

Privacy Policy

Handling of Personal Information

I Policy for Protection of Personal Information

SSA Co., Ltd. (from here on “the company”) in order to guarantee the proper use of personal information for business purposes the company will respect the laws related to the protection of personal information and all other related standards. We voluntarily set in place rules and systems to that end and vow to maintain them accordingly. The company will stipulate internal regulations related to the protection of personal information in order to carry out this commitment. The company will make this policy known to employees (board members, hired employees and part time employees) as well as all other related personnel, and improve and maintain the aforementioned policy. In order to prevent the loss, destruction, falsification, and leakage of personal information, the company will set in place internal regulations related to safely managing the information system and enact an appropriate security system to prevent unauthorized access and computer viruses. The basic rules regarding the protection of personal information by the company are as follows:

(1) Prohibition of inappropriate collection

Upon collecting personal data, fair and lawful methods will be used, and all unlawful collection of personal data is prohibited.

(2) Prohibition of unauthorized usage

Upon using personal information, usage shall be limited to the designated range. Usage of personal information beyond the designated range is prohibited.

(3) Insurance of safety

Upon using personal information, maintaining safety will always be kept in mind and the import export, storage, delivery, transfer and disposal of information in an environment where safety cannot be guaranteed is prohibited.

(4) Prohibition of providing information to a third-party

Unlawful provision of personal information to a third-party that has not been approved by the individual is prohibited. In the case of personal information being provided to a third-party in an outsourcing agreement, or being shared by third parties for mutual purposes, the third-party entities involved will execute a contract and put in place all measures required by law.

(5) Respect for individual rights

With regards to personal information, we recognize that the individual whose information is involved has the right to request the disclosure, correction and cessation of usage of the information. In the event that such a request is made by the individual, we will take the appropriate steps in accordance with the law.

II Matters related to the Collection of Information

When collecting personal information, the company will explicitly state the purpose for which it will be used and in accordance with the individual's consent will collect the information lawfully and use it for within the range of the stated purpose. In the event that a need arises to use the information beyond the originally stated purpose, the company will consult the individual and request their consent. In addition, the company does not offer goods or services to children and will not collect personal information from them. Individuals under 18 years of age will need the consent of their guardian in addition to their own consent before their personal information is handled.

III Matters related to the purpose of Usage

The company will use personal information that has been collected for the following purposes.

- (1) To provide services to the customer.
- (2) To contact the customer regarding verification of reservations, etc.
- (3) To deliver goods, billing and accounting, to inform and verify transactions.
- (4) For the company and "Higashiyama Ogata" management to conduct surveys and send out advertisements and business information.
- (5) For the company and "Higashiyama Ogata" facilities to make improvements and grasp the amount of usage of the goods and services.
- (6) To improve the company's homepage and goods and services.
- (7) Any other related operations that are connected with the afore mentioned purposes.
- (8) To respond in compliance to the law or requests from the government.

IV Provision of Information to a Third-party

The company will not disclose any individual's personal information in its care to a third-party without the explicit consent of the individual except where permitted by law.

V Matters related to outsourcing

When the company needs to outsource part or all of the operations in order to accomplish the goals listed in section III, “matters related to purpose of usage”, a contract will be made including the responsibility of managing and overseeing the confidentiality of personal information and the company will appropriately oversee the outsourcing contractor.

VI Matters related to shared usage

There are times when the company needs to share information that it has obtained in order to accomplish the goals listed in section III, “matters related to purpose of usage”. The company’s personal information security manager will take responsibility for managing personal information that has been shared. For more details regarding this matter contact the information desk listed in section VIII.

1. Shared personal information includes the following:
Addresses, names, company names, telephone numbers, email addresses, credit card information, flight information and any other information that is needed to provide services to our customers.
2. Range of shared users
 - (1) SSA Co., Ltd.
 - (2) Hired vehicles and taxi companies.
 - (3) “Higashiyama Ogata”
3. Purpose of usage
 - (1) Billing and payment
 - (2) Reserving a hired vehicle and providing pickup and drop-off services
 - (3) Providing various arranged agency services
 - (4) Providing the services afforded by “Higashiyama Ogata”
4. The entity responsible for the management of personal information.
SSA Co., Ltd.

VII Handling personal information on the company website

Personal information received from customers via the company website will be recorded strictly for the purpose of the services requested. After a set amount of time has expired all information will be deleted. In addition, to ensure the security of the

information, the following precautions will be taken.

In order to ensure the safety of personal information and to prevent unauthorized access, loss, destruction, falsification and leakage practical safety strategies will be incorporated into both the operation and management of the system. All transmission and reception of personal information from customers via the company's homepage are protected by encryption using SSL (Secure Sockets Layer).

VIII Inquiries regarding personal information

The company makes every effort to maintain the most accurate and updated information for each customer. Requests for disclosure, correction or deletion of information from the individual (all requests related to personal information) should be directed to the customer service listed below.

Office hours (9:00~19:00 not available on Sat., Sun. or holidays)

SSA Co., Ltd. Tokyo office 03-6264-5056

- Call for the contact information for the suppliers' representative.
- Inquire for details regarding the procedure for disclosure requests (necessary documents, method of receipt, method of verifying identity, fees, etc.)

IX Changes in Service Content

Changes may be made to this policy without prior disclosure due to revisions in the law or changes in generally accepted societal norms.

February 28, 2022

SSA Co., Ltd.