Privacy Policy

This Privacy Policy sets out how JTB Corp. of Shiodome City Center, 1-5-2 Higashi-Shimbashi, Minato-ku, Tokyo, Japan ("**JTB**", "**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"). Local-specific clauses (Section 11) also apply to residents in those territories and may in some cases set out different standards due to 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 the English version and other language version of this Privacy Policy, the English version shall prevail.

Table of Contents

1 Categories of Personal Information we collect 2
2 Purposes for processing Personal Information 3
3 Sharing Personal Information 4
4 International Transfer 5
5 Retention 5
6 Security 5
7 Children 6
8 Privacy Rights 6
9 Changes to this Privacy Policy 6
10 Contact information 7
11 Local specific clauses 7
11.1 Japan 7
11.2 European Economic Area, United Kingdom and Switzerland 9
11.3 United States 10
11.4 Canada (including Québec) 17
11.5 China 17
11.6 South Korea 18
11.7 Malaysia 19
11.8 Indonesia 19
11.9 Thailand 21
11.10 India 21
11.11 Philippines 21
11.12 Vietnam 22
11.13 Taiwan 24
11.14 New Zealand 24
11.15 Brazil 24

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.

1.1.1 Personal Information collected directly from you

a. Your profile

(1) Full Name
(2) Phone Number
(3) Email Address
(4) Residence Address
(5) Company's name, department and title (If applicable)

<Collection method>

We collect the above information by asking you to provide them.

b. Information you register when you use our services

(1) Information about your travel (e.g., Place to stay, departure date, return date, number of guests, type of service, purpose of travel)
(2) Any other information you have provided to us in relation to your use of the services

<Collection method>

We collect the above information by asking you to provide them.

c. Responses to the survey

<Collection method>

We may ask you to participate in a survey. If you choose to answer the survey, we collect any information you provide in your responses.

d. Information collected through your use of the services

(1) IP address
(2) Information collected through Cookie or similar technologies (e.g., logs regarding the use of our website)
(3) Information about your usage of our services (e.g., date of service application, JTB's stores that you used (If any)
(4) Other service usage history including browsing history

<Collection method>

We collect the above information automatically when you use our services or when you access to our website.

e. Information about your inquiry

<Collection method>

We collect the above information through your inquiry.

1.1.2 Personal Information collected indirectly from third parties.

1.2 Our services allow you to share certain details about your preferences, needs, or restrictions, such as “Dietary preferences including allergy information” or “Disability Information”, through various means including text boxes. Please note that any information you voluntarily provide through these means may reveal to us or to entities with which we share Personal Information (as outlined in “Section 3. Sharing Personal Information” below) certain information that may be classified as sensitive personal information under applicable laws. We do not use such sensitive personal information for marketing or promotional purposes. 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” below.

2 Purposes for processing Personal Information

2.1 JTB processes your Personal Information for the purposes below.

Purpose	**Categories of Personal Information**
To provide services you have asked us to provide to you. This includes making necessary notifications and responding to your inquiry.	All categories of Personal Information listed in Section 1.
To improve and develop our services, marketing strategy and business.	All categories of Personal Information listed in Section 1 except for Personal Information in the item b. and e in the paragraph 1.1.1.
To provide you with news, offers, promotions and advertisements (including those based on profiling of your interests and preferences) via email or online advertisements.	All categories of Personal Information listed in Section 1 except for Personal Information in the item b. and e. in the paragraph 1.1.1.
To protect interests and legal rights of JTB and our users.	All categories of Personal Information listed in Section 1.
To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar in accordance with our legal and regulatory obligations under the applicable law.	All categories of Personal Information listed in Section 1.

2.2 Where we collect your Personal Information to perform a contract with you, or where we have to collect Personal Information by law, provision of 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, but not providing information may affect your ability to use the services or use particular aspects of the services if information is needed for those purposes.

2.3 When we access your information stored on your device for the purpose that is not strictly necessary to provide our services, we obtain your consent. For example, when we collect information through Cookie for such purpose, we ask your consent in advance, and you can withdraw such consent at any

time by accessing to the Cookie setting page on our website.

3 Sharing Personal Information

We share your Personal Information with the following entities.

Entities with whom we share Personal Information	Categories of Personal Information	Detail
JTB Group Companies	All categories of Personal Information listed in Section 1.	We share Personal Information with JTB Group Companies where those companies process it on our behalf to provide products and services to you, to conduct marketing and communication activities, or when it is necessary to perform a contract or to take steps. Specific company names can be found below: Japanese group companies Overseas group companies
Business partners	"Your profile" and "Information you register when you use our services". We may share "Responses to the survey" and "Information about your inquiry" when they relate to Business Partners.	We share Personal Information with our business partners such as hotels and airline companies to provide you with our services. Business partners who receive such Personal Information differ depending on the travel plans booked by you but are limited to those partners necessary for us to provide travel services. If you would like to know the specific name of the business partners who receive your Personal Information, please contact us as indicated in Section 10 "Contact Information" below.
Service providers	All categories of Personal Information listed in Section 1.	We share Personal Information with service providers including professional advisors such as lawyers, travel service providers, electronic payment service providers, and system service providers including cloud service providers.
Advertising and Analytics Providers	All categories of Personal Information listed in the item a. and d. in the paragraph 1.1.1	We share Personal Information with advertising and analytics providers to provide you with news, offers, promotions and advertisements (including those based on profiling of your interests and preferences) via email or online advertisements.
Government or public authorities, law enforcement	All categories of Personal Information listed in Section 1.	We may share Personal Information with government or public authorities, law enforcement officials, courts, regulators or similar if required by law, or if necessary

officials, courts, regulators or similar.		for us to protect our legitimate interests, or the interests of others, in compliance with applicable laws.
Counterparty of Business transfer	All categories of Personal Information listed in Section 1.	In the event that we undertake a merger, acquisition, reorganization or disposal, Personal Information may be disclosed to any prospective purchaser and its advisers and will be passed to the new owners of the business.

4 International Transfer

We will process and store your Personal Information for the purposes outlined in this Privacy Policy in Japan. In addition, we may transfer your Personal Information to other countries/regions when it is necessary for us to provide services to you.

Any transfers outside your country/region that do not provide an adequate level of data protection will be secured through appropriate contractual guarantees such as standard contractual clauses specified under the Regulation (EU) 2016/679 (General Data Protection Regulation).

5 Retention

We will retain Personal Information for as long as it is necessary to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted 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 have taken necessary and appropriate safety management measures to protect Persona Information, such as preventing leakage, loss, or damage. The main contents of these measures are as follows:

a. In order to comply with laws and regulations and ensure proper handling of Personal Information, we have formulated the personal information protection policies, and based on these policies, we have established this handling rule and other related internal rules concerning the acquisition, use, provision, and disposal of Personal Information.

b. We have appointed our Data Protection Officer and a person in charge of the handling of Personal Information in each department. We have also established a system to report any violations or threats of violation of laws and regulations our internal rules to the Data Protection Officer.

c. We conduct periodic self-inspections of the status of the handling of Persona Information and conduct audits by our audit department.

d. When outsourcing businesses, including the handling of Personal Information, we include clauses related to the handling of Personal Information in our contracts.

e. We provide regular training to our employees on the handling of Personal Information.

f. Matters concerning the confidentiality of Personal Information are described in our work

rules and other internal rules.

g. We monitor entering and leaving our facilities, and establish rules for storage and disposal of documents and electronic media containing Personal Information.

h. Measures are taken to prevent theft or loss of equipment such as password setting and remote-control measures.

i. Access control is implemented to limit the scope of databases handled by employees.

j. We have introduced mechanisms to protect the systems from unauthorized access from outside or from unauthorized software.

k. We store a part of Personal Information in some foreign counties such as the U.S, Singapore, etc. We confirm the outline of the personal information protection legislation in such regions and take measures such as concluding a contract on the handling of Personal Information with a third party to whom we transfer Personal Information.

7 Children

Our services are not directed to and does not knowingly collect Personal Information from children. 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" below.

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:

a. Ask us for a copy of your Personal Information;

b. Correct, delete or restrict our processing of your Personal Information;

c. Obtain some Personal Information you provide to us in a structured, machine-readable format;

d. Object to our processing your Personal Information on the basis of our legitimate interests (or those of a third party), including processing for direct marketing or profiling for purposes of direct marketing; and

e. 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" below. 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.

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:

JTB PIM Office,

Address: Shiodome City Center, 1-5-2 Higashi-Shimbashi, Minato-ku, Tokyo, Japan

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

By Email: private@jtb.com

11 Local specific clauses

This section provides for certain local-specific amendments which may apply depending on which you are located or reside in and other factors set forth by local laws and regulations. The following provisions supplement the sections above. In case of a conflict or inconsistency, the specific local clause prevails.

In the event of any conflict between the English and local language versions of this Privacy Policy, the English version shall prevail.

11.1 Japan

a. 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, and such third parties may use such information in conjunction with your "Personal data" (defined in APPI) held by such third parties.

b. Joint use of Personal Information

We will share and jointly use the Personal Information of our customers/users as follows.

(1) Personal information

Personal Information listed in Section 3.

(2) Scope of joint users

Our group companies (Please refer to the following for our group companies)

https://www.jtbcorp.jp/jp/jtb_group/

(3) Purpose of Jointly Use

The purposes for jointly use shall be included within the scope of the purpose of use mentioned in Section 3.

(4) Manager in charge of jointly use under Japanese law

JTB Corp.

c. Transfer of Personal Information to a third party in a foreign country

In order to arrange travel services provided by transportation/accommodation facilities in the travel for which the customer applies or for the purpose of use as set forth in Section 3, we may, upon informing you of the country or region in which your Personal Information is to be provided, transfer Personal Information to transportation/accommodation facilities, service providers, or other third parties in the

country or region above. In this case, it is as follows.

(1) Country or region to which Personal Information is transferred

We will inform you orally, by pamphlets, brochures, travel terms and conditions documents, notice documents, or websites, e-mails or other electromagnetic means.

(2) Systems for the protection of Personal Information in the above country or region and measures for the protection of Personal Information to be taken by a third party

Please see [https://www.jtb.co.jp/privacy/]

We may transfer Personal Information to a third party in a foreign country after taking measures such as concluding an agreement with such third party to implement appropriate measures for the protection of Personal Information.

d. Handling of anonymously processed information

We will take appropriate protective measures to prevent the identification of specific individuals and the restoration of such Personal Information used for production, and will prepare anonymously processed information and provide such information to third parties to the extent permitted by law.

(1) How to create anonymously processed information

When preparing anonymously processed information, we process the information appropriately according to the following in accordance with the standards stipulated by the Personal Information Protection Law and the Rules of the Personal Information Protection Committee.

① Deleting a description that identifies a specific individual

② Deleting an Individual Identification Code

③ Eliminating the sign that connects information with each other

④ Deleting unique descriptions, etc.

⑤ Taking other appropriate measures based on the nature of the personal information database, etc.

(2) Items included in anonymously processed information

① Personal Attribute Information of Customers [Gender and Year of Birth of Representatives]

② Information on use of us [Application date (month/year), Stores (prefecture/municipality/type), Travel information (departure date/return date, area, and accommodation facility (name/type), Number of users (by adult, male, female, and child), Product grade, product type, product form, travel purpose, and type of participation]

(3) Provision of anonymously processed information to a third party

Items and methods of provision of information included in anonymously processed information prepared by us and provided to third parties are as follows.

① Items in (2) above

② We will inform the recipients of such information that such data is anonymously processed information and provide such information after

stipulating a contract to prevent improper handling of such information as identifying acts.

③ To provide anonymously processed information to a third party by a secure electromagnetic manner such as encrypting data files.

(4) Other safety management measures for anonymously processed information

① Clarify the authority and responsibility of the person handling information such as the processing method.

② We have established rules and regulations concerning the handling of such information, such as processing methods, and provide education and supervision to employees who handle such information.

11.2 European Economic Area, United Kingdom and Switzerland

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

Purpose	**Legal Basis**
To provide services you have asked us to provide to you. This includes managing your payments, making necessary notifications and responding to your inquiry.	The processing is necessary to perform a contract or to take steps, at your request, prior to entering into a contract with you.
To analyse your use of the service in order to improve and develop our services, marketing strategy and business.	The processing is necessary for the purposes of the legitimate interests.
To provide you with news, offers, promotions and advertisements via email or online advertisements.	Consent. You can withdraw your consent at any time by sending an e-mail to request for withdrawal to "private@jtb.com".
To provide you with tailored news, offers, promotions and advertisements based on profiling of your interests and preferences via email or online advertisements.	Consent. You can withdraw your consent at any time by sending an e-mail to request for withdrawal to "private@jtb.com".
To protect interests and legal rights of JTB and our users.	The processing is necessary for the purposes of the legitimate interests.
To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar in accordance with our legal and regulatory obligations under the applicable law.	The processing is necessary for compliance with a legal obligation to which the controller is subject. When the applicable law is other than those of your country of residence, we process your Personal Information for the purposes of the legitimate interests.

b. When we access your information stored on your device for the purpose that is not strictly necessary to provide our services, we obtain your consent. For example, when we collect information through Cookie for such purpose, we ask your consent in advance, and you can withdraw such consent at any time by accessing to the Cookie setting page on our website.

c. If you live in France, you have a right to instruct us on the processing of your Personal Information after your death. You can change or revoke such instruction at any time.

d. 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.

e. We have designated the following domestic representative in the European Economic Area and the United Kingdom to process Personal Information:

- Name of the entity: TUMLARE CORPORATION HUNGARY Travel Agent Ltd.
- Address: H-1133 Budapest, Váci út 76.
- E-mail: eurepresentative@jtb-europe.com

11.3 United States

11.3.1. For residents of U.S. states excluding California

a. We set forth in our Privacy Policy, the categories of personal data we process. The purpose for processing Personal Information, the categories of Personal Information shared, and the categories of third parties with whom Personal Information is shared.

b. 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.

(1) Right to know and access

The tight 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.

(2) Right to correct

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

(3) Right to delete

The right to delete the Personal Information provided by you or obtained about you.

(4) Right to access and data portability

The right to obtain a copy of the Personal Information previously collected by us and, to extent feasible, in a readily usable format to allow data portability.

(5) Right to appeal

If for any reason 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. Please include your full name, the basis for your appeal and any other additional information to consider.

c. Consumers in certain states may also have the following rights:

(1) 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. To exercise the above right, please ensure that you may send an e-mail to request for opt-out to

"private@jtb.com", and you may also submit a request at: the Contact in Section 10.

(2) Right to Opt-out of Automated Decision Making and Profiling

While 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, JTB does not engage in such activities.

11.3.2. For residents of California

a. California Consumer Rights

(1) Request to Know

Request information regarding what Personal Information we collect, use, disclose and sell, including the right to request that we provide you with the categories and specific pieces of Personal Information we have collected about you.

(2) Request to Correct

Request correction of inaccurate Personal Information that we maintain about you.

(3) Request to Delete

Request deletion of Personal Information that we maintain about you.

(4) "Do Not Sell or Share My Personal Information"

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).

(5) "Limit the Use and Disclosure of Sensitive Personal Information"

A consumer has 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 or provide the goods reasonably expected by on average consumer who requests such goods or services. JTB does not offer this right because we do use and disclose sensitive personal information only for such purposes.

b. 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 that we collected, or their authorized representative. You must also describe your request with enough detail so that we can understand, evaluate and respond to it.

When you exercise your Right to Know, Right to Delete, and /or Right to Correct, we may ask you to provide us with additional information to verify your identity and process your request. If we obtain such additional information, we may not be able to process the request.

c. 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.

d. Exercising Your Rights

(1) Request to Know, Correct and/or Delete

Please submit your request at: private@jtb.com by e-mail.

(2) "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 ensure that CCPA, and you may also submit a request at: Do Not Sell or Share My Personal Information.

e. Data Retention

We retain Personal Information for as long as it is necessary for the purposes outlined in this California Privacy Notice. However, we will keep the data for so long as is reasonably necessary if we are required to retain information by law.

f. Non-Discrimination

California consumers have the right to not receive discriminatory treatment for exercising CCPA rights. We will not discriminate against you for exercising your CCPA rights.

g. 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". In such case, we will be required to make additional disclosures to you, which we will provide when you agree to participate.

h. Personal Information We Collect and Purposes for Collection

The Personal Information we collect about you will depend upon you use services. Accordingly, we may not collect all of the below information. In addition to the below, we may collect and use additional type of information and will do so after providing notice to you and obtaining consent to the extent such notice and consent is required by applicable law.

We may have used Personal Information for the business or commercial purposes described in the following Table 1.

i. Additional Notice

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

(1) 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

(2) a description of the categories of Personal Information disclosed.

To obtain such information, please email your request to private@jtb.com, and include your name, email address, mailing address or zip code, and a reference to “Your California Privacy Rights”.

[Table 1]

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**
Identifiers: Such as real name, postal address, email address, online identifier and IP address	• To provide services you have asked us to provide to you. • To analyse your use of the service in order to improve and develop our services, marketing strategy and business. • To provide you with news, offers, promotions and advertisements (including those based on profiling of your interests and preferences). • To protect interests and legal rights of JTB and our users. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar.	• Consumers • JTB Group Companies • Business Partners • Cookies or similar technologies	• Business partners • Service providers • Government authorities, law enforcement officials, regulators, and court and similar. • Counterparty of Business transfer	• Advertising and Analytics Providers
Commercial information: Such as records of services purchased or considered and other purchasing or consuming histories or tendencies.	• To provide services you have asked us to provide to you. • To analyse your use of the service in order to improve and develop our services, marketing strategy and business. • To provide you with news, offers, promotions and advertisements (including those based on profiling of your interests and preferences). • To protect interests and legal rights of JTB and our users. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar.	• Consumers • JTB Group Companies • Business Partners	• Business partners • Service providers • Government authorities, law enforcement officials, regulators, and court and similar. • Counterparty of Business transfer	• Advertising and Analytics Providers
Internet or other electronic network	• To provide services you have asked us to provide to you. • To analyse your use of the service in order to improve and	• Consumers • JTB Group Companies	• Business partners • Service providers	• Advertising and Analytics Providers

activity information: Such as browsing history and information regarding a consumer's interaction with an internet website, application, or advertisement	develop our services, marketing strategy and business. • To provide you with news, offers, promotions and advertisements (including those based on profiling of your interests and preferences). • To protect interests and legal rights of JTB and our users. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar.	• Cookies or similar technologies	• Government authorities, law enforcement officials, regulators, and court and similar. • Counterparty of Business transfer	
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.	• To provide you with news, offers, promotions and advertisements (including those based on profiling of your interests and preferences).	• Consumers • JTB Group Companies • Cookies or similar technologies	• Service providers • Government authorities, law enforcement officials, regulators, and court and similar. • Counterparty of Business transfer	• Advertising and Analytics Providers
Sensitive Information: Such as passport number, allergy information and disability information	• To provide services you have asked us to provide to you. • To protect interests and legal rights of JTB and our users. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar.	• Consumers • JTB Group Companies	• Business partners • Service providers • Government authorities, law enforcement officials, regulators, and court and similar. • Counterparty of Business transfer	• Advertising and Analytics Providers
Responses to the survey	• To provide services you have asked us to provide to you. • To analyse your use of the service in order to improve and	• Consumers • JTB Group Companies	• Business partners • Service providers	• Advertising and Analytics Providers

	develop our services, marketing strategy and business. • To provide you with news, offers, promotions and advertisements (including those based on profiling of your interests and preferences). • To protect interests and legal rights of JTB and our users. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar.		• Government authorities, law enforcement officials, regulators, and court and similar. • Counterparty of Business transfer	
Information about your inquiry	• To provide services you have asked us to provide to you. • To analyse your use of the service in order to improve and develop our services, marketing strategy and business. • To provide you with news, offers, promotions and advertisements (including those based on profiling of your interests and preferences). • To protect interests and legal rights of JTB and our users. • To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar.	• Consumers • JTB Group Companies	• Business partners • Service providers • Government authorities, law enforcement officials, regulators, and court and similar. • Counterparty of Business transfer	• Advertising and Analytics Providers

11.4 Canada (including Québec)

a. International Transfer

Through your use of our services, your Personal Information will be transferred outside of Canada or state where you live. Please see Section 3 for categories of recipients.

If your Personal Information is transferred to jurisdictions outside of Canada, it may be subject to the laws of those jurisdictions, which may allow access by courts, law enforcement, or government authorities in accordance with their laws.

You may obtain written information regarding our policies and practices with respect to service providers outside Canada, by sending an e-mail to private@jtb.com. You may also contact our JTB PIM Office (e-mail: private@jtb.com) for questions about the collection, use, disclosure, or storage of Personal Information by such service providers.

b. Profiling

We may use Personal Information for profiling. In such cases, we will inform you of the means to activate or deactivate profiling. You may also deactivate profiling by withdrawing your consent to our use of your data by sending an e-mail to private@jtb.com.

c. Your Rights

Subject to certain exceptions, you may have the following rights regarding your Personal Information in addition to the rights listed in Section 8:

Right to Access. Request to confirm the existence of the Personal Information, communicate it to you, and allow you to obtain a copy of it.

Right to Rectify. Request rectification of inaccurate, outdated or incomplete Personal Information we maintain about you.

Right to Withdraw Consent. Request to withdraw previously provided consent to the communication or use of the information collected.

11.5 China

a. We process your Personal Information that may fall under the definition of Sensitive Personal Information under Personal Information Protection Law such as allergy information. We process such information to provide our services based on your requests/preferences. Please note that providing such information is optional and we do not process such information to analyse your characteristics for business purposes other than the above.

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

Purpose	**Legal Basis**
To provide services you have asked us to provide to you. This includes managing your	The processing is necessary to perform a contract or to take steps, at your request, prior to entering into a contract with you.

payments, making necessary notifications and responding to your inquiry.	
To analyse your use of the service in order to improve and develop our services, marketing strategy and business.	This processing is based on your consent to this Privacy Policy or separate consent on cookie settings. For the latter, you can withdraw your consent at any time by accessing to the Cookie setting page on our website.
To provide you with news, offers, promotions and advertisements via email or online advertisements.	Your separate consent. You can withdraw your consent at any time by sending an e-mail to request for withdrawal to "private@jtb.com".
To provide you with tailored news, offers, promotions and advertisements based on profiling of your interests and preferences via email or online advertisements.	Your separate consent. You can withdraw your consent at any time by sending an e-mail to request for withdrawal to "private@jtb.com".
To protect interests and legal rights of JTB and our users.	This processing is based on your consent to this Privacy Policy.
To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar in accordance with our legal and regulatory obligations under the applicable law.	We process Personal Information in order to comply with Chinese laws and regulations. When the applicable law is other than Chinese laws, we process your Personal Information based on your consent to this Privacy Policy.

Where we collect the Personal Information based on your separate consent to this Privacy Policy, provision of any requested Personal Information is optional. In all other cases, provision of any requested Personal Information is mandatory, and we will not be able to provide services to you without this information.

11.6 South Korea

a. We entrust the processing of your Personal Information to the following entities within South Korea.
   - LOTTE JTB CO., LTD.

b. We provide your Personal Information to the following entities within South Korea. The retention period of your Personal Information at the recipients shall be in accordance with the provisions outlined in Section 5.

[Recipients]

- LOTTE JTB CO., LTD.

c. Pursuant to Article 28-8, Paragraph 1, Item 3 of the Personal Information Protection Act, we entrust the processing of your Personal Information or provide your Personal Information to the following entities outside South Korea. The retention period of your Personal Information at the recipients shall be in accordance with the provisions outlined in Section 5. The transfer of your Personal Information occurs only when necessary and is carried out via the internet.

[Entrusted entities]

JTB Business Transformation Corp.

Tour operators, accommodation facilities such as hotels, duty free shops, souvenir shops, transportation companies, activity companies, and other entities which are necessary to provide services under the contract with you.

We will inform you the country or region to which your personal information is transferred orally, in our pamphlets, brochures, travel terms and conditions, notice, or website, by e-mail or by other electromagnetic means.

If you wish to refuse the entrustment or provision of your Personal Information to the above entities, please refer to Section 10.

d. We have designated the following domestic representative for the processing of Personal Information:

- Name of the entity: LOTTE JTB CO., LTD.
- Name of the above entity's representative: Ko Moonyoung
- Address: 13FL, Central Place, 50, Seosomun-ro, Jung-gu, Seoul, 04505, Korea
- Tell: 82-2-6313-8034
- E-mail: privacy@lottejtb.com

11.7 Malaysia

a. In addition to the rights stated in Section 8.1, you also have the right to prevent processing for a specified purpose in a specified manner if the same may cause damage or distress and the right to prevent processing for the purposes of direct marketing.

11.8 Indonesia

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

Purpose	**Legal Basis**
To provide services you have asked us to provide to you. This includes managing your payments, making necessary notifications and responding to your	The processing is necessary to perform a contract or to take steps, at your request, prior to entering into a contract with you.

inquiry.	
To analyse your use of the service in order to improve and develop our services, marketing strategy and business.	The processing is necessary for the purposes of the legitimate interests.
To provide you with news, offers, promotions and advertisements via email or online advertisements.	Consent. You can withdraw your consent at any time by sending an e-mail to request for withdrawal to "private@jtb.com".
To provide you with tailored news, offers, promotions and advertisements based on profiling of your interests and preferences via email or online advertisements.	Consent. You can withdraw your consent at any time by sending an e-mail to request for withdrawal to "private@jtb.com".
To protect interests and legal rights of JTB and our users.	The processing is necessary for the purposes of the legitimate interests.
To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar in accordance with our legal and regulatory obligations under the applicable law.	The processing is necessary for compliance with a legal obligation to which the controller is subject.
To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar in accordance with our legal and regulatory obligations under the applicable laws other than Indonesian laws.	The processing is necessary for the purposes of the legitimate interests.

b. 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 the 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.

11.9 Thailand

a. We have designated the following domestic representative for the processing of Personal Information:

- Name of entity: JTB (Thailand) Limited
- Address: 54 Harindhorn Building, 9th Floor, Room 9C, 9D, 9E North Sathorn Road, Silom, Bangrak, Bangkok 10500 THAILAND
- E-mail: dpo.th@jtbap.com

11.10 India

a. In certain cases, we may process your Personal Information on the legal basis of legitimate use, as permitted under the Digital Personal Data Protection Act 2023 of India ("**DPDPA**"). This includes situations where you have voluntarily shared your Personal Information with us for certain specified purposes and have not indicated to us that you do not consent to its use.

b. If you have any complaints or grievances regarding the processing of your Personal Information or the exercise of your rights under the DPDPA, please contact us using the details provided in Section 10. If your complaint or grievance remains unresolved, you may file a complaint with the Data Protection Board of India, as provided under the DPDPA.

11.11 Philippines

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

Purpose	**Legal Basis**
To provide services you have asked us to provide to you. This includes managing your payments, making necessary notifications and responding to your inquiry.	The processing is necessary to perform a contract or to take steps, at your request, prior to entering into a contract with you.
To analyse your use of the service in order to improve and develop our services, marketing strategy and business.	The processing is necessary for the purposes of the legitimate interests.
To provide you with news, offers, promotions and advertisements via email or online advertisements.	Consent. You can withdraw your consent at any time by sending an e-mail to request for withdrawal to "private@jtb.com".
To provide you with tailored news, offers, promotions and advertisements based on profiling of your interests and preferences via email or online	Consent. You can withdraw your consent at any time by sending an e-mail to request for withdrawal to

advertisements.	"private@jtb.com".
To protect interests and legal rights of JTB and our users.	The processing is necessary for the purposes of the legitimate interests.
To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar in accordance with our legal and regulatory obligations under the applicable law.	The processing is necessary for compliance with a legal obligation to which the controller is subject.
To respond to requests from government or public authorities, law enforcement officials, courts, regulators or similar in accordance with our legal and regulatory obligations under the applicable laws other than Philippine laws.	The processing is necessary for the purposes of the legitimate interests.

b. 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 JTB 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 JTB's filing system, in both live and back-up systems;

(5) Right to obtain from JTB a copy of your Personal Information and/or have the same transmitted from JTB 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.

11.12 Vietnam

a. For Vietnamese inside and outside Vietnam, and other persons in Vietnam, you have the following rights as a data subject:

(1) Right to be informed

You have the right to be informed of the processing of your Personal Information, unless otherwise provided for by law.

(2) Right to give consent

You have the right to give consent to the processing of your Personal Information, except for the case provided for by law.

(3) Right to access Personal Information

You have the right to access your Personal Information in order to view, correct or request correction of your Personal Information, unless otherwise provided for by law.

(4) Right to withdraw consent

You have the right to withdraw your consent, unless otherwise provided by law.

(5) Right to delete Personal Information

You have the right to delete or request deletion of your Personal Information, unless otherwise provided for by law.

(6) Right to restrict of data processing

You have the right to request to restrict the processing of your Personal Information, unless otherwise provided for by the law.

The restriction on the processing of Personal Information shall be implemented with all Personal Information that you request the restriction within 72 hours after receiving your request, unless otherwise provided for by law.

(7) Right to data provision

You may request us to provide you with your Personal Information, unless otherwise provided by law.

(8) Right to object to data processing

You have the right to object to us processing your Personal Information in order to prevent or restrict the disclosure of Personal Information or the use of Personal Information for advertising and marketing purposes, unless otherwise provided for by law.

We shall comply with your request within 72 hours after receiving the request, unless otherwise provided for by law.

(9) Right to complain, denounce and initiate lawsuits

You have the right to lodge complaints, denunciations or initiate lawsuits in accordance with law.

(10) Right to claim damages

You have the right to claim damages in accordance with the law when a violation of the provisions on the protection of Personal Information occurs, unless otherwise agreed between you and us or otherwise provided for by law.

(11) Right to self-protection

You have the right to self-protection in accordance with the provisions of the Vietnamese Civil Code (Law No. 91/2015/QH15, as amended or supplemented (if any)), other relevant laws and Decree No. 13/2023/ND-CP (as amended or supplemented (if any), "**Decree 13**"), or request competent agencies and organizations to take measures to protect civil rights as prescribed in Article 11 of the Vietnamese Civil Code.

b. For Vietnamese inside and outside Vietnam, and other persons in Vietnam, you may have the following obligations as a data subject:

(1) The obligation to protect your Personal Information and request other relevant

organizations and individuals 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 Personal Information when agreeing to allow the processing of Personal Information;

(4) The obligation to participate in propagating and disseminating skills to protect Personal Information; and

(5) The obligation to implement the provisions of the law on personal data protection and participate in preventing and combating violations of regulations on personal data protection.

c. We make efforts to keep your Personal Information in accurate and up-to-date condition, and take the necessary and appropriate security control measures in order to protect your Personal Information against undesirable adverse effects or damage that may occur in the process of our processing of your Personal Information, such as unauthorized access, tampering, leakage, loss, and damage.

Please be advised that it cannot be denied that Personal Information we collect might include your sensitive personal data defined under Decree 13.

11.13 Taiwan

a. We process your Personal Information based on your consent or in compliance with applicable laws and regulations.

11.14 New Zealand

a. In addition to the rights stated in Section 8.1, where you request the correction of Personal Information we hold about you, you have the right to request us to attach your statement of the correction to the original information that was requested to be corrected but not corrected.

11.15 Brazil

a. Article 18 of the General Personal Data Protection Law (Law 13.709/2018) ("**LGPD**"), grants you the following rights:

(1) Confirmation of the existence of Personal Information processing

(2) Access to Personal Information

(3) Correction of incomplete, inaccurate or outdated Personal Information

(4) Anonymisation, blocking or deletion of unnecessary, excessive or processed Personal Information that do not comply with the LGPD

(5) Portability of Personal Information to another service or product provider, upon express request, in accordance with the regulations of the National Data Protection Authority

(6) Withdrawal of consent and consequent disposal of Personal Information processed, except in the cases provided for in Article 16 of the LGPD

(7) Information of public and private entities with which the controller has made shared use of Personal Information

(8) Personal Information on the possibility of not providing consent and on the consequences of refusal

(9) Revocation of consent, pursuant to Section 5 of Article 8 of the LGPD