

Processing of Personal Information Under General Data Protection Regulation (“REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC”; hereinafter referred to as “**GDPR**”)

0. Customers subject to the provisions of this document

The provisions prescribed in Chapter 2 will apply to the processing of personal information if the GDPR applies to the personal information of customers located in the European Economic Area, which consists of members of the EU, Norway, Iceland, and Liechtenstein (these countries are collectively referred to as the “**EEA**”), at the time of provision of personal information to the Company by those customers.

1. Purpose of use of personal information

H.I.S. Co., Ltd. and HIS Group (collectively, the “**Company**”) will use the following types of information in the manner set out below in this document: (i) personal information provided by a statement or entry made in a written application (application form) or by contacting the Company by phone, email, etc. when making inquiries or applications for travel products or other products and services; and (ii) information related to personal information, such as website browsing histories, search histories, purchase histories, Internet advertising access log data, and location information.

In addition to using these forms of personal information to contact customers, the Company will use that personal information in relation to travel services applied for by customers within the scope necessary (i) for the arrangement and receipt of travel services that are provided by transportation and lodging providers, etc. (principal transportation and lodging providers, etc. are described in an agreement with each customer) and (ii) for provision of insurance-related services.

In addition to the above, the Company may use customer’s personal information, etc. for the following:

- Requests for opinions or feedback after participation in travel or receipt of other products or services
- Provision of special services
- Preparation of statistical data
- Market analysis to help develop better travel products or other products and services in the future
- Notification and management of products and services of the Company or partner companies based on customer tastes and preferences
- Implementation of monitoring, analysis, and countermeasures when the Company deems it necessary in order to identify unauthorized third-party use of payment methods, such as electronic payment, or other fraudulent activities
- Provision of advertising for new products and services in response to customer tastes and preferences based on analysis of personal information that has been obtained and analysis of information related to personal information, such as customers’ website browsing histories, search histories, purchase histories, Internet advertising access log data, and location information, that can be obtained using standard Internet technologies

In each of the cases above, the customer may choose for him or herself whether or not to provide his or her personal information to the Company; however, please note that if personal information not provided by a customer is essential for the provision of a travel product or other products or services applied for by that customer, the customer might not be able to use that travel product or other products, services, etc. of the Company.

When a customer applies for travel products or other products and services, the Company will store in a database the personal information provided by that customer. The Company will store the personal information stored in the database for five years in principle or for as long as necessary in order to perform agreements, pursue legitimate interests, or comply with legal obligations.

2. Legal basis for processing personal information

The Company will process personal information based on the legal basis stated in Article 6 of the GDPR. The Company processes personal information in the cases set out below.

- (1) When necessary for the performance of an agreement with a customer
The Company might be required to process personal information in order to perform an agreement that a customer has executed with the Company. If the customer applies for a service of the Company, the Company will use personal information provided by that customer for procedures required to perform an agreement.
- (2) When necessary for the purposes of the Company's legitimate interests
The Company might process a customer's personal information for the purposes of the Company's legitimate interests, such as the following: optimization of the content of websites, email, etc. (delivery of emails will be made only if the customer agrees to such delivery of his or her own free will) for the delivery to the customer of guidance, etc. regarding products or services of the Company and partner companies; and compliance, etc. with requirements of national or local governments, with laws and regulations, or with fraud detection.
- (3) When necessary for compliance with legal obligations
The Company might disclose a customer's personal information to a third party in order to comply with provisions under laws and regulations, court orders, or contractual obligations owed to the customer. This also includes providing customers' personal information to licensed tax accountants or public institutions in accordance with the provisions of tax laws, social security laws, etc.
- (4) When a customer has given consent
The Company might use personal information based on a customer's consent. A customer may withdraw such consent at any time by contacting the Company's contact address set out below. However, the legality of the processing of personal information based on consent before its withdrawal will not be affected by that withdrawal of consent.
Contact address: gdpr-pj@his-world.com

3. Provision of personal information

The Company will not disclose or provide to a third party any personal information provided by a customer except in cases permitted by laws, regulations, etc. However, this will not apply in any case where the Company obtains the consent of the identifiable person in question or where the Company has reasonable grounds set out below, such as a legal obligation to disclose or provide personal information to a third party.

- (a) When necessary for protection of life, body, or property
The Company might provide a third party with a customer's personal information in a case where it is necessary to do so for the purpose of protecting the life, body, or property of the customer and it would be difficult to obtain the customer's consent. The Company might also provide a third party with a customer's personal information in a case where it is particularly necessary to do so to improve public health or promote healthy child development and it would be difficult to obtain the customer's consent.
- (b) Provision to national or local governments
The Company might provide a customer's personal information in a case where (i) the provision of personal information becomes necessary in accordance with the provisions of laws and regulations, etc. or (ii) there is a strong necessity to provide personal information in order to prevent, investigate, or prosecute, etc. crimes or fraud. The Company might also disclose a customer's personal information to competent authorities in order to protect the rights or property of the Company.
- (c) Provision to group companies
The Company may disclose a customer's personal information to affiliate companies in order to provide services to the customer. Please check the "Corporate Information" page on this website for details regarding the organizational structure of the Company.
- (d) Provision to service providers, etc.
The Company may cause tour operators (agencies, etc.) or service providers (transportation providers, lodging providers, etc.) to process a customer's personal information on behalf of the Company to provide services to the customer. Each service provider, etc. has entered into a confidential agreement with the Company and does not process any customer's personal information for any purpose other than the provision of services. If the Company transfers a customer's personal information to a data processor located outside the EEA, the Company will take appropriate protection measures to protect the customer's personal information.

If, in connection with any disclosure or provision stated above, the Company transfers a customer's personal information to a corporation located outside the EEA, the Company will guarantee the security of the customer's personal information. If the Company transfers a customer's personal information to any country for which an adequacy decision has not been adopted by the European Commission, the Company will take appropriate protection measures required under the GDPR. Unless extraterritorial transfer is permitted under the GDPR, the Company will enter into with each business partner located outside of the EEA an agreement based on the Standard Contractual Clauses regarding extraterritorial transfer prescribed by the European Commission and seek to protect customers' personal information.

4. Customers' rights; procedures for disclosure, etc. of personal information

Each customer has various rights regarding his or her own personal information. If a customer wishes to make a request concerning inquiries, disclosure, deletion or erasure, correction of content, suspension of use, data portability, etc. in relation to the customer's personal information held by the Company, the customer is requested to make an application using the contact email address set out below or the nearest branch of the Company (limited to local subsidiaries of the Company in the EEA), and the Company will notify the customer of the necessary procedures. The Company will comply with the contents of such request in accordance with laws and regulations and the regulations of the Company within a reasonable period and notify the identifiable person in question of the result thereof. If the Company is unable to comply with a part or all of such request, the Company will explain the reason therefor. In addition, the customer is guaranteed the right to file an objection with regulatory authorities.

Contact address: gdpr-pj@his-world.com

5. Security measures

In order to prevent exposing personal information to danger, such as divulgence, loss, or data corruption, the Company will endeavor to take appropriate and reasonable security measures from both a technical and management perspective. In the unlikely event that personal information is divulged, lost, or corrupted, the Company will immediately notify the competent regulatory authority and the customer in question to that effect and take appropriate measures and corrective actions.

The Company will, in accordance with laws and regulations related to personal information protection in Europe, take appropriate measures to prevent unauthorized access to, or misuse of, personal information and take various technical measures to ensure the security and integrity of customers' personal information in information processing systems. Only persons who have received appropriate training in the protection of personal information will be authorized to process customers' personal information. The Company regularly conducts various types of training for employees to raise awareness regarding the protection of personal information.

6. Other matters

The Company complies with personal information protection laws, other related laws and regulations, and other policies and standards stipulated by national governments or the European Commission. The Company has established a personal information protection management system, endeavors to ensure that all officers and employees are aware of and comply with the system, and continues to make improvements and maintains the system at its optimal condition at all times.

The Company requests that each customer who is a minor provides his or her personal information after obtaining the consent of his or her guardian.

The Company possesses a system for managing personal information protection that ensures that all officers and employees understand and comply with laws and regulations, and the Company will continuously review that system.

The Company might make revisions to this document from time to time in order to manage customers' personal information more appropriately and in response to changes in related laws and regulations.

7. Contact address of Data Protection Officer (DPO)

Contact address: gdpr-pj@his-world.com