

IN-OUTBOUND SENDAI MATSUSHIMA INC. PRIVACY POLICY

OBJECTIVE

In-Outbound Sendai Matsushima Inc. ('we' 'us' or 'our') acknowledges the importance of personal information and firmly believes it is our social obligation to protect this information. We are committed to the appropriate collection, use and management of personal information in strict adherence with relevant legislation as well as our company regulations.

SCOPE OF USE

This Privacy Policy demonstrates the principles our company will adhere to in the handling of our customer's personal information, or equivalent information, when conducting our services.

COLLECTION OF PERSONAL INFORMATION

The collection of personal information will only be conducted for clearly indicated purposes, and only within the scope necessary for the fulfillment of specified purpose of use.

Our company receives the following information from customers:

1. Information collected in the event of making reservations, applications and other preparations relating to travel:
 - Customer's name, address, phone number, fax number, email address, occupation, passport information, date of birth, gender, emergency/other contact details, credit card information and other necessary information.
 - The name, address, phone number, fax number, email address, occupation, passport information, date of birth, gender, emergency/other contact details, credit card information and other necessary information of other travelers/accompanying members ('other travelers') provided by a customer when making reservations etc. on behalf of other travelers, or as a representative or responsible member of an affiliated group.
2. Other information collected in connection with use of our company's services:
 - Information provided by customers as part of any other services not relating to travel.
 - Information relating to transaction records between customers and our company.
 - Information relating to postage of pamphlets etc. from our company.
3. Information automatically collected when accessing our webpage; including IP address, information relating to unique identifiers of mobile devices, browser type and version,

as well as information relating to browsed pages and length of browsing.

USE OF PERSONAL INFORMATION

Personal information provided by customers will be used in the services provided by our company within the scope of the purposes outlined below. Personal information will not be collected or used for any other purpose without customer consent.

1. The arrangement, provision or receipt of travel or other services provided by our company or business partners.
2. Communication of product and service campaigns of our company or cooperating enterprises, other advertising and marketing activities.
3. Communication via digital magazine, direct mailing services etc.
4. Management of customer inquiries.
5. Surveys conducted following provision of services, after-sales services following completion or cancellation of transaction, all inquiries, management of service usage records.
6. Creation of statistic materials, market research and development or research of other services.
7. Ensuring smooth dealings between our company and customers.

DISCLOSURE OF PERSONAL INFORMATION TO A THIRD PARTY

Our company will not disclose personal information to a third party without the prior consent of the user, except in adherence to the law or in the cases determined below:

1. When necessary to protect human life, physical safety or property and it is difficult to obtain consent from the relevant party.
2. When necessary for improving public health or promoting healthy upbringing of children and it is difficult to obtain consent from the relevant party.
3. When necessary to cooperate with a government organization, local public body or part commissioned by such an organization or agency for the execution of legally prescribed matters, and obtaining consent from the relevant party would hinder or risk impeding said implementation of issues.
4. When content, usage history or profile information is displayed within our services based on conditions determined by our company.
5. Provision of information as a result of the succession of business due to a merger, company split, transfer of business or otherwise.
6. When the user is a minor and disclosure is requested by parental authority or legal guardian, or when the user is an adult ward and disclosure is requested by a Guardian

of Adult.

7. When disclosure is judged necessary by our company to solve dissent between users or with a third party.
8. When the information is used for the improvement of service quality or in the deliberation, examination, research or analysis of new services.
9. When disclosure is necessary for the arrangement of tour products administered by our company, travel related insurance procedures, financial procedures relating to settlement of travel expenses, and other cases when disclosure is judged necessary to carry out our services within the necessary scope of purpose.
10. Other cases when disclosure becomes necessary for the appropriate administration of our services.

CONSIGNMENT OF PERSONAL INFORMATION

In order to run our affairs smoothly and provide the best level of service to our customers, the handling of personal information may be consigned to a subcontracting partner within the scope necessary for fulfillment of the purpose of use. In such cases, a system for the appropriate management of information will be created through careful and thorough consideration of the eligibility of the subcontractor, along with a duty of confidentiality stipulated in the relevant contract.

CUSTOMER INQUIRIES

Customers may request the disclosure or details of purpose of use of their personal data (personal information subject to disclosure), as well as the correction, amendment, deletion, suspension of use, or suspension of access by a third party to the contents of this information. Relevant procedures will be explained following enquiry to the below contact details. Necessary corrective measures will be undertaken swiftly and in adherence to relevant legislation and company regulations.

Contact details: Protection of personal information management

Inoutbound Sendai Matsushima Inc.

Address: Nippou Koutoudai Nishi Bldg. 7F, 3-11-5 Kokubuncho, Aoba-Ku,

Sendai, Miyagi 980-0803 Japan

TEL : +81-22-302-7390

Email : info@inoutbound.co.jp