## PRIVACY POLICY

Hokkaido Hotel's website, collect the personal information you provide us in the database, during procedures such as reservation, inquiry, request for data, registration of e-mail magazine, etc. The information will be used for providing useful services to our customers.

## Direct acquisition from an individual

Customers should register personal information necessary for various applications and inquiries.

## Purpose of use

The information registration of customers by the reason above, will be used for the following purpose.

## ■Various arrangements

Filling in the application form for various arrangements such as making reservations, sending materials, sending products, responding to inquiries.

## Sending e-mail magazine

In order to inform customers who willing to receive news by emails of events, cooking fairs, accommodation plans, etc. by e-mail magazine, we ask customers to fill in the application form.

If you have some information to change, please tell us as early as possible. (Please change or stop the service from the dedicated page.)

We may ask for a questionnaire.

## Others connection

In addition, we may contact you by email, phone or letter when we think that we need to contact you.

## Management and Security Measures

Personal information of customers who used our website is stored in a database which is a system protected by a mechanism (firewall) to prevent external access. The process of reservation and user registration is protected by SSL. For the safety of personal information(External leakage, falsification, loss, etc.), we do the management of our employees thoroughly, and we are constructing a system for management and operation.

# Presentation and Disclosure

Personal information received from customers will not be disclosed to third parties except for the following conditions.

- Disclosure or sharing of personal information is considered necessary for the propose of providing services. Including the subcontractors obliged to keep secrets.
- With the promotion of customer.
- With the formal inquiry of public institution such as police or court.
- Other situations that important, emergence and considered necessary to customers or our company or something else.

# Conservation

The personal information provided by customers, only preserved for requested services from customers. We will delete the data after a period of time. In order to provide even more convenient information and services, we will show the link of some websites of other companies and organizations. We take no responsibility for the information you provide to those websites.

## Statistics

The information of customers will be used in statistics expect for the personal information. The information is only used in statistics for various kinds of marketing data.

## Use of cookie

A part of our website use cookie. Cookie is a small file sent to user's browser from website, which is normally used in most websites.

Because of using cookie, by consulting to the sites accessed in the past, our website can show more acceptable contents and provide services to returning users.

Except where especially marked, no personal information will be got by cookie. If you don't want your browsing record be collected, you can stop the cookies function by settings of your own browser.

## Record of access log

Our website records the information of a person accessing it in the form of an access log, but does not contain information that can identify a specific individual. Access logs are used for statistical analysis for website maintenance and usage, and for no other purpose.

Important revisions to this Policy will be announced on our website. About other revisions, please confirm the latest version on our website.

Inquiry Desk for Personal Information Protection Management Strategy Office Hokkaido Hotel Co., Ltd. Nishi 7-jo Minami 19-chome 1, Obihiro, Hokkaido, 080-8511, Japan TEL: 0155-21-0001 E-mail: info@hokkaidohotel.co.jp Hours: 9: 00~18: 00/excluding Saturdays, Sundays, holidays and New Year holidays.

## 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 Hokkaido Hotel 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 this 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. Although Japan has yet to receive an adequacy decision on protection of personal information from the European Commission, 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 7 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 this 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 this 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 guardian's 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.