

Appendix: To Persons Residing in the European Economic Area

To persons residing in the European Economic Area (EEA), we hereby inform you of the following matters based on the EU General Data Protection Regulation (hereinafter referred to as "GDPR").

1. Controller

The controller of the customer's personal data (hereinafter referred to as "Personal Information") is the Company. For the purposes of providing the Service, implementing marketing activities of the Company and Takara Leben Co., Ltd., and responding to inquiries from customers (this Appendix 3), the Company determines the purposes and means of the handling of the customer's personal data jointly with Takara Leben Co., Ltd. The Company and Takara Leben Co., Ltd. are Joint Controllers within the meaning of the GDPR regarding the provision of the Service and the implementation of marketing activities.

2. Categories of Related Personal Data

The Company acquires and processes personal data stipulated in [Article 2 \(Personal Information to be Acquired\)](#) of this Policy from the customer himself/herself or travel agencies for the purposes described in this Appendix 3. In cases where the Company processes sensitive personal data, the Company will follow the procedures stipulated by the GDPR, such as obtaining explicit consent from the customer, in accordance with Article 9(2) of the GDPR.

3. Purpose of Processing Personal Data and Legal Basis

The Company processes the personal data described in this Appendix 2 to achieve the following purposes based on lawful bases:

No.	Purpose	Lawful Basis
1	To accept, manage, and provide reservations regarding the Service	Necessary for the performance of a contract to which the customer is a party
2	To bill and collect fees, issue receipts, and	Necessary for the performance of a

	perform related confirmation tasks regarding the Service	contract to which the customer is a party
3	To create and manage the guest registry based on laws and regulations such as the Hotel Business Act	Necessary for compliance with a legal obligation of the Company
4	To confirm the identity of the customer (identity verification)	Necessary for the performance of a contract to which the customer is a party
5	To respond to inquiries, requests, complaints, etc., from customers	Necessary for the legitimate interests of the Company (to respond appropriately to inquiries from customers)
6	To contact customers (including in emergencies)	Necessary for the performance of a contract to which the customer is a party
7	To provide information on the Company's services, products, campaigns, events, etc. (including sending emails and direct mail)	Consent of the customer
8	To conduct questionnaire surveys and marketing analysis for the maintenance and improvement of the Company's services and the development of new services	Necessary for the legitimate interests of the Company (to implement improvements to the Company's services and products)
9	To ensure the safety of the Company's facilities and customers, and for crime prevention and disaster prevention	Necessary for the legitimate interests of the Company (appropriate implementation of visitor management and security for security and safety assurance)
10	To respond to acts that violate the Terms of Use, etc., established by the Company	Necessary for the performance of a contract to which the customer is a party

4. Disclosure of Personal Data

In the following cases, the Company may disclose the personal data described in this Appendix 2 to the Company's trustees and third parties. In such cases, the Company will disclose it after undergoing the necessary procedures based on the GDPR.

<Categories of Recipients of Personal Data>

- Hired car operators
- Security service providers
- Cloud service providers such as hotel management systems
- Payment agency service providers
- Website maintenance and operation providers
- Web analysis service providers
- Targeting advertising related service providers
- Dispute resolution organizations such as courts and public institutions
- Professionals such as attorneys

5. Cross-border Transfer of Personal Data

The customer's personal data will be transferred to and processed by the Company (Controller) located in Japan for the provision and management of the Service. The European Commission has granted an "Adequacy Decision" (GDPR Article 45) to Japan, recognizing it as a country guaranteeing a level of data protection equivalent to the EEA. The Company transfers the customer's personal data to Japan based on this Adequacy Decision.

Note that the disclosure of personal data to a third party described in this Appendix 4 may fall under cross-border transfer to a country or region other than the EEA and the UK. In such a case, the Company will take any of the following data protection measures:

- Adequacy decision by the European Commission or the UK government
- Standard Contractual Clauses (SCC) adopted by the European Commission
- International Data Transfer Agreement (IDTA) approved by the UK Parliament or International Data Transfer Addendum to the European Commission's Standard Contractual Clauses
- Establishment of a system conforming to standards based on the Personal Information Protection Act of Japan

6. Retention Period of Personal Data

The Company stores the customer's personal data for the period necessary for the purposes described in this Appendix 3, or for the period stipulated by applicable laws and regulations. When it is no longer necessary to use the customer's personal data, the Company will erase or anonymize the customer's personal data in accordance with applicable laws and regulations and the procedures established by the Company.

7. Rights of the Data Subject

The customer has the following rights stipulated by the GDPR regarding the Company's handling of personal data:

- The right to withdraw consent at any time if the Company acquires, uses, or discloses the customer's personal data based on the customer's consent as described in this Appendix 3 (Right to Withdraw Consent).
- The right to access one's own personal data (Right of Access).
- The right to request rectification of one's own inaccurate personal data (Right to Rectification).
- The right to request erasure of one's own personal data based on certain grounds (Right to Erasure).
- The right to restrict the processing of personal data without erasing it (Right to Restriction of Processing).
- The right to have personal data provided to oneself or another controller in a structured, commonly used, and machine-readable format (Right to Data Portability).
- The right to object to the processing of one's own personal data based on legitimate interests as a legal basis (Right to Object).

8. Lodging a Complaint with a Supervisory Authority

The customer has the right to lodge a complaint with the data protection supervisory authority having jurisdiction over the country or region where the customer resides regarding the Company's handling of personal data. The Company would like to have the opportunity to respond to the customer before the customer lodges a complaint with the supervisory authority. Please contact the contact point stipulated in Article 13 (Inquiry Window) in advance.

9. Inquiry Window

For questions or inquiries regarding the handling of the customer's personal data, please contact the following:

Email Address: info-osaka@leben-hotels.jp