

Privacy Policy

Shintoukai Travel Ltd. has established and adheres to the following privacy policy (hereinafter referred to as "Privacy Policy") and declares that it will handle all personal information in a safe and appropriate manner.

Shintoukai Travel Co.

Representative Director Fumoto Kawano

1. Personal Information

"Personal information" means information about a living person as defined in the law on the protection of personal information (Act No. 57 of 2003, hereinafter referred to as the "Personal Information Protection Act"), which can be used to identify a specific individual by the name, date of birth or other description contained in the information (including information that can be easily compared with other information to identify a specific individual) or information that contains a personal identification number.

2. Access to and use of personal information

The Company collects and uses your personal information to the extent necessary for the purposes described below. If we wish to use your personal information outside the scope of the following purposes, we will obtain your prior consent in an appropriate manner. With respect to personal information provided to our services and advertising campaigns, we will utilize it for the following purposes;

- The purpose of providing services to you (hereinafter referred to as "the Services")
- In order to improve and enhance the Service or to develop new services
- For the purpose of notifying you of new features of the Service and other services (including the sending of e-mails, flyers, and other mails) we provide and information on updates to the Service, events, etc.
- For the the purpose of maintenance, important notices, etc.
- For the purpose of responding to inquiries from users of the Service (including legal persons using the Service. The same shall apply hereinafter). This includes the verification of the user's identity.
- To report to users on the use of the Service
- To request the users' participation in surveys, interviews, and other events regarding the Service, and to report on the results of such activities.

- To investigate and analyze the usage history of the Service and to use the results for improvements, developments, and/or advertisements of the Service.
- To personalize advertisements for new products or services based on browsing history and/or purchase history.
- To identify users who violate the Terms of Use or users with the intent to use the Service for fraudulent or inappropriate purposes, and to refuse their use.

3. Management and protection of personal data

The Company will strictly manage personal information and will not disclose or provide data to third parties without the consent of the person concerned, except for the following cases. In addition, in consideration of safety issues, the Company shall take measures to prevent and correct the risks of unauthorized access to personal information, loss, destruction, falsification and leakage of personal information.

- (1) When necessary to protect the life, body, or property of the individual and when it is difficult to obtain the consent of the person concerned
- (2) When it is particularly necessary to improve public health or promote the healthy development of children and when it is difficult to obtain the consent of the person concerned
- (3) When it is necessary to cooperate with a state agency, local authority, or a person entrusted by such agency to perform a matter prescribed by law, and obtaining the consent of the individual may hinder the performance of the matter
- (4) When the third party is an academic research institution, etc., and the third party is required to process personal data for the purpose of academic research (including when the processing of personal data is partly for the purpose of academic research, except in cases where there is a risk of infringement of the rights and interests of the individual)
- (5) When the processing of personal data is outsourced, in whole or in part, to the extent necessary to achieve the purpose of use in order to ensure the smooth operation of the business
- (6) When personal information is provided as a result of a merger or other reason for business succession
- (7) In other cases as permitted by law.

4. Outsourced handling of personal information

The Company may outsource the handling of personal information in whole or in part to the extent necessary to achieve the purpose of use. In such cases, the Company will thoroughly review the suitability of the contractor, stipulate confidentiality obligations in the contract, and provide necessary and appropriate supervision of the contractor. In addition, the Company will jointly use all or part of the acquired personal information in accordance with the provisions of the Personal Data

Protection Act.

5. Disclosure of personal information

If a person requests disclosure of his or her personal information or records related to the provision of personal information to a third party, the Company will immediately disclose such information to the person. However, we may decide not to disclose all or part of the information if disclosure would result in any of the following situations. Once the decision is made, we will notify you immediately.

- (1) Circumstances that are likely to harm the life, body, property or other rights or interests of the person concerned or a third party
- (2) Circumstances that may seriously interfere with the normal conduct of our business.
- (3) Any other situation that violates the law.

6. Correction and deletion of personal information

In the event that personal information held by the Company is incorrect, the Company shall correct or delete such personal information at the request of the individual in accordance with the procedures established by the Company.

If the Company receives such a request from the person concerned and deems it necessary, the Company will immediately revise or delete the personal information and notify the person concerned.

7. Suspension of use of personal information

If the person concerned requests the suspension of use or deletion (including suspension of provision to a third party, hereinafter referred to as "suspension of use") of his or her personal information for reasons specified in the Personal Information Protection Law, the Company shall immediately conduct the necessary investigation, and based on the results of the investigation, shall suspend the use of the personal information to the extent necessary and notify the person concerned. However, if it is difficult to suspend the use because it would cost a large amount of money, and if other necessary measures can be taken to protect the rights and interests of the person concerned, these alternative measures will be taken.

8. Basic guidelines for security management measures

- (1) In order to establish and continuously improve the safety management system for personal information, the Company identifies risks to personal information using established procedures and implements appropriate risk countermeasures.
- (2) The Company clearly defines roles and responsibilities regarding the security of personal information and manages personal information appropriately.

(3) The Company conducts training and enlightenment activities in order to make management, employees and all related parties aware of their responsibilities to maintain information security regarding personal information.

(4) The Company will monitor and document the implementation of the personal information security management system, set and achieve security goals related to personal information, and ensure reliable operation and continuous improvement of the system through regular internal audits and management reviews.

(5) In the unlikely event of a security issue related to personal information, the Company will immediately investigate the cause, minimize damage, and strive to ensure business continuity.

(6) The Company shall comply with laws, regulations, other social norms and contracts with customers regarding personal information and its handling.

9. Procedures for changes to the Privacy Policy

The Company will review and improve the contents of this Privacy Policy as it sees fit. In addition, the contents of this Privacy Policy may be changed appropriately, except in cases where the personal information protection policy in the law stipulates otherwise. The changed Privacy Policy will be notified to the user in the manner prescribed by the Company or will take effect from the time it is posted on the Company's website.

10. Compliance with laws and regulations

The Company complies with the laws, regulations and other norms of Japan relating to personal information held by the Company.

11. Response to complaints and inquiries

If the Company receives complaints and inquiries from individuals regarding the handling of their personal information, it will respond appropriately and promptly. The Company will also respond promptly and appropriately to requests from individuals for disclosure (including disclosure of records related to the provision of personal information to third parties), correction, supplementation, deletion, use, or suspension of use of personal information.

12. Handling of cookies, etc.

In order to analyze access to and use of the Company's official website and the Service (hereinafter collectively referred to as the "Website, etc."), publish advertisements, and improve the convenience of the Website, etc., the Company may acquire files and similar technology (hereinafter referred to as "cookies") stored on the devices of persons who access the Website, etc. I am responsible for changing the settings of my web browser to restrict the acquisition of cookies, etc. at my own risk.

When you personally enter or register personal information on the Website, etc., or when you access the Website, etc. from a URL in an e-mail or similar message sent by us, the Company may associate cookies, etc. with your personal information.

Since cookies, etc. associated with your personal information are your personal information, the Company will manage them in accordance with the provisions of this Privacy Policy.

13. Inquiry Window

If you have any questions about the handling of personal information by the Company, please refer to the following contact information.

Shintoukai Travel Co.

Customer Service Counter

〒110-0015 Tokyo Taito-ku, Higashi-Ueno 1-2-13 Kanipples Shin Mido-cho 2F

Tel: 03-5817-4425

Email: info@stk-t.com

14. Language

If there is any discrepancy between the Japanese version of this Privacy Policy and any other language version, the Japanese version shall prevail.

15. Governing Law/Agreement Jurisdiction

This Privacy Policy shall be governed by and construed in accordance with the laws of Japan. The Tokyo District Court is the exclusive court of first instance for any disputes relating to this Privacy Policy.