

## **JTB Privacy Notice**

JTB Corp. (Main office : 2-3-11, Higashi-Shinagawa, Shinagawa-ku, Tokyo, Japan), (hereinafter referred to as the “Company” or “We”) hereby informs you, the data subject, that the Company collects, accesses, uses and otherwise processes your personal data in the following ways with respect to Luggage Free Travel Services (hereinafter referred to as the “Services” ).

### **1. Categories of personal data**

We hereby inform you that we collect, use and otherwise process the following categories of your personal data:

- Name
- Phone Number
- Email Address
- Credit Card Information

### **2. Legal basis and purpose:**

In accordance with Article 6 (1) (f) of General Data Protection Regulation (hereinafter referred to as “GDPR”), we hereby inform you that we use and otherwise process your personal data for the following purposes:

- Member registration-related services regarding the Services
- Handling of inquiries and other customer relationships
- Settlement
- Marketing/ Providing information regarding our or other person’s products, services or events or campaigns

We may also use your personal data for statistical research or reporting purposes after it has been converted into unidentifiable statistical or aggregated data. This aggregated data may be shared or used for the aforementioned purposes.

We process your personal data in your interest as well as our interest, that is, we provide and you receive the services that you have requested and other related services as specified in the above.

### **3. Retention periods**

We keep your personal data as long as there is a statutory or legal requirement to do so

or in order to provide the aforementioned services to you. For accounting or auditing purposes we may retain your personal data for a period of time after our direct business dealings have ended

#### **4. Data storage and transfer**

In addition, in connection with the Services, we may share your personal data with our group companies and other companies within or outside the EEA (for instance, delivery companies that carry out baggage delivery in relation to the Services, service providers, system operation companies).

Where a company is located outside the EEA, we will arrange adequate safeguards such as Binding Corporate Rules or Standard Contract Clause arrangement or transfer your personal data based on appropriate legal basis.

Regarding your personal data that is shared with or transferred to and held by the delivery company who carries out baggage delivery in relation to the Services, , such delivery company is the person who processes such your personal data independently and separately from us, and the terms and conditions of such delivery company as well as its privacy policy shall be applied to such your personal data (that is, our Privacy Policy and our this Privacy Notice shall not be applied to such your personal data). Thus, such delivery company is responsible and we are not responsible for managing and otherwise processing such your personal data.

#### **5. Prior consent**

Where we require access to your Personal Data that GDPR considers Sensitive, we will seek separate explicit consent from you prior to obtaining that data.

#### **6. Your rights**

You have the right to request access to your personal data that we hold, to have it corrected or deleted, and to object to processing of your personal data. For more information about your rights, please see our Privacy Policy.

Online link to Privacy Policy: [https://www.jtbcorp.jp/en/privacy/pi\\_gdpr.asp](https://www.jtbcorp.jp/en/privacy/pi_gdpr.asp)

If you require assistance or further information about how your personal data is used by us then contact our Data Protection Team via email: [private@jtb.com](mailto:private@jtb.com)

If you are not completely satisfied with how personal data request was handled then you may contact your local Data Protection Supervisory Authority.