

Noborioji Hotel, Ltd. (hereinafter referred to as “the Hotel”) handles the personal information of its Guest and external stakeholders (hereinafter collectively referred to as “the Guest”) in accordance with this Policy.

1. Definition

- 1) Personal information in this Policy refers to personal information as defined in Article 2.1 of the Act on the Protection of Personal Information (Act No. 57 of 2003, hereinafter referred to as the “Personal Information Protection Act”).
- 2) Personal data in this Policy refers to personal data as defined in Article 16.3 of the Personal Information Protection Act.
- 3) Personal data the Hotel holds refers to personal data the business holds as defined in Article 16.4 of the Personal Information Protection Act.

2. Acquisition of personal information

When acquiring personal information, the Hotel will clearly state the purpose for which the information is to be used and will acquire the information in a lawful and fair manner.

- 1) Direct acquisition from the Guest
Telephone, written documents (including electromagnetic records), business cards, oral, internet, etc.
- 2) Acquisition from a person duly authorized by the Guest
Introducers, travel agents, business partners, and businesses accepting package deals, etc.
- 3) Acquisition from publicly-available information media
Internet, newspapers, telephone directories, books and other publications, etc.
- 4) Concerning underage Guests
The Hotel will not intentionally ask those under 18 years of age to provide personal information nor intentionally collect personal information from those under 18 years of age. The Hotel only accepts those over 13 years of age for stay or dining.

3. Management of personal information

- 1) The Hotel will comply with the Personal Information Protection Act, the various guidelines established in relation to the Act, and this Policy.
- 2) The Hotel takes necessary and appropriate measures for the safe management of personal

information, including internal management and supervision, employee training, and supervision of contractors, to prevent leakage, loss, or damage of personal information.

- 3) The Hotel will acquire personal information and use the acquired information to the extent necessary for the purposes set forth in this Policy. If the Hotel intends to use personal information beyond the scope of the purposes set forth in this Policy, the Hotel will obtain prior consent from the Guest in an appropriate manner.
- 4) The Hotel implements preventive and safety measures against leakage, loss, damage, etc. of personal information.

4. Purposes of use of personal information

The Hotel will use the personal information of the Guest for the following purposes:

- 1) Personal information of the Guest who is planning to purchase or has already purchased the Hotel's goods or services
 - a) Provision of the Hotel's goods and services and related correspondence

This includes the following uses:

- To process reservations, changes, and cancellations with regards to the use of the Hotel
- To provide reminders regarding dates of stay at the Hotel
- To provide lodging, food and beverage, sales of goods, and other incidental services at the Hotel
- To issue invoices, process payments, issue receipts, process refunds, and conduct other settlement with regards to consideration for the services offered by the Hotel
- To respond to inquiries regarding the Hotel's goods and services
- To verify the history of usage in the event of a request for after-sales service (lost and found)

- b) Implementation of improvements and enhancements to the Hotel's goods and services

This includes the following uses:

- To conduct surveys regarding the Hotel's goods and services
- To create internal records if any problems with the Hotel's goods or services occur
- To analyze feedback on new goods and services

- c) Distribution of advertisements regarding the Hotel's goods and services

This includes the following uses:

- To notify campaigns and events related to the Hotel's goods and services
- To send catalogs and promotional materials related to the Hotel's goods and services
- To distribute e-mail newsletters regarding the Hotel's goods and services

d) Continuation of the Hotel's business operations

This includes the following uses:

- To perform obligations or exercise rights in accordance with contracts
- To manage potential and existing guests
- To develop sales and product strategies based on purchase and service history
- To ensure the safety and health of the Guest staying at the Hotel
- To maintain information security on IT systems managed by the Hotel
- To maintain operation and safety of the facilities managed by the Hotel
- To respond to legal requirements or guidance from governmental authorities
- To implement other purposes of use clearly indicated at the time of acquisition of personal information

2) Personal information of other business partners including suppliers

a) Purchases of goods and services of suppliers and related interactions

This includes the following uses:

- To set up meetings with business partners regarding their goods and services
- To go through internal procedures with regards to the payments for the purchase of goods and services from business partners
- To coordinate delivery schedules for business partners' goods and services
- To confirm payment for goods and services provided by business partners
- To inquire about the goods and services provided by the Hotel's business partners
- To inquire about or make requests for after-sales service

b) Continuation of the Hotel's business operations by the Hotel

This includes the following uses:

- To perform obligations or exercise of rights in accordance with contracts
- To manage existing and new business partners
- To distribute information related to the Hotel's business operations, etc.
- To verify identities for events held by the Hotel for business partners
- To formulate purchasing strategies based on purchase history
- To maintain information security on IT systems managed by the Hotel
- To maintain operation and safety of the facilities managed by the Hotel
- To respond to legal requirements or guidance from governmental authorities
- To achieve other purposes of use clearly indicated at the time of acquisition of personal information

3) Personal information of job applicants and internship students

a) Implementation of recruitment and internship activities by the Hotel

This includes the following uses:

- To distribute information regarding the Hotel's recruitment and internship events
- To notify the schedule of the Hotel's selection process
- To notify the Hotel's selection results
- To conduct various types of communications during the internship period
- To maintain information security on IT systems managed by the Hotel with regards to any access rights given during the internship

5. Disclosure and provision to third parties

The Hotel will not disclose or provide personal data to third parties, except in the case of provision to subcontractors, or in any of the following cases:

- 1) When the Hotel has obtained the consent of the Guest
- 2) When disclosure or provision is required by law
- 3) When disclosure or provision is necessary for the protection of human life, human health, or property, and it is difficult to obtain the Guest's consent
- 4) When it is necessary to cooperate with national or local governments in the performance of their official duties and obtaining the Guest's consent would interfere with the performance of such duties

6. Information obtained in connection with personal information

- 1) Regardless of whether or not it falls under the definition of personal information, the Hotel will collect information related to the content and date of purchase of goods and services purchased by the Guest, use and browsing of the website operated by the Hotel (this includes cookie information, access logs and other information related to usage conditions, information on the Guest's device, operating system, etc.), or any other information related to the Guest's use of the Hotel's website. The information will be used to improve the functionality of the website operated by the Hotel and to conduct advertisements and promotions related to goods and services based on browsing and purchase histories.
- 2) The webpages maintained by the Hotel uses Google Analytics to collect access information to understand usage status. Data collected with the use of Google Analytics is managed pursuant to Google's privacy policy. Check the following Google's website for details and how to stop sending information to Google Analytics:

Google Analytics Terms of Service:

<https://marketingplatform.google.com/about/analytics/terms/us/>

Google Privacy Policy:

<https://policies.google.com/privacy?hl=en-US>

How Google uses information from sites or apps that use our services:

<https://policies.google.com/technologies/partner-sites?hl=en-US>

Google Analytics Opt-out Browser Add-on:

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

To disable Google Analytics, download and install "Google Analytics Opt-out Add-on" from the Google Opt-out Add-on Download page, and change the add-on settings in your browser. If you disable Google Analytics, Google Analytics will also be disabled on websites other than the Hotel's website. You may re-enable Google Analytics by reconfiguring the add-on setting on your browser.

7. Requests to disclose, etc.

In the event that the Hotel receives a request from a Guest or the Guest's representative for notification of the purpose of use of personal data the Hotel holds that identifies the Guest, disclosure of personal data the Hotel holds, disclosure of records of provision to third parties, addition, correction, or deletion of personal data the Hotel holds, or suspension of use, deletion, or provision to third parties of personal data the Hotel holds (hereinafter referred to as "Disclosure, etc."), the Hotel will respond appropriately to the request in accordance with the provisions of the law only if the Hotel can confirm that the request is made by the Guest him/herself. If the request for Disclosure, etc. by the Guest or the Guest's representative is not in conformity with the request method prescribed below, the Hotel may not be able to respond to such a request. The implementation or non-implementation of disclosure, etc. will be communicated to the person who made the request without delay. In the case of non-implementation, the Hotel will make effort to explain the reason for the non-implementation.

<Point of Contact>

Administration Department

Noborioji Hotel, Ltd.

40-1, Noborioji-cho, Nara City, Nara, 630-8213, Japan

<Documents Needing Submission>

To make a request for Disclosure, etc., please print out the following request forms, fill in the required items, and mail it to the address above, along with the following identification

documents. Please note that the Guest is responsible for all costs associated with obtaining and mailing the identification documents.

- Request Form for Notification of Purpose of Use
- Request Form for Disclosure of Personal data the Hotel holds
- Request Form for Disclosure of Records of Provision of Personal Data to Third Parties
- Request Form for Correction, etc. of Personal data the Hotel holds
- Request Form for Suspension of Use, etc. of Personal data the Hotel holds

< Identity Confirmation Document(s)>

[In the case of a request made by the Guest him/herself]

Please enclose a copy of any of the following:

- Driver's license, passport, health insurance card, residence certificate, etc. any of which have been issued by public agencies
 - ※ Prepare a copy without My Number (Japan's governmental personal identification number).
 - ※ Black out the items corresponding to Code (*Kigou*), Number (*Bangou*), Insurer Number and QR Code in the case of health insurance card.

[In the case of a request made by the Guest's representative]

In addition to the Identity Confirmation Documents prescribed above, please enclose the following documents:

(1) In the case of a legal representative:

- Document(s) to verify the authority of his/her legal representation:
- To verify the identification of the legal presentative, please prepare a copy of any of the following:
 - Driver's license, passport, health insurance card, residence certificate, etc. any of which have been issued by public agencies
 - ※ Prepare a copy without My Number (Japan's governmental personal identification number).
 - ※ Black out the items corresponding to Code (*Kigou*), Number (*Bangou*), Insurer Number and QR Code in the case of health insurance card.

(2) In the case of an agent:

- Power of attorney (Note: the Guest's registered seal is required to be affixed.)
- Certificate of the Guest's registered seal
- To verify the identification of the agent, please prepare a copy of any of the following:

- Driver's license, passport, health insurance card, residence certificate, etc. any of which have been issued by public agencies
 - ※ Prepare a copy without My Number (Japan's governmental personal identification number).
 - ※ Black out the items corresponding to Code (*Kigou*), Number (*Bangou*), Insurer Number and QR Code in the case of health insurance card.

<Fee>

A fee of 750 yen (including Japan's consumption tax) will be charged per a request for either notification of purpose of use, disclosure of personal data the Hotel holds, or disclosure of records of provision of personal data to third parties. No fee will be charged for requests for correction, addition, deletion, suspension of use, elimination, or suspension of provision to a third party of Personal data the Hotel holds.

Please pay the fee by enclosing a fixed-amount postal money order (issued by a post office) for the face value of 750 yen with the request form.

<Method to Respond>

After having performed personal identification and the payment of the fee, the Hotel will respond to the request in the manner specified in the request form.

If you have any questions, concerns, or other inquiries regarding this Policy, please contact the address specified above.

8. Changes to this Policy

The Hotel may change or revise this Policy from time to time, and such changed or revised Policy will be posted on this website. The Guest is advised to refer to the most current version of this Policy after any changes are posted on this website.

Date of Revision: April 1, 2024

Akihiko Kawashima

President, Noborioji Hotel, Ltd.

40-1, Noborioji-cho, Nara City, Nara, 630-8213, Japan