

Protection of Personal Information Policy

Tachihi Hospitality Management Co., Ltd. (“THM”) Basic Policy on Information Security and Protection of Personal Information

Given the importance of information security and the protection of personal information in a culture of advanced information and communications, THM endeavors to appropriately manage and protect the information in its possession in accordance with the policy stated herein.

1. Compliance with Laws and Regulations, etc.

THM shall comply with laws concerning the protection of personal information and other relevant laws, policies, guidelines, etc. prescribed by regulatory bodies in the handling of personal information.

2. Collection of Personal Information

THM shall, in relation to the hotel business that THM operates, clearly state the purpose of use of the collection of personal information and collect the personal information required for achieving the stated purpose of use through lawful and fair means.

3. Purpose of Use

THM shall use the personal information collected from customers for the purposes set forth hereunder

- ① To provide services related to the accommodation business and food and beverage service business
- ② To contact customers to confirm reservations, etc.
- ③ To inform and confirm with customers about product delivery, payments, notices, and transactions
- ④ To provide information, advertise, publicize, and carry out surveys regarding THM’s hotel business
- ⑤ To determine and develop the usage conditions of THM facilities, products, services,

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etc.

- ⑥ To improve the website managed by THM and THM products and services, etc.
- ⑦ To perform other duties incidental or related to the purposes of use described above
- ⑧ To fulfill obligations pursuant to notification and direction of laws and regulations

4. Provision to Third Parties

THM shall not provide or disclose personal information to third parties without the consent of the customer(s) concerned or unless approved in accordance with laws and regulations.

5. Establishment of a Management System

THM shall organize an internal management system for personal information and clearly outline the allocation of roles and responsibilities.

6. Compliance with Internal Rules, etc.

THM shall create internal rules, etc. concerning the management of personal information, and THM employees (including executive officers, employed workers, and temporary staff; the same shall apply hereunder) shall comply with such rules.

7. Implementation of Safety Control Measures

THM shall implement safety control measures to prevent unauthorized access to information and the loss, damage, falsification, leaks, etc. of such information.

8. Provision of Training and Educational Activities

THM shall provide training and educational activities for employees in order to enhance their knowledge and awareness of personal information management so that personal information is managed appropriately through familiarization with the said subject.

9. Coordination with Subcontractors

If THM subcontracts work relating to personal information management to other companies, THM shall select a party with adequate experience and capabilities, prescribe matters concerning the duty of confidentiality in the relevant agreements, and ensure that the information is managed appropriately.

10. Management Improvement Initiatives

THM shall regularly review whether personal information is appropriately managed and continuously engage in internal initiatives to improve the management of personal

information.

11. Measures Upon Occurrence of Accidents

If accidents, such as personal information leaks, occur, THM shall minimize the damage thereof and shall promptly publish the necessary information and take appropriate internal measures, including measures to prevent the recurrence thereof.

12. Customer's Rights

THM shall respond to requests from customers for notification of the purposes of use, disclosure, correction, addition, deletion in part, suspension of use, deletion in whole, suspension of provision of the customer's own personal information held by THM to a third party, or disclosure of records of provision of such personal information to a third party (collectively, "Request for Disclosure, etc.") without delay in accordance with the laws and regulations. However, THM may not be able to respond to a customer's request if THM is not under a legal obligation to respond to a Request for Disclosure, etc. If you wish to make a Request for Disclosure, etc., please contact the following Inquiries Desk.

13. Inquiries Desk

Please contact the inquiry desk at the address provided below for customer inquiries, complaints, and requests. For inquiries about personal information, THM shall respond in a prompt manner within a reasonable period upon verification of the customer's identity.

Tachihi Hospitality Management Co., Ltd.

Reception hours: 9:00 a.m. to 5:00 p.m.

Inside the SORANO HOTEL

W1, 3-1, Midori-cho, Tachikawa, Tokyo

JAPAN 1900014

Email: administration@soranohotel.com

TEL: +81(0)42-540-7777

14. Publication of this Policy

THM shall broadly publish policies concerning information security and the protection of personal information, including this Policy, by posting on its website, etc.

15. Amendments

THM may amend this Policy without advance notification. Amendments to this Policy shall take effect at the time THM publishes the amended Policy on its website.

Handling of Reservation Records

Tachihi Hospitality Management Co., Ltd. (“THM”) shall handle the customers’ reservation records as stated herein.

1. Management of Personal Information

Recognizing the importance of personal information acquired from customers, THM shall handle the same with great care and shall appropriately manage such information according to the Information Security and Protection of Personal Information Policy.

2. Shared Use

THM shall share the reservation records of customers as follows

- (1) Shared personal information: customer’s name, telephone number, address, email address, age, gender, employer, mileage membership number, mileage membership tier, the name of hotel at which the customer will stay, dates of stay, package plan, applicable rate, mileage, arrival time, specific requests, and credit card number to guarantee reservations
- (2) Scope of Users: Group companies of THM, THM-managed hotels, THM alliance hotels, travel agencies, airlines, and credit card companies
- (3) Responsibility: THM shall bear the responsibility for management of personal information

3. Provision of Reservation Records to Travel Agents

Provision of Reservation Records to Travel Agents THM shall provide the above information described in item 2(1) to travel agents if an inquiry is made based on a reservation number provided to the travel agent by a customer.

4. Provision to Third Parties

Except for items 2 and item 3, THM shall not provide or disclose reservation records and information to third parties, unless customers have given their consent or as required to comply with laws and regulations, etc.

5. Confirming Reservations

THM shall issue a reservation confirmation for reservations accepted by the SORANO HOTEL following finalization by mail, fax, or email, etc. to the address, telephone number, fax number, or email address specified by customers. Furthermore, please note that when making reservations via the hotel website, an email message confirming the reservation

will be sent to the email address provided by the customer.

6. Inquiries, etc.

THM shall accept inquiries and modification requests, etc. relating to reservation records from customers as follows and shall respond promptly within a reasonable period at the address provided below:

Tachihi Hospitality Management Co., Ltd.

Reception hours: 9:00 a.m. to 4:00 p.m.

W1, 3-1, Midori-cho, Tachikawa, Tokyo 190-0014

Inside the SORANO HOTEL

TEL: +81(0)42-540-7777

Inquiries regarding the SORANO HOTEL: info@soranohotel.com

Inquiries regarding Auberge TOKITO: info@aubergtokito.com

7. Other Inquiries, etc. regarding Reservations

For customer inquiries, amendments, etc. about reservation records for facilities other than SORANO HOTEL and Auberge TOKITO, please contact the hotel, facility, travel agent, etc. with which the reservation was made directly.

Handling of Information related to SORANO HOTEL WEB Membership (Special Offers Program)

Tachihi Hospitality Management Co., Ltd. (hereinafter referred to as “THM”) shall handle the personal information of SORANO HOTEL WEB Special Offers Program applicants (hereinafter referred to as “Applicant”) as stated herein.

1. Management of Personal Information

Recognizing the importance of personal information acquired from applicants, THM shall handle the same with great care and shall appropriately manage such information according to the Information Security and Protection of Personal Information Policy.

2. Provision to Third Parties

THM shall not provide or disclose personal information to third parties, unless applicants have given their consent or as required to comply with laws and regulations, etc.

3. Inquiries, etc. regarding Personal Information

If an applicant contacts the inquiry desk at the address provided below with an inquiry or request to modify or suspend the use of their personal information, such inquiry shall be dealt with in a prompt and appropriate manner within a reasonable period. In addition, the inquiry desk shall receive feedback regarding the handling of personal information.

Tachihi Hospitality Management Co., Ltd.

SORANO HOTEL

Reception hours: 9:00 a.m. to 4:00 p.m.

W1, 3-1, Midori-cho, Tachikawa, Tokyo 190-0014

SORANO HOTEL

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TEL: +81(0)42-540-7777

Handling of Other Information Registered on the Website

Tachihi Hospitality Management Co., Ltd. (hereinafter referred to as “THM”) shall handle personal information, such as responses to online questionnaires, applications for various events that include prizes, requests for information materials, etc., entered or registered by customers on the website as described below

1. Management of Personal Information

Recognizing the importance of personal information, THM shall handle the same with great care and appropriately manage such information according to the Information Security and Protection of Personal Information Policy.

2. Reference, Amendments, and Suspension of Use of Personal Information

If the customer contacts the inquiry desk at the address provided below with an inquiry or request to modify or suspend the use of their personal information, such inquiry shall be dealt with in a prompt and appropriate manner within a reasonable period.

Tachihi Hospitality Management Co., Ltd.

Reception hours: 9:00 a.m. to 4:00 p.m.

W1, 3-1, Midori-cho, Tachikawa, Tokyo 190-0014

Inside the SORANO HOTEL

TEL: +81(0)42-540-7777

Inquiries regarding the SORANO HOTEL: info@soranohotel.com

Inquiries regarding Auberge TOKITO: info@aubergtokito.com

3. Provision of Personal Information to Third Parties

THM shall not provide or disclose personal information to third parties, unless customers have given their consent or as required comply with laws and regulations, etc.

4. Personal Information in Linked External Websites

THM assumes no management responsibility whatsoever for the gathering of personal information conducted via other companies' websites linked to the THM website.

5. Data Protection

The THM website uses SSL (Secure Sockets Layer) encryption technology as a safety measure on all pages on which personal information is entered when gathering customers' personal information. As a result, the data traveling across the internet is encrypted to prevent data leaks.

SSL

SSL (Secure Sockets Layer) refers to the protocol for encrypting and transmitting information over the internet. SSL is a security function that aims to protect important information, such as personal information transferred over the internet, from theft, falsification, and spoofing by third parties. On the website operated by THM, the room reservation page for entering personal information is an SSL secure page. (Certain pages allow users to select non-SSL communication.)

1. Importance of SSL

The encryption of protocols currently used on the internet is not regulated, and, thus, third parties are able to insert line monitors, personal computers, etc. into lines to view information that is transmitted across the internet. The internet is a network made up of interconnecting websites, and a number of relay sites exist between access points and users, making it difficult to confirm whether a site is safe. For this reason, the THM website prevents interception, etc. by third parties by utilizing secure communication using SSL when transmitting important information, especially personal information, etc. over the internet.

2. SSL Structure

SSL first conducts electronic authentication between THM and customers prior to customers' sending personal information (digital certificates and digital signatures) and

transmits data after conducting cross-certification. In doing so, exchanges between THM and customers are disturbed by random digits, and false transmissions to third parties, posing as customers, attempting to steal data are prevented. Furthermore, information transmitted using SSL is encrypted using a method that combines two types of encryption methods – public key encryption (RSA) and symmetric key encryption (private key cryptography). An electronic “key” is required to decipher this information. Even if information is intercepted by third parties, it is impossible to decrypt encrypted information without the correct key. Although the number of available keys is finite, it is extremely difficult for third parties to decrypt information, as it requires an unrealistically long time, even if work is conducted using a computer, etc., to find the right key by testing all keys in turn.

3. SSL Enabled Browsers

A special configuration is not necessary in order to use SSL. SSL functions automatically when using SSL enabled browsers, such as Internet Explorer, Firefox, etc., in their default configuration. It may not be possible to access SSL secure pages or enter information when using browsers that do not support SSL.

*It may not be possible to transmit information using SSL due to firewall configurations, if the customer is connected to the internet via a firewall on an internal LAN, such as a LAN within a company.

4. Data Protection

The website operated by THM uses SSL (Secure Sockets Layer) encryption technology on the SORANO HOTEL WEB Online Members (Special Offers Program) page, the credit card payment page, and other pages on which personal information is entered as a safety measure when gathering customers’ personal information. As a result, the data traveling across the internet is encrypted to prevent data leaks.

This document is posted only for the purpose of providing information to customers. It does not intend to recommend, request, or demand the use or otherwise of any specific software products.

About Use of Cookies

On the Tachihi Hospitality Management Co., Ltd. (hereinafter referred to as “THM”) website, web servers called “Cookies” collect information such as internet users’ web browsing history and e-commerce site purchasing history which can be used to analyze

users' interests and preferences ("Informative Data"), by using technology to identify a user's computer (browser) using industry standard technology, etc.

- ① Cookie IDs (codes issued by websites each time Cookies are sent)
- ② Page URLs of the websites visited by users through their computer (browser)
- ③ Page categories (segments) and analysis results, etc. for websites visited by users through their computer (browser), and
- ④ Websites visited by users, webpages viewed, and any other site transition or behavior history of users using their computer (browser)

We only identify individual data units and in no way identify each individual. The retention period for Informative Data collected by THM is two (2) years from the last date each user visits the corresponding website through their computer (browser).