

# Handling of Personal Information

Kinki Nippon Tourist Co., Ltd.  
Shinjuku-Sumitomo Bldg.  
2-6-1, Nishi-Shinjuku, Shinjuku-ku, Tokyo  
Chief Executive Officer (CEO) Shuichi Uryu

In order to ensure the strict protection of the information we collect from our customers, we have implemented the measures detailed below.

## [Personal Information Protection Measures]

1. We will manage the personal information of our customers in an appropriate manner.
2. We have appointed a security manager for each department that manages customers' personal information, and these managers are tasked with the appropriate management of such information.
3. The information we ask for from our customers is primarily personal information necessary for us to provide our services, such as name, e-mail address, telephone number, and address. In addition, we may ask customers other questions for the purpose of providing services they wish to receive, but except for the minimum necessary items, this information is provided at the customer's discretion. Please note that there may be cases in which we cannot accept a customer's request if the customer does not agree to provide personal information.

### 4. <Customers Making Consultations and Inquiries>

Please be advised that we may notify third parties of customers' personal information as appropriate to the nature of the consultation or inquiry (hereinafter referred to as "Inquiries, etc."). For example, if the nature of an inquiry is beyond the scope of what we are able to handle, we may need to check with one of our group companies that deals with the relevant field.

### <Customers Making Applications>

Please be advised that we may notify third parties of customers' personal information as appropriate for the category of service. This includes, for example, informing the inn or hotel where a customer will be staying of the customer's name and other information.

5. To ensure the strict safekeeping of customers' personal information, we have established an information security policy and conduct regular employee training and audits regarding the protection of personal information.
6. In the event that a customer wishes to inquire about or correct their own personal information, we will respond to such requests to the extent reasonable after confirming that the request is made by the customer themselves.

7. Our website may use cookies in order to provide better service, but no personally identifiable information is obtained through these cookies. Cookies are a feature by which information is stored on the computers of visitors to our website in order to remember them.

Visitors may refuse to accept cookies by adjusting their browser settings, but if they do, some services may not be available.

In addition to complying with applicable laws and regulations regarding personal information, we will review and improve the above measures as appropriate.

In addition, we may cooperate in the release of personal information in response to requests from the Ministry of Land, Infrastructure, Transport and Tourism, the Ministry of Foreign Affairs, and other public agencies, as well as in the provision of information during police investigations related to accidents and other incidents.

## **[Purposes of Use of Personal Information]**

### **<Customers Making Consultations and Inquiries>**

We may use the personal information submitted at the time of the Inquiry, etc., to contact the customer concerned, and may use such information to the extent necessary to contact or confirm the details of the customer's Inquiry, etc., with the relevant organizations, etc.

Other purposes of use may be announced or communicated individually in addition to the above.

### **<Customers Making Applications>**

We will use the personal information submitted at the time of application for travel to the extent necessary to communicate with the customer, and to arrange for and receive the services provided by the transportation and accommodation providers, etc. involved in the travel applied for by the customer.

In addition, we and our agents may use customers' personal information to develop better travel products, to provide customers with information on travel products, and to provide nonlife insurance and additional related services on behalf of insurance companies. In addition, credit card information obtained by us will be used only for the purpose of settling the fee for the travel applied for by the customer with the credit card company indicated by the customer, and after the settlement is completed, such information will be stored for a period of time specified by law, and then deleted.

Other purposes of use may be announced or communicated individually in addition to the above.

## **[Joint Use of Personal Information]**

### **<Customers Making Consultations and Inquiries>**

Of the personal information submitted by customers when making an Inquiry, etc., we will share the

minimum information necessary for the purpose of contacting and responding to the customer concerned, such as name, telephone number, address, etc., with the following companies in our group.

**<Customers Making Applications and Customers who have Provided Business Cards>**

We will share personal information about customers with the following companies in our group for the purpose of product development and promotion activities such as providing product information, as well as for contacting and responding to customers. The personal information shared by our group companies is as follows: address, name, telephone number, age, date of birth, gender, purchase history, e-mail address, and passport number.

Customers with whom we have exchanged business cards will also be treated in the same manner as customers making inquiries or consultations.

**Our Group Companies**

- KNT-CT Holdings Co., Ltd.
  - Club Tourism International Inc.
  - Kinki Nippon Tourist Blue Planet Co., Ltd.
  - Kinki Nippon Tourist Okinawa, Inc.
  - Tourist Experts Inc.
  - United Tours Co., Ltd.
  - KBC Co., Ltd.
  - Event & Convention House, Inc.
  - SANKI Travel Service Co., Ltd.
- and other group companies

Name, address, and representative of the company responsible for managing personal information under joint use

KNT-CT Holdings Co., Ltd.  
Shinjuku-Sumitomo Bldg.  
2-6-1, Nishi-Shinjuku, Shinjuku-ku, Tokyo  
President and Chief Executive Officer  
Yoshinobu Koyama

**[Provision of Personal Information to Third Parties]**

**<Customers Making Consultations and Inquiries>**

To the extent necessary to respond to Inquiries, etc. from customers, we may provide customers' personal information to transportation and accommodation providers (including overseas providers, etc.).

### <Customers Making Applications>

We will provide customers' personal information to transportation and accommodation providers (including overseas providers, etc.) to the extent necessary to make travel arrangements, etc.

In addition, we will provide customers' personal information to overseas and domestic duty-free stores and other businesses for the convenience of customers' shopping, etc. at their travel destinations. In this case, we will provide personal information such as names, passport numbers, and flight numbers by sending them electronically or by other means. Customers shall consent to the provision of such personal information when they apply.

### [Entrustment of Personal Information]

To the extent necessary to respond to Inquiries, etc. from customers, we may entrust the handling of customer personal information to contractors with whom we have entered into a confidentiality agreement regarding personal information.

### [Handling of Personal Information in Foreign Countries]

We take the following measures when entrusting the handling of personal information to contractors in foreign countries.

(1) Establishment of a system for foreign contractors

- Personal information is provided to foreign contractors only after a consignment agreement is concluded between our company and the foreign contractor, which requires the foreign contractor to take measures in line with the intent of the provisions of Chapter 4, Section 1 and Section 2 of the Japanese Act on the Protection of Personal Information.

(2) Measures taken by foreign contractors

- The service agreement stipulates that the foreign contractor shall handle personal data within the scope of the specified purpose of use, shall take necessary and appropriate security control measures, and shall prohibit the provision of personal data to third parties.

(3) Overview of personal information protection systems of foreign contractors

- Please refer to the attached document.

(4) Method of conformation

- We will annually confirm the information published by the administrative agencies of Japan regarding the systems for the protection of personal information described in (3) above.

(5) Cessation of provision of personal information

- In the event a foreign contractor is handling personal information in a manner contrary to the terms of the service agreement, including the measures described in (2) above, and we request that the

foreign contractor promptly correct the problem in accordance with the service agreement, but this is not done within a reasonable period of time, and we determine that it is difficult to ensure the continued implementation of the appropriate measures, we will cease the provision of personal information to the foreign contractor.

- If we ascertain that a foreign country's system for protecting personal information has been revised in a way that conflicts with (3) above, we will cease the provision of personal information to the foreign contractors concerned.

### **[Procedures for Notification of Purpose of Use, Disclosure, Correction, etc.]**

If you wish to request notification of the purpose of use, disclosure, correction, addition, partial deletion, suspension of use, or expungement of your personal information held by us, or to request disclosure of records of provision to third parties or the suspension of provision to third parties, please contact the sales office where you applied, and we will provide you with information on the necessary procedures. In such cases, in accordance with the law and our internal regulations, we will promptly respond to the request after confirming the identity of the person making the request.

If we are unable to accommodate all or part of your request, we will explain the reasons for this.

As a rule, requests for disclosure shall be made in writing by mail.

#### **[Inquiries regarding Personal Information]**

Kinki Nippon Tourist Co., Ltd.

Shinjuku-Sumitomo Bldg., 36F

2-6-1, Nishi-Shinjuku, Shinjuku-ku, Tokyo 163-0236

Party with responsibility for personal information management: General Manager,  
General Affairs Department, Administration Division

Please use this e-mail form to send your inquiry.

[https://cmail.knt.co.jp/form/pub/knt\\_kbc/knt](https://cmail.knt.co.jp/form/pub/knt_kbc/knt)

# Privacy Policy

Our corporate mission is to create a world filled with smiles by inspiring encounters among people around the world. To achieve this end, in our travel and travel-related services businesses we will continue to tell stories that inspire, that bring a smile, and that foster confidence.

Believing that protecting the personal information of our customers and all those affiliated with our company is a major responsibility as we put our mission into practice, in addition to declaring our intent to take all possible measures to protect personal information based on the amended Act on the Protection of Personal Information, the Act on the Use of Numbers to Identify a Specific Individual in the Administrative Procedure, and the Specific Personal Information Protection Assessment Guidelines enacted by the Japanese Government, the General Data Protection Regulation (GDPR) enacted by the European Union, and other laws and regulations, we will engage in the following efforts:

1. Name, address, and name of representative of the business operator

Kinki Nippon Tourist Co.,Ltd.

Shinjuku-Sumitomo Bldg, 36F

2-6-1, Nishi-Shinjuku, Shinjuku-ku, Tokyo Japan 163-0236

Chief Executive Officer (CEO) Shuichi Uryu

2. Collection and use of personal information

We will acquire and use personal information by appropriate means, taking into account the nature and scale of our business. When obtaining personal information, we will specify the purpose of use and obtain the express consent of the relevant person as necessary. In addition, we will establish an in-house management system and take safety measures to prevent the use of personal information beyond the scope of the purpose of use, except with the consent of the relevant person or as permitted by law.

3. Matters relating to safety management measures for personal information

We will carefully manage personal information and will not disclose or provide / transfer such data to third parties except in cases where the customers have given their consent.

We will also implement safety measures and take corrective action to prevent personal information from being leaked, lost or damaged. The details of these measures are as follows:

(1) Formulation of the basic policy

- In order to ensure the proper handling of personal data, we have formulated this policy with regard to “Observance of laws and norms”, “Matters relating to safety management measures for personal information”, “Handling of complaints and inquiries”, etc.

(2)Development of disciplines regarding the handling of personal data

- The Personal Information Management Implementation Regulations have been established for each stage, including acquisition, use, storage, provision, deletion, and disposal, with respect to the handling methods, responsible persons, persons in charge, and their duties, in order to establish disciplines for the handling of personal data.

(3)Systematic security control measures

- Concerning the handling of personal data, we have appointed the top officer, the personal information manager, the internal audit manager, and the department personal information managers. We have also clarified the employees who handle personal data, their roles, and the scope of personal data handled by such employees, and have established a system to report to the personal information manager in the event that any facts or signs of violation of the Act on the Protection of Personal Information, the Personal Information Management Implementation Regulations, and other internal regulations, are identified.
- We conduct periodic self-inspections of the status of the handling of personal data and conduct audits by other departments.

(4)Human security control measures

- We regularly train employees on matters of concern regarding the handling of personal data.
- Matters concerning the confidentiality of personal data are described in the Work Rules.

(5)Physical security control measures

- In areas where personal data is handled, employees are controlled to enter and leave the premises, and measures are taken to prevent unauthorized persons from viewing personal data.
- We control devices, electronic media, and documents that handle or contain personal data to prevent theft or loss, and take measures to prevent leakage when carrying such devices, electronic media, etc.

(6)Technical security control measure

- We limit the information systems and devices that can handle personal information databases, etc., and the employees who can use such information systems and devices.
- We have introduced a mechanism to protect information systems and devices that handle personal data from unauthorized access from outside sources or from unauthorized software.

(7)Understanding of the external environment

- In view of the fact that the privacy protection system in some countries is less strict than the provisions of the Act on the Protection of Personal Information of Japan, we conclude an outsourcing contract with land operators and other contractors requiring them to comply with the eight principles of OECD Privacy Guidelines.

4. Observance of laws and norms

We will abide by laws that apply to the personal information held by us, guideline and other norms enacted by each nation and region.

## 5. Handling of complaints and inquiries

We have established a system and procedures for accepting and handling inquiries and complaints with respect to the personal information held by us and will respond to them promptly. The contact point for inquiries and complaints regarding the handling of personal data held by us is as below.

[Contact point for opinions and inquiries about personal information]

General Manager of General Affairs Department

Kinki Nippon Tourist Co.,Ltd.

Shinjuku-Sumitomo Bldg, 36F

2-6-1, Nishi-Shinjuku, Shinjuku-ku, Tokyo Japan 163-0236

Reception hours: 10 : 00-17 : 00 (excluding weekends, holidays and from 29 Dec. to 3 Jan.)

Party with responsibility for personal information management: General Manager,

General Affairs Department, Administration Division

E-mail: [knt-kanri-somu@or.knt.co.jp](mailto:knt-kanri-somu@or.knt.co.jp)

## 6. Continuous improvement of management system and mechanisms for protection of personal information

We will carry out continuous improvement of our management system and mechanisms for the protection of personal information.

April 1, 2018 Enacted

October 1, 2021 Revised

April 1, 2022 Revised

June 1, 2024 Revised

Kinki Nippon Tourist Co., Ltd.

Chief Executive Officer (CEO) Shuichi Uryu



(For EU residents)

- [Processing of EU Personal Data](#)
- [Consent Form of Acquiring EU Personal Data](#)
- [Application Form of Request of Disclosure, etc. of EU personal data](#)

Note : This application is accepted only by airmail.

<Inquiry Desk >

General Manager of General Affairs Department Kinki Nippon Tourist Co.,Ltd.

Shinjuku-Sumitomo Bldg, 36F

2-6-1, Nishi-Shinjuku, Shinjuku-ku, Tokyo Japan 163-0236

Reception hours: 10 : 00-17 : 00 (excluding weekends, holidays and from 29 Dec. to 3 Jan.)

E-mail: [knt-kanri-somu@or.knt.co.jp](mailto:knt-kanri-somu@or.knt.co.jp)