

**Dear participants,**

Please read and understand the following Personal Information Protection Policy set forth by TOBU TOP TOURS CO., LTD. If you read the Policy and agree with the conditions and stipulations thereof, please click the "Agree" the button and proceed to the following screen, in which you could enter your travel requests, inquiries or messages sent to TOBU TOP TOURS CO., LTD.

### **TOBU TOP TOURS's Personal Information Protection Policy**

TOBU TOP TOURS CO., LTD. (hereinafter referred to as TOBU TOP TOURS) in accordance with the "Personal Information Protection Codes" and all corporate compliance measures and rules concerning the protection of personal information, will make utmost efforts to protect the personal information, which it collects and utilizes in a manner described as follows:

#### **1. Purpose of using personal information**

We will use personal information acquired by the method of from the principal or contract manager in applying for travel or from the principal or contract managers at other applications such as Documents or from customers who applied for travel planning products of companies affiliated with the company to us within the range necessary for that purpose for the following purposes.

In addition, when using the personal information acquired by the Company through the marketed name list or information provided by a third party etc., we promptly notify him / herself of purpose of use, we acquire consent and use it.

- (1) Contact with customers (including the sending of documents etc.)
- (2) Arrangement of travel services provided by the transportation / accommodation agencies etc (necessary for the major transportation and accommodation agencies etc on the contract document) necessary for the trip that the customer applied
- (3) Procedures for receiving the service of the preceding item
- (4) Procedures for insurance covering our travel agreement liability and accident cost etc
- (5) Requests for questionnaires such as guidance on products and campaigns to customers, opinions, comments, etc.
- (6) Fact confirmation of contents of consultation and reply to customer (Personal information received by e-mail or customer upon consultation from customers is limited to that purpose only.)
- (7) For the convenience of customers' shopping at souvenir shops etc. of the travel destination
  - (8) For shipping of purchased products, related after-sales service, information on new products and services, and for responding to inquiries
  - (9) For the implementation of contracted projects from the national government, local governments and various corporations

On the Company's website, the Company may use "cookie" to provide better service. "Cookie" is a function to store on the computer of the person who viewed the website. Although it is possible to refuse receipt according to the settings of the browser, some of the services may not be available by this.

## 2. Provision and consignment of personal information of customers to third parties

Within the range of the purposes stated in the Paragraph 1, the Company may, in advance, through an electronic communication technology, give the personal information of the Traveler such as his/her name, passport number and flight number to be boarded, age, sex, address, phone number and nationality etc. to the transportation, accommodation facilities and the insurance companies souvenir stores etc. with whom the Company has concluded a contract regarding the processing of personal information, to arrangement agencies, to whom the Company has consigned travel arrangement, to commissioned sales company for the Company's agent-organized tour guide and to the service provider to whom the Company consigns data processing or guide services. For information on the protection of personal data in the relevant provider where a third party providing personal data is located in a foreign country, please refer to our website "Processing of Personal Data: Information on the Protection of Personal data in Foreign Third Parties" (<https://tobutoptours.jp/info/privacy-guidelines.html>).

The Company may cooperate to provide personal information with police investigation or at the request of the Ministry of Land, Infrastructure, Transport and Tourism, or Japan Tourism Agency and other public affairs of national and local governments in connection with the occurrence of the accident etc.

In preparation for the Traveler to suffer injuries or diseases during the travel, the Company inquire the personal information of the contact person in Japan during the travel. The Company may use such personal information in case of the Traveler's injury or disease and when the Company decides to be necessary to contact with such contact person in Japan. The Traveler shall acquire the consent of such contact person in Japan to provide his/her personal information with the Company.

## 3. On applying for travel

Regarding the purpose of use of your personal information or the provision to third parties, in addition to the description here, it is clearly stated on our Travel brochure and travel condition explanation document.

The Traveler must give accurate information when filling out the application form, making the list of participants' names and answering the questionnaires, lest travel arrangements and service provision will be interfered with. In application for the travel, the Traveler shall consent the provision of personal information as stipulated in the preceding documents.

## 4. Safety Management Measures

We have taken necessary and appropriate safety management measures to protect personal data, such as preventing leakage, loss, or damage. The main contents of these measures are as follows

- In order to comply with laws and regulations and ensure proper handling of personal information, we have formulated a personal information protection policies, and based on these policies, we have established this handling rule and other related internal rules concerning the acquisition, use, provision, and disposal of personal information.
- We have appointed our Personal Information Management Officer and a person in charge of the handling of personal information in each department. We have also established a system to report any violations or threats of violation of laws and regulations our internal rules to the Personal Information Management Officer.

- We conduct periodic self-inspections of the status of the handling of personal data and conduct audits by our internal audit department.
- When outsourcing businesses, including the handling of personal information, we includes clauses related to the handling of personal data in our contracts.
- We provide regular training to our employees on the handling of personal information.
- Matters concerning the confidentiality of personal information are described in our work rules and other internal rules.
- We monitor entering and leaving our facilities, and establish rules for storage and disposal of documents and electronic media containing personal information.
- Measures are taken to prevent theft or loss of equipments such as password setting and remote control measures.
- Access control is implemented to limit the scope of databases handled by employees.
- We have introduced mechanisms to protect the systems from unauthorized access from outside or from unauthorized software.
- When providing personal data to a third party in a foreign country, We confirm the outline of the personal information protection legislation in such regions and take the necessary safety control measures.

5. About inquiry, disclosure and request procedure for customer's personal information

- (1) Matters concerning personal information to be disclosed are as follows.
  - a. Types of personal information to be opened  
Address, phone number, e-mail address, travel history, etc. obtained by application form (application for travel, tokimeki etc), application documents (campaign application etc.), other documents or website etc.
  - b. purpose of use
    - a) Contact with customers (including the sending of documents etc.)
    - b) Arrangement of travel services provided by the transportation / accommodation agencies etc (necessary for the major transportation and accommodation agencies etc on the contract document) necessary for the trip that the customer applied
    - c) Use of specific personal information under the law
- (2) Regarding personal data to be disclosed held by the Company, we will notify you of the purpose of use, disclosure of personal information, correction / addition / deletion of personal information, suspension of use of personal information, elimination of personal information, or Disclosure of records provided to third parties , If you wish, we will inform you about necessary procedures, so please inquire to the following inquiries.

**【Inquiries concerning personal information, offer of complaints etc】**

1. For inquiries, complaints, etc. concerning the handling of personal information, please contact the customer personal information handling manager at the sales office where you make a deal or to the

below

**(1) General Inquiries**

TOBU TOP TOURS CO., LTD. Tobu Tourist Information Center ASAKUSA

Phone: +81 (0) 3 3841 2871

Fax: +81 (0) 3 3845 1327

**(2) For Users in Thailand**

If you are a resident of Thailand, please refer to the relevant "Special Information" sections provided at the end of this policy for detailed information regarding the processing of your personal data, your rights, and the contact information for our Data Protection Representatives in your respective regions.

2. If you can not resolve complaints concerning personal information with us between the parties, we can offer the following association to ask for assistance on solution.

Japan Association of Travel Agents Consumer counseling office (person in charge of personal information protection)

TEL +81-3-3592-1266

JIPDEC Authorized Personal Information Protection Organization Office

TEL +81-120-700-779

6. Company address, name of representative, Person in charge of personal information management

Yasushi Karakita, President

Person in charge of personal information management Compliance Office Director

1-1-2 Oshiage, Sumida-ku, Tokyo

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## Special Information For Thai Users

In order to strictly protect information of customers residing in the Kingdom of Thailand (hereinafter referred to as "**Thai Personal Data**"), TOBU TOP TOURS CO., LTD. (hereinafter referred to as "**the Company**") is implementing the following measures in accordance with the Personal Data Protection Act (PDPA).

In the event of any conflict or inconsistency between the Company's general Personal Information Protection Policy and this Special Information, this Special Information shall prevail concerning the handling of Thai Personal Data.

**1. Roles of Entities** TOBU RAILWAY CO., LTD. acts as the **Data Controller** for this service, and TOBU TOP TOURS CO., LTD. processes personal data as a **Data Processor** on its behalf.

**2. Personal Data Collected** The data the Company acquires from customers is as follows:

- e-mail address;

- date of birth; and
- cookie data (online identifiers) Each of the customer's Thai Personal Data above is necessary for providing the services.

### 3. Legal Basis for Processing

The Company processes Thai Personal Data based on the following legal bases:

**Contractual Necessity:** For travel arrangements and related services.

**Consent:** For marketing activities or where required by law.

**Legal Obligation:** To comply with applicable laws and regulations.

**Legitimate Interests:** For safety management and service improvement.

### 4. International Transfer of Personal Data

Thai Personal Data may be transferred to and stored on servers in **Japan** (where the Company is located). The Company ensures appropriate safety management measures are taken during such transfers.

### 5. Data Retention Period

Thai Personal Data provided by customers will be kept for **2 years** and then properly erased and discarded, unless a longer retention period is required by law.

### 6. Your Rights as a Data Subject

Under the PDPA, you have the following rights regarding your Thai Personal Data:

Right to access and obtain a copy of your personal data.

Right to data portability.

Right to object to the processing of your personal data.

Right to request erasure, destruction, or anonymization.

Right to restrict processing.

Right to rectification of inaccurate data.

Right to withdraw consent at any time.

Right to lodge a complaint with the Thai Personal Data Protection Committee (PDPC).

### 7. Contact

For any inquiries regarding this matter, please contact the following:

#### (1) Contacting Us

Please note that TOBU RAILWAY CO., LTD. acts as the Data Controller for this service, and TOBU TOP TOURS CO., LTD. processes personal data as a Data Processor on its behalf.

TOBU TOP TOURS CO., LTD.

Tobu Tourist Information Center ASAKUSA

Phone: +81 (0) 3 3841 2871

Fax: +81 (0) 3 3845 1327

#### (2) Contact Information (Data Protection Representative in Thailand)

TOBU RAILWAY CO., LTD. has appointed TNY Legal Co., Ltd. as its representative under the Personal Data Protection Act (PDPA) in Thailand.

If you wish to ask questions or exercise your rights regarding your personal data in Thailand, you may do so through any of the following methods:

- By Email: Send an email to [pdpa-contact@tny-legal.com](mailto:pdpa-contact@tny-legal.com)

Please ensure that you include "TOBU RAILWAY CO.,LTD." in the subject line of your email. (We also recommend stating clearly in the body of the email that your inquiry relates to "Tobu Japan Trip Tickets / Tobu Top Tours Co., Ltd.")

- By Mail: Mail your inquiry to:

TNY Legal Co., Ltd.

11/2 Room 19A P23 Building 19th Floor, Sukhumvit 23 Alley, Sukhumvit Road, Khlong Toei Nuea, Wattana, Bangkok 10110, Thailand

- By Phone: Call +66(0)2-127-0742

PLEASE NOTE: When contacting by mail or phone, please be sure to inform them of the name "TOBU RAILWAY CO., LTD.". On receiving your correspondence, Tobu Railway Co., Ltd. (or Tobu Top Tours Co., Ltd. acting on its behalf) is likely to request evidence of your identity, to ensure your personal data and information connected with it is not provided to anyone other than you.