

PRIVACY POLICY

1. Information & Inquiry desk of the controller

Kanden Amenix Co., Ltd. (hereafter referred to as “the Company”) maintains the following inquiry desk concerning personal information.

4-11-12 Minamisenba Chuou-ku Osaka, 542-0081

Kanden Amenix Co., Ltd. Personal Information Inquiry Desk

E-mail : info.eng@k-amenix.co.jp

2. Acquisition of personal information

The Company uses the following methods for the acquisition of personal information directly from customers and from companies in case of transactions concerning our properties and goods (hotel accommodation, banquets, restaurant and catering services, sales of goods, use of golf & sports facilities, sightseeing, and other incidental provision or sales of goods, provision of services, implementation of events, etc.), transactions between the Company and its allied business operators and other transactions.

(1) Acquisition directly from customers

By telephone, in writing (including electronic records), business cards, oral communication, internet, etc.

(2) Acquisition from persons duly authorized by customers

Applicants, intermediaries, travel agencies, allied service providers, and booking intermediaries for packaged products.

(3) Acquisition from publication

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

3. Purposes of use of personal information

The Company uses acquired personal information for the following purposes.

(1) Transactions involving facilities and merchandise of the Company (hotel accommodation, banquets, restaurant and catering services, sales of goods, use of golf & sports property, sightseeing, and other incidental provision or sales of goods, provision of services, implementation of events, etc.), transactions between the Company and its allied business operators, and communication, merchandise shipment, payment and settlement which are conducted in relation to transactions and other related matters .

(2) Management of membership information and provision of services, etc., to members

of the Company's membership programs.

- (3) Responding to inquiries, requests, etc. to the Company
- (4) Disseminating information, advertisement, marketing mail, and questionnaire surveys, etc., to customers by email, postal mail, door-to-door delivery, telephone, facsimile, and by other means, in connection with sales and marketing activities of the Company, its tenants (restaurants, stores, sales and information counters, and businesses, etc., run by business operators other than the Company, with shops or tenancies based on due authorization located on properties or in buildings owned or operated by the Company), and allied business operations.
- (5) With respect to the services, etc., related to the Company, tenants, and the facilities and merchandise of allied businesses, obtain and analyze usage information for such services, etc., for the purpose of their improvement, development, and marketing, etc.
- (6) With regard to cookies, IP addresses, browser types, and access date and time, etc., logged by the Company website, ensure appropriate information provision and security of the website, and to conduct statistical analysis concerning the website's maintenance management and usage.
- (7) Preparing, providing and preserving hotel room guest lists as stipulated in laws and regulations.
- (8) In cases other than the above, for purposes where the consent of customers has been obtained.

4. Types of personal information

Personal information acquired and held by the Company includes the following.

- (1) Basic information on customers (street address, name, sex, date of birth, nationality, e-mail address, telephone number, facsimile number, and mailing address, etc.)
- (2) Additional information on customers (occupation, employer information (company name, street address, telephone number, department, position) date of marriage, information on family members (name, lineal relation, date of birth), etc.)
- (3) Payment information (credit card number, bank account information, billing address, etc.)
- (4) Service usage information (facility usage information, merchandise purchasing information, etc.)
- (5) Communication details (e-mails, website form inputs, facsimiles, telephone notes, letters, contents of questionnaire survey responses, etc.)
- (6) Information collected by security systems (security cameras, card keys, etc.)
- (7) Information automatically collected on the Company's website (cookie, IP address,

types of browser, access date and time, etc.)

- (8) Hotel guest registry information (street address, name, occupation, nationality, passport number, age, prior-day accommodation location, destination location, arrival date and time, departure date and time, name of guest room, etc.)

Sensitive information, such as information regarding a guest's physical disability, etc., may be included in the information that the Company will obtain.

For such sensitive information, the Company will handle it in accordance with such guest's agreement or within the scope permitted by applicable personal information protection laws.

5. Personal information required to be provided by guests staying overnight

In order to provide customers with hotel accommodation services, the Company requires the following information. Notably, hotel guest registry information is subject to recording and a statutory compulsory 3-year retention period according to the law of Japan. If this information is not provided, the Company may not be able to provide hotel accommodation services to the customer concerned.

- (1) Basic information on customers and so on (street address, name, sex, date of birth, nationality, e-mail address, telephone number, facsimile number, and mailing address, etc.)
- (2) Hotel guest registry information (street address, name, occupation, nationality, passport number, age, prior-day accommodation location, destination location, arrival date and time, departure date and time, name of guest room, etc.)

6. Provision and disclosure of personal information

Personal information provided by customers will not be provided or disclosed to any third party except in the following cases:

- (1) Outsourcing to external service providers with whom the Company has concluded an agreement prohibiting the use of personal information other than for the services contracted by the Company.
- (2) In cases where customers have given prior consent.
- (3) In necessary cases based on laws and regulations.

7. Retention period of personal information

The Company holds personal information only for the periods necessary to achieve its purpose of use, and takes measures to safely eliminate or anonymize personal

information within a reasonable time after the passing of the retention period.

8. Exercise of rights based on laws and regulations

Customers can exercise their rights based on laws and regulations by contacting the Company through the form on the website or through the Company's Personal Information Inquiry Desk. The Company will respond to such requests in good faith and in accordance with applicable personal information protection laws.

9. Appeals to regulators

Customers can, with regard to the handling of personal information by the Company, file an appeal with regulators, in accordance with the laws and regulations associated with the applicable personal information protection law.