

Privacy Policy

This Privacy Policy sets out how Okura Nikko Hotel Management Co., Ltd. of 2-chome 10-4 Toranomom, Minato-ku, Tokyo 105-0001, Japan (“**ONHM**”, “**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”).

Section 11 “Local-specific clauses” applies where the laws of the relevant region apply to you based on your residence in such region or other factors as provided under applicable local laws and regulations. In the event that this creates a conflict between the local-specific clause and any other clause, the local-specific clause will govern.

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.

In this Policy, “Okura Group” means Hotel Okura Co., Ltd. and entities listed [here](#).

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

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

application data	<p>online identifiers</p> <ul style="list-style-type: none"> • Information collected through Cookie or similar technologies (e.g., logs regarding the use of our website) • Other usage history including browsing history 	<ul style="list-style-type: none"> • Third-parties who 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"> • You • Anyone who makes a booking and/or checks in on your behalf, or your traveling companions • Travel Agents and other third-parties involved in services provided by the hotel

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.

Purpose	Categories of Personal Information
<p>To provide services to you. This includes making necessary safety measures, notifications and responding to your inquiry.</p>	<ul style="list-style-type: none"> • Your profile • Information you register when you use our services • Service usage information • Video information • Survey responses • Website or mobile application data • Information about your inquiry
<p>To take payments</p>	<ul style="list-style-type: none"> • Your profile • Information you register when you use our services • Service usage information
<p>To improve and develop the services and business strategies of ONHM and Okura Group (including conducting surveys).</p>	<ul style="list-style-type: none"> • Your profile • Information you register when you use our services • Service usage information • Survey responses • Website or mobile application data • Information about your inquiry
<p>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.</p>	<ul style="list-style-type: none"> • Your profile • Information you register when you use our services • Service usage information • Survey responses • Website or mobile application data • Information about your inquiry
<p>To protect interests and legal rights of our customers, ONHM and Okura Group.</p>	<ul style="list-style-type: none"> • Your profile • Information you register when you use our services • Service usage information • Video information • Survey responses • Website or mobile application data • Information about your inquiry
<ul style="list-style-type: none"> • To comply with our legal and 	<ul style="list-style-type: none"> • Your profile

<p>regulatory obligations under the applicable law.</p> <ul style="list-style-type: none"> • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar 	<ul style="list-style-type: none"> • Information you register when you use our services • Service usage information • Video information • Survey responses • Website or mobile application data • Information about your inquiry
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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

We share your Personal Information with the following entities.

Entities with whom we share Personal Information	Categories of Personal Information Shared	Detail
Okura Group	<ul style="list-style-type: none"> • Your profile • Information you register when you use our services (excluding “Allergy information” and “Health status and disability information”) • Service usage information • Survey responses • Information about your inquiry 	We provide Personal Information to provide services, improve and develop the services and business strategies of ONHM and Okura Group, and protect interests and legal rights of our customers, ONHM and Okura Group.
Hotel management company	<ul style="list-style-type: none"> • Your profile • Information you 	We share your Personal Information with the hotel where you stayed and the

	<p>register when you use our services (excluding “Allergy information” and “Health status and disability information”)</p> <ul style="list-style-type: none"> • Service usage information • Video information • Survey responses • Information about your inquiry 	<p>hotel where you will stay so that you can receive high-quality service at any hotel. Hotel management companies process your Personal Information shared from us as independent business entities separate from us. However, such processing is subject to contractual restrictions we impose to protect your Personal Information. If you do not wish to have your information shared as described above, please contact us using the contact information provided in Section 10. “Contact Information”.</p>
<p>Service providers e.g., IT service providers (Cloud service provider, data centers), payment processing companies, marketing/email delivery vendors, Customer support service providers</p>	<p>All categories of Personal Information listed in Section 1.1.</p>	<p>We share Personal Information with the service providers to achieve the purposes listed in Section 2.1.</p>
<p>Booking platforms (including travel agencies)</p>	<ul style="list-style-type: none"> • Your profile • Information you register when you use our services • Service usage information • Information about your inquiry 	<p>We may provide Personal Information to Booking platforms when you book a hotel using that platform, for the purpose of fulfilling the reservation agreement.</p>
<p>Companies and other organisations that own and manage facilities, such as the spas, restaurants, health clubs,</p>	<ul style="list-style-type: none"> • Your profile • Information you register when you use our services • Service usage 	<p>At your request, we may provide your Personal Information to these companies or organisations. These companies or organizations process your Personal Information as</p>

and other outlets, within the hotel	<p>information</p> <ul style="list-style-type: none"> Information about your inquiry 	independent business entities separate from us.
<ul style="list-style-type: none"> Transportation services Leisure facilities Other Companies operating facilities or providing services 	<ul style="list-style-type: none"> Your profile Information you register when you use our services Service usage information Information about your inquiry 	<p>At your request, we may provide your Personal Information to these companies or organizations.</p> <p>These companies or organizations process your Personal Information as independent business entities separate from us.</p>
政府もしくは公的機関、法執行当局、裁判所、規制当局または類似の機関	セクション 1.1 記載のすべての個人情報カテゴリ	当社は、適用法令に基づく当社の法的および規制上の義務に従い、政府もしくは公的機関、法執行当局、裁判所、規制当局または類似の機関からの要請に対応するために、個人情報をこれらの機関に共有することがあります。
事業移転の相手方	セクション 1.1 記載のすべての個人情報カテゴリ	当社が合併、買収、組織再編または処分を行う場合、個人情報の一部または全部が、見込購入者およびそのアドバイザーに開示され、事業の新しい所有者に移転される可能性があります。

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:

Okura Nikko Hotels Reservation Center

(Toll free within Japan)

0120-00-3741 (9:30 – 17:30JST, Closed Sundays and Holidays)

Email: privacy@okura-nikko.co.jp

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

Mail: No.2 Akiyama Building 3-6-2 Toranomom, Minato-ku, Tokyo 105-0001, Japan

Okura Nikko Hotel Management Co., Ltd. Sales & Marketing

Email: privacy@okura-nikko.co.jp *Please include "Exercise of Privacy Rights" in the email subject line.

11 Local specific clauses

This section provides for certain local-specific provisions that apply where the laws and regulations of a particular region apply to you based on your location residence or other factors as provided under applicable laws and regulations. The following provisions supplement the sections above.

11.1 Japan

(1) Joint Use

ONHM will jointly use your Personal Information as follows:

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	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 (*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. *1 For details, please refer to the "OUR HOTELS" on our company website. *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.
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	ONHM

B) Joint Use in relation to One Harmony membership information

Jointly used data	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
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	religious data, memorial days such as wedding anniversary.
Scope of Joint Users	<p>ONHM, member hotels of Okura Hotels & 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 HOTELS" 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>
Purpose of Joint Use	Recording lodging history, inclusion in 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	ONHM

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
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	(aka FFP), FFP membership number, FFP tier, tier of membership, membership number, reservation history, lodging history.
Scope of Joint Users	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	ONHM

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	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	ONHM

(2) Provision of Information related to personal information

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.

11.2 European Economic Area, United Kingdom and Switzerland

- We process your Personal Information for the following purposes. We also explain each legal basis in the table below.

Purpose	Categories of Personal Information	Legal Basis
<p>To provide services to you. This includes making necessary safety measures, notifications and responding to your inquiry.</p>	<ul style="list-style-type: none"> • Your profile • Information you register when you use our services • Service usage information • Video information • Survey responses • Website or mobile application data • Information about your inquiry 	<p><u>Contractual Necessity.</u> The processing is necessary to perform a contract or to take steps, at your request, prior to entering into a contract with you.</p> <p><u>Legitimate Interest.</u> Where the service is not necessary to perform the contract above, the processing is necessary for the purposes of the legitimate interests.</p>
<p>To take payments</p>	<ul style="list-style-type: none"> • Your profile • Information you register when you use our services • Service usage information 	<p><u>Contractual Necessity.</u> The processing is necessary to perform a contract or to take steps, at your request, prior to entering into a contract with you.</p>
<p>To improve and develop the services and business strategies of ONHM and Okura Group (including conducting surveys).</p>	<ul style="list-style-type: none"> • Your profile • Information you register when you use our services • Service usage information • Survey responses • Website or mobile application data 	<p><u>Legitimate Interest.</u> The processing is necessary for the purposes of the legitimate interests.</p>

	<ul style="list-style-type: none"> Information about your inquiry 	
<p>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.</p>	<ul style="list-style-type: none"> Your profile Information you register when you use our services Service usage information Survey responses Website or mobile application data Information about your inquiry 	<p><u>Consent.</u></p> <p>We process your Personal Information if you give us your consent in relation to the service “One Harmony”.</p> <p>After signing in to the member page, you can withdraw your consent at any time by selecting your preference for receiving campaign information under “Edit Profile” in “My Account & My Card.”</p>
<p>To protect interests and legal rights of our customers, ONHM and Okura Group.</p>	<ul style="list-style-type: none"> Your profile Information you register when you use our services Service usage information Video information Survey responses Website or mobile application data Information about your inquiry 	<p><u>Legitimate Interest.</u></p> <p>The processing is necessary for the purposes of the legitimate interests.</p>
<ul style="list-style-type: none"> To comply with our legal and regulatory obligations under the applicable law. To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar. 	<ul style="list-style-type: none"> Your profile Information you register when you use our services Service usage information Video information Survey responses Website or mobile application data Information about your inquiry 	<p><u>Compliance with laws.</u></p> <p>The processing is necessary for compliance with a legal obligation to which the controller is subject.</p> <p><u>Legitimate Interest.</u></p> <p>Where the applicable law is other than those of your country of residence, we process your Personal Information for the purposes of the legitimate</p>

		interests.
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- Details of the mechanism (including a copy of it) to ensure that the cross-border data transfer meet the requirements of applicable data protection legislation can be obtained on your request by using contact details at Section 10 “Contact Information”.
- Details of EU data protection authorities is available [here](#) and the website of the data protection authority of the UK Information Commissioner’s office is [here](#).
- We have designated the following domestic representative for the processing of Personal Information:
[Hotel Okura Amsterdam B.V.](#)

11.3 **United States**

(1) **Privacy Rights**

Consumers in certain states may have the following rights, and you can submit a request to exercise these rights by contacting us as indicated in Section 10 “Contact Information” above.

- **Right to know and access**

The right to confirm whether we are processing Personal Information and to access such information. Residents in certain states may also obtain a list of third-parties with whom we have shared personal data.

- **Right to correct**

The right to correct inaccurate Personal Information we hold about you.

- **Right to delete**

The right to delete the Personal Information we hold about you.

- **Right to access and data portability**

The right to obtain a copy of the Personal Information and, to extent feasible, in a readily usable format.

- **Right to appeal**

If you would like to appeal a decision made by us relating to your request to exercise privacy rights, you have the right to submit an appeal to us.

- **Right to Opt-out of Targeted Advertising and Sales**

Some state laws may set forth the right to opt-out of advertising and analytics practices that may be considered “Targeted Advertising” or “Sale/Selling” of Personal Information under the applicable state law.

- **Right to Opt-out of Automated Decision Making and Profiling**

Some state laws may set forth the right to opt-out of the automated decision

making and profiling in furtherance of decisions that produce legal or similarly significant effects. However, ONHM does not engage in such activities.

- “Do Not Sell or Share My Personal Information”

Residents of California can request to opt-out of the “sale” of your Personal Information or the “sharing” of your Personal Information to a third-party for cross-contextual behavioral advertising (i.e., targeted advertising).

- “Limit the Use and Disclosure of Sensitive Personal Information”

Residents of California have the right to limit the use of the consumer’s sensitive personal information to certain purposes such as the purpose which is necessary to perform the services reasonably expected by an average consumer. ONHM does not offer this right because we use sensitive personal information only for such purposes.

(2) Verifying Request

When making the above request, please provide us with enough information to allow us to verify you are the data subject of the Personal Information or their authorized representative. You must also describe your request with enough detail so that we can understand, evaluate and respond to it.

(3) Agent

If you are an authorized representative submitting a request on a consumer’s behalf, please complete the applicable request per the instructions below. We will follow up to request a signed, written permission signed by the individual who is the subject of the request. The written permission must state your full legal name, the full legal name of the individual who is the subject of the request, and a clear description of the permission granted. Alternatively, you may submit a copy of a power of attorney under applicable state law. Please keep in mind that if we do not receive adequate proof that you are authorized representative, we may deny the request.

(4) Exercising Your Rights

- Request to Know, Correct and/or Delete

Please submit your request at: privacy@okura-nikko.co.jp by e-mail or you may call us at : +81-(0)3-6402-3377.

- “Do Not Sell or Share My Personal Information”

To opt-out of “sale” or “sharing” of your Personal Information for cross-context behavioral advertising, please submit a request at: Do Not Sell or Share My Personal Information.

(5) Data Retention

We retain Personal Information for as long as it is necessary for the purposes outlined in this section unless we are required to retain information by law.

(6) Non-Discrimination

Consumers have the right to not receive discriminatory treatment for exercising privacy rights. We will not discriminate against you for exercising your privacy rights.

(7) Notice of Financial Incentive

Under California regulations, if offer certain loyalty or similar program(s) directly or reasonably related to the collection, retention or deletion of your Personal Information, such program may be considered a “financial incentive”. We may collect Personal Information in connection with a loyalty program “One Harmony” (For details of the program, please see [here](#)). You can confirm “One Harmony Membership Terms and Conditions” at [here](#). By collecting members’ Personal Information, we can operate One Harmony and provide membership benefits. We use your Personal Information to both award and redeem points. We may share your Personal Information in connection with our hotels you visit or reserve for your better experience. The types of Personal Information that we collect from members are generally similar to the types of Personal Information of non-members. The amount of Personal Information that we collect from a member or non-member may vary and is dependent on the level of interactions and engagement that the member or non-member has with us. Participation is voluntary (you can join One Harmony at [here](#)), and you may withdraw at any time by submitting the request at [here](#).

We estimate the value of a member’s Personal Information to us to be on average approximately \$0.33 per Consumer in 2026. This estimate is not specific to any individual Consumer and varies per Consumer. We have based this good faith estimate on the value that arises from our commercial relationships and the collection and retention of the Personal Data of Consumers who have voluntarily signed up and chosen to remain in the Program. The value of Program benefits to members varies significantly as individual members take advantage of Program benefits to varying degrees.

(8) Personal Information We Collect and Purposes for Collection

We may use Personal Information for the purposes described in the following Table.

Categories of Personal Information	Purposes for collection of Personal Information	Categories of sources from which Personal Information was collected	To whom we may disclose Personal Information for a business purpose	Third-Parties We Share with for Cross Context Behavioural Advertising
<p>Identifiers: Such as real name, postal address, email address, online identifier and IP address</p>	<ul style="list-style-type: none"> • To provide services to you. • To take payments • To improve and develop the services and business strategies of ONHM and Okura Group (including conducting surveys). • 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. • To protect interests and legal rights of 	<ul style="list-style-type: none"> • You (Consumers) • Anyone who makes a booking and/or checks in on your behalf, or guests' traveling companions • Travel Agents and other third-parties involved in hotel reservations or usage • Third-parties who collect data from the website or application as a data controller 	<ul style="list-style-type: none"> • Okura Group • Hotel management company • Service providers • Booking platforms (including travel agencies) • On-property companies • Companies and other organizations that own and manage facilities, such as the spas, restaurants, health clubs, and other outlets, within the hotel • Transportation services • Leisure facilities • Other Companies 	<ul style="list-style-type: none"> • Advertising and Analytics Providers

	<p>our customers, ONHM and Okura Group.</p> <ul style="list-style-type: none"> • To comply with our legal and regulatory obligations under the applicable law. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar. 		<p>operating facilities or providing services</p> <ul style="list-style-type: none"> • Government or public authorities, law enforcement officials, courts, regulators or similar • Counterparty of Business transfer 	
<p>Commercial information: Such as records of services purchased or considered and other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • To provide services to you. • To take payments • To improve and develop the services and business strategies of ONHM and Okura Group (including conducting surveys). • To provide you with news, offers, 	<ul style="list-style-type: none"> • You (Consumers) • Anyone who makes a booking and/or checks in on your behalf, or guests' traveling companions • Travel Agents and other third-parties involved in hotel 	<ul style="list-style-type: none"> • Okura Group • Hotel management company • Service providers • Booking platforms (including travel agencies) • On-property companies • Companies and other organizations that own and 	<ul style="list-style-type: none"> • N/A

	<p>promotions and advertisements, including personalised content based on profiling of your interests and preferences via email, mail or online advertising.</p> <ul style="list-style-type: none"> • To protect interests and legal rights of our customers, ONHM and Okura Group. • To comply with our legal and regulatory obligations under the applicable law. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar. 	<p>reservations or usage</p>	<p>manage facilities, such as the spas, restaurants, health clubs, and other outlets, within the hotel</p> <ul style="list-style-type: none"> • Transportation services • Leisure facilities • Other Companies operating facilities or providing services • Government or public authorities, law enforcement officials, courts, regulators or similar • Counterparty of Business transfer 	
Internet or other electronic	<ul style="list-style-type: none"> • To provide services to you. 	<ul style="list-style-type: none"> • You (Consumers) 	<ul style="list-style-type: none"> • Service providers 	<ul style="list-style-type: none"> • Advertising and Analytics

<p>network activity information: Such as browsing history and information regarding a consumer's interaction with an internet website, application, or advertisement</p>	<ul style="list-style-type: none"> • To improve and develop the services and business strategies of ONHM and Okura Group (including conducting surveys). • 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. • To protect interests and legal rights of our customers, ONHM and Okura Group. • To comply with our legal and regulatory obligations under the applicable law. 	<ul style="list-style-type: none"> • Anyone who makes a booking and/or checks in on your behalf, or guests' traveling companions • Travel Agents and other third-parties involved in hotel reservations or usage • Third-parties who collect data from the website or application as a data controller 	<ul style="list-style-type: none"> • Government or public authorities, law enforcement officials, courts, regulators or similar • Counterparty of Business transfer 	<p>Providers</p>
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	<ul style="list-style-type: none"> To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar. 			
<p>Inferences drawn from any of the information identified in this section to create a profile about a consumer reflecting the consumer's preferences and characteristics.</p>	<ul style="list-style-type: none"> To provide services to you. To improve and develop the services and business strategies of ONHM and Okura Group (including conducting surveys). 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"> You (Consumers) Anyone who makes a booking and/or checks in on your behalf, or guests' traveling companions Travel Agents and other third-parties involved in hotel reservations or usage Third-parties who collect data from the website or application as a data controller 	<ul style="list-style-type: none"> Service providers Government or public authorities, law enforcement officials, courts, regulators or similar Counterparty of Business transfer 	<ul style="list-style-type: none"> Advertising and Analytics Providers

	<ul style="list-style-type: none"> • To protect interests and legal rights of our customers, ONHM and Okura Group. • To comply with our legal and regulatory obligations under the applicable law. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar. 			
<p>Sensitive Information: Such as passport number, health status and disability information</p>	<ul style="list-style-type: none"> • To provide services to you. • To protect interests and legal rights of our customers, ONHM and Okura Group. • To comply with our legal and regulatory obligations under the applicable law. 	<ul style="list-style-type: none"> • You (Consumers) • Anyone who makes a booking and/or checks in on your behalf, or guests' traveling companions • Travel Agents and other third-parties 	<ul style="list-style-type: none"> • Service providers • Government or public authorities, law enforcement officials, courts, regulators or similar • Counterparty of Business transfer 	<p>N/A</p>

	<ul style="list-style-type: none"> To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar. 	involved in hotel reservations or usage		
Survey responses	<ul style="list-style-type: none"> To provide services to you. To improve and develop the services and business strategies of ONHM and Okura Group (including conducting surveys). 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"> You (Consumers) 	<ul style="list-style-type: none"> Okura Group Hotel management company Service providers Government or public authorities, law enforcement officials, courts, regulators or similar Counterparty of Business transfer 	N/A

	<ul style="list-style-type: none"> • To protect interests and legal rights of our customers, ONHM and Okura Group. • To comply with our legal and regulatory obligations under the applicable law. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar. 			
Information about your inquiry	<ul style="list-style-type: none"> • To provide services to you. • To improve and develop the services and business strategies of ONHM and Okura Group (including conducting surveys). • To provide you with news, 	<ul style="list-style-type: none"> • You (Consumers) • Anyone who makes a booking and/or checks in on your behalf, or guests' traveling companions • Travel Agents and other third-parties 	<ul style="list-style-type: none"> • Okura Group • Hotel management company • Service providers • Booking platforms (including travel agencies) • On-property companies • Companies 	N/A

	<p>offers, promotions and advertisements, including personalised content based on profiling of your interests and preferences via email, mail or online advertising.</p> <ul style="list-style-type: none"> • To protect interests and legal rights of our customers, ONHM and Okura Group. • To comply with our legal and regulatory obligations under the applicable law. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar. 	<p>involved in hotel reservations or usage</p>	<p>and other organizations 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"> • Transportation services • Leisure facilities • Other Companies operating facilities or providing services • Government or public authorities, law enforcement officials, courts, regulators or similar • Counterparty of Business transfer 	
Video information	<ul style="list-style-type: none"> • To provide services to you. 	<ul style="list-style-type: none"> • You (Consumers) 	<ul style="list-style-type: none"> • Service providers 	N/A

	<ul style="list-style-type: none"> • To protect interests and legal rights of our customers, ONHM and Okura Group. • To comply with our legal and regulatory obligations under the applicable law. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar. 		<ul style="list-style-type: none"> • Government or public authorities, law enforcement officials, courts, regulators or similar • Counterparty of Business transfer 	
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(9) Additional Notice

Under the California “Shine the Light” law, you have the right to receive the following information:

- information identifying any third-party company to which we may have disclosed, within the past year, Personal Information pertaining to you and your family for the company’s direct marketing purposes
- a description of the categories of Personal Information disclosed.

To obtain such information, please email your request to privacy@okura-nikko.co.jp, and include your name, email address, mailing address or zip code, and a reference to “Your California Privacy Rights”.

11.4 Mainland China

If the Personal Information Protection Law of the People's Republic of China ("PIPL") applies due to such reasons as that you are a resident of the People's Republic of China (for the purposes of this Privacy Policy, this excludes Hong Kong Special Administrative Region, Macao Special Administrative Region and Taiwan; "Mainland China"), the provisions of this Section shall apply in addition to the provisions up to Section 10 of this Privacy Policy. If there is any inconsistency between the provisions of this Section and the provisions of the other sections, the provisions of this Section shall prevail.

(1) Processing of Personal Information

Based on your consent or other grounds set forth in applicable laws, we shall process your Personal Information in accordance with the provisions up to Section 10 of this Privacy Policy and this Section.

(2) Sensitive Personal Information

Sensitive personal information under the PIPL may be included in the information which you provide to us and which we collect (for instance, **details of your passport and other government issued ID, information about payment such as credit card number, stay information, and accurate location information**).

With respect to the processing of sensitive personal information such as collection, storage, use, sharing and international transfer, we shall perform such processing in accordance with applicable laws, and based on your individual consent or other grounds.

In the event that sensitive personal information is unduly used due to divulgence, unauthorized access or others, your personal dignity or safety of body or property may be impaired. Therefore, we shall process sensitive personal information upon taking required safety measures in accordance with applicable laws.

(3) Personal Information of Children

As described in Section 7 "Children Data" of this Privacy Policy, we do not knowingly collect Personal Information from children (persons who do not have the capacity to solely give consent for 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, please contact us as indicated in Section 10 "Contact Information".

We do not knowingly collect Personal Information of minors under 14 years of age. If you provide us with Personal Information of a minor under 14 years of age, we will confirm the existence of consent of such minor's parent or other guardian, and will process such Personal Information limited to the extent of such consent.

(4) Sharing Including International Transfer

For the purposes prescribed in this Privacy Policy, we may share your Personal Information to a third-party within or outside Mainland China or internationally transfer your Personal Information as set forth in Section 3 “Sharing Personal Information” and Section 4 “International Transfer”, upon obtaining your consent and meeting the requirements prescribed under applicable laws, if necessary.

The processing purposes of the entities with whom we share Personal Information and the categories of Personal Information for which processing is performed are as indicated in the chart in Section 3 “Sharing Personal Information” of this Privacy Policy. The processing methods of the entities with whom we share Personal Information include collection, storage, use, transmission, entrustment of processing and deletion.

You may contact these entities with whom we share Personal Information through the method described in Section 10 “Contact Information” of this Privacy Policy.

Such entities with whom we share Personal Information may, as a personal information controller and for its own sole purpose, process your Personal Information in accordance with the purposes and methods of processing set forth in the Personal Information processing rules such as its privacy policy.

(5) Mobile Device Permissions

If you have selected to use specific functions in our mobile applications, we may ask to have necessary permissions on your mobile device in order to provide such functions. You may withdraw or disable such permissions at any time through the settings on your mobile device. If you withdraw such permissions, certain functions of the mobile application may no longer be available.

(6) Your Rights

To the extent provided by law, you have the rights to request access, copy, transfer to another personal information controller, correction, supplementation, deletion, explanation, restriction of processing and deletion of account, as well as the right to withdraw your consent. You may exercise such rights through the method of exercising rights set forth in Section 10 “Contact Information” in this Privacy Policy. Upon verifying your identity, we will respond to your claims without undue delay (within fifteen (15) business days, in principle). If you wish to withdraw from the One harmony membership program, you may also contact us [here](#).

You may withdraw your consent to receive news, offers and promotional or advertising communications, or change your personalization preferences for such

communications, through the following methods:

- If you are a member of the One Harmony program, by signing in to the member page and selecting your preferences for such communications under “Edit Profile” in “My Account & My Card”;
- By sending an email to privacy@okura-nikko.co.jp; or
- By sending a written notice, including your email address, to Okura Nikko Hotel Management Co., Ltd., Sales & Marketing, at No.2 Akiyama Building 3-6-2 Toranomom, Minato-ku, Tokyo 105-0001, Japan.

11.5 Indonesia

- Your Rights

Under Personal Data Protection Law of Indonesia, subject to certain exceptions, you may have the following rights regarding your Personal Information in addition to the rights listed in Section 8:

- (1) Right to Inform/Access. Request to confirm the existence of Personal Information, communicate it to you, and allow you to obtain a copy of it.
- (2) Right to Rectify. Request rectification of inaccurate Personal Information we maintain about you.
- (3) Right to Withdraw/Restrict Processing. Request to withdraw previously provided consent to process your Personal Information.
- (4) Right not be subject to a decision based solely on automated processing
- (5) Right to obtain clear information regarding identity clarity, basis of legal interest, purpose of requesting and using Personal Information, and accountability of the party requesting Personal Information; and
- (6) Right to sue and receive compensation for violations of Personal Information processing about you.

11.6 Philippines

- In addition to the rights stated in Section 8.1, you also have the following rights:
 - (1) Right to be informed whether Personal Information pertaining to you shall be, are being, or have been processed, including the existence of automated decision-making and profiling;
 - (2) Right to object to the processing of your Personal Information for direct marketing, profiling, or in cases of automated processing where the personal data will, or is likely to, be made as the sole basis for any decision that significantly affects or will

affect you;

- (3) Right to dispute the inaccuracy or error in your Personal Information and have ONHM correct the same within a reasonable period of time;
- (4) Right to request for the suspension, withdrawal, blocking, removal, or destruction of your Personal Information from the ONHM's filing system, in both live and back-up systems;
- (5) Right to obtain from ONHM a copy of your Personal Information and/or have the same transmitted from ONHM to another entity, in an electronic or structured format that is commonly used and allows further use by you; and
- (6) Right to be indemnified for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of your personal data, taking into account any violation of your rights and freedoms as data subject.

11.7 Vietnam

- For Vietnamese inside and outside Vietnam, and other persons in Vietnam, you have the rights as stipulated by relevant Vietnamese laws and regulations such as follows, and you can submit a request to exercise these rights by contacting us as indicated in Section 10 "Contact Information" above:
 - (1) Right to be informed of the processing of your Personal Information;
 - (2) Right to consent, refuse or request withdrawal of consent to the processing of your Personal Information;
 - (3) Right to view, modify or request modification of your Personal Information;
 - (4) Right to request provision, deletion and restriction of the processing of your Personal Information; right to request for objection to the processing your Personal Information;
 - (5) Right to complain, denounce, initiate lawsuits or claim damages according to the law;
 - (6) Right to request competent authorities or agencies, organizations, or individuals relevant to the processing of your Personal Information to adopt solutions and measures to protect your Personal Information according to the law.
- For Vietnamese inside and outside Vietnam, and other persons in Vietnam, you have the obligations as stipulated by relevant Vietnamese laws and regulations such as follows:
 - (1) The obligation to protect your Personal Information;
 - (2) The obligation to respect and protect the Personal Information of others;
 - (3) The obligation to provide complete and accurate your Personal Information in accordance with the law, the agreement or when you agree to allow to process your Personal Information;

- (4) The obligation to implement the laws and regulations on personal data protection and participate in preventing and combating violating activities against personal data.
- We fall under a personal data controller cum processor under relevant Vietnamese laws and regulations for your Personal Information. In addition, entities that receive your Personal Information from us (excluding service providers) also process your Personal Information as personal data controllers or personal data controllers cum processors under relevant Vietnamese laws and regulations, independently of us.
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11.8 Taiwan

- We process your Personal Information, including sensitive information if any, based on your consent to this Privacy Policy or in compliance with applicable laws and regulations