

Privacy Policy

THM Corporation (hereinafter, the “Company”) recognizes the importance of customers’ personal information and takes great care in its handling. It conducts the following initiatives to provide better products and services and responsibly protects customers’ personal information.

1. Compliance with laws and regulations

The Company complies with the Act on the Protection of Personal Information (Personal Information Protection Act) and other laws and regulations related to personal information and privacy protection.

2. Internal systems

The Company formulates internal regulations and rules necessary for individual business processes in connection with systems for the handling and storage of personal information, and also maintains organizational structures, including the appointment of managers, and builds systems for compliance related to the protection of personal information.

3. Acquisition of personal information

When the Company acquires personal information from customers, it clearly indicates the purpose of use and obtains the consent of the customer and then acquires the information within the scope necessary for achievement of that purpose. The customer may withdraw consent at any time.

4. Use of personal information

In using the personal information of customers, the Company uses it appropriately within the scope of the purpose of use, except in the following cases, and does not use it in ways that could potentially foment or induce an unlawful or wrongful act or engage in uses that exceed the scope of the purpose.

- (1) Cases in which the handling of personal information is based on laws and regulations
- (2) Cases in which the handling of personal information is necessary for the protection of the life, body, or property of an individual and in which it is difficult to obtain the consent of the person
- (3) Cases in which the provision of personal data is specially necessary for improving public health or promoting the sound growth of children and in which it is difficult to obtain the consent of the person
- (4) Cases in which the provision of personal data is necessary for cooperating with a state organ, a local government, or an individual or a business operator entrusted by one in executing the affairs prescribed by laws and regulations and in which obtaining the consent of the person is likely to impede the execution of the affairs
- (5) Cases in which personal data is provided to colleges, universities, other institutions or organizations engaged in academic studies, or entities belonging to them, and it is necessary for such academic research institutions to handle the data for the purpose of academic studies (includes cases in which a part of the purpose for handling the personal data is for academic studies, and excludes cases in which there is a risk of unjustly infringing on individual rights and interests)

5. Joint use of personal information

The Company jointly uses personal information as follows within the scope of the purpose of use in order to provide higher added value services. When other rules have been stipulated on the handling of personal information, the Company complies with them.

(1) Items of personal data that are used jointly

Name (including furigana (assigned phonetic characters)), email address, address, phone number, fax number, workplace (including furigana), workplace address, departmental affiliation, position, workplace phone number, workplace fax number, password, credit card information, wedding anniversary, and birthdate, in part or full

(2) Scope of organizations involved in joint use

Tokyu Group companies (refer to the following website for the company names)

Tokyu Group website (<https://tokyugroup.jp/about/grouplist/>)

Pan Pacific Hotels Group (Singapore company with which Tokyu Hotels Co., Ltd. has a partnership agreement; Tokyu Hotels is contracted by the Company for the management of Bellustar Tokyo and Hotel Groove Shinjuku, which includes management, sales promotions and technical assistance, etc.)

The company's website (<https://www.panpacific.com/ja/about.html>)

The company's privacy policy (<https://www.panpacific.com/ja/data-protection-policy.html>)

(3) Purpose of use of organizations involved in joint use

- To provide the latest information, promotional information, and product and service information, etc. from the companies of the Tokyu Group
- To administer the Tokyu Hotels Comfort Members program and report on use of benefits
- To provide the latest information, promotional information, and product and service information, etc. from Pan Pacific Hotels and Resorts
- To administer the Pan Pacific Discovery program and report on use of benefits
- To conduct market research, including marketing analysis, and develop products
- To help in decisions on selecting information to provide to customers

(4) Party with responsibility for management of personal information used jointly

THM Corporation

31-2 Sakuragaokacho, Shibuya-ku, Tokyo

President & CEO Akinori Kanayama

6. Ensuring accuracy

The Company takes appropriate measures to ensure that the personal information of customers is accurate

and up-to-date.

7. Security control measures

The Company strictly manages customers' personal information, and it takes preventive measures against leakage, loss, damage, alteration, and unauthorized access, etc. and other measures necessary for security control.

When the retention period established by law is exceeded or when it is no longer necessary to handle a customer's personal information, the Company promptly deletes that information.

8. Internal education

The Company conducts education and training on protection of personal information for employees and ensures awareness of its content internally.

9. Supervision of vendors

In using customers' personal information, the Company may contract out processing of personal data in part or full to a third party within the scope of the purpose of use. In this case, the Company requires the vendor to strictly manage personal information and provides supervision in accordance with the Personal Information Protection Act.

10. Restriction of provision to a third party

The Company does not provide or disclose customers' personal information to third parties without the customer's consent except in the following cases.

- (1) Cases in which the handling of personal information is based on laws and regulations
- (2) Cases in which the handling of personal information is necessary for the protection of the life, body, or property of an individual and in which it is difficult to obtain the consent of the person
- (3) Cases in which the provision of personal data is specially necessary for improving public health or promoting the sound growth of children and in which it is difficult to obtain the consent of the person
- (4) Cases in which the provision of personal data is necessary for cooperating with a state organ, a local government, or an individual or a business operator entrusted by one in executing the affairs prescribed by laws and regulations and in which obtaining the consent of the person is likely to impede the execution of the affairs
- (5) Cases in which the third party to which personal information is provided is a college, university, other institution or organization engaged in academic studies, or entity belonging to them, and it is necessary for that party to handle personal data in academic studies (This includes cases in which a part of the purpose for handling the personal data is for academic studies, and excludes cases in which there is a risk of unjustly infringing on individual rights and interests)

11. Disclosure, correction, discontinuation of use, etc. of personal information

When a customer wishes to request the disclosure, correction, or discontinuation of use, etc. of personal

information held by the Company, the customer should make the request according to the request procedures stipulated by the Company. The Company will confirm the customer's identity as prescribed and promptly respond within a reasonable and necessary scope.

12. Pseudonymized personal information and anonymized personal information

In using customers' personal information as pseudonymized personal information or anonymized personal information as stipulated in the Personal Information Protection Act, the Company handles the information appropriately in compliance with the Act and other related laws, regulations and guidelines, etc.

13. Information related to personal information

When acquiring and providing information related to personal information as personal data as is stipulated in the Personal Information Protection Act, the Company handles the information appropriately in compliance with the Act and other related laws, regulations and guidelines, etc.

14. Continual review of internal systems

The Company continually conducts reviews and improvements to sustain effective and appropriate operation of internal regulations related to the handling of personal information and organizational systems for executing them.

15. Inquiry desk

For questions related to the Company's handling of personal information, please direct your inquiries to the inquiry desk indicated below. You may also file complaints related to the handling of personal information with the Personal Information Protection Commission or other supervisory body.

31-2 Sakuragaokacho, Shibuya-ku, Tokyo 150-8511

Personal Information Inquiry Desk, THM Corporation

03-6273-8405

(Reception hours 10:00 – 17:00; excluding weekends, holidays, and the New Year's holiday period)

Personal data possessed by the Company and its purpose of use

The Company's purpose of use for personal data

The Company uses personal information it has been provided for the following purposes in order to fulfill its contracts, etc. with customers. In order to contract with customers, it is necessary for customers to provide their personal information.

1. To sell products, provide regular and member program services, and respond in other ways incidental to these activities
2. To provide guidance through the sending, etc. of information on products, services, benefits, events, etc. by Bellustar Tokyo and Hotel Groove Shinjuku
3. To respond to various inquiries and document requests, etc.
4. To collect opinions, requests, etc. in order to improve products and services
5. To create basic data for customer trend analysis, market research and other analysis necessary for management, and to create statistical data that does not allow specific individuals to be identified
6. To fulfill the duties and execute the rights of Bellustar Tokyo and Hotel Groove Shinjuku and respond in various ways incidental to this from a hotel operations standpoint

Personal data held

- All lodging reservation and usage data
- All restaurant/bar reservation and usage data
- All banquet reservation and usage data
- All corporate contract data
- All restaurant/bar member data
- All customer data
- List of people registered to receive the email newsletter
- List of people participating in hotel events
- List of respondents to event questionnaires

About customer access logs

The Company's website records the information of people who have accessed the site in the form of access logs for the purpose of improving customer convenience and services. The information recorded is the times, dates and pages accessed, domain names and IP addresses, and the type of browser used, etc.; it does not include information that allows individuals to be identified. The Company uses this information only for statistical analysis related to website usage and does not use it for any other purpose.

Access logs are recorded by using cookies and web beacons provided by a service provider contracted by the Company.

Cookies are small bits of information sent to the user's browser from the server that manages the website when that website is viewed. Through these cookies, the server records which pages of the website are visited and other such information, but they are not able to identify individual users. Web beacons are a technology that functions together with cookies to determine how many times a specific page has been accessed.

Customers can refuse to accept cookies by changing the settings on their browser. Customers can also reject web beacons by refusing to accept cookies.

Procedures for requesting disclosure, etc.

1. Regarding specification of retained personal data subject to the request for disclosure, etc.

When a request is made for disclosure, etc., we ask that you specify the retained personal data subject to the request.

Please be aware that personal information that corresponds to the following is not subject to disclosure, etc.

(1) Items that do not correspond to retained personal data

- Items for which the Company has only been contracted to process and has not been authorized for data disclosure, etc.
- Items scheduled to be certainly deleted within six months (excluding cases provided for differently in laws or regulations, etc.)

(2) Items not subject to disclosure, etc. in accordance with the provisions of the Personal Information Protection Act

- Items likely to harm the rights or interests of the person involved or a third party as a result of their disclosure, etc.
- Items likely to seriously interfere with the Company's proper implementation of business as a result of their disclosure, etc.
- Items whose disclosure, etc. is likely to violate another law or regulation

(3) Items stipulated in other laws or regulations, etc.

2. Scope of disclosure, etc.

The scope of disclosure, etc. shall be limited to the name and address of the person involved, the Company's purpose of use, and other items included in retained personal data that the Company has acquired and currently possesses.

3. Where to make requests for disclosure, etc.

When requesting disclosure, etc., make your request to the following address.

Please be aware that the Company does not take requests through direct in-person visits.

(1) When making your request via postal mail

(i) Address

31-2 Sakuragaokacho, Shibuya-ku, Tokyo 150-8511

Personal Information Inquiry Desk, THM Corporation

*Please make your request via registered mail.

(ii) Please enclose the following (refer to 4 below)

- Prescribed request form
- Identification document(s)

(2) When making your request via e-mail

(i) Address

Personal Information Inquiry Desk, THM Corporation

E-mail address: admin@tokyu-thm.co.jp

(ii) Please attach the following (refer to 4 below)

- Prescribed request form
- Identification document(s)

(iii) Please note the following

- Attached files should be in the PDF or Word format.
- Be sure to set a password for attached files and inform us of the password in a separate email.
- We cannot accept files sent via file transfer systems or provided by viewing the website.
- Please limit the size of attached files sent via e-mail to no larger than 3 MB. If the file exceeds this size, please send it by dividing it into multiple batches.

4. Documents (forms), etc. to be submitted when requesting disclosure, etc.

Request documents forms shall be limited to those prescribed by the Company. We cannot accept any other type of form. Your understanding is appreciated.

*Documents submitted when requesting disclosure, etc. (including identification documents) will not be returned. Your understanding is appreciated. Documents will be promptly destroyed in the appropriate manner after the response to the request for disclosure, etc. is complete.

(A) Request form prescribed by the Company

- Request for Disclosure of Personal Information [PDF/Word](#)
- Request for Correction, Etc. of Personal Information [PDF/Word](#)
- Request for Discontinuation of Use of Personal Information [PDF/Word](#)
- Request for Notification of Purpose of Use of Personal Information [PDF/Word](#)
- Request to Discontinue Provision of Retained Personal Data to a Third Party [PDF/Word](#)

(B) Identification documents

Enclose or attach a copy of one of the following documents. Please copy the portion that displays the name of the person involved.

- Driver's license
- Basic Resident Registration Card
- Excerpt from Family Register (only necessary items like your name and address)
- Certificate of Residence copy (only necessary items like your name and address)
- Insurance card from various types of insurance
- Insurance card for long-term care insurance

- Pension book
- Pension certificate

*1 If your current address or current name, etc. differs from the address or a previous name, etc. registered in the Company's retained personal data due to a change of address or change of name, etc., it may not be possible to verify your identity when making a request for disclosure, so please conduct the procedures for requesting a correction, etc. prior to requesting disclosure or at the same time as requesting disclosure. In this case, please submit the request with documents by which we can confirm changes of address, such as the Record of Deletion from Certificate of Residence. Inquire with your local government office to acquire a Certificate of Residence or Record of Deletion.

*2 In the case of certificates containing your registered domicile, please cover up the registered domicile portion with a piece of paper or by some other means before copying the certificate.

*3 If an identification document has not been enclosed or attached, or your identity cannot be verified due to an unclear area in the identification document or for some other reason, your request for disclosure, etc. will be regarded as having not been made, you will be contacted regarding this fact by the Company using the contact details entered on the request form, and all request forms and documents, etc. already sent to and received by the Company will be sent by the Company via registered mail (mail that can only be received by the person involved) to the address entered on the Certificate of Residence that has been sent (if a Certificate of Residence has not been sent, etc., then the address indicated on the request form). Your understanding is appreciated.

5. Requests for disclosure, etc. made by an agent

Please make the request via registered mail.

If the person making the request for disclosure, etc. is the agent of the person involved, please enclose the following documents in addition to the request form in A above and the identification document in B above.

- Power of attorney sealed with registered seal that is related to disclosure of personal data of the person subject to disclosure
- Seal registration certificate of the seal affixed on the power of attorney (within three months of issue date)
- Copy of official gazette or notice of family court decision (guardians only)

*Please use the [power of attorney](#) form prescribed by the Company.

6. Method of response to requests for disclosure, etc.

When requests for disclosure, etc. are made by postal mail, the Company will respond in writing via simplified registered mail to the address indicated on the request form.

When requests for disclosure, etc. are made by e-mail, the Company will respond via electronic record to the email address entered as the recipient. However, if disclosure, etc. by providing an electronic record incurs substantial cost or is otherwise difficult, the Company will respond via delivery of documents.

*1 A period of at least two weeks will be required from the start of disclosure, etc. procedures until the response.

*2 If the inquiry desk is especially busy or there are other business-related circumstances at the Company, the response may be delayed further. Your understanding is appreciated.

*3 When requests for disclosure, etc. are made by postal mail and there is trouble related to the postal service, the Company shall bear no liability except in cases in which the reasons are attributable to the Company. Your understanding is appreciated.

*4 When requests for disclosure, etc. are made by e-mail and the e-mail is delivered to the wrong address or is not delivered due to an error in the e-mail address entered as the recipient or the e-mail is not delivered or delayed due to communication trouble, the Company shall bear no liability except in cases in which the reasons are attributable to the Company. Your understanding is appreciated.

7. Regarding non-disclosure of retained personal data

In the following cases, the Company is not able to respond to requests from the person involved.

(1) When the request cannot be accepted due to a problem, etc. in the request

In the following cases, the Company is not able to accept requests. Please revise the problematic areas and resubmit the request documents according to the Company's prescribed procedures.

- When the request documents prescribed by the Company are not used
- When the documents, etc. necessary for the submission are incomplete
- When it is not possible to verify the identity of the person involved using the information entered on the request form
- When the address entered on the request form, the address listed on documents used to verify the identity of the person involved, and the address registered at the Company are not consistent, etc. and it is not possible to confirm that the request is from the person involved
- When the request is by an agent and the agent's power of attorney cannot be confirmed
- Other cases in which there are problems in the request documents submitted
- When requests are not made according to the procedures prescribed by the Company

(2) Cases in which the Company refuses the request, etc. for disclosure, etc.

(i) Notification of the purpose of use

In the following cases, the Company will not provide notification of the purpose of use for retained personal data subject to a request.

- When the purpose of use of retained personal data that identifies the person involved is clear
- When notifying the person involved of the purpose of use or making the purpose of use public is likely to harm the life, wellbeing, property, or other rights or interests of the person involved or a third party
- When notifying the person involved of the purpose of use or making the purpose of use public is likely to infringe upon the rights or legitimate interests of the Company
- When it is necessary to cooperate with a state organ or a local government in executing the affairs prescribed by laws and regulations and notifying the person involved of the purpose of

use or making the purpose of use public is likely to impede the execution of those affairs

- When the retained personal data related to the request does not exist

(ii) Disclosure

In the following cases, the Company will not disclose, in full or in part, the retained personal data subject to the request.

- When disclosure is likely to harm the life, wellbeing, property, or other rights or interests of the person involved or a third party
- When disclosure is likely to seriously impede the proper execution of business by the Company
- When disclosure violates another law or regulation
- When the retained personal data related to the request does not exist

(iii) Disclosure (of records in the case retained personal data is provided to a third party and records in the case it is received by a third party)

In the following cases, the Company will not disclose, in part or in full, the retained personal data subject to the request.

- When making the existence or non-existence of such records clear is likely to harm the life, wellbeing or property of the person involved or a third party
- When making the existence or non-existence of such records clear has the potential to foment or induce an unlawful or wrongful act
- When making the existence or non-existence of such records clear is likely to harm national security, cause damage to the relationship of mutual trust with another country or an international organization, or cause a disadvantage in negotiations with another country or an international organization
- When making the existence or non-existence of such records clear is likely to hinder prevention, suppression or the investigation of crimes or other matters concerning upholding public safety and public order
- When the retained personal data related to the request does not exist

(iv) Corrections, etc. (correction, addition, deletion)

In the following cases, the Company will not make corrections, etc. to the retained personal data subject to the request.

- When special procedures regarding the correction, addition or deletion of that information are prescribed by another law or regulation
- When the information is factual and correction, addition and deletion are not necessary
- When correction, addition or deletion of the information is not necessary to achieve the purpose of use of the retained personal data

(v) Discontinuation of use, etc. (discontinuation of use, deletion)

In the case the personal data held by the Company was handled beyond the scope necessary for achievement of the purpose of use, or in the case it was acquired by deception or other wrongful means, or in the case it was used in a way that could potentially foment or induce an unlawful or wrongful act, the person involved may request the discontinuation of use or deletion (hereinafter,

“discontinuation of use, etc.”) of the retained personal data.

Also, in addition to the aforementioned cases, in the case it is no longer necessary for the Company to use the personal data it holds, or in other cases in which the handling of personal data held by the Company is likely to harm the rights or legitimate interests of the person involved, the person involved may request the discontinuation of use, etc. of that retained personal data to the extent that it is necessary to prevent infringement on the rights and interests of the person involved.

However, in the following cases, the Company will not discontinue use, etc., in part or in full, of the retained personal data subject to the request.

- When the retained personal data is being handled within the scope necessary to achieve the purpose of use specified in advance (includes cases that go beyond the extent necessary to redress the violation)
- When the retained personal data is acquired via a proper method (includes cases that go beyond the extent necessary to redress the violation)
- When it would be sufficient to discontinue use or delete a portion of the retained personal data subject to the request in order to redress the violation
- When discontinuation of use or deletion incurs substantial cost or when discontinuation of use, etc. would otherwise be difficult and alternative measures are taken that are necessary to protect the rights and interests of the person involved

(vi) Discontinuation of provision to a third party

When personal data held by the Company is provided to a third party without the consent of the person involved or otherwise without legitimate grounds, the person involved may request that provision of that retained personal data to a third party be discontinued (hereinafter, “discontinuation of provision to a third party”).

Also, in addition to the aforementioned cases, in the case it is no longer necessary for the Company to use the personal data it holds, or in other cases in which the handling of personal data held by the Company is likely to harm the rights or legitimate interests of the person involved, the person involved may request the discontinuation of provision to a third party to the extent that it is necessary to prevent infringement on the rights and interests of the person involved.

However, in the following cases, the Company will not discontinue provision of the retained personal data subject to the request to a third party, in part or in full.

- When the retained personal data is provided after having obtained the consent of the person involved in advance
- When it is based on laws and regulations
- When it is necessary for the protection of the life, body, or property of an individual and it is difficult to obtain the consent of the person involved
- When it is specially necessary for improving public health or promoting the sound growth of children and is difficult to obtain the consent of the person involved

- When it is necessary for cooperating with a state organ, a local government, or an individual or a business operator entrusted by one in executing the affairs prescribed by laws and regulations, etc. and obtaining the consent of the person involved is likely to impede the execution of the affairs
- When discontinuation of provision to a third party incurs substantial cost or when discontinuation of provision to a third party would otherwise be difficult and alternative measures are taken that are necessary to protect the rights and interests of the person involved

8. Purpose of use of personal information acquired in connection with a request for disclosure, etc.

Personal information submitted when requesting disclosure, etc., including the request form and identification documents, are handled only within the scope necessary to respond to the request for disclosure, etc., to contact the person involved related to the request for disclosure, etc. or confirm with the person if any questions arise, for example.

Identification documents that are submitted will be promptly destroyed in the appropriate manner after the response to the request for disclosure, etc. is complete.

Basic Policy on the Proper Handling of Specific Personal Information

THM Corporation (hereinafter, the “Company”) promotes the following initiatives as an organization with respect to ensuring the proper handling of individual numbers and specific personal information (hereinafter, “specific personal information, etc.”) in accordance with the Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (hereinafter, “My Number Act”).

1. Name of business operator

THM Corporation

2. Compliance with related laws, regulations, and guidelines, etc.

In connection with the handling of specific personal information, etc., the Company complies with the My Number Act, other related laws and regulations, the rules of the Personal Information Protection Commission, and other guidelines, etc.

3. Items related to safe management measures

The Company has separately stipulated the Rules for the Handling of Specific Personal Information, etc. and complies with them in order to appropriately manage specific personal information, etc., which includes preventing leakage, loss and damage.

4. Continual improvement

The Company conducts reviews and improvements on a continuing basis to sustain effective and appropriate operation of the Rules for the Handling of Specific Personal Information and internal systems for executing it.

5. Desk for questions and complaints

Direct your questions and complaints related to the Company’s handling of specific personal information, etc. to the following inquiry desk.

31-2 Sakuragaokacho, Shibuya-ku, Tokyo 150-8511

Inquiry Desk for Specific Personal Information, Etc., THM Corporation

Phone: 03-6273-8405

(Reception hours 10:00 – 17:00; excluding weekends, holidays, and the New Year’s holiday period)