

Privacy Policy

Date Established: November 29, 2019

Senko Creative Management Co., Ltd. (hereinafter referred to as “the Company”) considers personal information protection to be an important social responsibility. When handling personal information in our business activities, we will perform appropriate procedures while placing priority on the relationship of trust with the customer. In order to ensure the performance of these activities, a privacy policy is established as follows (hereinafter referred to as “the Policy”). The officers and employees of the Company shall comply with the Policy and strive to appropriately handle and manage personal information inside and outside the Company.

Customers residing in the European Economic Area (EEA) are asked to confirm Appendix 1, “Additional Rules Applicable to the Handling of Personal Information of EEA Residents.”

1. Matters concerning acquisition

The Company shall acquire personal information through the following methods when conducting transactions related to the Company’s facilities and products (such as accommodations, food and drinks, parties, article sales, provision of other ancillary products, services etc.) and transactions with partner entities.

(1) Direct acquisition from the subject individual

Telephone, document (including electromagnetic records), business card, orally, Internet, etc.

(2) Acquisition from a person who has been duly authorized by the subject individual

User applicant, introducer, travel agency, business partner, business entity which accepts package products, etc.

(3) Acquisition from public materials

Internet, newspapers, telephone book, books and other publications, etc.

2. Personal information possessed by the Company

For the purpose of the Policy, “Personal Information” refers to information that can be used to identify a specific individual (including information that can be easily collated with other information and thereby be used to identify a specific individual). Personal information handled by the Company includes the following:

(1) Name, gender, date of birth, address, telephone number, email address, date of marriage, data about the workplace (company name, address, telephone number, affiliated division, job position), family information (name, relationship, date of birth)

(2) Information about the stay, including the products and services purchased, details of special requests, feedback regarding preferred services (room preferences, etc.)

(3) Registered user information for online booking at Hotel KAIE

(4) Information provided by the customer in a questionnaire, promotion campaign, etc.

(5) Information collected through the use of any surveillance camera, card key, security system, etc.

(6) Contact information and other related information about the employees of the corporations, accounts and external vendors with which the Company conducts transactions, and other individuals (travel agency, meeting and event planner, etc.)

3. Matters concerning the acquisition, use, and provision of personal information

When acquiring personal information from a customer, the purpose of use shall be made clear and the

information shall be used within the following scope of the purpose of use. In addition, when the information is used beyond the scope of the purpose of use or when the acquired personal information is provided to an external party, unless such is required by law, consent shall be obtained from the subject customer in advance.

- (1) Registration of customer information as required by law
- (2) Use in providing business-related information, such as sending information about preferential services at Hotel KAIE, various product plans, and events
- (3) Use as statistical data within the scope in which no specific individual is identified, for the purpose of investigating the usage trends, new product development, and customer satisfaction surveys
- (4) Use in managing the member information of each member organization and for services offered to members
- (5) Use in contacting individuals in writing, by phone, or by email regarding feedback received in a questionnaire, etc.
- (6) Use in contacting individuals in order to provide information or make a confirmation in relation to transactions etc., as well as in order to ship products, make a payment/settlement, and other related matters
- (7) Responding to inquiries, requests, etc.
- (8) Other uses in relation to the provision of services by the Company in general

4. Handling of sensitive information

The Company shall not acquire/use/provide to a third party any sensitive information (political views, religious beliefs, status of membership in a labor union, race/ethnicity, family origin/permanent domicile, medical health situation, etc.) handled in relation to the business, including that of the customers, unless required by law etc. or only to the extent necessary for execution of the business based on consent received from the customer.

5. Matters concerning subcontracting and joint use

When the Company provides personal information to a subcontractor in relation to subcontracting all or part of the business in a transaction etc., the Company shall cause the subcontractor to comply with the safety management measures for personal information by concluding an agreement which stipulates the confidentiality obligations, appropriate management, and supervisory obligations in relation to the personal information. In addition, the Company and the subcontractor may jointly use “2. Personal information possessed by the Company” in the Policy within the scope of the following purposes of use. The Company shall be responsible for the management in relation to the joint use of such personal information.

(Scope of persons for whom the information is jointly used and the purposes of use)

- (1) Accommodations, food and drink, parties, etc.

Use between the Company and vendors which provide products and services for the purpose of providing decorations, floral decorations, performances, photographs, souvenirs, and other products and services

- (2) Packaged plans for accommodations, food and drink, parties, etc.

Use between the Company and the vendors which provide products and services for the purpose of providing such products and services

- (3) In-building facilities, etc.

Use between the Company and the vendors which provide services for the purpose of providing such services

- (4) Management of the member organizations

Use between the Company and the vendors which provide services for the purpose of providing services such as services related to member information, registration management, and point services

(5) Other

Use between the Company and the vendors and partners which provide services for the purpose of providing comprehensive services

6. Disclosure, correction, suspension of use, etc. of personal information

When a customer requests disclosure, correction, suspension of use, etc. of the acquired personal information, after verifying the identification of the subject individual, a sincere response shall be made to the extent such disclosure etc. is reasonable and necessary.

For details concerning the procedures for requesting disclosure etc. (necessary documents, how to accept the request, how to verify the subject person, fee, and other matters), please contact the “point of contact for inquiries regarding personal information protection.”

7. Matters concerning the safety measures for personal information

- (1) A person responsible for handling personal information shall be appointed, and the persons who handle personal information shall be limited to the minimum number necessary. In addition, efforts shall be made to prevent unauthorized access to personal information, as well as the loss, destruction, alteration, leakage, etc. of personal information, and the necessary safety management measures shall be taken.
- (2) When subcontracting the processing of personal information, etc. to an external vendor, a vendor which is deemed to have an appropriate level of personal information protection management in regard to the handling of personal information and information security measures shall be selected. In addition, when subcontracting, the matters concerning the handling of personal information shall be set forth in an agreement etc., and all possible measures concerning safety shall be taken.

8. Other matters

- (1) Based on the laws, governmental and ministerial ordinances, guidelines, and related standards regarding of personal information, along with establishing internal rules concerning the protection and handling of personal information, these rules shall be reviewed as necessary and continuously improved.
- (2) In relation to the handling of personal information, the related laws, standards, and internal rules shall be complied with.

9. Audits

The status of implementation of the Policy shall be confirmed through regular audits, and any problems shall be corrected and improvements shall be made.

10. Matters concerning the website

Regarding the website operated by the Company (hereinafter referred to as “the Website”), utmost attention is paid to handling and protecting personal information in accordance with the Policy so that the users can use the services comfortably and safely. However, the Company shall not be responsible for the safety of the customer’s personal information on other websites that are linked in the Website.

We recommend that you confirm the safety of your personal information on your own by thoroughly checking the handling criteria in relation to personal information protection on other websites, and if no such

handling criteria exist, by confirming directly with the person or division responsible for the website.

(1) Use of cookies

The Website uses cookies in some of the services in order to provide better services to customers. Cookies are a type of data sent to the customer's computer by the webpage server. The cookies used in the Website are used for the purpose of appropriately providing information and securing the customer's security, and they do not include any data related to personal information that can be used to identify the customer.

Customers may set their browser settings to reject cookies; however, in order to comfortably use all the services on the website operated by the Company, please enable the cookies setting.

(2) Customer's access log

The Website records the information about persons who accessed the Website in the form of an access log. The access log includes the domain name and IP address of the persons who access the Website, as well as the type of browser used and the date and time of access. However, the access log does not contain any information which can be used to identify a specific individual.

The access log shall be used for the maintenance and management of the website and statistical analysis of the status of use, and will not be used for any other purposes.

11. Policy revisions

In the event an important change is made to the Policy, such shall be notified on the Website. Changes may be made without prior notice, so please check the latest information on the Website as needed. Please note that the Company shall not be responsible for any trouble etc. occurring as a result of the user not checking the Website for changes to the Policy.

12. Point of contact for inquiries concerning personal information protection

Shiomi SIF 1st floor, 2-8-10 Shiomi, Koto-ku, Tokyo 135-0052

Planning Office, Sales Division of Hotel KAIE, Senko Creative Management Co., Ltd.

TEL: 03-6684-1145 E-mail: hotelkaie.info@sknet.senko.co.jp

Open hours: 9:00 - 18:00 (excluding Saturdays, Sundays, national holidays, and New Year's Holidays)

Appendix 1

Additional Rules Applicable to the Handling of Personal Information of EEA Residents

These additional rules set forth the specific additional information which the Company is required to provide to customers residing in the European Economic Area (EEA) based on the EU General Data Protection Regulation (GDPR), as well as the customers' rights in relation to the handling of personal information in accordance with the local governing laws. In the event of any discrepancies between the provisions of these additional rules and the Policy, the provisions of these rules shall take precedence.

1. Handling of personal information

The methods and purposes for the handling of customers' personal information by the Company, types of customers' personal information handled by the Company, and the provision of the customers' personal information to third parties are as described in items 1 to 5 of the Policy.

2. Legal grounds

The use of personal information by the Company is legally based on the consent of the customer, in principle. Use of personal information without consent from the customer shall be legally based on the necessity in order to execute the agreement with the customer, the necessity in order to perform the procedures in accordance with the request of the customer prior to the conclusion of the agreement, the necessity in relation to legitimate interests sought by the Company or a third party, or the necessity in order to comply with the legal obligations the Company should comply with. Legitimate interests sought by the Company or a third party include increasing sales revenue through improved marketing and services, as well as improving the convenience and security of the Website.

3. Transfer of personal information to a third country

The Company shall transfer the personal information acquired from outside of Japan to Japan in order to execute the agreement concluded with the customer and perform the procedures in accordance with the request of the customer prior to the conclusion of the agreement. Japan has been determined by the European Commission to have a sufficient level of personal information protection.

4. Period of retaining personal information

The Company shall retain the personal information for the period necessary to achieve the purpose of use, and following the expiration of the retention period, the Company shall delete the information using a safe manner or anonymize the information within a reasonable period of time.

5. Customers' rights

Customers have the following rights against the Company under the laws. Customers may exercise these rights by contacting the point of contact for inquiries concerning personal information protection set forth in item 12 of the Policy.

The Company shall sincerely respond to the exercise of such rights after verifying the identity of the customer, excluding cases that correspond to exceptions set forth in the laws.

(1) Right to access the personal information

The right to confirm whether or not the customer's personal information is being used, and if being used, access the personal information and information pertaining thereto

(2) Right to correct the personal information

The right to have inaccurate personal information about the customer corrected

(3) Right to delete the personal information

The right to have the customer's personal information deleted in certain cases

(4) Right to restrict the use of the personal information

The right to have the use of the customer's personal information restricted in certain cases

(5) Right to file an objection to the use of the personal information

The right to file an objection to the use of the customer's personal information based on legitimate interests sought by the Company or a third party

(6) Data portability right

The right to receive the personal data provided by the customer to the Company in a structured, commonly-used, and machine-readable form and to transfer the personal data to another business entity without

hindrance by the Company

6. Withdrawal of consent

Customers may at any time withdraw their consent to the use of their personal information. The withdrawal of consent shall not affect the legality of the use of personal information based on the consent before it is withdrawn. The customer may withdraw consent by contacting the point of contact for inquiries concerning personal information protection set forth in item 12 of the Policy.

7. Filing a complaint with a regulatory agency

Regarding the handling of personal information by the Company, customers may file a complaint with a regulatory agency, including a national, regional, or international organization etc. under the laws.

8. Personal information necessary for accommodations

The Company shall need the following information in order to provide accommodation services to the customer. In particular, the matters entered in the hotel register are required to be entered and stored for three (3) years under the laws of Japan. In cases where such information is not provided, it is possible that the Company will not be able to provide accommodation services to the customer.

- (1) Basic information (name, telephone number, etc.)
- (2) Matters entered in the hotel register (name, address, occupation, nationality, passport number, gender, age, etc.)

9. Personal information of children

When a person under the age of 16 provides personal information, such shall be provided based on consent of a parental guardian.

10. Automated decision making such as profiling

The Company shall not make decisions only based on automated handling such as profiling of personal information.

End of text