

**PRIVACY POLICY**  
**Personal Information Protection Policy**

The Company shall respect and comply with the Act on the Protection of Personal Information, the Cabinet Order to Enforce the Act on the Protection of Personal Information, and other rules and regulations, to thereby strive to achieve appropriate processing and protection of personal information.

The following “Special Clauses for Guests within the EEA” apply in order to ensure appropriate processing of the personal data of guests residing in the European Economic Area (“EEA”) who fall under the coverage of “REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)” (the “GDPR”).

To ensure that the personal data of guests residing in the People’s Republic of China and covered by China’s Personal Information Protection Law is processed appropriately, the following "Special Clauses for Guests within the People’s Republic of China" apply.

**USAGE**  
**Purposes of Collection and Use of Personal Information**

The Company obtains and uses the personal information of our guests for the following cases:

1. Analysis of guest trends at the facilities managed by the Company and the group companies of the Company (“Tokyo Tatemono Group”) (\*1), and conducting surveys and analysis on the development of new products and market etc.;
2. Provision of various services at the facilities managed by the Company and Tokyo Tatemono Group ;
3. Contacting guests for the purpose of confirming reservations at facilities managed by the Company and the Tokyo Tatemono Group;
4. Sales activities at facilities managed by the Company and Tokyo Tatemono Group and in relation to the services to be provided (\*2);
5. Announcement of questionnaire surveys on guest satisfaction, etc., at the facilities managed by the Company and Tokyo Tatemono Group ;
6. Analysis for improvement of services and products at facilities managed by the Company and the Tokyo Tatemono Group;
7. Confirmation of visitors at the Company and Tokyo Tatemono Group , and recording of responses made to visitors;

Provided, however, that if, in connection with the provision of personal information, purposes of use differing from those stated in this page are notified or clarified to the data subjects, such purposes of use shall prevail over those stated herein.

The Company will not use personal information in a manner that may encourage or induce illegal or improper activities.

- (\*1) Tokyo Tatemono Co., Ltd. and its subsidiaries and consolidated companies listed in its annual securities report other than the Company
- (\*2) Various announcements and sales activities may be conducted in a manner of visiting, sending cards, sending direct mails, making telephone calls, and the transmission of e-mails, etc.

## **PROVISION**

### **Provision of Personal Information to Third Parties**

Except for the following cases, the Company will not provide personal information to any third parties:

1. If consent is obtained from the data subjects;
2. If required under laws or regulations;
3. If it is necessary for protecting the life, limb or property of data subjects and it is difficult to obtain consent from the data subjects for the disclosure or provision of their personal information;
4. If it is necessary to improve public health or promote the sound development of children, and it is difficult to obtain consent from the data subjects; or
5. If it is necessary for governmental or municipal agencies or the persons entrusted by the foregoing to cooperate in performing the duties as stipulated by the laws or regulations, and if obtaining consent from the data subjects for the disclosure or provision of their personal data may disturb the performance of such duties.

## **PROVISION ( FOREIGN THIRD PARTIES)**

### **Provision of Personal Information to Foreign Third Parties**

The Company will not provide personal information to any third parties in foreign countries, except as permitted by law or with the consent of the guests.

## **SHARED USE**

### **Shared use of Personal Information**

The Company will share personal information as follows:

- (1) Types of personal information shared  
Address, Name, Phone number, Email address, Response details
- (2) Purposes of shared use  
Purposes of use described in “USAGE Purposes of Collection and Use of Personal Information”
- (3) Scope of shared users  
Tokyo Tatemono Group
- (4) A party responsible for shared use of personal information  
The Company (9F Tokyo-Tatemono-Muromachi-Building, 4-3-18 Nihonbashimuromachi, Chuo-ku,  
Tokyo: Representative Director, President and Chief Executive Officer Hisatoshi Kato)

## **DATA SECURITY**

### **Protection measures of Personal Information**

The Company will take necessary and appropriate measures to prevent leakage, loss, or damage of personal information processed by the Company and to otherwise safely manage personal information. Please refer to I-3 of the Personal Information Protection Guidelines (<https://tt-resort.co.jp/privacy.html>) for the security control measures taken by the Company.

## **CONTACT US**

### **Inquiries Regarding Personal Information**

Please make contact as set forth below for any inquiries or requests for notification of the purpose of use of personal information, disclosure, rectification, addition, deletion, suspension of use, suspension of provision to third parties of personal information or records of provision etc., and other questions of the personal information provided.

The Company will inform the guests of the designated procedures necessary for the disclosure, rectification, suspension of use, etc.; provided, however, that a request may not be accepted depending on the contents.

Company name, hotel name	Telephone number
Regina Kawaguchiko	81-555-20-9000
Tokyo Tatemono Resort Co., Ltd.	81-3-3274-0865

**FOR EEA GUESTS**  
**Special Clauses for the guests outside of EEA**

Tokyo Tatemono Resort Co., Ltd. (the “**Company**”; please check Section 9 below for the contact details) performs the following processing of personal data of guests (the “**Guests**”) at the Hotel Regina Kawaguchiko (the “**Hotel**”) operated by the Company, to whom the EU General Data Protection Regulation (the “**GDPR**”) applies.

1. Applicable Scope

The following statements (the “**Special Clauses**”) apply to the processing of personal data of Guests who are in the EEA and to whom the GDPR applies in accordance with Article 3.2 (a) of the GDPR, in which the personal data is processed by the Company as a controller (defined in Article 4(7) of the GDPR as a person who decides the purpose and manner of the processing of personal data).

2. Categories of and Legal Basis for Processing the Guests’ Personal Data

The Company processes the following categories of the Guests’ personal data based on the following legal basis. The Company processes the specified categories of personal data as set forth in Article 9.1 of the GDPR among the following categories, so long as the processing is admitted in accordance with Article 9.2 of the GDPR, including in the cases where explicit consent is obtained from the Guests.

Categories of the Guests’ personal data to be processed by the Company

Information regarding the name, gender, telephone number, e-mail address, postal code, residential address, date of birth, passport, visa; or security information (such as the history of entry into and exit from the Hotel, image information photographed by monitoring cameras located within the Hotel), and information in response to any request from the Guests (such as information on health conditions or regarding religious beliefs), information on accommodation history, settlement, etc.

(1) If the processing becomes necessary for the performance of an agreement entered into with the Guests (or in response to any request of the Guests before entering into an agreement):

- (a) For the purpose of providing the accommodation services at the Hotel;
- (b) Other than the foregoing, for the purpose of the Company providing services at the Hotel.

(2) If the processing becomes necessary for the legitimate interests of the Company or any third party:

- (a) For the purpose of improving the services of the Company through the analysis of Guest trends, and research and analysis on the development of new products, etc.;
- (b) For the purpose of managing the visitors at the Company and the Hotel, and for managing other services of the Company;
- (c) For the purpose of making legal assertions of the Company during litigation or other disputes; or

(d) For the purpose of arranging services to be provided by any third parties, including transportation and related activities, upon request from the Guests.

(3) If the processing becomes necessary in order to ensure compliance with the legal obligations imposed on the Company:

(a) For the purpose of taking administrative procedures, including application, notification, etc., to any administrative authorities;

(b) For the purpose of complying with any requests made by any administrative or judicial authorities in accordance with laws or regulations applicable to the Company; or

(c) Other than the foregoing, for the purpose of making any processing required by the Company in accordance with the laws and regulations.

(4) If prior consent is obtained from the Guests:

Even if the foregoing legal basis does not apply, the Company will process specific personal data of the Guests in the event that the Company obtains the Guest's prior consent for the processing of such personal data.

The Guests may withdraw their consent at any time by contacting the Company in a manner separately determined by the Company; provided, however, that the lawfulness of processing based on consent given before such withdrawal will not be affected by the withdrawal thereof.

The Guests are not obligated to provide their personal data to the Company; however, if the Guests fail to provide all or part of the foregoing categories of personal data, or fail to enter into an agreement with the Company, the Company may not be able to provide its services to the Guests.

### 3. Sources for Acquiring Personal Data

The Company may receive the Guests' personal data directly from the Guests as well as from the following third parties:

(1) Travel agencies used by the Guests; and

(2) Online travel reservation agents used by the Guests.

### 4. Personal Data Retention Period

The Company retains the Guests' personal data for the period necessary for the Company to provide services to the Guests. The specific retention period is determined taking into consideration the necessity in relation to the purposes for processing the personal data, the characteristics of the personal data, and other circumstances. Such retention period may be extended or shortened if required under the laws or regulations applicable to the Company.

### 5. Disclosure and Provision of Personal Data to Third Parties

The Company may disclose and provide personal data of the Guests mainly to the following third parties, for the purposes set forth in Section 2 above:

(1) Each group company of Tokyo Tatemono Group (Please click [here](#) for details of each group

company);

- (2) Subcontractors, including service vendors, to whom the Company outsources the processing of personal data;
- (3) Travel agencies used by the Guests;
- (4) Online travel reservation agents used by the Guests;
- (5) Credit card companies used by the Guests; and
- (6) Service providers that provide services such as transportation and activities to the Guests, upon request from the Guests.

## 6. Extraterritorial Transfer of Personal Data

In connection with the Company's processing of personal data, for the purpose of Section 2 above, the Guests' personal data may be transferred to countries and/or territories outside of the EEA. In the event that the Company transfers the Guests' personal data to any countries and/or territories where an adequate level of protection in accordance with Article 45 of the GDPR is not ensured, the Company takes appropriate protection measures by way of entering into, with a transferee of personal data, standard contract terms approved by the European Commission, or through other methods. If a Guest wishes to request a copy of the standard contract terms or another document related to appropriate protection measures, he/she should make such request using the contact information stated in Section 9 below.

## 7. Rights of the Guests

Each Guest has the following rights for his/her personal data obtained and processed by the Company.

### (1) Right of Access to Personal Data

The Guest shall have the right to obtain confirmation from the Company as to whether or not personal data concerning the Guest is being processed, as set forth in Article 15 of the GDPR. In the event that personal data is being processed, the Guest shall have the right to access such personal data and certain information set forth in the said Article.

### (2) Right to Rectification

The Guest shall have the right to obtain, without undue delay, the rectification of any inaccurate personal data concerning the Guest from the Company, and shall have the right to have any incomplete personal data of the Guest's completed, as set forth in Article 16 of the GDPR.

### (3) Right to Erasure ('Right to be Forgotten')

The Guest shall have the right to obtain the erasure of personal data concerning the Guest from the Company without undue delay if certain requirements set forth in Article 17 of the GDPR are satisfied.

### (4) Right to Restriction of Processing

The Guest shall have the right to obtain restriction of the processing of personal data concerning the Guest from the Company if certain requirements set forth in Article 18 of the GDPR are satisfied.

### (5) Right to Data Portability

The Guest shall have the right to receive the personal data concerning the Guest in a structured, commonly-used and machine-readable format if certain requirements set forth in Article 20 of the GDPR are satisfied. In addition, the Guest shall have the right to transmit such data to another

controller without hindrance from the Company to which the personal data has been provided.

**(6) Right to Object**

The Guest shall have the right to object to certain processing of personal data as set forth in Article 21 of the GDPR which is included in the Company's processing of the Guest's personal data. In the event that the Guest objects to the processing, the Company will cease the processing of the relevant personal data of the Guest if certain requirements set forth in the said Article are satisfied.

**(7) Right to Not be Subject to "Automated Individual Decision-Making"**

The Guest shall have the right to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the Guest or similarly significantly affects the Guest as set forth in Article 22 of the GDPR.

If the Guest wishes to exercise any of the foregoing rights against the Company, please make contact using the details stated in Section 9 below.

In the event that the Company is contacted by the Guest regarding the exercise of such rights, the Company will conduct necessary investigations without undue delay and respond to such contact. The Guest may lodge a complaint with the competent supervisory authority regarding the processing of personal data in relation to the Company's processing of the Guest's personal information.

**8. Amendment to Processing of Personal Data**

In the event of any amendment to the purposes set forth in Section 2 above or any matters relating to the processing of the Guest's personal data, the Company will inform the Guest of the post-amendment purposes and other necessary matters in advance by way of publishing the post-amendment Special Clauses, through individual contact, or via other manners.

**9. Contact Details**

Please contact the Company using the following contact details for any inquiries to the Company in relation to the processing of the Guest's personal data, the exercise of rights, or other communications.

**[Manager of Personal Data]**

**Trade name** Tokyo Tatemono Resort Co., Ltd.  
**Contact** Hotel Regina Kawaguchiko  
5239-1, Funatsu, Fujikawaguchiko-machi,  
Minamitsuru-gun, Yamanashi 401-0301  
[e-mail address]kawaguchiko@regina-resorts.com  
[telephone number]+81-555-20-9000