) the personal data to the management of other organizations without disturbing.

8. Safety management measures

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

9. Contact information

General Affairs Department

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