

About Privacy Policy

1. A privacy policy:

Tobu Top Tours Co., LTD. is committed to the corporate philosophy of valuing the bonds with our customers, vendors, employees, stockholders, local society, and we are to aim to strengthen the coexistence and co-prosperity, respecting each other among these peoples described. In order to enhance this, we believe that it requires to keep and to develop our business bases on the core as "Travel Itself" Based on this philosophy, Tobu Top Tours Co., LTD., by catching the sense of diversity of customers' needs, by offering the satisfying travel products and services, we continue to make efforts to enhance the corporate value and the confidence by the persons concerned as a travel enterprise. To achieve the philosophy and the policy, Tobu Top Tours Co., LTD. established the "Personal Information Protection Act" as follows and vow to promote it, by device the "Personal Information Protection Act", for the employees to recognize and pursue the importance of the law thoroughly.

Tobu Top Tours Co., LTD.

Yasushi Karakita

President

• Personal information Protection Act

(1) Usage and action

Tobu Top Tours Co., LTD. verifies the purpose of use and collects the personal Information with-in the territories of permission of use. The purpose of use is contained in the stipulation of the personal information. Also, the manager of the personal information at each branch has responsible to supervise it in this management regime and drastic measure to be taken.

(2) Managements and protections

Tobu Top Tours Co., LTD. is committed to manage the personal information strictly and never provide and never announce it to any other third parties, except the acceptance of the principal. In case of accidents, if Police, MIIT (Ministry of land, Infrastructure and Tourism), Ministry of Foreign Affaires of Japan and other government and municipal offices requests, our company may respond to disclose the

personal information. We will implement safety measure rules to manage risks to prevent unexpected matters, such as, the leakage, the loss, the destruction and damages. Also we will take a preventive measures against the outbreak of problems. If unexpected problems actually happened, we will take a corrective measures appropriately. (i.e.

Implementation of Safeguards)

- Limit access by unauthorized persons
- Access confirmation of authorization
- Measures against the Network and terminal being accessed by unauthorized persons
- Password settlement and SSL (Secure Socket Layer)

(3) Observance of the Law

Tobu Top Tours Co., LTD. will observe laws and ordinances on protection of personal information, governmental guidelines and other social norms.

(4)Inquiries and Complaints

Tobu Top Tours Co., LTD. will take a measure to handle inquiries and complaints.

(5)Continued Implementation for the “Personal information Protection Act”

Tobu Top Tours Co., LTD. will endeavor to continually improve the management System through regular Personal information Protection Act.

2. How We Handle Personal Information:

In accordance with the Personal Information Protection Act and Tobu Top Tours Personal Information Protection Policy. Tobu Top Tours handles and works to protect the personal information of customers as follows.

(1) Reasons for Use of Customer Personal Information

Tobu Top Tours Co., LTD. utilizes the personal information to customers or contractor, when purchasing travel products, as well as when necessary in the performance of travel and other services. And Tobu Top Tours Co., LTD. utilizes the personal information for travel insurances to guarantee the travel expenses in case of accidents.

Other reasons of use of personal information provided by E-mail and phone call are;

To provide the information of products and promotional campaign,

To request inquiries of opinions and impressions of the travel,

To respond to confirm the facts of consultation

In case of using personal information provided by the third parties or by the public list of names,

Tobu Top Tours Co., LTD. contacts the person principal immediately to give notice of the reasons for use and to obtain approval for use of personal information.

(2) Providing Consignment and Customer Personal Information to Third parties

Within the scope of the usage stated in previous article, Tobu Top Tours Co., LTD. may provide customer' name, gender, age, address, phone number, e-mail address, passport number, and flight number to transportation, accommodation, and insurance companies in via electronic communication in advance as necessary to arrange and provide purchased travel services. And also, Tobu Top Tours Co., LTD. may provide the personal information, such as the customer's name, passport number and flight number in our possession to contracted souvenir stores in order to facilitate shopping by customers at their visiting cities via electronic communication.

For further information regarding cases in which a third party located in a foreign country has access to personal information, please refer to the following # 1.(Handling of Personal Information: Information on the Protection of Personal Information by Third Parties in Foreign Countries).

"Handling of Personal Information: Information on the Protection of Personal Information by Third Parties in Foreign Countries."

(3) When Ordering Travel Services

The purpose of usage or the provision of information to the third parties is described here on web-site as well as the brochures of the travel and the standard terms & conditions of travel contracts. When ordering the travel plans, Tobu Top Tours Co., LTD. will make contract after the acceptance or Agreement by customers for the Personal information Protection Act as described on this web page.

As when The information filled out in the application form and contents in the order form are not correct, or the personal information of customers is not filled out, we may not complete the customer request of travel arrangements and services, we require customers to fill out the correct information in the forms.

(4) About Procedures on Inquiries, Disclosure, Deletion on Customers' Personal Information. Please contact the departments below for any issues concerning personal information. Regarding customers' personal information we possess, we

will advise the necessary procedure for those who request to disclose, delete or destroy, stop the use, sharing with third parties.

3. Questions and Complaints about personal information

Please contact the departments below for any issues concerning personal information.

Tobu Top Tours Co., LTD.

Tobu Tourist Information Center ASAKUSA

Phone: +81 (0) 3 3841 2871 Fax: +81 (0) 3 3845 1327

Office hours 7:20AM to 7:00PM(Open year round)

(The articles of the personal information protection Act is to conform of Japanese customized Law)

When it cannot be settled between the people concerned about a complaint about the personal information with us, the guest can do a proposal to demand help from the following association about the solution.

Japan Association of Travel Agents consumers counselor's office (personal information protection charge)

Phone:03-3592-1266

Found. Japan Information Processing Development Center personal information protection complaint counselor's office

Phone:03-5776-1379 Foundation, 0120-700-779

1 : Information on the Protection of Personal Information by Third Parties in Foreign Countries.

Information on the Protection of Personal Information by Third Parties in Foreign Countries where third parties that receive your personal information are located is as follows (please check the specific country names in itinerary documents, etc.).

[1] Countries subject to GDPR (General Data Protection Regulation) and the UK (designated as countries with personal information protection systems that are recognized by the Personal Information Protection Commission as having a protection level equivalent to that of Japan): Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Liechtenstein, Iceland, Norway, United Kingdom (Reference: Notification No. 1 and No. 5 of the Personal Information Protection Commission in 2019)

[2] Countries/regions that have obtained adequacy recognition under Article 45 of GDPR (recognized by the European Commission as having sufficient data protection standards under GDPR): Argentina, Andorra, United Kingdom, Israel, Uruguay, Canada, Switzerland, New Zealand
(Reference: <https://www.ppc.go.jp/enforcement/infoprovision/laws/GDPR/>)

[3] APEC's CBPR system member countries/regions (have laws that comply with APEC's privacy framework): United States, Mexico, Canada, Singapore, South Korea, Australia, Taiwan, Philippines
(Reference: https://www.ppc.go.jp/enforcement/cooperation/international_conference/)

[4] Countries that comply with all eight principles of the OECD Privacy Guidelines (the OECD Privacy Guidelines establish the following eight basic principles: 1. Limitation of collection, 2. Data quality, 3. Purpose specification, 4. Limitation of use, 5. Security safeguards, 6. Openness, 7. Individual participation, 8. Accountability). China

[5] Countries without a personal information protection system Further information will be provided separately.

If the third parties to whom we provide your personal information are located in the foreign countries listed in [1] to [4] above, all of these third parties implement measures for the protection of personal information in accordance with the eight principles of the OECD Privacy Guidelines.