

Personal Information Protection Policy (Odakyu Electric Railway Co., Ltd.)

Odakyu Electric Railway Co., Ltd. (hereinafter referred to as “the Company”), in order to comply with laws and regulations concerning the protection of personal information, has prescribed a Personal Information Protection Policy ([click here to view](#). Hereinafter referred to as “Company-wide Policy”) regarding the personal information of customers and trading partners, etc., that it uses over the course of business. However, in addition to the Company-wide Policy, the Company has prescribed the following Privacy Policy (hereinafter referred to as “this Policy”), particularly for the handling of personal information of customers that is handled in the travel service provided on the Website operated by the Company and various sales outlets, etc. (hereinafter referred to as “the Service”), and reliably executes various measures in accordance with the Company-wide Policy and this Policy.

1. Business Operator Handling Personal Information

The Company (please [click here](#) for the address and name of the representative)

2. Regarding Personal Information

The personal information the Company asks customers through the Service is the customer personal information required for the provision of the Service, etc., including name, address, telephone number, and email address.

3. Regarding the Appropriate and Proper Collection and Management of Personal Information

The Company shall collect the personal information of customers through proper means and shall manage such information appropriately.

4. Regarding Information Management and Safety Measures

(1) The Company shall appropriately and strictly manage personal data and shall take thorough safety measures in order to ensure that there is no leaking or loss of information, or unauthorized access, destruction, or falsification.

(2) The Company shall construct and appropriately operate an internal system in order to perform the safety measures of (1) on an ongoing basis, including through the performance of education and awareness-raising activities for employees on the appropriate handling of personal data.

(3) The Company shall execute an agreement with business contractors entrusted with personal data that prescribes the appropriate handling of personal data by the contractor and shall regularly confirm the management status.

5. Regarding the Purpose of Use of Personal Information

(1) Concerning the personal information provided by the customer or the person responsible for the contract, the Company, besides using it for contact with customers, shall use it within the range necessary to arrange the services to be provided by transportation and accommodation facilities, etc. and for the procedures to receive such services, as well as within the range necessary for the insurance procedures to cover the Company's liability under the travel contract and expenses in the case of accidents, etc. in the trip requested by the customer. When applying, customers shall agree to the provision of such personal data.

The Company may also use customer personal information for purposes such as

- Information on products, services, and promotions
- Requests for post-trip opinions and feelings
- Requests to take part in surveys
- Provision of special benefits and services
- Creation of statistical materials in which information has been processed to a form where the individual cannot be identified
- Responding to inquiries and consultations from customers
- Distribution of email magazines
- Improvement of services and development of new services.

In addition, the Company may ask for the personal information of an emergency contact person for the customer during their trip in case of an accident or injury occurring during the trip. The Company shall use such personal information only when the customer suffers an accident or injury and the Company has deemed it necessary to contact the contact person within Japan. The customer shall obtain the consent of the contact person within Japan for the provision of their personal information to the Company.

(2) The Company shall use the personal information provided by representatives, etc., of companies, organizations, and groups, etc., within the range required for the arrangement of the services to be provided by transport and accommodation facilities, etc. as well as the procedures for the receipt of these. In addition, the Company may also use such personal information to inform of products, services, and promotions.

(3) The personal information obtained from the travel insurance agency business shall be used for the travel insurance application procedures.

(4) The Company may use personal information for payment and billing business in

association with the performance of business activities.

(5) The Company has installed surveillance cameras at some of its stores for crime prevention and safety management purposes in order to record images inside stores.

6. Regarding the Provision or Entrusting of Personal Information to Third Parties

The Company, within the range of the purpose of use set forth in the preceding Paragraph and within the range required for the convenience of the customer's shopping at souvenir shops at the travel destination, shall provide personal data such as the customer's name, passport number, and flight number to third parties in advance by an electronic method, etc., such as to transportation and accommodation facilities, etc., insurance companies, and souvenir shops.

<Main Provision Destinations>

Provision Destination	Item of Personal Information to be Provided	Objective of Third-Party Provision
Travel Planning Company	The name, address, telephone number, gender, etc., of the customer	For the arrangement of travel
Accommodation Facilities, Transportation Facilities	The name, address, telephone number, gender, etc., of the customer	For the arrangement of accommodation, airline tickets, train tickets, etc.

The Company may entrust the handling of personal data for travel arrangements and mediation services at airports, etc. In addition, for the achievement of the objectives of Paragraph 5, the handling of customers' personal data may be entrusted to a business contractor that had entered into an agreement on the appropriate management of personal data, etc. In addition, if the customer pays for a trip, etc., by credit card, information such as the customer's credit card number and expiry date shall be provided by an electronic method, etc., to the credit card company for payment purposes. The Company shall not use such information outside of the purposes of use described above or provide it to third parties outside of those described above, with the exception of where any of the following is applicable.

- (1) In the event of the customer having given their prior consent
- (2) In the event of an official demand based on law
- (3) In the event of cooperation being required with the performance of business prescribed in law by a national government agency or local government agency
- (4) In the event of it being necessary in order to protect vital interests such as the life, health, and property of the customer and the public
- (5) In the event of it being particularly necessary for the improvement of public hygiene or the promotion of the sound development of children
- (6) In the event of provision in conjunction with the succession of business by merger or other reason
- (7) In the event of provision to an academic research organization, etc., and handling by the recipient being necessary for academic research purposes (excluding where undue detriment may be caused to the rights and interests of the individual, although a part of the purpose is academic research)
- (8) In the event of there being valid reason, such as to contact the customer in the case of an emergency

It should be noted that the Company shall not provide third parties with the personal information trusted for distribution of the accommodation reservation operation method or email magazines.

7. Regarding the Joint Use of Personal Information

The Company may jointly use the personal information, etc., collected in the Service within the range set forth below.

(1) Items Subject to Joint Use

- a. Information of users notified to the Company via the document specified by the Company, such as name, date of birth, gender, address, telephone number, and email address
- b. Payment financial institution name (code), branch name (code), account type, account number, account holder

(2) Scope of Joint Users

The Company and its group companies (please refer to [Click Here](#) for details. Hereinafter collectively referred to as “Odakyu Group”)

(3) Purposes of Joint Use

- a. The provision of preferential services, such as the points service, by the Odakyu Group
- b. The provision of information concerning the products and services handled by the Odakyu Group to customers, etc., as well as the provision of after-sales service

- c. The provision of information on the products and services handled by each tenant store at properties owned by the Odakyu Group, as well as the provision of after-sales service
- d. Use for the development of new products, new features, and new services, etc., in relation to the products and services handled by the Odakyu Group, as well as for surveys such as market research
- e. For communications to customers, etc., from the Odakyu Group necessary for transactions, as well as to confirm the content of transactions
- f. To respond to inquiries from customers, etc., at the Odakyu Group
- g. Payment and billing operations in conjunction with the performance of the business activities of the Odakyu Group

(4) Manager of Joint Use

The Company (please visit the [Click Here](#) (Odakyu Electric Railway website) for the name and address of the representative)

8. Regarding the Voluntariness, Etc., of Provision of Personal Information

The provision of personal information from the customer is voluntary, but it is required for the arrangement of travel. If a customer does not provide their information, there may be cases where the requested travel arrangements cannot be performed smoothly and accurately.

9. Information on Requests for the Disclosure, Etc., of Personal Information

We will respond in good faith in regard to the notification of the purpose of use of personal information held by the Company, disclosure of personal information, correction, addition, or deletion of content, suspension of use, deletion, and suspension of third-party provision, as well as disclosure of third-party provision records. For inquiries about such matters, requests such as consultations and complaints concerning the handling of personal information, and requests for disclosure, etc., please contact the help desk stated at the end of this document. We will provide a prompt response after confirming that the person making the request is actually the individual concerned. Or, in the case of an inquiry from a representative, we will confirm their position as representative through a power of attorney and certificate of seal. It should be noted that a fee of 500 yen per instance will be charged for requests for disclosure of personal information and third-party provision records, as well as for notifications of the purpose of use; we ask for your understanding.

10. Regarding Website Security

The personal information provided by customers is subject to strict data management when they use the website. The customer's personal information is managed in a database

protected from unauthorized access through a firewall, etc. Access to this database is restricted to the minimum necessary number of employees with viewing authority, and management is performed through the use of passwords for privacy protection and security reasons.

11. Regarding Cookies

■Regarding the Use of Cookies

The website uses cookies for the improvement of services, provision of services that are more suitable to the customer, as well as for distribution of notifications (advertisements).

■Purpose of Use

Ascertaining the usage status, the improvement of services, and distribution of notifications (advertisements)

Cookies are used with the objective of the collection and use of information such as for the improvement of services, provision of services that are more in keeping with the customer's interests and needs, and distribution of notifications (advertising) based on the customer's needs, through ascertaining the usage status of the services provided by the website.

■On this website, information such as gender, occupation, age, viewed pages, time of use, method of use, and usage environment, etc., may be used to consider new services and to improve the content of the services and notifications provided to make it more suitable to the customer.

■Regarding the Use of Google Analytics

In this website, Google Analytics, which is a service provided by Google, is used in order to ascertain the usage status of the website. Google Analytics analyzes the usage status of the website through the use of cookies issued by the Company. The Company receives the analysis results (various data relating to visit trends, user attributes, and interest categories) from Google to ascertain the customer's status of visits to the website.

Google Analytics Terms and Conditions

<https://www.google.com/analytics/terms/jp.html>

Google Analytics can be disabled by downloading and installing the “Google Analytics Opt-out Add-on” from Google's opt-out add-on download page and changing the add-on settings for your browser. It should be noted that if the customer sets Google Analytics as disabled, Google Analytics will also be disabled on websites that the customer visits other than this

website. However, Google Analytics can be re-enabled by reconfiguration of the browser add-on by the customer.

Google Analytics Opt-out Add-on

<https://tools.google.com/dlpage/gaoptout?hl=ja>

■Distribution of Notifications Through the Use of Cookies

The Company uses the advertising services of various advertising business operators, such as Google and Yahoo! (listing advertisements/display advertisements/audience/re-targeting), and distributes notifications (advertisements) when a specific page is visited by a customer who has visited the website in the past. At such times, cookies are used in order to acquire information on the viewing history of the website. If you would prefer not to receive such notifications (advertisements), please access the page below, and use and configure the respective advertising settings function. Reconfiguration will be required if you change browsers, delete cookies, or change to a new PC.

Google Advertising Settings

<https://adssettings.google.com/authenticated>

Yahoo! Advertising Settings

<https://btoptout.yahoo.co.jp/optout/index.html>

So-net Media Networks Opt-out

https://www.so-netmedia.jp/cookie/dsp_optout.html

b→dash/data X Inc. Opt-out

https://www.fs-bdash.com/tracking_optout/

Current as of April 2022

■Inquiries Concerning Personal Information

Personal Information Protection Help Desk, Business Support Department, Odakyu Travel Co., Ltd.

2-28-12, Yoyogi, Shibuya-ku, Tokyo, 151-0053

TEL: 03-3379-6178

Email: privacy@odakyu-travel.co.jp

<Open Hours: 10:00-18:00 (excludes Saturdays, Sundays, holidays, and the New Year

holiday period)>

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