

## Privacy policy

### 1. Basic concept

West Japan Railway Daily Service Net Company (hereinafter referred to as "we", "our", "us") recognizes the importance of personal information and considers it our social responsibility to protect personal information. We comply with laws and internal rules regarding personal information and properly acquire, use and manage the personal information we handle and strive for continuous improvement.

### 2. Handling of personal information

We comply with the following matters regarding the handling of personal information.

#### (1) Clarification of the purpose of use

We clarify the purpose of use of personal information and utilize it within the scope of the purpose.

#### (2) Restriction on the use for unintended purpose

"We will not use personal data for any purpose other than the purpose of use or provide personal data to a third party, unless we obtain prior consent of the customer or except as otherwise provided by law."

#### (3) Proper acquisition

We acquire personal information by lawful and fair means.

#### (4) Ensuring accuracy

We strive to keep personal data accurate and up-to-date.

#### (5) Safety protection

- We assign a manager on each business that handles personal information.
- We take security measures to prevent unauthorized access to personal information, loss, destruction, falsification or leakage of personal information.
- We establish rules and manuals regarding the handling of personal information, then widely disseminate them throughout the company and group companies, and provide guidance and supervision.
- We will properly select the outsourcing company and provide guidance and supervision to conduct appropriate management in the same way as we do in our company, when we outsource the processing of personal information to a third party.

#### (6) Disclosure, correction, deletion, etc.

When you request to disclose, correct or delete your own personal data, we will respond to the request according to the Act on Protection of Personal Information, etc.

#### (7) Responding to inquiries

We will respond appropriately and promptly to inquiries from customers regarding personal information.

### 3. Matters to be announced based on "Act on the Protection of Personal Information"

We announce the following matters based on "Act on the Protection of Personal information" regarding the personal information we retain.

#### (1) Purpose of use

We use the customer's personal information within the scope of the following purposes.

- To conclude and perform the contract about providing products/services and after-sales services, and to execute our business appropriately
- To protect the security of our customers and employees
- To deliver invitations and information by mail, telephone, e-mail, etc., about products and services or various events and campaigns, etc. handled by our company, our group companies and our affiliated companies.
- To carry out questionnaire surveys by mail, telephone, e-mail, etc., in order to develop products, start new services or plan measures to improve customer satisfaction
- To enhance the safety, investigate/research the use trends etc. of our customers and analyze the business
- To consider and develop the software/system/facilities/devices etc. for new products/services and protecting the security
- To improve the quality of the official website
- To respond to inquiries, opinions and requests sent from customers about products, services, etc., handled by our company, group companies and affiliated companies
- To provide notification of lost property or conduct emergency contact, etc.
- In addition, to carry out the work associated with each item above

If we intend to use customer's personal information for any purpose other than the above, we will notify you of the purpose of use in advance, and we will not use it for unintended purposes without the consent.

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In addition, when we outsource operations, we may provide customer information to our subcontractors to the extent necessary for said operations. In such cases, we will conclude agreements with our subcontractors concerning the handling of personal information, and supervise them appropriately.

### (2) Provision to a third party

We will not provide your personal information to any third parties, except for the purposes in the preceding paragraph and any of the following cases.

- When we have your consent
- When required by law
- When it is necessary for the protection of human life, body or property, and obtaining your consent is difficult
- When it is specially required for improving public health or promoting the sound growth of children, and obtaining your consent is difficult
- When it is necessary for cooperation with an authority or institution of the national or local government, and any other third party entrusted by them, in executing the affairs required by laws and regulations, and obtaining your consent could impede the execution of said affairs
- When providing personal information to a third party in a foreign country, we will obtain your consent in advance, except where permitted by law.

### (3) Anonymized information

When we create anonymized information, we will comply with the Act on the Protection of Personal Information and related guidelines, and handle it appropriately. In such cases, we will handle the information in accordance with the standards for the method of creation of anonymized information and the standards for the security management measures for anonymized information and processing methods, as well as making public announcements at the time of creation and at the time of provision to a third party.

### (4) Shared use

We share personal information as follows:

#### ① Shared use of personal data related to the Via Inn Members Club and the Via Inn Official App

##### A) Items of personal data for the shared use

- Name, age, gender, address, birthdate, phone number, email address, member number etc.
- Information concerning Via Inn usage, such as reservation history at Via Inn (date, hotel, amount, number of points, app usage information)
- Information concerning Via Inn Members Club membership invalidation, withdrawal or loss or theft of membership card, etc.
- Information about the request of stopping sending DM etc.

##### B) Scope of shared use

- West Japan Railway Company
- West Japan Railway Daily Service Net Company
- West Japan Railway Via Inn
- West Japan Railway Hotel Development Limited

(Hereinafter, West Japan Railway Daily Service Net Company, JR West Via Inn Co., Ltd., and West Japan Railway Hotel Development Limited referred to collectively as the "Hotel Chain")

##### C) Purpose of use

- To provide the benefits and services offered by the Hotel Chain to members
- To provide information about the events and services etc. of the Hotel Chain
- To investigate the market and develop products based on the use status of accommodation services related to the Hotel Chain

- To improve convenience by improving the content of accommodation services related to the Hotel Chain, and to provide members with information of high interest at appropriate times
- Various communications regarding accommodation and services at our Hotel Chain
- To respond to the customer's inquiries
- In addition, to carry out the work associated with each item above

D) The entity name in charge of managing the personal data

West Japan Railway Daily Service Net Company

② Shared use of personal data related to the Via Inn Official Website

A) Items of personal data for the shared use

Name, e-mail address, date of birth, gender, telephone number, postal code of residence, country of residence, membership number, information related to reservations such as dates of stay, cookie information

B) Scope of shared use

- West Japan Railway Company
- The companies of the Hotel Chain

C) Purpose of use

- To contact you and confirm your hotel reservations
- To respond to inquiries, opinions, and requests from you related to the services of the Hotel Chain
- To conduct surveys, research and analysis regarding customer usage trends, etc.
- To provide you with information on various events and services provided by us and co-users

D) The entity name in charge of managing the personal data

West Japan Railway Daily Service Net Company

(5) Notification, disclosure, correction, deletion and suspension of use of personal information

When we receive a request for notification of the purpose of use, disclosure, correction, deletion, suspension of use, etc., (hereinafter referred to as "disclosure, etc.") of personal information acquired by the Hotel Group, we will respect the intention of the person in question, and after confirming that the identity of the requester, we will respond within a reasonable period of time to the extent stipulated by laws and regulations.

However, we may refuse such a request if it is in violation of the law; if there is a risk of harm to the life, body, property, etc., of the person in question or a third party; if there is a risk of significant hindrance to the performance of the business of the Hotel Group; if the relevant personal information does not exist; if the requester's identity cannot be confirmed; or if the requester does not pay the prescribed fee, etc.

When requesting disclosure, etc., of personal information, please fill in the required items on the prescribed application form, enclose documents required to confirm the identity of the person making the request (hereinafter referred to as "identity verification documents") together with the administrative fee and apply by registered mail to the Personal Information Inquiry Desk below. Please note that we cannot respond to requests not made via this method (including cases where you come in person).

## (6) Inquiries

### A. Requests from the person in question

If the person in question is making the request regarding his or her own personal information, he or she is to fill out the application form applicable to the nature of the request, sign and seal it, and send it by registered mail to the Personal Information Inquiry Desk below, enclosing documents verifying his or her identity.

#### 1) Application form

- Application form for disclosure of retained personal data
- Application form for correction of retained personal data
- Application form for suspension of use of retained personal data
- Application form for notification of purpose of use of retained personal data

#### 2) Identity verification documents: enclose copies of any two of the following

- Driver's license
- Basic Resident Register Card
- Abstract of family register (only necessary items such as your name and address)
- A copy of your resident record (only necessary items such as your name and address)
- An insurance card
- Insurance card for long-term care insurance
- Pension book

- Pension certificate

- Passport

#### B. Requests from an agent of the person in question

If an agent of the person in question is making the request, in addition to the application form (signed and sealed by the agent) and the agent's identity verification documents, the following documents are to be enclosed.

##### 1) Required documents

- Power of Attorney

- Registration Certificate of seal stamped on the power of attorney (issued within 3 months from the date of the power of attorney)

- A copy of the official gazette or notice of family court judgment (guardians only)

#### C. Administrative fee

An administrative fee of 600 yen will be charged for each notification or disclosure of the purpose of use of personal information.

Please enclose a postal money order for the fee amount with the application documents.

#### D. Personal Information Inquiry Desk

Address: 661-0976

JR Amagasaki Station North NK Building 1-2-12 Shioe, Amagasaki, Hyogo

Inside West Japan Railway Daily Service Net Company

Hotel Via Inn Secretariat "Personal Information Inquiries Section"

#### E. Method of notification of the outcome of requests

We will notify the person who made the request (using the name and address of the requester written on the disclosure request form, etc.) in writing by post (Japan Post's certified mail with delivery restricted to the addressee). In addition, if we choose not to grant the request for disclosure, etc., we will include the reason. Please note that notification may take a few days.

#### F. Purpose of use of personal information obtained via a request for disclosure, etc.

Personal information we obtain via a request from you for disclosure, etc., will be used only to the extent necessary for the procedure for disclosure, etc.

In addition, any documents you submit will be properly disposed of.

(7) Changes in "Our Basic Policy for the Handling of Personal Information"

We may change this policy without notice but we will update the updated date at the bottom of this policy when we change this policy.

Please see below for the handling of the personal data of persons who are in the EEA.

["Privacy Policy on the Handling of the Personal Data of Persons Who are in the EEA"](#)

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West Japan Railway Daily Service Net Company

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