

## PRIVACY STATEMENT

Our Hotel values you as our guest and recognizes that privacy is important to you. We want you to be familiar with how we collect, use, and disclose your Personal and Other Data (collectively, "Data").

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### DATA COVERED BY THIS PRIVACY STATEMENT

This Privacy Statement describes the privacy practices of our Hotel for data that we collect:

- through websites operated by us from which you are accessing this Privacy Statement (collectively, **the Websites**);
- through our social media pages that we control from which you are accessing this Privacy Statement (collectively, **our Social Media Pages**);
- through email messages that we send you that link to this Privacy Statement and through your communications with us online or in person;
- from third parties such as public databases, marketing partners, and other third parties; and
- when you visit or stay as a guest at our Hotel, or through other offline interactions (collectively, **Property Visits and Offline Interactions**).

Collectively, we refer to the **Websites**, and our **Social Media Pages**, as the "**Online Services**" and, together with the **Property Visits and Offline Interactions**, the "**Services**."

### THE DATA WE COLLECT

At touchpoints throughout your guest journey, we collect Personal Data in accordance with the law, and to provide you with exemplary services. **Personal Data** is information that may identify you as an individual or relate to you as an identifiable individual. We collect and process the following types of Personal Data about you:

- Name
- Gender
- Postal address
- Telephone number
- Email address
- Financial information (such as credit and debit card number or other payment data)
- Language preference
- Date and place of birth
- Nationality, passport, visa, or other government-issued identification data
- Important dates: birthdays, anniversaries, and special occasions
- Employer details (for business-related bookings)
- Travel itinerary, tour group, or activity data
- Prior guest stays or interactions, goods and services purchased, special service and amenity requests

In more limited circumstances, we may also collect:

- Data about family members and companions, names, and ages of children
- Images, video and audio data via: security cameras located in public areas, such as hallways and lobbies, in our properties;

We may also collect information about your "**Stay Preferences**" that we use to make your current and future stays and experience with us more enjoyable, including information about your interests and other relevant information that we learn about you during your stay. This may also include any likes and dislikes about our services that you tell us about so that we can improve our services, and specific dietary, health restrictions or personal needs to ensure your wellbeing. We may also collect your "**Personal Preferences**," that may include details of your special anniversaries (such as your birthday or wedding anniversary), what type of activities you prefer to take part in when staying with us, and your hobbies. Personal Preferences may also include details about who you usually travel with, their relationship to you, and your marital status.

If you submit any Personal Data about other people to us or our Service Providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

#### THE ONLINE AND MOBILE DATA WE COLLECT

Typically, we do not collect Personal Data through your use of the Online Services. However, we may collect “Other Data” that does not directly identify you. To the extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as Personal Data.

“Other Data” includes:

**System Data:** When you use both desktop and mobile devices to access the Online Services, we collect certain data through your browser or automatically through your device, such as your computer type, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services you are using.

**IP Address:** We also collect your IP address, a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Online Services.

**Precise Location-Based Services:** With your consent, we may collect the precise physical location of your device by using satellite, cell phone tower, Wi-Fi signals, or other technologies. We will collect this data if you opt-in through the App or other program (either during your initial login or later) to improve special offers and to enable location-driven capabilities on your device. If you have opted-in to share your location, the App or other program will continue to collect location data based on how you chose to share the data.

• **Precise Location Opt-Out:** You can specify via your device’s operating system (such as through the “Settings” icon) to always share location data, only when the App is in use, or never. If you choose only when the App is in use, we will have access to the data until you log off or close the application.

#### Cookies and Similar Technologies on our Websites:

When you visit our Websites from either a desktop or mobile device, we may collect and use cookies or other identifiers to serve you with personal advertisements for our Hotel and third party products, either via email, on our website, or on other websites on the Internet; to measure how you interact with our Websites; and to maintain your preferences. We do this primarily through cookies, which are pieces of data stored directly on the computer or mobile device that you are using.

You can learn more about cookies at: <http://www.allaboutcookies.org/manage-cookies/index.html> .

In general, we use four different types of cookies:

- **Strictly Necessary Cookies:** These cookies are necessary to enable the basic features of the website or app, such as providing a secure log-in.
- **Functional Cookies:** These cookies allow our websites to remember your site preferences and choices you make on the site. We also use functional cookies to facilitate navigation, to display content more effectively, and or to personalize your experience.
- **Advertising Cookies:** Advertising cookies allow us to select which advertisements or offers are most likely to appeal to you. We also use them to track responses to online advertisements and marketing, and we may use it to better understand your interests so we may can present you with relevant messages and offers. These cookies may also allow you to share certain pages with social networks.
- **Analytics Cookies:** Analytics cookies help us improve our website by collecting and reporting information on how you use it.

#### Opting Out of Cookies

There are several ways to opt-out of cookies. If, however, you do not accept any cookies, you may experience some inconvenience in your use of the Online Services. For example, we will not be able to recognize your computer, and you will need to log in every time you visit. You also will not receive advertising or other offers from us that are relevant to your interests.

1. **Browser settings:** You can opt out of cookies on your browser. Every browser is different so please check the instructions provided by your browser.
2. **Google Analytics:** We collect data through Google Analytics and Adobe Analytics, which use cookies and

technologies to collect and analyze data about use of the Online Services. These services also collect data regarding the use of other websites, apps, and online resources. You can learn about Google's practices by going to ([www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/))

and opt out by downloading the Google Analytics opt out browser add-on, available at (<https://tools.google.com/dlpage/gaoptout>) . You can learn more about Adobe and opt out by visiting(<http://www.adobe.com/privacy/opt-out.html>)

#### **Aggregated and Segmented Data.**

We may aggregate data that we collect, and this aggregated data will not personally identify you or any other user. We may also use both Personal Data and Other Data to divide customers into segments, or groups, in order to provide more relevant advertising, including third party advertising.

#### HOW AND WHERE WE COLLECT YOUR DATA

This Privacy Statement describes the privacy practices of our Hotel for Personal and Other Data that we collect through the following:

- **Our Hotel.** We collect Personal Data for the purposes described in this Privacy Statement, such as providing and personalizing the Services, communicating with you, facilitating the loyalty programs and to accomplish our business purposes.
- **On-Property and/or Travel Providers.** We may collect your Personal Data and Other Data from restaurant, concierge.
- **Promotional Activity.** We collect Personal Data and Other Data from with third parties who may provide promotions to you, such as sweepstakes, contests, or other offers.
- **Other Sources & Service Providers.** We collect Personal Data and Other Data from various third parties, such as public databases, joint marketing partners, and online travel agencies (OTAs).
- **Online Services.** We collect Personal or Other Data when you interact with our Online Services, by performing such actions as, but not limited to, browsing, making a reservation, purchasing goods and services from our Websites or Apps, communicating with us or otherwise connecting with us or posting to social media pages, or signing up for a newsletter or participating in a survey, contest or promotional offer.
- **Customer Care Centers.** We collect Personal Data when you make a reservation over the phone, communicate with us by email, fax, or via online chat services or contact customer service. These communications may be recorded for purposes of quality assurance and training.
- **Internet-Connected Devices.** We collect Personal and Other Data from internet-connected devices available in our properties. For example, when you connect a device to the hotel's internet, or when a smart home assistant may be available for your use to tailor your accommodations and experience.

#### HOW AND WHEN WE SHARE YOUR DATA

Our goal is to provide you with the highest level of hospitality and Services, and to do so, we may share Personal Data and Other Data with the following:

- **Our hotel.** We disclose Personal Data for the purposes described in this Privacy Statement, such as providing and personalizing the Services, communicating with you.
- **Promotional Activity.** We partner with third parties who may provide promotions to you, such as sweepstakes, contests, or other offers.
- **Service Providers.** We disclose Personal Data and Other Data to third party service providers including, for example, companies that provide website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing, and other services.

#### **Other Uses and Disclosures:**

We will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations, such as in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our Hotel business, assets or stock (including any bankruptcy or similar proceedings); (f) to protect the rights, privacy, safety or property of our Hotel, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose Other Data for any purpose, except where we are not allowed to under applicable law.

## YOUR DATA, YOUR CHOICES: YOUR PRIVACY PREFERENCES & RIGHTS

At our Hotel, we believe that you should have choices with respect to your data. We provide you with the options, information, and choices below to express your preferences: what and how much you share with us and when and how you hear from us.

### Communication Preferences

- If you no longer wish to receive marketing-related emails, you may opt out by visiting our unsubscribe page or by following the instructions in any such email you receive from us.
- In addition, you can opt out from marketing-related emails by sending a letter to: Internet Customer Care – Unsubscribe, 556 Nakatani Mimasaka city Okayama prefecture JAPAN 707-0402
- NOTE: Even if you choose to opt out of marketing-related emails, we will continue to send you transactional messages, such as information about your reservations or stays, including confirmation and pre-arrival emails, or account security updates.

### Cookies and Other Data

For information on your choices related to Cookies and Other Data, please see the Section on Cookies and Other Data, above.

### Individual Rights

**The right to access-** You have the right to request Our Hotel for copies of your personal data. We may charge small fee for this service.

**The right to rectification-** You have the right to request that Our Hotel correct any information you believe is inaccurate. You also have the right to request Our Hotel to complete information you believe is incomplete.

**The right to erasure-** You have the right to request that Our Hotel erase your personal data, under certain conditions.

**The right to restrict processing-** You have the right to request that Our Hotel restrict the processing of personal data, under certain conditions.

**The right to object to processing-** You have the right to request that Our Hotel's processing of your personal data, under certain conditions.

**The right to data portability-** You have the right to request that Our Hotel transfer the data that we have collected to another organization, or directly to you, under certain conditions.

### How You Can Request to Access, Change, Delete, Restrict or Confirm the Use or Object to the Processing of Your Personal Data

If you or your authorized agent would like to request to access, change, delete, restrict or confirm the use or object to the processing of your Personal Data that you have previously provided to us, or if you would like to receive an electronic copy of your Personal Data for purposes of transmitting it to another company, or appeal our decision regarding your privacy request (to the extent these rights are provided to you by law), If you have any questions about the form or our process, feel free to contact us at Contact Us.

For your protection, we only fulfill requests for the Personal Data associated with the email address and/or loyalty account number that you identify in your request, and we may need to verify your identity before fulfilling certain requests. When permitted by law, we may charge an appropriate fee to cover the costs of responding to your request. Our Hotel acknowledges and respects our guests' privacy and we will try to comply with your request as soon as reasonably practicable and consistent with applicable law. Please note that all individual rights may not be available under applicable law to all of our guests or other users of our Services.

## OTHER IMPORTANT PROVISIONS

### Security

We seek to use reasonable organizational, technical, and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "Contact Us" section, below.

### Retention

We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services.)

- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation, or regulatory investigations)

**Sensitive Data**

Unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any Sensitive Personal Data (e.g., social security number, taxpayer identification number, passport number, driver's license number, or other government-issued identification number; credit or debit card details or financial account number, with or without any code or password that would permit access to the account, credit history; or information on race, religion, ethnicity, medical or health information, genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records, or information on other judicial or administrative proceedings).

**Use of Services by Minors**

The Services are not directed to individuals under the age of sixteen (16), and we request that they not provide Personal Data through the Services.

**Updates to This Privacy Statement**

The "Last Updated" legend at the top of this page indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on the Online Services. If you would like to review the version of the Privacy Statement that was effective immediately prior to this revision, please contact us at [privacy@awakura.com](mailto:privacy@awakura.com).

**CONTACT US**

If you have any questions about this Privacy Statement, please contact us at [privacy@awakura.com](mailto:privacy@awakura.com).