

## **Our Basic Policy on the Processing of Personal Data of Customers Located in the European Economic Area (EEA) and the UK**

West Japan Railway Daily Service Net Company (the “Company”) values the privacy of its customers and is committed to protecting personal information in accordance with applicable personal information protection laws and regulations. The Company’s basic policy on the processing of personal data of its customers located in the EEA and the UK (“Personal Data”) (the “Privacy Policy for the EEA and the UK”) aims to protect the rights and interests of its customers by setting forth fundamental matters related to ensuring the lawful and appropriate processing of Personal Data by the Company.

### **1. Controller for Processing of Personal Data**

The Company is responsible for processing your Personal Data. Please see Section 12 for our contact details.

### **2. Personal Data to Be Processed**

We may process the following Personal Data. We collect your Personal Data directly from you or through our business partners.

- Contact details and identity verification information provided to the Company, such as your name, age, address, nationality, telephone number, e-mail address, place of work, and identification number (e.g., passport number).
- Information on reservations and history of customer accommodation (accommodation details, including dates, locations, room types, expenses, customer requests, and other services related to stays).
- Information necessary for the purpose of providing the services you request, such as online identifiers and credit card information.

Your contact details and identity verification information, your accommodation reservation information, and your credit card information for payment are necessary for the execution and performance of contracts with you, and if your Personal Data is not provided, we will not be able to execute contracts with you or provide services to you.

### **3. Legal Bases for Processing of Personal Data**

We process Personal Data based on the following legal bases:

- (1) Performance of a contract: where processing of your Personal Data is necessary for the performance of a contract to which you are a party or for the implementation of measures at your request prior to entering into a contract.
- (2) Legitimate interests: where processing of your Personal Data is necessary for the following legitimate interests sought by us or a third party, and is not overridden by your interests or fundamental rights:
  - to achieve customer satisfaction by conducting customer management, such as communicating with customers and responding to orders and requests from customers, and by providing appropriate services to customers;
  - to enhance the quality of our services and improve our management by conducting surveys, research, and management analysis regarding trends in the use of our services by customers and other similar data;
  - to promote our business activities by providing customers with information on products, services, events, and other business activities through direct marketing;
  - to establish, exercise, and defend our legal rights and secure our legal interests; and
  - to take necessary measures in order for the Company to comply with legal obligations and to cooperate with public authorities in law enforcement.
- (3) Consent: where we have received your consent to process your Personal Data.  
You can withdraw your consent to the processing of your Personal Data at any time. Please see Section 7 for details of the right to withdraw consent and how to exercise it.
- (4) Legal obligations: where we need to comply with a legal obligation.

#### **4. Purpose of Processing of Personal Data**

We process Personal Data for the following purposes:

- to execute and perform a contract in connection with the provision of accommodation services (legal basis: performance of a contract);
- for customer management purposes, such as communicating with customers and responding to orders and requests from customers (legal basis: legitimate interests);
- to provide customers with information on products, services, events, and other business activities through direct marketing (legal bases: consent and legitimate interests);
- to conduct surveys, research, and management analysis regarding trends in the use of our services by customers and other similar data (legal basis: legitimate interests);
- to establish, exercise, and defend our legal rights (legal basis: legitimate interests); and
- to comply with legal obligations and cooperate with public authorities in law enforcement (legal bases: legal obligations and legitimate interests).

#### **5. Recipients of Personal Data**

We may provide Personal Data to the following business partners and third parties:

- We may use JR West Hotel VIA INN Co., Ltd., to which we outsource hotel management operations, and third parties, such as IT service providers, to conduct our business. In such cases, it may be necessary to provide Personal Data for the purposes described in Section 4. The provided Personal Data will be processed in accordance with our instructions and for the original purpose.
- We may provide your Personal Data to a party that succeeds to our business due to organizational restructuring, business transfer, or other form of business succession.
- As required by law, we may disclose Personal Data to public authorities related to law enforcement in response to legal requirements, court orders, or requests from governmental or law enforcement agencies.

#### **6. Security to Protect Personal Data**

- We take technical, physical, and organizational measures designed to protect Personal Data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, and other unlawful processing.
- Access to Personal Data is limited to authorized persons, based on the principle of minimum necessity. In addition, we are working on data security initiatives that take into account the risks associated with the processing of Personal Data. These efforts will be made on an ongoing basis to protect Personal Data, taking into account industry standards.

#### **7. Exercise of Rights regarding Personal Data**

If you meet certain requirements, you may exercise the following rights with respect to your Personal Data:

- (1) Right of access (Article 15 of the GDPR/UK GDPR): The right to obtain information about the content and processing of Personal Data.
- (2) Right to rectification (Article 16 of the GDPR/UK GDPR): The right to have Personal Data rectified if it is inaccurate or incomplete.
- (3) Right of erasure (Article 17 of the GDPR/UK GDPR): The right to erase Personal Data.
- (4) Right to restrict processing (Article 18 of the GDPR/UK GDPR): The right to restrict the processing of Personal Data, for example, if Personal Data is inaccurate or the processing is unlawful.
- (5) Data portability (Article 20 of the GDPR/UK GDPR): The right to receive Personal Data in a structured, commonly used, and machine-readable format or to have it transmitted directly to third parties other than the controller.
- (6) Right to object (Article 21 of the GDPR/UK GDPR): The right to object to the processing of Personal Data based on legitimate interests.**
- (7) Right to withdraw consent (Article 7 of the GDPR/UK GDPR): The right to withdraw consent.

You may withdraw your consent to the processing of your Personal Data at any time. Withdrawal of your consent does not affect the lawfulness of processing that took place before the withdrawal.

You can exercise the rights described above by contacting us at the contact details indicated below in Section 12. If you wish to withdraw your consent or object to the processing of your Personal Data for direct marketing purposes, you can do so through the methods described in the direct marketing email you have received. You can lodge a complaint with the competent data protection supervisory authority if you believe that any of your data protection rights have been infringed.

## **8. Cross-border Transfers of Personal Data**

Your Personal Data may be transferred to a third party located outside the EEA or the UK. If we transfer Personal Data to a third party located outside the EEA or the UK, we will ensure one of the following:

- (1) the destination country or region has been designated by the European Commission or the UK government as a country or region that ensures an adequate level of protection for the rights and freedoms that you possess in respect of your Personal Data; or
- (2) the third party has entered into standard data protection clauses with us approved by the European Commission or the UK government.

You can obtain more details of the protections given to your Personal Data when it is transferred outside the EEA or the UK by contacting us at the contact details indicated below in Section 12.

## **9. Storage Period**

We will not store Personal Data longer than necessary for the purpose for which the Personal Data is processed.

We will process your Personal Data as long as our contractual relationship is ongoing or we provide services to you.

If the contract or the provision of services is terminated, we will keep storing your Personal Data for a period of three years for the following purposes:

- for customer management, including responding to inquiries from customers;
- to comply with laws and regulations applicable to us; and
- to establish, exercise, or defend legal rights.

## **10. Cookies**

Our website may use cookies and other automatic information gathering programs, subject to your consent where appropriate. Cookies are functions that allow the Company's website to store information about users in their browsers or hard drives. The use of cookies saves you from having to manually re-enter information stored on your hard drive. Cookies also help us to improve the usability of our website by recording how and when our website is used.

You can disable cookies in your browser settings, but certain features of our website may not work.

## **11. Changes to Privacy Policy**

If we change the Privacy Policy for the EEA and the UK, we will take steps as required by law to protect your Personal Data. If we change the Privacy Policy for the EEA and the UK, we will set out the date of the update in Section 12.

## **12. Contact Us**

If you wish to exercise any of the rights set forth in Section 7, or if you have any questions regarding the Privacy Policy for the EEA and the UK and the processing of your Personal Data, please contact us using the contact details below or our representatives listed below. Please note that the Personal Data obtained in the course of contacting us will be used only for the purpose of responding to your inquiry.

**【Company's contact details】**

West Japan Railway Daily Service Net Company

Address: JR Amagasaki Station North NK Building, 1-2-12 Shioe, Amagasaki City, Hyogo 661-0976, Japan

Contact Information of the Data Protection Officer: [GDPR\\_DPO@daily-service.co.jp](mailto:GDPR_DPO@daily-service.co.jp)

**【EU/UK representatives】**

You may contact our EU/UK representatives using the contact details below.

EU Representative: DP-Dock GmbH

Address: Ballindamm 39, 20095 Hamburg, Germany

Website: [www.dp-dock.com](http://www.dp-dock.com)

E-mail Address: [jr-west-daily-service@gdpr-rep.com](mailto:jr-west-daily-service@gdpr-rep.com)

UK Representative: DP Data Protection Services UK Ltd.

Address: 16 Great Queen Street, Covent Garden, London, WC2B 5AH, United Kingdom

Website: [www.dp-dock.com](http://www.dp-dock.com)

E-mail Address: [jr-west-daily-service@gdpr-rep.com](mailto:jr-west-daily-service@gdpr-rep.com)

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