# Privacy Policy

Tosei Hotel Kanda Co., Ltd. (hereinafter "Our Company") hereby pledge to execute/sustain the following privacy policy to carryout proper use and management of the personal information, by placing the highest priority to maintain trust, and by complying with the provisions of laws and regulations concerning the protection of personal information and other criterion.

#### 1.Basic Stance

In order to execute this policy, Our Company will establish the internal regulations and system concerning the handling of the personal information and anonymized processed information (hereinafter, "Personal Information etc."), will make sure Our Company's employees (executive, employee, contract employee, part-time employee, temporary employee, etc.) and related entities such as outsourcing contractor etc. are aware of these items, and will sustain/improve these measures to ensure our operation is carried out in a proper manner.

### 2. Proper Management

- (1) Our Company will make effort to maintain the personal information at accurate and latest content within the scope necessary to achieve the use purpose.
- (2) To prevent loss, leakage, destruction, modification etc. of the Personal Information etc., Our Company will carry out proper safety management measures and necessary corrective measures.

# 3. Clear Indication of Use Purpose etc.

- (1) In obtaining the personal information, Our Company will obtain such information through legal and proper method, and will clearly indicate the necessary items concerning the use purpose etc. of the personal information at the time of obtainment or on Our Company's website etc.
- (2) In the event of indirectly obtaining the personal information, Our Company will announce the use purpose etc. of the personal information on Our Company's website etc.
- (3) With respect to the personal information that we obtained upon applying to join the hotel member organization or applying for stay at the hotel, Our Company will use such information for arrangement work concerning the stay at the hotel, to contact our guests, and for the purpose of transmitting various information to develop better products and further improve our service.

## 4. Compliance with the Use Purpose

- (1) Our Company will use the personal information within the scope of use purpose under proper procedure.
- (2) In the event Our Company decides to use the personal information beyond the scope of the use purpose, we will notify such intent to the subject person in advance and will confirm his/her will regarding such use.

## 5. Providing to Third Party

There may be a case whereby Our Company will provide the personal data to Our Company's group company and our affiliate etc. through the procedure required by the laws/regulations and other criterion.

### 6. Supervising of Outsourced Contractor

In the event Our Company decides to outsource the handling of the Personal Information etc., we will properly supervise such outsourced contractor to make sure such information is being managed safely.

# 7. Disclosure/Correction etc. of Retained Personal Information

In the event a request is made for disclosure, correction, or suspension of usage etc. concerning the personal data retained by Our Company, we will respond in a prompt manner by confirming the subject person.

# 8. Handling of Anonymized Processed Information

- (1) As a general rule, Our Company will not handle the anonymized processed information, provided, however, that in the event an opportunity arises for us to create or provide such information, we will announce the necessary items required by laws/regulations and other criterion on Our Company's website etc.
- (2) With respect to the anonymized processed information, Our Company will carry out the safety management measures set forth in the internal regulations.