



**The privacy and security of your information is very important to us. Whether you are booking a holiday to Japan, we want you to trust that the information that you have provided to us is being properly managed and protected.**

**We have prepared this Privacy Policy to explain more about who we are and how we collect and manage your information.**

## **Who we are**

This Privacy Policy is issued by TLC Ltd. (collectively referred to as "TLC", "japanrailjourney", "Tessera", "we", "us", "our " in this Privacy Policy and in our websites – [www.japanrailjourney.com](http://www.japanrailjourney.com)), covers information collected and used by us in the course of our business. When we mention ""TLC ", "TLC Ltd", "Tessera", "we", "us", "our " , we process your personal information.

### **TLC Ltd.**

**Address: Sanno Park Tower Level 3, 2-11-1 Nagata-cho, Chiyoda-ku, Tokyo, 100-6162, Japan**

**Travel agency license: Tokyo Metropolitan Office: No. 3-8031**

**Contact person: Noriko Ogawa - CEO**

Your information may also be collected and used by our partner companies based in Japan. These companies are independently owned and their use of your information is protected by the Japanese Act on the Protection of Personal Information.

**The companies which can collect and use your personal data will be:**

**Hotels, transport companies, local travel agencies, restaurants, guides and etc.**

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### ***Information we collect and how we use and share it***

We collect and use personal information if you make a booking through our reservation system or interact with us through our corporate site. We generally collect this information directly from you. We also collect information through our third party service providers' use of technologies such as pixels, web beacons, tracking tools and similar technologies.

If you do not provide us with your information, it may mean that you are unable to use our services. For example, we may be unable to complete any booking you may wish to make.

### **If you make a booking:**

**Information we collect:** We collect information from you when you make a booking through our booking form or email or by phone. Information collected during the course of the booking may include:

- Your name, email address, home and business address, phone number, nationality, passport number, flight details, bank account details and payment card information;
- If you make a booking for your friend, family or colleague, we also have to collect his/her personal data as yours.
- Information such as stay and room preferences made during the course of your booking such as your preferred room or meal type and specific requests to the hotel or to the restaurants.

This information may be provided to us directly when you make a booking through our websites, email or telephone conversation.

**How we use this information:** We use the information collected from you primarily to fulfil your booking. Prior to your arrival in Japan this may include sending your information to our partners or sending you pre-stay communications. Following your stay, we may also send you post-stay communications and satisfaction surveys to get feedback on your experience.

In some instances where we have your consent or where permitted under applicable law, we may send you marketing communications (which may include text messages or calls placed using autodialer technology) for products and services that we believe would be relevant for you. We also may use information related to your stay to

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display targeted advertisements on our websites or on third-party websites or to send you more relevant messaging. Additionally, we use this information for purposes of aggregated trend and statistical analysis to evaluate and improve our products and services, plan new hotel locations and services and other market research.

**Who we share your information with:** We will share your information with our partners which also fulfil your reservation. We may also share your information with third-party service providers to provide services in relation to our business as well as to help us improve our products and services. For example, we might use a third party or a third-party product for the purposes of market research and data analytics, or share data with online partners we work with, so we, or our online partners on our behalf, can communicate with you and serve advertisements through their platforms or on other websites or platforms.

We only share your stay information with other third parties in circumstances such as:

- when we believe in good faith that the disclosure is required by law or to protect the safety of other guests, employees, the public or Carrow property;
- when disclosure is required to comply with a judicial proceeding, court order, subpoena, warrant or legal process; or
- in the event of a merger, asset sale, or other related transaction.

There are other times when we collect and use personal information, for example if you choose to participate in one of our competitions or sweepstakes, sign up to receive our newsletters or other special offers and promotions, read our blogs. In these instances, we will collect information from you for running and administering the respective competition, sweepstakes or service that you have elected to participate in. The information collected may include personal details such as your name and address as well as certain demographic information. In each case, we will collect, use and secure your information in a manner consistent with the general principles set out in this Privacy Policy unless we tell you otherwise.

We also collect information from you when you browse our websites. In these instances, information such as your country information, internet protocol ("IP") address, media access control address and other characteristics about your system or device may be automatically collected. This information is collected for functional purposes as well as to improve your experience when using these services. This information may also be used for aggregated trend and statistical analysis, and for showing you more relevant advertisements and messages.

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## **The legal basis for processing your personal data**

We are committed to collecting and using your information in accordance with applicable data protection laws. We will only collect, use and share your information where we are satisfied that we have an appropriate legal basis to do this.

This may be because:

- you have provided your consent to us using the personal information;
- our use of your information is necessary to perform our contract with you, for example, making and managing your booking and operating and providing services;
- our use of your information is necessary to meet responsibilities we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities;
- our use of your information is in our legitimate interest as a commercial organisation, for example to operate and improve our services and to keep people informed about our products and services (including for profiling and targeted advertising) - in these cases we will look after your information at all times in a way that is proportionate and respects your privacy.

If you would like to find out more about the legal basis for which we process personal information please contact our office. If you have provided your consent to our processing of your information you can withdraw this consent at any time by contacting us.

## **Data Transfer**

As we operate with partners in Japan, it may be necessary to transfer your information to a country outside of the country where it was originally collected or outside of your country of residence or nationality - Japan. The information that you provide us during the course of a booking or through the provision of any other services may be transferred to any of our partners located in Japan. It will also be necessary to transfer this information to third parties, including, without limitation, our partners and third-party service providers.

Where we transfer information which originates in the European Union ("EU") to a country outside of the EU - Japan, we will take steps to make sure such transfer is carefully managed to protect your privacy rights:

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- we will only transfer personal information to Japan, which is recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights; and
- any requests for information we receive from law enforcement or regulators will be carefully validated before personal information is disclosed.

## **Using our websites and other technology**

We and our third-party service providers use cookies, pixels, web beacons, tracking tools and other similar technologies on our websites and in other areas of our business to collect information and provide you with the services that you have requested or participate in and to provide targeted advertising. Subject to local consent requirements, we may use this and other information we collect, such as a hashed email address, to help us and our third-party service providers identify other devices that you use (e.g., a mobile phone, tablet, other computer, etc.). We, and our third party service providers, also may use the cross-device tracking and other information we learn about you to serve targeted advertising on your devices. We also use the information that we collect to improve our products and services as well as your experience when visiting our websites.

## **Cookies and other tracking technologies**

**What is a cookie:** A “cookie” is a small text file that is placed onto an Internet user’s web browser or device and is used to remember as well as obtain information about that party. You might be assigned a cookie when visiting our websites or when using our mobile applications. In some instances, where permitted under the applicable law, cookies may also be used for the purposes of certain email campaigns.

**What types of cookies we use and how we use them:** We use three primary types of cookies, which include:

- **Functional Cookies** – these cookies support the use of the website and applications and enable certain features to enhance your experience. For example, we use functional cookies to facilitate your reservation and to remember your selections as you move from page to page. We also use functional cookies for remembering things like your sign-in information and hotel preferences to avoid you having to re-enter it.
- **Performance Cookies** – these cookies collect information needed to support the website and our applications and allow us to improve our website and identify any problems that you faced while visiting us. For example, performance cookies may provide us with information about how you came to

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our website and how you navigated around our website during your visit. We also use these cookies to provide us with certain statistical and analytics information, such as how many visitors came to our website or how effective our advertising is.

- **Targeting Cookies** – these cookies are used to collect information from you to help us to improve our products and services as well as serve you with targeted advertisements that we believe will be relevant for you. We use targeting cookies across our websites and applications for various marketing initiatives and campaigns. For more information, please see the “Targeted advertising” section below.

To learn more about cookies and how they are used, please visit:

<http://www.allaboutcookies.org/>.

**Third-party cookies:** As described above, we use a number of third-party service providers to help us manage, carry out and improve our advertising. These parties set cookies at our direction to help us collect information and provide you with advertisements that we believe would be relevant for you. In some instances these third parties may also assist us by providing certain statistical and analytics information in relation to our marketing practices. We also may share information collected through cookies (and other tracking technologies) with third parties to use for their own analytics and marketing purposes.

**Managing cookies and opting out:** You can choose to visit our web sites without cookies, but in some cases certain services, features and functionality may not be available. To visit without cookies, you can configure your browser to reject all cookies or notify you when a cookie is set. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

**Other technologies:** Other technologies such as pixels and web beacons may also be used on our websites, in email messages and in other areas of our business. These technologies are used to improve our products and services as well as our marketing efforts.

**Targeted advertising:** We and our third-party service providers may serve targeted advertisements through the use of first-party or third-party cookies, pixels and web beacons when you visit our website, use our mobile applications, or visit third party websites. In some instances, these cookies may be persistent cookies. As described in the section above, we and our third party service providers may also use cookie and other information to try to identify other devices and web browsers that you may use so we and our third-party service providers may serve targeted advertisements to those devices. We do this to provide you with advertising that we

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believe may be relevant for you as well as improve our own products and services, including the functionality and performance of our websites.

## **Google Analytics**

We also have integrated the Google Analytics components (with anonymization function) on this website. Google Analytics is a web analysis service. Web analysis is the collection, gathering and analysis of data about the conduct of visitors to websites. The operating company of the Google Analytics components is Google inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA. We use the affix "\_gat.\_anonymizeIp" for the web analysis through Google Analytics. By means of this affix, your IP address of the internet connection is abbreviated and anonymized if the access to our websites occurs from a Member State of the European Union or from another Treaty State of the Agreement on the European Economic Area. The purpose of the Google Analytics components is the analysis of the visitor streams on our website. Google uses the data and information obtained among other things to analyse the use of our website in order to compile online reports for us, which show the activities on our websites, and provide services in connection with the use of our website. Google Analytics sets a cookie on your IT system. By setting the Cookies Google enables an analysis of the use of our website. Through each call-up of one of the individual pages of his website, which is operated by us and on which a Google Analytics component was integrated, your internet browser is prompted to transmit data for the purpose of the online analysis to Google automatically to the IT system through the respective Google Analytics component. In the course of this technical procedure, Google obtains knowledge about personal data, such as your IP address, which Google among other things uses to track the origin of the visitor and clicks and consequently to enable commission settlements. You can prevent the setting of Cookies through our website, as already stated above, at any time, by means of a corresponding setting of the internet browser used and hence object to the setting of cookies. Such a setting of the internet browser used would thus prevent Google from setting a cookie on your IT system. In addition, a cookie already set by Google Analytics may be deleted at any time through the internet browser or other software program. Furthermore, you have the possibility to object to a collection of the data related to the use of this website created by Google Analytics as well as the processing of this data by Google and prevent such a collection and processing. In this connection, you must download and install a browser add-on under the link <https://tools.google.com/dlpage/gaoptout>. This browser add-on informs Google Analytics through JavaScript that no data and information on the visits to websites may be transmitted to Google Analytics. The installation of the browser add-ons will be evaluated as an objection by Google. If your IT system is deleted, formatted or

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newly installed at a later time, a new installation of the browser add-ons must be done by you in order to deactivate Google Analytics. If the browser add-on is de-installed or deactivated by you or another person imputable to your sphere of power, the possibility of the new installation or the new activation of the browser add-on exists.

## **Google Tag Manager**

This website uses Google Tag Manager, a service that allows us to manage website tags via a user interface. The Tag Manager by itself does not use cookies and does not collect any personal data. The tool provides for the triggering of other tags, which in turn may use personal data. Google Tag Manager does not access this data. If disabling of cookies is done at the domain or cookie level, it will persist for all tracking tags implemented with the Google Tag Manager.

For further details, please check the applicable websites/information of the Google.

## **Online Channels/Social medias**

We may use information from online sources, such as websites, social media and information sharing platforms. This information may be used to help tailor and improve our services and communicate with you effectively, as we know many of our customers use a range of media channels to communicate and share information.

We may use various social media features such as the Facebook "Like" button on our websites. Certain information may be shared or otherwise provided to us through your use of these features in conjunction with our services and programmes. Subject to your account and privacy settings, we may also be able to see information that you post when using these social media platforms whether or not you are using one of our services. In some instances, depending on the circumstances, we may contact you on these social media platforms. The information you post on social media sites as well as the controls surrounding these disclosures are governed by the respective policies of these third parties.

Where we use information from these sources, we will respect any permissions you have set about how you would like your information to be used for each source.

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We recommend you routinely review the privacy notices and preference settings that are available to you on any social media platforms.

## **Facebook**

We have integrated components of a company, Meta Platforms, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA, formerly known as Facebook, Inc. on this website. The data controller if you live outside of the USA or Canada is Facebook Clonee Ireland Ltd., 4 Grands Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Through each call-up of one of the individual pages of this website, which is operated by us and on which a Facebook component has been integrated (Facebook plugin), your internet browser is automatically prompted to download a display of the corresponding Facebook components on the IT system by Facebook. An overall summary of all Facebook plugins may be called up under [https://developers.facebook.com/docs/plugins/?locale=de\\_DE](https://developers.facebook.com/docs/plugins/?locale=de_DE). In the course of this technical procedure, Facebook will receive knowledge about what specific sub-page of our website is visited by you. If you are logged in at Facebook at the same time, Facebook will recognise each call-up of our website by you and which specific subpage of our website you visit during the entire period of the respective stay on our website. This information will be gathered through the Facebook components and allocated to your Facebook account. If you activate one of the Facebook buttons integrated on our website, for example the "Like" button, or give a comment, Facebook will allocate this information to your personal Facebook user account and save this personal data. Facebook will always receive information that you have visited our website through the Facebook components when you are simultaneously logged in at Facebook at the time of the call-up of our website; this will take place regardless of whether you click on the Facebook components or not. If you do not want such a transmission of this information to Facebook, you can prevent the transmission by logging out before a call-up of our website from your Facebook account.

The data protection guideline published by Facebook explains there what setting options Facebook offers for the protection of your privacy. In addition, different applications can be obtained which make it possible to suppress a data transmission to Facebook, for example of a Facebook blocker by the provider Webgraph, which can be procured under <http://webgraph.com/resources/facebookblocker/>. Such applications can be used by you to suppress a data transmission to Facebook.

For further details, please check the applicable websites/information of the Facebook.

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## YouTube

Then, we have integrated components of YouTube on this website. YouTube permits the publication of all kinds of videos, which is why both complete film and television broadcasts, but also music videos, trailers or videos made by users themselves can be called up through the internet portal. The operator company of YouTube is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. YouTube, LLC is a subsidiary of Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA. Through each call-up of one of the individual pages of this website, which is operated by us and on which a YouTube component (You-Tube video) was integrated, the internet browser on your IT system is automatically prompted to download a display of the corresponding YouTube component from YouTube. In the course of this technical procedure, YouTube and Google obtain knowledge about what specific subpage of our website is visited by you. If you are logged in at YouTube at the same time, YouTube will recognise each call-up of our website by you and which specific subpage of our website you visit during the entire period of the respective stay on our website. This information will be gathered through the YouTube- components and allocated to your YouTube account. If you activate one of the YouTube buttons integrated on our website, for example the "I like" button, or give a comment, YouTube will allocate this information to your personal YouTube user account and save this personal data. YouTube and Google will always receive information that you have visited our website through the YouTube components when you are simultaneously logged in at YouTube at the time of the call-up of our website; this will take place regardless of whether you click on the YouTube components or not. If you do not want such a transmission of this information to YouTube, you can prevent the transmission by logging out before a call-up of our website from your YouTube account.

For further details, please check the applicable websites/information of the YouTube.

**All videos which are not played by YouTube but can be watched directly on our website are shot by Tessera or granted the permission to show on our website by the person who shot the video. These videos' copyrights belong to Tessera or the person who shot the video, which means you cannot publish it on your website, SNS or played for commercial uses without his permission. This applies to the photos on our websites too.**

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## **Links to Other Sites**

Our websites contain links to websites that are maintained and/or controlled by third parties. In some instances these websites may be co-branded and display our logos or other trademarks. You can always tell whether you are on one of our websites by checking the uniform record locator ("URL") on the page that you are visiting. We encourage you to review the privacy policies of these third-party websites as their privacy practices may differ from ours.

## **YOUR RIGHTS**

You have the following rights regarding personal data collected and processed by us.

– Information regarding your data processing: You have the right to obtain from us all the requisite information regarding our data processing activities that concern you.

– Access to personal data: You have the right to obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and certain related information.

– Rectification or erasure of personal data: You have the right to obtain from us the rectification of inaccurate personal data concerning you without undue delay, and to complete any incomplete personal data. You may also have the right to obtain from us the erasure of personal data concerning you without undue delay, when certain legal conditions apply.

– Restriction on processing of personal data: You may have the right to obtain from us the restriction of processing of personal data, when certain legal conditions are met.

– Object to processing of personal data: You may have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, when certain legal conditions are met.

– Data portability of personal data: You may have the right to receive your personal data in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller without our hindrance, when certain conditions are met.

– Not to be subject to automated decision-making: You may have the right not to be subject to automated decision-making (including profiling) based on the processing of your personal data, insofar as this produces legal or similar effects on you, when certain conditions are met .

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If you intend to exercise such rights, please refer to the contact section below.

Where EU data protection laws apply, you have a right to lodge a complaint with your local data protection supervisory authority at any time. However, we ask that you please try to resolve any issues with us first before referring your complaint to the supervisory authority.

## **Children**

Our websites are not intended for children and we do not intentionally solicit or collect personal information from individuals under the age of 18. If we are notified or otherwise discover that a minor's personal information has been improperly collected, we will take all commercially reasonable steps to delete that information. In limited instances, we may have a campaign or programme targeted towards children. In these instances details on the information practices will be presented within the terms and conditions of the programme or campaign.

## **Retaining your information in our systems**

We generally keep your information for as long as 1 year. However, in some cases we keep transactional records (which may include your information) for longer periods if necessary to meet legal, regulatory, tax or accounting needs – **up to 7 years**.

We maintain a data retention policy which we apply to the records we hold.

## **How to contact us**

For any questions or concerns regarding this Privacy Policy, our data privacy practices, please contact us:

- By email: [info@tlcw-ltd.com](mailto:info@tlcw-ltd.com)
- By post:

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- By phone: +81-362053064

Effective: 23 January 2021

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