

(English translation)

## **Handling of Personal Information**

Sumitomo Fudosan Villa Fontaine Co., Ltd.  
(a personal information handling business)

We keep your personal information necessary for our businesses. We hereby notify you of our handling and protection of personal information in accordance with the provisions of the Act on the Protection of Personal Information (Kojin Joho Hogo Ho) as follows:

### 1. Protection policy of personal information

We endeavor to appropriately handle and to protect personal information by respecting and complying with the applicable laws and regulations regarding the protection of personal information and with the social order.

### 2. Personal information in our possession

We hold customers' personal information (information that can identify customers, such as names, addresses, birth dates, places of work, salaries, telephone numbers, and e-mail addresses).

### 3. Purpose of use of personal information

1. Performance of agreements and provision of information and services relating to the hotel business
  2. Sales and marketing activities (such as surveys) by mail, telephone, e-mail, or other methods in order to provide the information and services stated in 1 above. Customer trends analysis and research analysis, such as for product development.
  3. Other purposes incidental or related to our businesses or the businesses of other companies belonging to our group
  4. Provision of personal information to third parties only when granted consent by the person concerned
- We will stop providing information and services to you if you so request.

### 4. Shared use of personal information

We engage in shared use of the personal information we hold as follows.

1. Types of information

Names, addresses, birth dates, places of work, salaries, phone numbers, e-mail addresses, etc.; information provided to us by customers

2. Parties with whom we engage in shared use

- Companies belonging to our group
- Companies that provide the services offered by us and our group to customers staying at hotels, and other related parties to the extent necessary in order to provide services performed under agreements executed with customers by us and our group companies

3. Purpose of use

The same as stated in “Purpose of use of personal information” above.

4. Party responsible for management of personal information

See section 5 below.

5. Responsible department for management of personal information

Sumitomo Fudosan Villa Fontaine Co., Ltd.

Information Desk for Handling of Personal Information

8-15-1, Nishi-shinjuku, Shinjuku-ku, Tokyo, 160-0023

Tel: 03-5925-7292 (office hours: 9:00 – 17:00 on business days)

Please contact us at the above number or e-mail address for inquiries regarding personal information and for disclosure of, amendment to, or discontinuance of use of personal information.

## Additional Provisions Applicable to Processing of Personal Information of EEA Residents

For individuals residing in the EEA, this Additional Provisions outlines certain additional information that **Sumitomo Fudosan Villa Fontaine Co., Ltd.** is obligated to provide to you, as well as certain rights you have with respect to the processing of your personal information, based on the General Data Protection Regulation (GDPR). This Additional Provisions shall prevail to the extent it conflicts with any provision in the main body of the Privacy Policy (the “Policy”).

### 1. Handling of Personal Information

The measures and purposes for which we handle your personal information, the types of personal information we handle, and the provision of your personal information to third parties are as described in the Policy.

### 2. Purpose of Handling Personal Information

The purposes of personal information that we handle are set out in the “**Handling of Personal Information**”.

### 3. The categories of personal information:

We handle personal information which includes the following. Should you be unable to provide the required information, we may not be able to provide you with accommodation services. We do not obtain your sensitive information (racial / ethnic identity, political thoughts, religious / philosophical beliefs, trade union qualifications, genetic data / biological data / health related data, sex life / sexual orientation) and your information related to criminal.

- Basic Information (name, address, phone number, e-mail address, individual identification code, sex, date of birth, nationality, fax number, address for service, etc.);
- Additional information (occupation, office information (company name, address, telephone number, department name, managerial position), the day of a wedding, family information (name, relationship, birthday), etc. )
- Payment information (a credit card number, the bank account information, the billing address, etc.)
- Service Utilizing Information (facility use state, a merchandise purchase state, etc.);
- Informative matters/Messages (e-mail, website form input, fax, a phone note, letter, the answers to the questionnaires, etc. )

- Information collected by using security systems (security camera, card key, etc.)
- Information automatically collected on our website (cookies, IP address, Browser types, access dates and times, etc.)
- Hotel register items (address, name, occupation, nationality, passport number, age, previous place of stay (coming from ~), next place of stay (going to ~), arrival date and time, departure date and time, guest room number, etc.)

#### 4. Legal Basis

We process customer's personal information based on the customer's consent in principle. The processing of personal information in the absence of the customer's consent shall be based on the necessity for the performance of the contract with the customer, the necessity to take steps at the request of the customer prior to entering into a contract, the necessity for the purposes of the legitimate interests pursued by us or a third party, or the necessity for compliance with a legal obligation to which we are subject. The legitimate interests pursued by us or a third party include an increase in operating income from marketing and improvement of services, and improvement of the convenience, security, etc. of our website.

#### 5. Transfer of Personal Information to a Third Country.

For the purposes of fulfilling the contract with the customer, or for taking procedures according to the customer's request prior to entering into a contract, personal information acquired outside Japan will be transferred to Japan.

Japan has received an adequacy decision on protection of personal information from the European Commission. We handle the customer's personal information with appropriate security and confidentiality measures.

#### 6. Retention Period of Personal Information

Our hotel will store the personal information for the necessary time to achieve the purpose of use (the storage stability of the basic information of the guests according to the Japanese law is three years). The personal information that have elapsed the period of storage will be deleted or become anonymous with great caution within a reasonable period.

#### 7. Customer's Rights

You have the following rights with respect to us based on laws and regulations. A customer may exercise these rights by contacting the **“Responsible department for**

**management of personal information”** stated in the **“Handling of Personal Information”**.

In the event that you exercise these rights, we will respond in good faith, barring statutory exceptions, after confirming that the requesting person is the person in question.

① The right of access

The right to obtain confirmation as to whether or not personal information concerning you is being processed, and where that is the case, access to the personal information and the accompanying information

② The right to rectification

The right to obtain the rectification of inaccurate personal information concerning you

③ The right to erasure

The right to obtain the erasure of personal information concerning you in certain cases

④ The right to restriction of processing

The right to obtain restriction of processing in certain cases

⑤ The right to object to processing

The right to object the processing of personal information based on the purposes of the legitimate interests pursued by us or third parties.

⑥ The right to data portability

The right to receive the personal information concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us.

## 8. Withdrawal of Consent

You can withdraw consent on the processing of your personal information at any time. Withdrawing consent does not affect the lawfulness of the processing based on consent before the withdrawal. You can withdraw consent by contacting the **“Responsible department for management of personal information”** stated in the **“Handling of personal information”**.

## 9. Lodging a Complaint with an Authority

Customers have the right to lodge a complaint on the processing of their personal information with the protection authority having jurisdiction over their residence.

#### 10. Personal Information from Children

A guardians consent or permission must be obtained in the event that a customer under the age of 16 uses our service and consents to the Policy.

#### 11. Automated Individual Decision-Making, including profiling

We do not make decisions based solely on automated processing, including profiling.