

# PRIVACY POLICY

The Hotel Group operated by Sotetsu Hotel Management Co., Ltd. (hereinafter referred to as the "Hotel Group" as described in [the bottom of the page](#)) strongly recognizes the importance of the personal information of customers. We comply with the Act on the Protection of Personal Information and related laws and guidelines, and strive for the proper handling and management of said information as follows.

We ask our customers to check "[Additional rules applicable to the handling Personal Information of residents of EEA, the United Kingdom and Kingdom of Thailand](#)", if they apply General Data Protection Regulation (hereinafter referred to as GDPR) established by the European Union (hereinafter referred to as the EU) and/or the Personal Data Protection Act (hereinafter referred to as PDPA) established by the Kingdom of Thailand.

Also, for customers who are residents of South Korea, please see "[To the customers who are residents of South Korea](#)".

For customers who are residents of Republic of China (Taiwan) are asked to read "[To the customers who are residents of Republic of China \(Taiwan\)](#)".

## 1. Collection of personal information

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The Hotel Group shall collect personal information for transactions relating to the hotel facilities and products (overnight stays, eating and drinking, parties, commodity sales, and provision of related products and services) and transactions with our business partners utilizing the following methods.

### 1. Direct collection from customers

Phone conversations, documents (including electromagnetic records), business cards, verbal communication, Internet, etc.

## 2. Collection from individuals who have been granted legitimate authority by a customer

Applicants for services, vendors, travel service providers, business partners, package product sellers, and other customer service providers

## 3. Collection from public sources

Internet and newspapers, telephone directories, books and printed materials

## 2. Purposes of use of personal information

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The Hotel Group shall not use the personal information of its customers, in the area where the Hotel Group is located, for any purpose other than the following unless such other use is required by law or regulation or such other purpose is presented separately.

### 1. Purposes of use based on the performance of obligations arising from an agreement with a customer

(1) Transactions relating to the hotel facilities and products (overnight stays, parties, meals, commodity sales, and provision or sales of related products and services as well as event hosting), communications relating to transactions with our business partners and other transactions, shipping of products and payment/settlement of those costs, and matters relating to the above;

(2) Management of member information and provision of services to the members of the membership association

(3) Response to inquiries and requests received by the hotel

(4) Creation, installation and preservation of a guest register as prescribed in laws and regulations, etc.

## 2. Purposes of use based on the consent of customers

(1) To ensure appropriate provision of information and security on the hotel website, as well as statistical analysis related to the maintenance and management of the website, based on information such as cookies, IP addresses, types of browsers and date and time of access collected through the Hotel's website.

(2) The Hotel Group shall use personal information for the following marketing purposes with the consent of the customer.

- Notification and sending of information, advertisements, questionnaires, etc. relating to hotel facilities as well as sales activities of tenants and partner companies to customers via e-mail, postal mail, courier services, telephone, facsimile or other means.

- To grasp the situation of utilization of the hotel services, we shall analyze browsing history, transaction history, etc, for the purpose of improvement, development and marketing of the facilities and services of tenants and partner companies, etc.

\*The Hotel Group cannot provide services unless customers provide relevant personal information. Customer's consent may be withdrawn at any time.

(3) Personal information collected will also be used for the purposes listed in the "Joint Use" section of Sotetsu Holdings' "Handling of Customer Personal Information" among Sotetsu Group companies.

## 3. Types of personal information

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Personal information collected and retained by the Hotel Group shall include the following.

1. Basic customer information (address, name, gender, date of birth, nationality, e-mail address, telephone number, facsimile number, and mailing address, etc.)
2. Additional customer information (occupation, employment (company name, address, telephone number, department, title), wedding anniversary date, family information (names, relationships, birth dates, etc.))
3. Payment information (credit card number, bank account information, billing address, etc.)
4. Service usage information (facility usage history, product purchase history, etc.)
5. Communication details (e-mails, website form entry details, facsimile, telephone notes, letters, questionnaires, etc.)
6. Information collected via security systems (security cameras, card keys, etc.)
7. Information automatically collected at the hotel website (cookies, IP address, browser type, date and time of access, etc.)
8. Hotel register information (address, name, occupation, nationality, passport number, age, previous place stayed, travel destination, arrival time/date, room type, etc.)

## 4. Retention period of personal information

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The Hotel Group will retain the personal information obtained from customers for the period necessary to achieve the above acquisition and processing purposes. The specific retention period is determined in consideration of the purpose of acquisition and processing of personal information, the nature of personal information, and the legal or business necessity of retaining personal information.

## 5. Management of personal information

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The Hotel Group shall strive to maintain accurate and up to date personal information to the extent it is necessary to achieve the purposes of use and shall take necessary and appropriate measures to prevent unauthorized disclosure, loss or damage of such personal information and ensure safe management of such information by appointing persons responsible for and in charge of information management. We will promptly delete any personal information that is no longer necessary.

## 6. Disclosure of personal information to third parties and joint use

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### 1. Limitations on disclosure to third parties

The Hotel Group shall not disclose or transfer the personal information of any of our customers unless any of the following applies. If we use personal information jointly or transfer personal information due to business outsourcing, such joint use or transfer shall not be considered as disclosure or transfer to third parties.

- (1) Disclosure or transfer is agreed to by the customer;
- (2) Disclosure or transfer is required to the extent permitted by law;
- (3) Disclosure or transfer is required for the purpose of protecting human life, preventing injury or protecting property and consent cannot be easily obtained from the customer;
- (4) Disclosure or transfer is pursuant to cooperation with official administration of the national or local government and obtainment of the customer's consent may prevent execution of such administration;

(5) When the third party is an academic research institution and needs to handle personal information for academic research purposes (including when part of the purpose of handling the personal information is for academic research, unless there is a risk of infringing on individual rights and interests)

(6) Disclosure or transfer of statistical data (based on which the customer is not identifiable);

(7) Disclosure or transfer occurs in connection with a business succession including a merger, spin-off or business transfer;

(8) Disclosure or transfer of personal information to hotels outside of Japan that participate in SOTETSU HOTELS CLUB;

## 2. Joint use of personal information

The Hotel Group is constantly making group-wide efforts to improve our service level, in order to provide high value-added services to our customers. For this purpose, the Hotel Group will jointly use personal information within the scope mentioned below under strict management.

### Joint Use of Personal Information Within the Sotetsu Group

The Hotel Group shall jointly use the personal information obtained from customers listed in the "Joint Use" section of Sotetsu Holdings' "Handling of Customer Personal Information" among Sotetsu Group companies.

### Joint Use of Personal Information Within the Hotel Group

(1) Scope of parties involved in joint use of personal information

The hotels and hotel chains listed on the bottom of the page.

## (2) Personal information items subject to joint use

The same items described in "3. Types of personal information" in this Policy.

## (3) Purposes of use by the joint users

The same purposes described in "2. Purposes of use of personal information" in this Policy.

## (4) Persons responsible for the management of jointly-used personal information

Sotetsu Hotel Management CO., LTD.

Address: 2-9-14 Kitasaiwai, Nishi-ku, Yokohama-shi, Kanagawa  
Japan

Representative: Takamasa Kato

# 7. Collection and use of customers' histories of visits to and activity on this website

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The Hotel Group is placing behavioral targeting advertising \*1 and retargeting advertising \*2 on specific websites by using programs provided by third-party providers such as ad serving operators.

\*1: Behavioral targeting advertising is a method of distributing advertisements that suit the interests of each user based on his/her search history and website browsing information.

\*2: Retargeting advertising is a method of distributing advertisements to users who have previously visited the website.

Third-party providers such as ad serving operators may collect and use the cookie information \*3, etc. of customers who visit our website.

\*3: Cookies refers to a mechanism by which the usage history and input record transmitted between the browser and the server is saved in a text file on the customer's computer when he or she browses a web page. The cookies configuration varies according to the browser, so please check it by visiting the "Help" menu of the browser you are using.

Cookies information, etc. collected by third-party companies such as ad serving operators shall be handled in accordance with such third-party companies' privacy policies.

Customers may stop the use of cookies information, etc. for the purpose of advertisement distribution by third-party providers such as ad serving operators, by visiting the \*opt-out page on the websites of such third-party providers.

\*Opt-out is the process by which a customer can prevent information about him/her from being identified as specific to a certain browser, by opting out of (refusing) cookies.

## 8. Safety management measures

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The Hotel Group takes the following measures to prevent leakage, loss or damage of personal information and other appropriate management.

### 1. Formulation of basic policy

- We have established this basic policy to ensure the proper handling of personal information and to inform you of our counter for handling questions and complaints.

### 2. Development of discipline regarding the handling personal data

- Established personal information handling rules regarding handling methods, responsible persons / persons in charge, and their duties at



each stage of acquisition, use, storage, provision, deletion / disposal, etc.

### 3. Organizational safety management measures

- Established a person in charge of handling personal data (personal information manager)
- Clarify the range of employees who handle personal data and the personal data handled by the employees
- Established a system for reporting and contacting the person in charge of personal information management when a fact or sign that violates the law or internal regulations is grasped.
- Regularly self-inspect the handling situations of personal information and conduct audits by other departments and the third parties.

### 4. Human safety management measures

- Implement trainings regularly for employees regarding the handling of personal information.
- Regarding the confidentiality of personal information is described in the work regulations

### 5. Physical safety management measures

- In areas where personal information is handled, we will control the entry and exit of employees and restrict the equipment they bring in, and take measures to prevent unauthorized persons from viewing personal information.
- Take measures to prevent theft or loss of devices, electronic media, documents, etc. that handle personal information.
- When carrying equipment, electronic media, etc. that handle personal information, including transferring it within the office, take measures to prevent revealing personal information.

## 6. Technical safety management measures

- Implement access control to limit the range of personal information handled by the person in charge
- Introduced a mechanism to protect information systems that handle personal information from unauthorized access or software from the outside

## 9. Disclosure of personal information

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The Hotel Group shall promptly respond to the following requests made by the customers themselves, unless prohibited by law, after confirming the identity of the customer and in accordance with the rules of the Hotel Group.

1. Purpose of use of personal information
2. Disclosure of personal information
3. Correction, addition or deletion of the contents of personal information  
(\*In the event that the details of the personal information are not factual.)
4. Suspension of use or deletion of personal information  
(\*When personal information is handled or acquired in violation of the law)
5. Suspension of disclosure of personal information to a third party  
(\*In the event that the personal information is disclosed to a third party in a manner that violates the provisions of law.)

[Check here](#) for information on how to request disclosure of personal data and to find the disclosure request form.

## 10. Revision of the Privacy Policy

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The Hotel Group may revise the contents of this Privacy Policy. In such cases, the latest policy shall be promptly posted on the Hotel Group's website. The revised Privacy Policy will take effect when the Hotel Group posts the policy on the Group's website.

## 11. Inquiries concerning Member's personal information may be directed to the following:

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Business Management Division, Planning Department, Sotetsu Hotel Management CO., LTD.

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<b>Address:</b>	(Sotetsu Headquarters building 2F) 2-9-14 Kitasaiwai, Nishi-ku, Yokohama, Kanagawa 220-0004 Japan
<b>E-mail:</b>	Click <a href="#">here</a> for inquiries via email
<b>FAX:</b>	(+81) 45-319-2577

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## Indication of the Hotel Group

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In this policy, "our hotel group" refers to the following hotels.

- SOTETSU FRESA INN  
<https://sotetsu-hotels.com/en/fresa-inn/>

- SOTETSU GRAND FRESA  
<https://sotetsu-hotels.com/en/grand-fresa/>
- HOTEL SUNROUTE  
(Hotels operated by Sotetsu Hotel Management Co., Ltd. and hotels operated through franchise and partnership agreements with Sotetsu Hotel Management Co., Ltd.)  
<https://sotetsu-hotels.com/en/sunroute/>
- SOTETSU HOTELS THE SPLAISIR  
<https://sotetsu-hotels.com/en/splaisir/>
- THE POCKET HOTEL BY SOTETSU  
<https://sotetsu-hotels.com/en/pocket-hotel/>
- SOTETSU HOTELS PARTNER HOTEL  
(Hotels operated through partnership agreements with Sotetsu Hotel Management Co., Ltd.)  
<https://sotetsu-hotels.com/en/partnerhotel/>

End

September 28, 2022

Sotetsu Hotel Management CO., LTD.

Address: 2-9-14 Kitasaiwai, Nishi-ku, Yokohama-shi, Kanagawa

Japan

Representative: Takamasa Kato

## Additional rules applicable to the handling personal information of residents of EEA, the United Kingdom and the Kingdom of Thailand

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This additional rule is based on the European Union (hereinafter referred to as EU), the General Data Protection Regulation established by the United Kingdom (hereinafter referred to as GDPR),

and the Personal Data Protection Act established by the Kingdom of Thailand (hereinafter referred to as PDPA). It describes certain additional information that the Hotel Group is required to provide to customers residing in the European Economic Area (EEA) and Thailand, and their right regarding the handling of personal information in accordance with the local applicable law. In the event of any conflict between this additional rules and the terms of the privacy policy text, this additional rules will prevail.

### 1. Handling of personal information

Regarding the method and purpose of handling customer's personal information by the Hotel Group, the retention period, the type of customer's personal information handled by the Hotel Group, and the provision of customer's personal information to a third party, are as described in the privacy policies from 1 to 6.

### 2. Legal basis

The fundamental legal basis underlying the use of personal information by the Hotel Group shall be the customer's consent. The legal basis for use of personal information without the consent of our customers shall be the necessity to perform an agreement with a customer, the necessity to implement procedures as requested by our customers before executing an agreement, the necessity to pursue legitimate interests sought by the Hotel Group or a third party, or the necessity of the Hotel Group to comply with legal obligations.

Legitimate interests sought by the Hotel Group or by a third party refers to an increase in operating profit through marketing and service improvements as well as the improvement of the convenience and security of the Hotel website.

### 3. Transfer of personal information to a third country

The Hotel Group may transfer personal information acquired outside Japan to Japan or a third country (including countries that have not been certified by the EU and the the United Kingdom.) in order to fulfill the contract with the customer or to follow the procedures

requested by the customer before concluding the contract. When transferring customer's personal information to a third country, the Hotel Group will handle the personal information with proper security and confidentiality measures.

#### 4. Customer rights

Customers shall have the following legal rights with regard to transactions with the Hotel Group. Customers can exercise these rights by contacting our personal information protection inquiry desk mentioned in Section 11 of the Privacy Policy. The Hotel Group shall respond to such exercise of rights in good faith after confirming that the rights were exercised by the customer her/himself, unless it falls under any exception permitted by law.

(1)Right of the customer to access his or her own personal information

The right to access personal information or attached information if the Hotel Group confirms that the customer's information is being used.

(2)Right to correct personal information

The right of the customer to correct inaccurate personal information.

(3)Right to delete personal information

The right of the customer to delete personal information under certain conditions.

(4)Right to limit the use of personal information

The right of the customer to limit the use of personal information under certain conditions.

(5)Right to file complaints about use of personal information

The right of the customer to file complaints about the use of personal information based on the legitimate interests sought by the Hotel Group or a third party.

(6)Right of data portability

The right of the customer to receive the personal data provided to the

Hotel Group in a structured, commonly used and machine-readable format and to transfer the personal data to any business operator without interference from the Hotel Group.

## 5. Withdrawal of consent

Customers may withdraw their consent to use their personal information at any time. The withdrawal will not have any impact on the legality of the use of the personal information that was performed in accordance with the consent before withdrawal. Customers can withdraw their consent by contacting our personal information protection inquiry desk mentioned in Section 11 of the Privacy Policy.

## 6. Filing of complaints to authorities

Our customers may file complaints about the treatment of personal information by the Hotel Group with the authorities of the country, region or international organization in accordance with applicable law.

## 7. Personal information required for hotel stay

The Hotel Group requires the following information in order to provide accommodation services to its customers. In particular, items that must be recorded in a hotel register must be retained for three years under Japanese law. In some cases, the Hotel Group may not be able to provide accommodation services to customers who do not provide this information.

(1) Basic information (such as name and telephone number)

(2) Items that must be recorded in the hotel register (Name, address, occupation, nationality, passport no, gender, age, etc.)

## 8. Personal information of children

If a person under the age of 16 provides personal information, such provision shall be made with the consent of a parent or guardian.

## 9. Automated decision making such as profiling

The Hotel Group shall not rely solely on automated processes such as profiling of personal information when making decisions.

## To the customers who are residents of South Korea

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If you are residents of South Korea, please see the "PRIVACY POLICY" below.

<https://sotetsu-hotels.com/en/privacy/korea/>

## To the customers who are residents of Republic of China (Taiwan)

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The following Taiwan-specific provisions apply to the collection, processing, or use of personal data in place of or in addition to the provisions of this Privacy Policy for guests located in the Republic of China (Taiwan).

1. The Guest represents and warrants that they have obtained the consent of the individuals involved when providing the Hotel Group with the personal data of family members.
2. The Hotel Group may transfer personal data to Japan in order to execute an agreement with the Guest or for procedures requested by the Guest prior to entering into an agreement. Any Guest data provided to a third party by the Hotel Group will be handled under appropriate safety control measures and confidentiality obligations.
3. Guests may exercise the following rights set forth in Article 3 of the Taiwan Personal Data Protection Act by contacting the Hotel Group in writing or by email.



- (1) the right to make an inquiry of and to review his/her personal data;
- (2) the right to request a copy of his/her personal data;
- (3) the right to supplement or correct his/her personal data;
- (4) the right to demand the cessation of the collection, processing or use of his/her personal data;
- (5) the right to erase his/her personal data.

However, if the Guest refuses to provide personal data, the Hotel Group may be unable to execute our agreement with the Guest or provide the services described in this Privacy Policy.

#### 4. Please read the following supplementary provisions for "6. Providing and Sharing Personal Data with Third Parties".

- (1) The Hotel Group may disclose or provide personal data to public institutions such as national or local governments when required under the law.
- (2) The Hotel Group may disclose or provide personal data to hotels within the Sotetsu Hotels Club in order to manage Guest membership.
- (3) The Hotel Group may disclose or provide guest personal data to potential business partners or interested third parties for the succession of business (including mergers, demergers, and business transfers), and the guest consents to this. Not consenting to the disclosure of personal data by the Hotel Group will not adversely affect the Guest's rights and interests in any way.