# **Privacy Policy**

GOODLIFE TAMA Co., Ltd. (hereinafter referred to as "Company") obtains personal information from customers on "Tokyo Mountain Tours," a travel service reservation site the Company operates, and other sites. To ensure that customers can make tour subscriptions safely and conveniently, the Company is keenly aware of the significant importance of the protection of their personal information and treats such information in conformity with the following statements:

## When obtaining personal information

The Company, when obliged by statute, obtains the minimum amount of personal information necessary to achieve its purpose of use from customers by obtaining their prior consent.

#### When using personal information

The Company only uses personal information it has obtained from customers to achieve the purpose of use specified by the Company.

## When storing personal information

The Company stores personal information it has obtained from customers with close attention to system security to prevent unauthorized access.

#### When discarding and erasing personal information

The company discards personal data (here and hereafter, meaning personal data specified by personal information protection laws) without delay when such information is no longer necessary after the elapse of a reasonable period of time.

#### Response to inquiries from customers, etc.

The Company, in pursuant to law, responds to requests from customers on personal data in its possession (here and hereafter, meaning personal data in possession of the Company specified by personal information protection laws) and to notify the customer of the purpose of use of such data, and to disclose, revise, add or delate part of whole of the data, suspend use of the data, erase the data, and stop third party access to the data.

## Safety management measures, etc.

The Company conducts staff education to ensure all staff members involved in Tokyo Mountain Tours services understand the importance of personal information. The Company has also implemented appropriate measures necessary for the safe management of personal information.

1. About personal information obtained by the Company and the purpose of its use.

The Company obtains customers' personal information, including residence address, name, date of birth, contract address, email address and passport number, to use such information for purposes specified below. The Company never obtains sensitive personal information without customers' consent. When the purpose of the use of personal information has not been publicized upon obtaining personal information from customers, the Company will notify customers the purpose of the use of the relevant information or publicize its purpose of use. The Company never obtains personal information from children below the age of 13 without consent from their parents. When customers provide personal information on children below the age of 13, the Company will treat such information assuming that their parents' consent has been obtained. However, when the Company finds no such consent has been obtained, it will never use the relevant information for whatever purposes other than notification to parents or purposes contingent on such notification.

1. For enabling customers the use of Tokyo Mountain Tours services (membership registration, etc.)

The Company exchanges customers' personal information within the Tokyo Mountain Tours group to enable customers to use Tokyo Mountain Tours services.

- 2. For enabling customers to subscribe to and join tours
  - Specific personal information the Company obtains:
    The Company, upon receiving a subscription for tours from customers, obtains the names of tour participants and payment information. It may also obtain passport numbers and information on health conditions (medical history, etc.) from customers when necessary.
  - Specific purpose of use The Company obtains and uses customers' personal information to confirm their eligibility for tour participation and their medical condition (depending on relevant tour details), provide support before and after the tour (including notification in emergencies) and to settle the tour price, etc. Also, to achieve the above purposes, the Company provides customers' personal information to tour operators, transportation facilities, financial institutions responsible for payment settlement (including overseas institutions, etc.) and other relevant parties.
- 3. For sending newsletters (including email magazines) and other information materials to customers
- 4. For advertisement through social media and ad platforms
- 5. For asking for customers' participation in questionnaire surveys
- 6. For analyzing and managing customer information
- 7. For sending emails to ask for the contribution of customer review to be posted on online review sites
- 8. For detecting illicit use of credit cards, etc.
- 2. About personal data provision to third parties

The Company never provides personal data obtained from customers to any third parties, except for following cases:

- 1. When the Company obtains prior consent from customers on the provision of their personal data to third parties (including overseas travel agencies, social media operators and ad delivery companies) through customers' agreement to this privacy policy or other means.
- 2. When the Company outsources the treatment of personal data within the range necessary to accomplish the purpose of use mentioned above.
- 3. When the Company is obliged by law to provide customers' personal information
- 4. When the provision of personal information is necessary to protect human life, body or property and it is difficult to obtain consent from customers.
- 5. When the provision of customer information is essential to improve public health or promote children's healthy growth and it is difficult to obtain consent from customers.

6. When the Company must cooperate with national or local governments to help them implement official work stipulated in law and obtaining customers' consent might hinder the implementation of such work.

## 3. About the outsourcing of work containing personal data

The Company, when it commissions the outsourcing of work containing personal data to third parties within the range necessary to attain the Company's purpose of use in pursuant to the preceding paragraph, exercises necessary and appropriate supervision over the relevant third parties. When such third parties recommission personal data treatment to other parties, the Company directly or indirectly checks if the recommissioning parties conduct necessary and appropriate supervision over their subcontractors. The same shall apply to cases when such subcontractors entrust the relevant data treatment to their own subcontractors.

## 4. About acquisition of cookie information, etc.

#### 1. Cookie

A Cookie is a type of data stored on the user's hard drive and contains information on the customer (user). The Company never uses the cookie information as personal identification data. Also, since the relevant cookie is a session cookie, the cookie information is not stored once the user closes the browser. The Company uses cookie information to improve customer services, customize the Company site and measure the effectiveness of ads placed there, etc. The Company also analyzes the cookie by using its data for statistical processing to detect what our customers are most interested in and use the results. The cookie information is also used to prevent unauthorized access.

Although disabling cookies is possible upon request from customers, doing so will prevent customers from being able to make reservations on the Tokyo Mountain Tours site.

#### 2. Log file

The Company automatically collects and stores specific information in its log file. That information includes the IP (Internet protocol) address, browser type, ISP (Internet service provider), reference/end page, operating system and date/time stamp. The Company can use such information to monitor unauthorized access. It also analyzes customer trends, manages the site and tracks customer movement on the site. Meanwhile, the Company uses such personal information in a way that prevents personal identification and never uses any obtained information for any purposes other than those specified above.

## 3. About statistical analyses

The Company, to see which site or service is in high demand, records pages accessed by customers and their access history within the Tokyo Mountain Tours site using a third party access analysis tool.

The Company uses these data to provide customers, who have shown interest in specific categories on the Tokyo Mountain Tours site, the contents and ads which match their interest. The Company may collect statistical information which does not identify individuals. Also, a third party's access analysis tool which the Company uses may enable both the Company and another company to browse cookie information they have respectively collected.

4. About personal data safety management measures.

To prevent the leakage, piracy, misuse, unauthorized access, falsification, destruction, etc. of personal data, the Company has taken organizational, technical and physical measures for safety management. Access to the server where the Company stores personal data is limited to specific employees who possess ID and PW. Above all, access to some personal data is strictly prohibited except for the minimum number of employees necessary to manage those data, etc.

Furthermore, individual data which include credit card information are separately stored in several data centers under secure conditions. The Company also uses Secure Sockets Layer (SSL) secret codes on all pages related to reservations and transactions. The use of the SSL compliant browser allows the Company to protect the secrecy of individual data and credit card information transmitted online.

Also, the Company's employees who handle customers' personal data use a password-protected screen saver when they are not around their terminal devices.

Education and training on the importance of personal information, etc. is conducted monthly in some departments and semiannually company-wide. The Company keeps track of such education.

5. About request for disclosure, revision, suspension of use, etc.

The Company accepts customers' request for notification of personal data in its possession, disclosure, revision, addition, deletion, suspension of use, erasure or cessation of provision to third parties (hereinafter collectively referred to as "Request for Disclosure, etc.") using contract means specified in Section 8 below.

The Company also accepts requests for changes and confirmation of member information, as well as suspension of mail magazine subscription on each customer's My Page.

## 6. About link to external sites

The Tokyo Mountain Tours website includes links to other sites. This privacy policy only applies to information collected on the Tokyo Mountain Tours site. The Company shall take no responsibility for privacy policy or contents of other websites. The Company asks customers to read privacy policy on any sites of linked URLs to see how personal information is treated.

#### 7. About change of privacy policy

The Company places its privacy policy on the Tokyo Mountain Tours website to keep customers informed of what personal information the Company obtains and for what purpose it collects and uses personal information. Also, whenever the Company changes its privacy policy, it places that information on the Tokyo Mountain Tours website to announce such changes.

## 8. About contact details

For inquiries regarding the Company's privacy policy, its efforts towards personal information protection, its acquisition and use of personal information, as well as a Request for Disclosure, etc., please use the inquiry form below.

Staff in charge will reply within five business days.

GOODLIFE TAMA Co., Ltd.

302 Maison Brocade Tachikawa, 2-6-12 Nishiki-cho, Tachikawa, Tokyo 190-0022 <u>Inquiry form here</u>

(link to inquiry form URL)