**Privacy Policy** 

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T-LIFE Holdings Co., Ltd. ("T-Life") conducts its business under the corporate mission of

"taking on infinite possibilities through travel." We believe that proper handling of all personal

data is our social responsibility and thus implement the following measures to achieve our

mission.

1. Collection, Use, and Provision of Personal Data

When collecting personal data belonging to customers or employees throughout all our

businesses, T-LIFE will clearly state the purpose of use and whether it will be provided to a

third party in advance, obtain the consent of the individual, and use data appropriately within

the scope of its purpose while taking measures to prevent unauthorized use.

2. Compliance with Laws, Guidelines, and Norms Regarding Personal Data

T-LIFE follows laws, government guidelines, and other norms regarding personal data.

3. Safeguarding Personal Data

T-LIFE takes reasonable preventive and corrective action against unauthorized access to

personal data as well as against the breach, loss, destruction, and falsification of personal

data.

4. Complaints and Inquiries Regarding Personal Data

T-LIFE responds promptly to any complaints or inquiries regarding personal data.

5. Efforts Toward Protecting Personal Data (Personal Data Protect Management System)

T-LIFE continuously reviews and improves our efforts to protect personal data properly.

T-LIFE Holdings, Co., Ltd.

President & CEO Kunihiro Ishikawa

Enacted: April 1, 2018

Revised: January 1, 2022

# **Handling of Personal Data**

Enacted: April 1, 2018 Revised: January 1, 2023

T-LIFE Holdings, Co., Ltd.

Personal Data Protection Officer

1. The Purpose of Using Personal Data

T-LIFE collects personal information for the following purposes and uses it within the necessary scope to achieve those purposes.

We may also acquire sensitive personal data with the consent of the customer to arrange for tours that the customer has applied for (including domicile, nationality, religion, criminal record, health information, medical history, bank account numbers, credit card numbers, etc.) Providing personal data is optional. However, please be aware that the personal data you provide is required for T-Life to arrange tours, and that we may be unable to provide our products or services if you do not provide the information we request.

- (1) To make arrangements with transportation providers, accommodation providers, public agencies (Ministry of Foreign Affairs, embassies/consulates, etc.), or for services provided by travel agencies contracted by T-LIFE and procedures to receive such services. To facilitate tour fee payment procedures and provide other travel services.
- (2) To receive a list of participants from the person in charge of group contracts (field trips, business trips, etc.) or agent contracts (inbound travel, commissioned sales, etc.), and to arrange transportation, accommodations, and other travel arrangements within the scope necessary as in (1).(T-LIFE will not use personal data obtained through outsourcing for any purposes other than those in which the subcontractor has obtained consent from the data subject in advance.)
- (3) To provide information on products (travel insurance, currency exchange, etc.), services, and information on campaigns provided by T-LIFE or its affiliates as well as related procedures, and to facilitate shopping by customers at souvenir shops at the destination.
- (4) To create statistical data and conduct surveys.
- (5) To provide customers with information on travel products.
- (6) To communicate with customers.
- (7) To make credit decisions regarding T-LIFE travel loans and to manage these once credit has been granted. Data obtained from personal credit information agencies will be used to investigate solvency.
- (8) To recruit job applicants.
- (9) To manage employees.

### 2. Provision of Personal Data to a Third Party

- (1) In order to complete the arrangements necessary for your tour itinerary, T-LIFE provides personal data such as name, gender, age, address, phone number, email address, passport number, credit card number, and date of birth to transportation and accommodation providers as well as travel agents in advance by mail, electronic means, or other means.
- (2) To facilitate shopping during the tour, T-LIFE may provide personal data it holds to souvenir shops. In doing so, T-LIFE will provide the souvenir shop with personal data such as name, passport number, and flight information in advance through electronic or other means.
- (3) Customer data for travel loans will be registered and provided to credit reporting agencies.

#### 3. Shared Use of Personal Data

T-LIFE shares customer personal data held by our company, such as names, addresses, phone numbers, or email addresses, with our group companies to the minimum extent necessary for them to contact customers. Group companies may use this data for business notifications, simplification of customer applications, providing event information, and shipping purchased products. Personal data shared will be managed responsibly by T-LIFE's Personal Data Protection Officer.

- •T-LIFE Holdings Co., Ltd., 4th Floor, Hikarigaoka MK Building, 5-11-26 Takamatsu, Nerimaku, Tokyo
- •T-LIFE Partners Co., Ltd., 4th Floor, Hikarigaoka MK Building, 5-11-26 Takamatsu, Nerimaku, Tokyo

### 4. Outsourcing of Personal Data

T-LIFE may outsource the handling of personal data provided by customers to an external contractor when necessary to achieve the aforementioned purposes. When outsourcing business, T-LIFE will enter into agreements with contractors regarding personal data protection and conduct necessary and appropriate supervision to ensure safeguarding of personal data.

## 5. Safeguarding Measures

- T-LIFE has implemented the following necessary and appropriate security measures to prevent the breach, loss, or damage of personal data and ensure its management.
- (1) We have established a personal data protection policy and rules for the collection, use, provision, and disposal of personal data to comply with the law and ensure proper handling.

- (2) We have appointed a Personal Data Protection Officer and designated an officer in charge of personal data handline in each department, and have also established a system for reporting to officers in the event of a violation of laws or regulations.
- (3) We conduct regular self-checks and audits by the Audit Department to assess the handling of personal data.
- (4) We provide regular training to employees on the handling of personal data.
- (5) Matters regarding the confidentiality of personal data are included in the rules of employment.
- (6) We manage employee entry and exit, and establish measures for the storage, disposal, and protection of documents and electronic media containing personal data.
- (7) We implement measures such as passwords and remote operation to prevent theft or loss of equipment.
- (8) We place access restrictions to limit the scope of databases that employees handle.
- (9) We have installed mechanisms to protect our systems against unauthorized access and malware.
- 6. Disclosing, Correcting, or Suspending Use of Personal Data

For inquiries about the purpose of use, disclosure, correction, addition, deletion, suspension of use, deletion, or suspension of provision to third parties of personal data, please see our Guide for Disclosure, Correction, or Deletion of Personal Data.

Contact the <u>Personal Data Help Desk</u> below for more information on the required procedures.

7. Complaints and Inquiries Regarding Personal Data

Contact our Personal Data Help Desk for any complaints regarding the handling of personal data.

#### Personal Data Help Desk

4th floor, Hikarigaoka MK Building, 5-11-26 Takamatsu, Nerima-ku, Tokyo 179-0075 T-LIFE Holdings, Co., Ltd.

To the Personal Data Protection Officer

Hours: (Weekdays) 11:00 a.m. to 4:00 p.m. (Closed) Saturday, Sunday, public holidays

\*The English version of the privacy policy is for reference only, and the Japanese version is the official version.