

## **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”).

## **USAGE**

### **Purposes of Use of Personal Information**

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

1. Analysis of customer trends at the facilities managed by the Company and Tokyo Tatemono Group (\*1), and conducting surveys and analysis on the development of new products, etc.;
2. Provision of various services at the facilities managed by the Company and Tokyo Tatemono Group (\*1);
3. Sales activities at facilities managed by the Company and Tokyo Tatemono Group (\*1) and in relation to the services to be provided (\*2);
4. Announcement of questionnaire surveys on customer satisfaction, etc., at the facilities managed by the Company and Tokyo Tatemono Group (\*1);
5. Confirmation of visitors at the Company and Tokyo Tatemono Group (\*1), 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.

- (\*1) Tokyo Tatemono Co., Ltd., Tokyo Tatemono Real Estate Sales Co., Ltd., etc.

- (\*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.

## **DISCLOSURE OR PROVISION**

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

Except for the following cases, the Company will not disclose or 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.

## **CONTACT US**

### **Inquiries Regarding Personal Information**

Please make contact as set forth below for any inquiries or requests for disclosure, rectification, suspension of use, etc., 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

## **ALLERGIES**

### **Basic Policy for Food Allergies**

#### **1. Purpose:**

In view of the importance of food allergy compliance and the Company's quality safety policy, the Company has established its "Basic Policy for Food Allergy Compliance" from the viewpoint of prioritizing the safety of guests and providing the best possible services thereto.

#### **2. Food Allergies:**

With respect to food allergies, there are certain people who show allergic reactions to specific foods. On some occasions, serious symptoms have been known to occur.

In Japan, manufacturers are obligated to provide labeling if using any of the following seven (7) ingredients in foodstuffs in accordance with the laws or regulations. Further, manufacturers are recommended to provide labeling for a further twenty (20) ingredients (\*).

(\* ) Allergens stipulated by the Food Labeling Act

Manufacturers are obligated to provide labeling for the following seven (7) specified ingredients:  
shrimp/prawns, crab, wheat, buckwheat, eggs, milk and peanuts

Manufacturers are recommended to provide labeling (rather than being obligated) for the following 20 items similar to specified ingredients listed above:

abalone, squid, salmon roe, oranges, cashews, kiwifruit, beef, walnuts, sesame, salmon, mackerel, soybeans, chicken, bananas, pork, matsutake mushrooms, peaches, Japanese yams, apples and gelatin

#### **3. Company's Basic Philosophy:**

The manufacturers who are obligated to label allergens in accordance with the Food Labeling Act are those that fall under purchasers of foodstuffs, etc.

The Company has established a basic policy in which, after the guests are requested to understand the following, the Company obtains information from the purchasers to the extent possible and provides a food allergy-complaint menu to those guests who have food allergies.

1. In view of the importance of food allergy compliance and the obligation to provide labeling in accordance with the laws and regulations, the Company provides guests who have food allergies with only a food allergy-compliant menu (dedicated menu) and will not serve such guests using any other menu.
2. Under the food allergy-compliant menu provided by the Company, efforts are made to filter out allergens as much as possible based on the allergen information obtained from the purchasers. However, while the obligation to provide labeling is imposed on the seven (7) ingredients set forth in “2. Food Allergies” above, a recommendation to provide labeling is also established with respect to 20 additional ingredients, and there is no recommendation to provide labeling for other potentially allergic ingredients; thus, it is difficult to grasp the entire picture surrounding allergens.
3. Although the Company pays minute attention to cooking, such foodstuffs are cooked in the same kitchen facilities as foodstuffs under the general menu; thus, there is the risk of trace amounts of allergens contaminating foodstuffs through food storage, cooking utensils, tableware, or just through the air, and it is difficult for the Company to completely filter out allergens.

The Company endeavors to disclose the foregoing philosophy to guests, as well as to inform guests of the basic policy for each relevant facility at the time when guests make reservations, and we thereby ask for understanding from guests.

#### 4. **Food Allergy-Compliant Menu**

1. Composition of menu

##### (1) Seven (7) ingredients compliant menu

The Company provides the guests with a food allergy-compliant menu (seven (7) ingredients compliant menu) wherein as many allergens (for which labeling is obligated in accordance with the Food Labeling Act) as possible are filtered out.

##### (2) Twenty (20) ingredients compliant menu

In this menu, the Company also excludes additional ingredients from the seven (7) ingredients compliant menu as requested by the guests; such additional ingredients including the twenty (20) ingredients recommended to be labeled in accordance with the Food Labeling Act.

2. Guests are kindly requested to understand that the complete filtering out of allergens is difficult, as stated in “3. Company’s Basic Philosophy”, when they request a food allergy-compliant menu. In particular, guests who are seriously allergic to any foodstuffs are requested to consult with a doctor in advance of requesting a menu.

3. Considering the importance of food allergy compliance, guests are kindly requested to confirm certain necessary items as to their status at the time of making orders for a food allergy-compliant menu.

#### **■ Acquisition of Personal Information regarding Food Allergies**

The Company obtains, in an appropriate manner in advance from the guests who request a food allergy-compliant menu, information on any foodstuffs which must be filtered out as allergens and food allergy symptoms. The Company may obtain the same via a website or through facsimile or telephone, etc.

\* The Company will not use any personal information obtained from guests for any purpose other than the purposes of providing a food allergy-compliant menu, or informing or providing information to medical institutions, etc., should any food allergy symptoms occur to guests at any facilities of the Company.

#### **■ Confirmation of Personal Information regarding Food Allergies**

In regard to personal information regarding food allergies, the Company will provide guests with a food allergy-compliant menu after: (i) requesting guests and staff of the Company to mutually confirm the guest's allergy status at the time of the guests' visit to the Company's facilities, and (ii) confirming the menu and the name of the guest at the time of the guests' use of the Company's restaurants.

**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]**

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**Trade name** Tokyo Tatemono Resort Co., Ltd.

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**Contact** Hotel Regina Kawaguchiko  
5239-1, Funatsu, Fujikawaguchiko-machi,  
Minamitsuru-gun, Yamanashi 401-0301

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[e-mail address]kawaguchiko@regina-resorts.com

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[telephone number]+81-555-20-9000

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