

# Privacy Policy

Last Updated: January 1, 2024

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. Compliance with Laws and Regulations, Etc.

- (1) We will comply with the “Act on the Protection of Personal Information” (“APPI”) and relevant laws and regulations, governmental and ministerial ordinances, guidelines and other standards (collectively, “Laws, etc.”).
- (2) We will set forth our internal rules regarding the protection and handling of personal information, and review and continuously improve such internal rules, as necessary.

## 2. Definition of Personal Information

“Personal Information” as used in this Policy is information concerning a living individual and means information that corresponds to either of:

- ① information that can identify a specific individual from the name, date of birth and other descriptions contained in such information (including information that can be easily compared with other information and can identify a specific individual thereby); or
- ② information containing an individual identification code.

## 3. Acquisition of Personal Information

We collect Personal Information from the following sources in conducting business related to our facilities, services and products by lawful and fair methods.

- ① Direct acquisition from an individual: by telephone, letter (including electromagnetic 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 a 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.

#### 4. Personal Information We Collect

We handle Personal Information which includes the following:

- ① Name, gender, date of birth, address, telephone number, e-mail address, date of marriage, business information (company name, address, telephone number, department, position), family information (names, genders, relationships, birthdays)
- ② Information obtained during a stay, including purchased goods and services, the content of special requests, findings about service preferences such as room 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 agents and outside contractors, or other individuals (travel agency employees, meeting planners, event planners, etc.)

#### 5. Purpose of Use of Personal Information

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, we will do so only after obtaining the consent of the customer, with the exception of statutory exceptions.

##### (1) Personal Information of customers

- ① Registration of customer information according to laws and regulations
- ② Sending our newsletters, information about various preferential treatments, product plans and events.
- ③ Management of member information in each membership and for the use of services, etc. offered to members.
- ④ For persons who provided opinions on questionnaires, etc., to contact them by letter, telephone or e-mail.
- ⑤ To contact regarding guidance, confirmation, etc., to ship products, for payments/settlements of charges, or similar matters.

- ⑥ For inquiries, confirmations, requests, etc. concerning our services when the customer makes purchases or reservations, etc.
- ⑦ Providing services other than the above according to customer requests.
- ※ When sending newsletters, etc. of the Keio Plaza Hotel chain, there may be instances where leaflets and other materials concerning products and services of each Keio Group company may be enclosed therewith, however, the customer's Personal Information will not have been provided to such other companies.

In addition, there may be instances where we analyze information regarding the customer's access and purchase histories, etc. on the website, and use such information for the following purposes:

- ① Use for advertising for new products and services of the Keio Plaza Hotel chain according to the customer's interests and preferences; and
- ② Use for usage trend investigations, new product development, and customer satisfaction surveys.

(2) Personal Information of business partners

- ① Carrying out meetings, etc. with business partners
- ② Providing information and communicating with business partners
- ③ Executing services entrusted by business partners
- ④ Services in connection with each of the above

(3) Personal Information of employees, officers and other Keio members

- ① Calculation and payment of wages
- ② Security management for the Keio members
- ③ Personnel management concerning Keio members
- ④ Services in connection with each of the above

(4) Personal Information of applicants for employment

- ① Our hiring activities and personnel and security management after hiring, and services in connection therewith.

6. Provision to Third Parties

Unless otherwise permitted by the laws and regulations, we will not provide Personal Information to third parties without obtaining the individual's consent.

7. Entrustment

We may entrust services to a third party, in whole or in part, for the services of sending information regarding products and services to customers and for the analysis and

transactions, etc. of the provision and purchase histories of products and services and other information. In such instance, we will conduct necessary and proper supervision of the entrustee.

## 8. Joint Use

We will jointly use the customer's Personal Information as follows:

(1) Items of personal data that will be jointly used

① ①, ② and ③ of "Personal Information We Collect" in article 4 of this Policy

② Information on business cards, including name, company name, address, postal code, telephone number, and e-mail address

(2) Scope of sharers and purposes of use

Scope and purpose of joint use of personal data in(1)①

	Purpose of Use	Scope of joint users
Accommodations, food and beverage, banquets, etc.	<ul style="list-style-type: none"> <li>• Providing decorations, flower arrangements, costumes, beauty, MCs, staging, writings, photographs, gifts, and other products and services</li> <li>• Providing packaged plans including medical checkups, esthetic services, and other products and services</li> </ul>	Use with services providers that provide such products and services
In-house facilities, etc.	<ul style="list-style-type: none"> <li>• Payments and providing services such as the swimming pool, massages, tenants, and other services</li> </ul>	Use with services providers that provide such services
Management of each member group, etc	<ul style="list-style-type: none"> <li>• Providing membership data and registration management, point services, and other services</li> </ul>	Use with the Keio Plaza Hotel Chain (Keio Plaza Hotel) and service providers that provide such services
Other uses	<ul style="list-style-type: none"> <li>• Providing services other than the above according to customer requests</li> </ul>	Use with service providers and business partners that provide such services

Scope and purpose of joint use of personal data in(1)②

Purpose of Use	Scope of joint users
<ul style="list-style-type: none"> <li>• To notify, communicate, and share information related to the "Purposes of Use of Personal Information" as described in Article 5 of this policy.</li> <li>• To introduce and provide information on products and services handled by Keio Group companies</li> </ul>	<p>Keio Group companies (For more information on each company, please visit the following websites.)</p> <p><a href="https://www.keio.co.jp/group/index.html">https://www.keio.co.jp/group/index.html</a></p>

(3) Person responsible for the management of shared personal data

Party responsible for management of joint use of personal data in(1)①

Keio Plaza Hotel Sapporo Co., Ltd.

2-1, North 5 West 7, Chuo-ku, Sapporo, Hokkaido

Personal Information Protection Officer:

Takamitsu Kusumoto, Managing Director and Director of Administration Department

Party responsible for management of joint use of personal data in(1)②

Keio Corporation

(Please check [here](#) for address and name of representative.)

## 9. Request for Disclosure, etc. of Retained Personal Data

When there is a claim for disclosure of such retained personal data from the individual or an agent thereof, we will respond thereto within a reasonable period (in principle, 2 weeks; however, 30 days is expected if the response requires time such as if there are many cases or if there is a difficult claim) and to the extent necessary, except in the following instances. Further, if we will not make such disclosure or there is no such retained personal data, we will respond to that effect.

- ① if there is the likelihood of harming the life, body, property or other rights and interests of the individual or a third party;
- ② if there is the likelihood of causing significant interference with the proper execution of our services; or
- ③ if it will violate a law or regulation.

In addition, we will investigate and respond in accordance with the laws and regulations when there is a claim for revision, addition or deletion, or a claim for suspension of use or removal or suspension of third party provision in relation to such retained personal data from the individual or an agent thereof.

For details on procedures concerning these requests (necessary documents, reception method, identity verification method, fees, etc.), please contact the Inquiry Desk for

## Personal Information Protection.

### 10. Security Management Measures

- (1) Enactment of basic policy
  - This Policy is provided to secure the proper handling of Personal Information and to give notification of the inquiry desk for questions and complaint processing.
- (2) Maintenance of rules regarding the handling of Personal Information
  - Enactment of personal information protection regulations with respect to the handling method, responsible persons, and their duties, etc. regarding the acquisition, usage, storage, provision, deletion, disposition, etc. of Personal Information
- (3) Organizational security management measures
  - Establishment of the responsible person for the handling of Personal Information (personal information protection officer)
  - Clarification of the employees handling Personal Information and the scope of the Personal Information that such employees will handle
  - Maintenance of the reporting and communication system to the personal information protection officer in the event a fact of a breach of a law or internal rule or an indication thereof becomes known
  - Periodically conduct self-inspections and audits of the handling status of Personal Information
- (4) Personal security management measures
  - Periodically conduct training and educational activities of employees with respect to points to consider regarding the handling of Personal Information
  - Statement of matters concerning confidentiality regarding Personal Information in the work rules
- (5) Physical security management measures
  - Permit the use of or properly restrict external storage devices, and periodically confirm the usage status thereof
  - Take measures to prevent thefts or losses of equipment, electronic media and documents that handle Personal Information
- (6) Technical security management measures
  - Execute access controls and limit the scope of persons in charge and Personal Information that is handled
  - Introduce mechanisms to protect the information system handling Personal Information from outside unauthorized access or unauthorized software

## 11. Audits

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

## 12. 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 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.

## 13. Pseudonymized Information

- (1) We will create pseudonymized information that is processed so that the individual cannot be identified unless it is compared with other information and will analyze such information to the extent of the purpose of use set forth in article 5 of this Policy. Furthermore, if a purpose of use set forth in article 5 of this Policy is changed, we will publicize the changed purpose of use on our homepage, etc.
- (2) When creating the pseudonymized information, we will process the Personal Information pursuant to the standards set forth in the APPI, the Personal Information Protection Committee Rules and other laws and regulations.
- (3) When pseudonymized information is created, or when pseudonymized information and deletion information, etc. regarding such pseudonymized information is acquired, we will take measures for the security management of the deletion information, etc. pursuant to the standards set forth in the Personal Information

Protection Committee Rules as measures necessary for preventing the leakage of deletion information, etc.

#### 14. Anonymized information

- (1) When creating the anonymized information, we will process the Personal Information pursuant to the standards set forth in the APPI, the Personal Information Protection Committee Rules and other laws and regulations.
- (2) When anonymized information is created, we will take measures for the security management to prevent the leakage of descriptions, etc. and the individual identification code deleted from the Personal Information used for creating the anonymized information, and information concerning the processing method conducted pursuant to the provisions of the preceding paragraph (limited to information that enables the restoration of such Personal Information by using such information).
- (3) When creating the anonymized information, we will publicize the items of information concerning an individual contained in such anonymized information on our homepage, etc.

#### 15. 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.

#### 16. Inquiry Desk for Personal Information Protection

Membership Office

Keio Plaza Hotel Sapporo Co., Ltd.

2-1, North 5 West 7, Chuo-ku, Sapporo, Hokkaido, 060-0005, Japan

Tel: +81-11-271-0111

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

Hours: Weekdays 10:00 A.M. ~ 5:30 P.M. / excluding Saturdays, Sundays, holidays and New Years' holiday

※Reservation confirmations of our accommodation, food and beverage, banquet and other business facilities are handled by the inquiry desk of business facility.

Keio Plaza Hotel Sapporo Co., Ltd.

2-1, North 5 West 7, Chuo-ku, Sapporo, Hokkaido

Toshihito Honda, President



## 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 KPH 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 3 through 9 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. 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, etc. A customer may

exercise these rights by contacting the Inquiry Desk for Personal Information stated in article 17 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 17 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 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.