

Security Policy

Security Policy

Japan Pet Hotel Association Co., Ltd. (3F, 3-9-23 Uchiyama, Chikusa-ku, Nagoya, Aichi Prefecture; Representative Director: Katsuaki Kito; hereinafter referred to as the “Company”) recognizes the importance of protecting personal information and strives to protect customer privacy in compliance with the Act on the Protection of Personal Information (hereinafter referred to as the “Act”) and this Security Policy.

1. Definition of Personal Information

In this Security Policy, “personal information” means information relating to an individual customer that can identify the individual customer, such as the customer’s name, address, telephone number, and other identifying information. This also includes information that can identify an individual when cross-referenced with other information.

2. Handling of Personal Information

The Company shall properly manage and protect personal information obtained from customers through the Company’s website (hereinafter referred to as the “Website”) as follows.

(1) Acquisition of Personal Information

The personal information acquired by the Company includes the following:

Name, telephone number, email address, workplace, area of residence (including optional items).

(2) Use of Personal Information

The Company shall use customers’ personal information for the following purposes. If the Company intends to use personal information beyond the scope reasonably recognized as related to the following purposes, the Company shall obtain the customer’s consent in advance by appropriate means.

- (i) To contact customers from the Website, provide information, and respond to inquiries.
- (ii) To provide information regarding the Company’s services, new services, questionnaires, campaigns, or advertisements (including sending email newsletters and direct mail).
- (iii) To improve the Company’s services and develop new services.
- (iv) To investigate and analyze Website usage history and utilize the results for improving and developing services or distributing advertisements.
- (v) To provide information to third parties as stipulated in “4. Disclosure and Provision to Third Parties.”
- (vi) To fulfill the Company’s obligations to customers or exercise the Company’s rights.
- (vii) To verify the identity of customers.

3. Management and Protection of Personal Information

The Company shall strictly manage personal information and endeavor to implement security measures such as appointing a person responsible for handling personal information, establishing reporting and communication systems in the event of leakage incidents, and restricting access by persons other than employees handling personal information, in order to prevent leakage, falsification, loss, or other incidents involving personal information obtained from customers. The Company shall also implement lawful and reasonable safety measures to protect information.

4. Disclosure and Provision to Third Parties

The Company shall not provide personal information to third parties except in the following cases:

- (i) When a customer makes an inquiry or application to a business operator registered on the Website using Website services, and the Company provides the customer's personal information to such business operator for the purpose of providing services to the customer and fulfilling contracts (including proposals and information provision leading to contract conclusion).
- (ii) When the customer has given prior consent.
- (iii) When outsourcing within the scope necessary to achieve the purpose of use.
- (iv) When providing statistical data in a form that does not identify individual customers.
- (v) When disclosure is required by laws and regulations.
- (vi) When necessary to protect human life, body, or property, and obtaining customer consent is difficult.
- (vii) When permitted or required by Article 27 or other laws and regulations.
- (viii) When personal information is provided in connection with business succession due to merger or other reasons, and handled within the scope of the purpose of use before succession.

When the Company provides personal information to foreign third parties, the Company shall obtain the customer's consent in advance. However, this shall not apply where the foreign country is recognized by the Personal Information Protection Commission as having a system for the protection of personal information equivalent to that of Japan, or where the third party has established a system complying with standards prescribed by the Personal Information Protection Commission Rules regarding the handling of personal data.

5. Disclosure, Correction, etc. of Personal Information

If a customer requests any of the following, the Company shall respond within a reasonable period and scope after confirming the identity of the customer and the existence of the reason for the request.

- (i) Disclosure of personal information or records of provision of personal information to third parties.

The Company shall disclose such information by providing electromagnetic records or written

documents within a reasonable period in accordance with laws and regulations. However, the Company may choose not to disclose all or part of the information in the following cases:

- When disclosure may harm the life, body, property, or other rights and interests of the customer or a third party.
- When disclosure may significantly interfere with the proper execution of the Company's business.
- When disclosure would violate other laws and regulations.

(ii) Correction, addition, or deletion of personal information when the customer claims that the information is inaccurate.

The Company shall promptly respond after conducting an investigation in accordance with the procedures prescribed by the Company.

(iii) Suspension of use or deletion of personal information when grounds specified by laws and regulations exist.

The Company shall suspend use or delete the information in accordance with laws and regulations and notify the customer accordingly. However, if suspension or deletion requires excessive costs or is otherwise difficult, and alternative measures necessary to protect the customer's rights and interests can be taken, the Company shall take such alternative measures.

(iv) Suspension of provision of personal information to third parties when the customer claims that the information is being provided without consent in violation of Article 27, Paragraph 1 or Article 28 of the Act.

The Company shall suspend provision to third parties only when there are reasonable grounds for the request in accordance with laws and regulations and shall notify the customer accordingly. However, the Company may not comply with requests regarding personal information retained in accordance with laws and regulations.

6. Use of Statistical Data

The Company may process and aggregate personal information provided by customers into statistical data that cannot identify individuals and cannot be restored to personal information. The Company may use such statistical data and data analyzed, processed, or derived therefrom without restriction and may provide such data to third parties.

7. Pseudonymized Processed Information

When the Company creates or acquires information processed so that specific individuals cannot be identified from the processed data alone by deleting or replacing information capable of identifying specific individuals from personal information provided by customers (hereinafter referred to as "Pseudonymized Processed Information"), the Company shall comply with applicable laws, national guidelines, and other standards regarding the handling of such information and shall take safety management measures equivalent to those for personal information.

The Company shall use Pseudonymized Processed Information for the following purposes and shall not use it for other purposes or provide it to third parties except as permitted by laws and regulations.

Purposes of Use of Pseudonymized Processed Information:

- Responding to customer inquiries
- Providing information and communications regarding the Company's services
- Research and analysis of the Company's services
- Conducting customer questionnaires and surveys

8. Handling of Cookies

The Company may use browsing history, search history, location information, access analysis data, cookies, and other related personal information obtained by the Company or received from affiliate sites, data analysis tool providers, advertising distributors, or other business partners (hereinafter referred to as "Partners") after linking such information with customers' personal information held by the Company.

The Company may also provide Partners with related personal information such as Website visit and behavior history, location information, access analysis data, and cookies collected by Partners after linking such information with information obtained by the Company, such as whether the customer is registered with the Company or has purchased specific products or services. However, where customer consent is required by law for such linking, the Company shall perform such linking only when the customer has consented to this Security Policy in accordance with the Act and related guidelines.

9. Outsourcing of Personal Information Handling Operations

The Company may outsource all or part of the handling of personal information to external parties within the scope necessary to achieve the purposes of use. In such cases, the Company shall provide necessary and appropriate supervision to the contractors.

10. Improvement of Personal Information Handling

The Company shall continuously improve its personal information protection initiatives by periodically confirming, auditing, and reviewing whether such initiatives are properly implemented.

11. Inquiries Regarding Personal Information

For requests and inquiries regarding disclosure, correction, suspension of use, or other matters relating to personal information, please contact the Company directly through the inquiry form.

12. Governing Law and Jurisdiction

This Security Policy shall be governed by the laws of Japan, and any and all disputes between the Company and customers regarding this Security Policy shall be subject to the exclusive jurisdiction of the Tokyo District Court or the Tokyo Summary Court.