

## Hotel JAL City NAGANO Privacy Policy

At this hotel, Hotel JAL City Nagano and Okura Nikko Hotel Management Co., Ltd. process your personal information as independent business operators handling personal information.

For details regarding the processing of personal information by both companies, please refer to the following:

- Okura Nikko Hotel Management Co., Ltd. “Privacy Policy”  
<https://www.okura-nikko.com/privacy-policy/>
- Hotel JAL City NAGANO “【Privacy Policy】”

Please see below.

## Hotel JAL City NAGANO Privacy Policy

**This Privacy Policy** sets out how **Hotel JAL City Nagano of 【1221 Tirosh-machi, Nagano, Nagano】** (“**we**”, “**our**” or “**us**”) collects, uses, stores and otherwise processes personal information or personal data defined in the applicable law in relation to the use of our services (“**Personal Information**”).

In the event of conflict between Japanese version and other language version of this Privacy Policy, Japanese version shall prevail, unless otherwise required by mandatory provisions of applicable laws.

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**1 Categories of Personal Information we collect**

1.1 We collect the following Personal Information directly from you or indirectly through third-parties, if any. Please note that Personal Information that we collect may differ depending on what service you use.

Category	Details	Source
Your profile	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Phone Number</li> <li>• Email Address</li> <li>• Gender</li> <li>• Nationality</li> <li>• Residence Address</li> <li>• Age</li> <li>• Date of Birth</li> <li>• Place of employment</li> <li>• Details of your passport and other government issued ID</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Anyone who makes a booking and/or checks in on your behalf, or guests' traveling companions</li> <li>• Travel Agents and other third-parties involved in services provided by the hotel</li> </ul>
Information you register when you use our services	<ul style="list-style-type: none"> <li>• Information regarding service usage (including the name of hotel booked, scheduled stay date, plan and facilities to be used)</li> <li>• Information about payment such as credit card number</li> <li>• Information about loyalty program such as type, membership number and point records</li> <li>• Information about airline mileage program (aka FFP) such as type,</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Anyone who makes a booking and/or checks in on your behalf, or your traveling companions</li> <li>• Travel Agents and other third-parties involved in services provided by the hotel</li> </ul>

	<p>membership number, and FFP tier</p> <ul style="list-style-type: none"> <li>• Emergency contact</li> <li>• Preference for smoking or nonsmoking room</li> <li>• Allergy information</li> <li>• Dietary preferences</li> <li>• Health status and disability information</li> <li>• Any other information you have provided to us in relation to your use of the services</li> </ul>	
Service usage information	<ul style="list-style-type: none"> <li>• Information regarding service usage (including the name of hotel stayed at, dates of stay, plan, and facilities used)</li> <li>• Information regarding purchases and payments</li> <li>• Points earned and used</li> <li>• Information we collect through your use of services, such as your dominant hand</li> <li>• Communication history</li> <li>• Other preferences, requests and feedback</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Anyone who checks in on your behalf, or your traveling companions</li> <li>• Third-parties involved in services provided by the hotel</li> </ul>
Video information	<ul style="list-style-type: none"> <li>• Your image captured within CCTV and other video surveillance</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>
Survey responses	<ul style="list-style-type: none"> <li>• Any information you have provided to us through the survey</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>
Website data	<ul style="list-style-type: none"> <li>• IP address and other online identifiers</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third-parties who</li> </ul>

	<ul style="list-style-type: none"> <li>Information collected through Cookie or similar technologies (e.g., logs regarding the use of our website)</li> <li>Other usage history including browsing history</li> </ul>	collect data from the website or application
Information about your inquiry	Any information you have provided to us through the inquiry including call recording data	<ul style="list-style-type: none"> <li>You</li> <li>Anyone who makes a booking and/or checks in on your behalf, or your traveling companions</li> <li>Travel Agents and other third-parties involved in services provided by the hotel</li> </ul>

1.2 Our services allow you to share certain details about your preferences, needs, or restrictions, such as “Allergy information” or “Health status and disability information”, through various means including text boxes. Please note that any information you voluntarily provide through these means may be classified as sensitive personal information under applicable laws. We do not use such sensitive personal information for marketing or promotional purposes. The provision of such information is optional, and sensitive personal information that you choose to submit is processed based on your consent, which you may withdraw at any time by contacting us using the details provided in Section 10. “Contact information”.

## 2 **Purposes for processing Personal Information**

2.1 We process your Personal Information for the purposes below.

<b>Purpose</b>	<b>Categories of Personal Information</b>
To provide services to you. This includes making necessary safety measures, notifications and	<ul style="list-style-type: none"> <li>Your profile</li> <li>Information you register when you use our services</li> </ul>

responding to your inquiry.	<ul style="list-style-type: none"> <li>• Service usage information</li> <li>• Video information</li> <li>• Survey responses</li> <li>• Website data</li> <li>• Information about your inquiry</li> </ul>
To take payments	<ul style="list-style-type: none"> <li>• Your profile</li> <li>• Information you register when you use our services</li> <li>• Service usage information</li> </ul>
To improve and develop our services and business strategy (including surveys).	<ul style="list-style-type: none"> <li>• Your profile</li> <li>• Information you register when you use our services</li> <li>• Service usage information</li> <li>• Survey responses</li> <li>• Website data</li> <li>• Information about your inquiry</li> </ul>
To provide you with news, offers, promotions and advertisements, including personalised content based on profiling of your interests and preferences via email, mail or online advertising.	<ul style="list-style-type: none"> <li>• Your profile</li> <li>• Information you register when you use our services</li> <li>• Service usage information</li> <li>• Survey responses</li> <li>• Website data</li> <li>• Information about your inquiry</li> </ul>
To protect interests and legal rights of our customers and us.	<ul style="list-style-type: none"> <li>• Your profile</li> <li>• Information you register when you use our services</li> <li>• Service usage information</li> <li>• Video information</li> <li>• Survey responses</li> <li>• Website data</li> <li>• Information about your inquiry</li> </ul>
<ul style="list-style-type: none"> <li>• To comply with our legal and regulatory obligations under the applicable law.</li> <li>• To respond to requests from government or public authorities, law</li> </ul>	<ul style="list-style-type: none"> <li>• Your profile</li> <li>• Information you register when you use our services</li> <li>• Service usage information</li> <li>• Video information</li> </ul>

enforcement officials, courts, regulators or similar	<ul style="list-style-type: none"> <li>• Survey responses</li> <li>• Website data</li> <li>• Information about your inquiry</li> </ul>
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2.2 Where we need to collect your Personal Information to perform a contract with you, or where we are legally required to collect Personal Information, the provision of such Personal Information is mandatory, and we will not be able to provide services to you without this information. In all other cases, provision of any requested Personal Information is optional.

2.3 Our websites use cookies or similar technologies to achieve above purposes. More information about our use of cookies or similar technologies can be found in our Cookie Policy.

### 3 **Sharing Personal Information**

3.1 We share your Personal Information with the following entities.

<b>Entities with whom we share Personal Information</b>	<b>Categories of Personal Information Shared</b>	<b>Detail</b>
Service providers e.g., IT service providers (Cloud service provider, data centres), payment processing companies, marketing/email delivery vendors, Customer support service providers	All categories of Personal Information listed in Section 1.1.	We share Personal Information with the service providers to achieve the purposes listed in Section 2.1.
Booking platforms (including travel agencies)	<ul style="list-style-type: none"> <li>• Your profile</li> <li>• Information you register when you use our services</li> <li>• Service usage information</li> <li>• Information about your inquiry</li> </ul>	We may provide Personal Information to Booking platforms when you book a hotel using that platform, for the purpose of fulfilling the reservation agreement.
Companies and other	<ul style="list-style-type: none"> <li>• Your profile</li> </ul>	At your request, we may provide your

<p>organisations that own and manage facilities, such as the spas, restaurants, health clubs, and other outlets, within the hotel</p>	<ul style="list-style-type: none"> <li>• Information you register when you use our services</li> <li>• Service usage information</li> <li>• Information about your inquiry</li> </ul>	<p>Personal Information to these companies or organisations. These companies or organizations process your Personal Information as independent business entities separate from us.</p>
<ul style="list-style-type: none"> <li>• Transportation services</li> <li>• Leisure facilities</li> <li>• Other Companies operating facilities or providing services</li> </ul>	<ul style="list-style-type: none"> <li>• Your profile</li> <li>• Information you register when you use our services</li> <li>• Service usage information</li> <li>• Information about your inquiry</li> </ul>	<p>At your request, we may provide your Personal Information to these companies or organizations. These companies or organizations process your Personal Information as independent business entities separate from us.</p>
<p>Government or public authorities, law enforcement officials, courts, regulators or similar</p>	<p>All categories of Personal Information listed in Section 1.1.</p>	<p>We share Personal Information with government or public authorities, law enforcement officials, courts, regulators or similar to respond to requests from such entity in accordance with our legal and regulatory obligations under applicable laws,</p>
<p>Counterparty of Business transfer</p>	<p>All categories of Personal Information listed in Section 1.1.</p>	<p>In the event that we carry out a merger, acquisition, reorganization or disposal, some or all Personal Information may be disclosed to any prospective purchaser and its advisers and will be passed to the new owners of the business.</p>

3.2 We may provide your “Information related to personal information” defined in Act on the Protection of Personal Information (“APPI”) to third-parties including data analysis companies and advertising companies for the purposes listed in Section 2.1, and such third-parties may use such information in conjunction with your “Personal data” (defined in APPI) held by such third-parties.

3.3 We will jointly use your Personal Information as follows (In this section, “ONHM” means Okura

Nikko Hotel Management Co., Ltd.):

A) Joint Use in relation to reservation records

Jointly used data	Customers' name, telephone number, address, email address, age, gender, the place of employment, type of airline mileage program (aka FFP), FFP membership number, FFP tier, name of hotel at which the customer will stay, dates of stay, package plan, applicable rate, arrival time, specific requests, credit card number to guarantee reservations.
Scope of Joint Users	<p>Hotel JAL City Nagano, ONHM, member hotels of Okura Hotels &amp; Resorts, Nikko Hotels International and Hotel JAL City chain operated by ONHM (*1), group hotels in alliance with ONHM (*1), Hotel Okura Co., Ltd., Hotel Okura Enterprise Co., Ltd., Hotel Okura Space Solutions Co., Ltd. and Continental Foods Co., Ltd., JAL Group Airlines (*2), and JAL Card Inc.</p> <p>*1 For details, please refer to the "OUR HOTLS" on our company website.</p> <p>*2 JAL Group Airlines are Japan Airlines Co., Ltd., Japan Transocean Air Co., Ltd., J-AIR Co., Ltd., Japan Air Commuter Co., Ltd., Ryukyu Air Commuter Co., Ltd and Hokkaido Air System Co., Ltd.</p>
Purpose of Joint Use	To provide services closely including hotel or air travel, publicize products and campaigns, and conduct work associated thereto.
Administrator of data jointly used	Hotel JAL City Nagano General Manager

B) Joint Use in relation to One Harmony membership information

<p>Jointly used data</p>	<p>Membership number, name, date of birth, gender, address, telephone number, fax number, e-mail address, place of employment (company name, department, title, address, telephone number, fax number, e-mail address), types of membership cards, lodging history, reservation history, communication history, point records, types of airline mileage program (aka FFP), FFP membership number, FFP tier, preference for smoking or nonsmoking room, taste, health and religious data, memorial days such as wedding anniversary.</p>
<p>Scope of Joint Users</p>	<p>Hotel JAL City Nagano, ONHM, member hotels of Okura Hotels &amp; Resorts, Nikko Hotels International and Hotel JAL City chain operated by ONHM (*1), SHIROYAMA HOTEL kagoshima, Hotel Kajima no Mori, a part of hotels or restaurants operated by Okura Enterprise Co., Ltd., Continental Foods Co., Ltd., or The Kyoto Hotel, Ltd., and restaurants operated by Hotel Okura Tokyo Co., Ltd., Hotel Okura Co., Ltd., Hotel Okura Enterprise Co., Ltd., Hotel Okura Space Solutions Co., Ltd. and Continental Foods Co., Ltd., JAL Group airline companies (*2), and JAL Card Inc.</p> <p>*1 For details, please refer to the “OUR HOTLS” on our company website.</p> <p>*2JAL Group Airlines are Japan Airlines Co., Ltd., Japan Transocean Air Co., Ltd., J-AIR Co., Ltd., Japan Air Commuter Co., Ltd., Ryukyu Air Commuter Co., Ltd. and Hokkaido Air System Co., Ltd.</p>
<p>Purpose of</p>	<p>Recording lodging history, inclusion in</p>

Joint Use	membership cards, issuance of membership cards, provision of hotel accommodations, food and beverage services and wedding services, provision of other services closely related to hotel usage, giving notices about promotional plans and questionnaires including those of the partner companies, product development, One Harmony program management, and all other activities related thereto.
Administrator of data jointly used	Hotel JAL City NAGANO General Manager

C) Joint Use in relation to data registered on website

Jointly used data	Name, date of birth, gender, address, telephone number, email address, occupation, place of employment (company, department, address, and telephone number), type of airline mileage program (aka FFP), FFP membership number, FFP tier, tier of membership, membership number, reservation history, lodging history.
Scope of Joint Users	Hotel JAL City Nagano, ONHM, member hotels of Okura Hotels & Resorts, Nikko Hotels International and Hotel JAL City chain operated by ONHM (*1), group hotels in alliance with ONHM, Hotel Okura Co., Ltd., Hotel Okura Enterprise Co., Ltd., Hotel Okura Space Solutions Co., Ltd. and Continental Foods Co., Ltd..  *1 For details, please refer to the “OUR HOTELS” on our company website.
Purpose of Joint Use	To provide hotel services and services closely related to hotels, provide advertising and promotional materials and

	questionnaires including those relating to affiliated companies, conduct product development, and for any other work associated thereto.
Administrator of data jointly used	Hotel JAL City NAGANO General Manager

D) Joint Use in relation to other Personal Information

Jointly used data	Personal Information described in Section 2.1, other than that listed in A) to C) above
Scope of Joint Users	Hotel JAL City NAGANO, ONHM, member hotels of Okura Hotels & Resorts, Nikko Hotels International and Hotel JAL City chain operated by ONHM (*1), ONHM Alliance Hotels (*1), Hotel Okura Co., Ltd., Hotel Okura Enterprise Co., Ltd., Hotel Okura Space Solutions Co., Ltd. and Continental Foods Co., Ltd.  *1 For details, please refer to the “OUR HOTELS” on our company website.
Purpose of Joint Use	Same as the purposes listed in Section 2.1
Administrator of data jointly used	Hotel JAL City Nagano General Manager

**4 International Transfer**

We may transfer your Personal Information across countries/regions for the purposes described in this Privacy Policy.

The above transfers, in particular to countries or regions that do not provide an adequate level of data protection, will be secured through appropriate contractual arrangements, such as standard contractual clauses specified under the Regulation (EU) 2016/679 (General Data Protection Regulation), and/or other measures required under applicable law.

## **5 Data Retention**

We retain Personal Information for as long as it is necessary to achieve our purposes of use. However, we will keep the data for so long as is reasonably necessary if we are required to retain them by law.

In the event that we delete Personal Information after the above period or for any other reason, we irreversibly destroy Personal Information recorded and stored in electronic files, and shreds or incinerate any Personal Information recorded and stored by paper-based means.

## **6 Security**

We implement necessary and appropriate security measures (including the following measures) to prevent incidents such as leakage, loss, or damage of Personal Information and to protect Personal Information. However, we cannot guarantee that incidents will not occur.

- Administrative measures: Formulating information security policies and conducting regular training for employees
- Technical measures: Implementing access controls for systems storing Personal Information, encrypting information, and deploying security software
- Physical measures: Restricting access to rooms and facilities storing Personal Information and key control

## **7 Children Data**

Our services do not knowingly collect Personal Information from children who do not have the ability to independently consent to the processing of Personal Information under applicable laws. If you are a parent or guardian and are concerned that your child has provided us with Personal Information without your consent, you should contact us as indicated in Section 10 “Contact Information”.

## **8 Privacy Rights**

8.1 You have certain rights with respect to Personal Information depending on the applicable law. These may include the following rights:

- Ask us for a copy of your Personal Information;
- Correct, delete or restrict our processing of your Personal Information;
- Obtain some Personal Information you provide to us in a structured, machine-readable format;
- Object to our processing your Personal Information (or those of a third-party), including processing for direct marketing or profiling for purposes of direct marketing; and

- Where we have asked for your consent, to withdraw consent at any time. If you ask to withdraw your consent, this will not affect any processing which has already taken place at that time.

8.2 You can exercise these rights by contacting us as indicated in Section 10 “Contact Information”. These rights may be limited, for example, if fulfilling your request would reveal Personal Information about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

8.3 If you have unresolved concerns, you have the right to complain to a data protection authority in the country/region that you live in, or where the alleged infringement occurred.

## **9 Changes to this Privacy Policy**

This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to this Privacy Policy and, where required by applicable law, request your consent to such changes.

## **10 Contact information**

If you have any questions or concerns about this privacy policy, please contact us at:

【Hotel JAL City NAGANO】 【Front Office】

Tel. 【+81-26-225-1131】

Email: 【front@nagano.jalcity.co.jp】

If you wish to exercise any of your privacy rights, please contact us in the following ways:

Mail: 【1221 Toigoshomachi, Nagano, Nagano, Japan】

【Hotel JAL City NAGANO】 【Front Office】

Email: 【front@nagano.jalcity.co.jp】 \*Please include “Exercise of Privacy Rights” in the email subject line.