

Privacy Policy

Last Updated: August 1, 2018

Keio Plaza Hotel Sapporo Co., Ltd. (“KPHS”, “we”, or “us”), as a member of the Keio Group aiming to become “the Top Brand in Trust”, considers the protection of personal information an important social responsibility. We carry out appropriate procedures when we handle personal information by placing our relationship of trust with our customers first and foremost. We have therefore set out our privacy policy (“Policy”) as stated hereinafter for protecting personal information.

In accordance with this policy, our executives and employees endeavor to handle personal information properly.

If you are a resident of the European Economic Area (EEA), please see Appendix 1 for additional information regarding our use of your personal information.

1. Acquisition of Personal Information

We collect personal information from the following sources in conducting business related to our facilities, services and products.

- ① Direct acquisition from an individual: by telephone, letter (including electro-magnetic records), business cards, verbally, through the internet, etc.
- ② Acquisition from persons with proper authorization to provide information for an individual: an individual applying on behalf of another, a party introduced by as second party, travel agents, business partners and agents selling retail packaged plans.
- ③ Acquisition from published material or public sources: internet, newspapers, telephone directories, books and other publications, etc.

2. Personal Information We Collect

The term "personal information" as used in this Policy shall mean information about an individual which can identify the specific individual (including such information as will allow easy reference to other information and will thereby enable the identification of the specific individual). We handle personal information which includes the following:

- ① Name, sex, date of birth, address, telephone number, e-mail address, date of marriage, business information (company name, address, telephone number, department, position), family information (names, relationships, birthdays)

- ② Information obtained during a stay, including purchased goods and services, the content of special requests, findings about service preferences.
- ③ Hotel member information, online user account information
- ④ Information provided in the course of participating in a questionnaire survey, promotional offer, etc.
- ⑤ Information collected through the use of surveillance cameras, card keys, security system, etc.
- ⑥ Contact information and other related information from corporations dealing with us, employees of outside contractors or other individuals (travel agency employees, meeting planners, event planners, etc.)

3. Purpose of Use

When we collect personal information from customers, we shall clarify the purpose of its use and use the information within the scope indicated below. For any use of the information beyond the indicated scope, or when the acquired personal information is provided outside KPHS, we will do so only after obtaining the consent of the customer, with the exception of statutory exceptions.

- ① Registration of customer information according to laws and regulations
- ② Sending our newsletters, information about various preferential treatments, product plans and events.
- ③ Statistical information on usage trends, development of new products and customer satisfaction surveys, to the extent that individuals are not specified.
- ④ Management of member information in each membership and for the use of services, etc. offered to members.
- ⑤ For persons who provided opinions on questionnaires, etc., to contact them by letter, telephone or e-mail.
- ⑥ To contact regarding guidance, confirmation, etc., to ship products, for payments/settlements of charges, or similar matters.
- ⑦ Responding to inquiries, requests, etc.
- ⑧ Other uses related to our overall provision of services.

4. Entrustment and Joint Use

When we entrust a business operator with the handling of personal information, we exercise necessary and appropriate supervision over the trustee to ensure the security control of the entrusted personal information by concluding a contract including obligations of disclosure and security control measures.

We may use personal information jointly among the Keio Group or between other business operators within the scope as stated hereinafter. For such cases of Joint use, KPHS is responsible for the protection of the applicable personal information.

(Scope of Purpose of Shared Use and Sharer)

- ① Accommodations, foods and beverages, banquets, etc.
For the purpose of providing products or services such as decorations, flower arrangements, costumes, beauty, etc., use with business operators providing said product or service.
- ② Package plans for accommodations, food and beverages, banquets, etc.
For the purpose of providing services such as medical checkups, esthetic services, use with business operators providing said product or service.
- ③ In-house facilities, etc.
For the purpose of payments and providing services such as the swimming pool, massages, tenants, use with business operators providing said service.
- ④ Management of each member group, etc.
For the purpose of providing services such as membership, point services, use with business operators providing said service.
- ⑤ Other use
For the purpose of providing comprehensive services, use with business operators providing said services and business partners.

5. Disclosure, Corrections, Discontinuance

If we receive a request from a customer for disclosure, correction, or discontinuance of the customer's personal information, we shall deal with the matter in good faith in a reasonable way and within the needed scope after confirming that the requesting person is the said person.

For details on procedures concerning these requests, please contact the Inquiry Desk for Personal Information Protection.

6. Security Measures

(1) We assign managers in charge for handling personal information, and limit the number of employees who handle personal information to the requisite minimum. We also take necessary and proper measures for the prevention of leakage, loss, or damage, and for other control of security of the personal information.

(2) When we entrust a business operator with the handling of personal information, we

select a trustee with an appropriate level for protection of personal information, and conclude an entrustment contract that specifies security control measures.

7. Other Matters

(1) Based on applicable laws, we have established internal regulations on the protection and handling of personal information and review these regulations continuously in order to make improvements.

(2) Regarding the handling of personal information, we comply with the related laws and regulations.

8. Audits

We conduct periodical audits on the implementation of this Policy and improve our procedures.

9. Website

Our website pays the utmost attention to handling and protection of personal information in accordance with this Policy so that all users may use the website comfortably and safely. However, we are not responsible for the security of users' personal information on third-party websites linked to our website.

We encourage customers to check the privacy policies of websites that you visit before submitting personal information.

① Cookies

Our website uses cookies for some services to ensure that we can provide the best service.

Cookies are a type of data sent by website servers to a user's computer. The cookies used on our website are for the purpose of providing proper information and to ensure security, and do not contain any data that can be used to identify the user. Customers can disable cookies by changing the browser settings, but this may result in an inability to access some or all of the services provided on our website.

② Access log

This website records the information of a person accessing it in the form of an access log. The access log includes the domain name and IP address of the accessing person, the type of browser used, and the date and time of access, 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 purposes.

10. Revisions of the Policy

Important revisions to this Policy will be announced on our website. We may revise this Policy without notice, however, so please confirm the latest version on our website. Please note that we shall bear no responsibility for any trouble caused by failure to confirm the Policy in advance.

11. Inquiry Desk for Personal Information Protection

Membership Office

Keio Plaza Hotel Sapporo Co., Ltd.

North5 West7 2-1, Chuo-ku, Sapporo, 060-0005, Japan

Tel: +81-11-271-0111

E-mail: info4045@keioplaza-sapporo.co.jp

Hours: Weekdays 9:00 A.M. ~ 5:30 P.M. / excluding Saturdays, Sundays, holidays and New Years' holiday

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 KPHS 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 articles 1 through 4 of the 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

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 article 11 of the 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 article 11 of the 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 guardians 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.