

KANAYA HOTEL KANKO Group Privacy Policy

KANAYA HOTEL KANKO Group will work on providing reliable and trusted service.

With respect to the handling of Personal Information provided by our customers, we will work on maintaining and stringent controlling the accuracy of Personal Information.

Furthermore, we will implement safety measures at the necessary and appropriate levels, and work on safety management of the Personal Information of our customers.

We educate our employee so that they fully understand the importance of Personal Information and the rule and system to protect Personal Information.

1. The Application of this Policy

KANAYA HOTEL KANKO Group will apply our privacy policy for guests using the facilities stated below:

- KINUGAWA KANAYA Hotel
- KINUGAWA ONSEN Hotel
- KANAYA RESORT HAKONE
- THE KEY HIGHLAND NASU
- Chocolaterie JOHN KANAYA
- Modern Japanese Restaurant HIRAKAWACHO KANAYA
- KTA Co., Ltd.

2. Purpose of usage

KANAYA HOTEL KANKO Group will acquire and use personal information only within the scope of the purposes stated below:

- (1) To provide our service and products, to ensure security.
- (2) To provide food and beverages, banquet and other services, and to confirm customer information in receiving dining reservation and party reservation
- (3) To invite and inform customers for events and products, etc.
- (4) To conduct a survey about the services and goods
- (5) To develop new service and products
- (6) To perform other operations relating to the above (1), (2), (3), (4) and (5)
- (7) To fulfil inquiries and requests

3. Collecting personal information

KANAYA HOTEL KANKO Group will obtain personal information only by fair, appropriate means.

4. Disclosures and provision of your personal information

Except the following circumstance, we will not disclose any individual's personal information to a third party without the consent of that individual.

Note that provision of information to data sharing partners and business entrusted companies are not deemed to constitute disclosure or provision to third parties.

- (1) Guest consent has been obtained.
- (2) Disclosure or provision is required within the scope allowed by laws or regulations.
- (3) Disclosure is required to protect human life, health, or property in cases where obtaining guest consent is difficult.
- (4) Disclosure is required to cooperate with the public affairs of national or local governments, and when obtaining customer consent is likely to hinder the administration of public affairs.
- (5) Disclosure or provision of information as statistical data (in a format that does not disclose the guest's identity).

5. Business entrustment

KANAYA HOTEL KANKO Group may entrust its business operations to third parties to which personal information may also be disclosed to the extent required.

6. Managing personal information

We manage our guests' information according to the strictest standards and take the utmost care to prevent leaks, loss, or alterations.

We ensure that our employees are properly trained regarding appropriate handling to safeguard the security of information identifying individual guests.

7. Disclosure, correction, deletion, addition, discontinuance, and erasure

Any guest request submitted in the manner specified for disclosure, correction, deletion, or addition, or 3) the discontinuance and erasure of personal information held by KANAYA HOTEL KANKO Group shall be handled as follows, within a reasonable timeframe, after such requests are determined to be authentic.

A guest request may be rejected partially or entirely if compliance with such request would endanger the life, health, or property of the guest or a third party; seriously impact KANAYA HOTEL KANKO Group's business operations; or result in a violation of laws or regulations.

8. Inquiries and submission of request for disclosures

Request procedure contact for requests prescribed in above relating to personal information stored at KANAYA HOTEL KANKO Group, and inquiries and claims relating to our handling of personal information are shown below.

For any other questions or concerns regarding our group reservation of hotel, banquet and restaurant, please contact our group reservation;

Personal Information Response Office

KINUGAWA KANAYA HOTEL General Administration Office

1394 Kinugawa Onsen Ohara, Nikko, Tochigi 321-2522

Fee

Requests for notification of the purpose of use of Personal Information or for the disclosure of Personal Information held will incur a handling fee of five hundred yen (500yen) per request.

9. Application and modification of the Privacy Policy

This Privacy Policy explains how KANAYA HOTEL KANKO Group handles personal guest information.

Use of KANAYA HOTEL KANKO Group's services and products by a guest is deemed to constitute full understanding of and consent to the terms of this privacy policy.

This privacy policy is subject to revision by KANAYA HOTEL KANKO Group at any time.

(As of October 1st, 2019)