

Global Privacy Policy

This Global Privacy Policy is established by Cosmos Initia Co., Ltd. (hereinafter referred to as the “Company”), located at 5-34-6 Shiba, Minato-ku, Tokyo, regarding “UCHIWA STAY” and other facilities operated by the Company (hereinafter referred to as “Company Facilities”) and stipulates the methods of processing personal services operated by the Company (collectively referred to as the “Service.” Note that the Services include the website related to the Service (hereinafter referred to as the “Company Website”) and inquiries related to the Service.). The Company complies with applicable personal information protection laws in each country and processes customers’ personal information as described below. Please note that the laws and regulations of the region where the customer resides or is located may impose restrictions on the Company’s methods of processing personal information that are more stringent than the contents of this Global Privacy Policy. In the event of a conflict between this Global Privacy Policy and the laws of the region where the customer resides or is located, the latter shall take precedence.

1. Categories of personal information subject to processing

The Company processes the following types of customer personal information.

- Registration information (customer’s name, username, email address, password, date of birth, age, gender, nationality, country of residence, address, phone number, occupation, passport number, date of entry into the country)
- Information related to accommodation and purchases (information regarding customer reservations and use of Company Facilities, information regarding the purchase and use of products and services offered at Company Facilities, payment information, footage from security cameras showing the customer, recordings of phone calls received from the customer, and other personal information obtained by the Company in relation to the Service (if required by applicable laws, we will obtain this information after notifying the customer separately))
- Customer survey responses (customer interests and preferences, number of visits to Japan, purpose of travel, and other personal information obtained from surveys conducted by the Company)
- Cookies and other online identifiers of customers who have accessed the Company Website (access tokens and refresh tokens of customers who have used the Service, IP addresses of customers who have accessed the Company Website, provider information, information on the device and web browser used, user behavior (visit duration, viewing time, frequency, transitions, sources of referrals, clicks within the site, page scrolling within the site), and demographics (age, gender, interest categories, affinity categories, segments with strong purchase intentions, etc. For detailed information on interest categories, affinity categories, and segments with strong purchase

intent, please see here ([About Demographics and Interests – Analytics Help \(google.com\)](#)).

- Contact information (the name, email address, inquiry item, and inquiry content of customers who have contacted the Company)
- Inferred information (information inferred about customer preferences and interests from personal information about the customer)
- Information obtained through integration with external services (information provided by the customer through social media and other third-party services the customer is registered with that the customer has consented to provide to the Company)
- In addition to the above information, the Company may collect information that the customer voluntarily provides to us when using the Service.

2. Purpose of collection and other processing

The Company processes customer personal information for the following purposes.

- To provide, operate, manage, and improve accommodation, travel, and other services at Company Facilities
- To contact customers regarding the provision of products and services, such as reservation confirmations for Company Facilities and the Service
- To provide customers with products or services from the Company and its group companies (including accommodation services at our facilities) and to bill for those services
- To provide customers with information regarding the review of products, operational services, equipment, etc., from the Company and its group companies
- To conduct sales promotion activities such as sending newsletters and emails and mailing direct mail to customers, and to distribute advertising for the Company or other companies (including analyzing customers' usage history of the Service and user behavior on the Company Website to deliver newsletters and emails, direct mail promotions, marketing communications on social media, and advertising, etc. tailored to customer interests and preferences)
- To operate the Company and its group companies, improve products and services, as well as plan, research, and develop new products and services
- To conduct analysis for promotional activities, market research, market understanding, and market forecasting
- To conduct surveys
- To send prizes and samples in response to entries into contests, surveys, etc.
- To protect and improve the services provided through the Company Website and mobile site
- To conduct buying, selling, leasing, planning, development, management, proposal, reporting, and appraisal of real estate by the Company and its group companies
- To detect and prevent fraud, respond to emergencies and incidents, and ensure the safety and

security of staff, customers, visitors, and others

- To respond to various inquiries, opinions, and requests, and to contact customers
- To provide to third parties in the manner described in this Global Privacy Policy
- For the purposes of use notified or published separately to customers in accordance with the Personal Information Protection Act
- For other purposes permitted by applicable laws and regulations

3. Legal basis for processing, etc.

The Company processes customer personal information in accordance with applicable personal information protection regulations.

The provision of customer personal information may be required for reasons such as being a statutory requirement, a contractual requirement, or a necessary condition for entering into a contract.

4. Retention period of personal information

The Company will consider the amount, nature, and confidentiality of the personal information, the potential risks of harm from unauthorized use or disclosure of the personal information, the purposes for which the Company will process the personal information, whether those purposes can be achieved by other means, and applicable legal requirements in determining the appropriate retention period for personal information. When personal information the Company has collected is no longer needed, the Company will delete or anonymize that personal information, or if that is not possible (for example, if the personal information is stored in a backup archive), the Company will securely store customer personal information until deletion becomes possible, and thereafter ensure that no further processing of the personal information occurs.

5. Sources of personal information acquisition

The Company will obtain customer personal information from the following sources.

- Directly from the customer or automatically through cookies and other online identifiers.
- The Company may obtain it from businesses authorized by customers, such as referrers, intermediary businesses, and partners.
- By linking the IDs of external services such as social media customers use, we may obtain customer personal information from the providers of those external services.
- The Company will indirectly obtain analysis and demographic information about customers who access the Company Website from website usage analysis service providers such as Google LLC.
- The Company may infer customer preferences and interests from the personal information we have obtained.

6. Sharing and disclosure of personal information

The Company will share or disclose your personal information to third parties in the following cases, and when it has obtained your consent, or in other cases permitted by applicable personal information protection laws in each country.

Sharing with processors (service providers)

- External contractors related to reservation management and accommodation services of Company Facilities, such as WeIns Co., Ltd. and Hosty inc.
- Providers of Company Website usage analysis services, such as Google LLC.
- Cloud service providers, such as Google LLC and Salesforce, Inc.
- Other contractors of the Company

Compliance with laws and regulations, etc.

In accordance with laws in the customer's country of residence or abroad, and/or requests from public institutions and government authorities, the Company may be required to disclose customer personal information to these institutions and authorities. In addition, the Company may disclose customer personal information if the Company believes disclosure is necessary or appropriate to comply with the law or to address other publicly important issues. The Company may also disclose customer personal information if it is reasonably necessary to protect its rights, pursue available remedies, enforce Company terms of service, investigate fraud, or protect Company operations or customers.

Others

Additionally, the Company may share customer personal information with third parties in the following cases.

- If personal information is shared in connection with the sale, merger, acquisition, reorganization, or transfer of all or part of our assets (including as part of bankruptcy proceedings)
- If it is necessary to protect the life, body, or property of the Company or a third party, and it is difficult to obtain customer consent
- In cases where the customer has given consent
- In other cases permitted by applicable laws and regulations

7. Transfer of personal information overseas

As a result of the above sharing and disclosure, your personal information may be transferred to the following countries.

United States, Canada, Argentina, Antigua and Barbuda, Uruguay, Ecuador, El Salvador, Guyana, Cuba, Guatemala, Grenada, Costa Rica, Colombia, Jamaica, Singapore, Suriname, Saint Vincent and the Grenadines, Saint Kitts and Nevis, Saint Lucia, Taiwan, Chile, Germany, Dominica, Dominican Republic, Trinidad and Tobago, Nicaragua, Haiti, Panama, Bahamas, Paraguay, Barbados, Brazil,

Venezuela, Belize, Peru, Bolivia, Honduras, Mexico

In such cases, the Company will implement appropriate protective measures as required by the personal information protection regulations of each country.

8. Security management measures

The Company will take necessary and appropriate measures to prevent the leakage, loss, or damage of customer personal information. Additionally, when handling personal information abroad, the Company will take necessary and appropriate measures for the safe management of personal data, based on an understanding of the external environment, including the personal information protection systems of the relevant foreign country.

Furthermore, when outsourcing part of the personal information handling operations to a subcontractor, the Company will select subcontractors recognized for properly handling personal information, and in the outsourcing contract, the Company will stipulate necessary matters to prevent the leakage of customer personal information, such as management of personal information, confidentiality, and prohibition of re-provision, while ensuring appropriate management and supervision.

9. Cookies and similar technologies

When a customer accesses the Company Website and the customer has enabled cookies (including tracking technologies such as Flash cookies and web beacons, and other technologies, hereinafter referred to as “cookies”), the Company may automatically collect information about the PC, mobile device, tablet, or other information communication devices the customer used. When the Company collects this information, it will treat it as personal information. If you do not wish to use cookies, you can disable them by changing your web browser settings.

About analytical cookies

The Company may cooperate with third parties that collect data regarding customer use of the Company Website over the long term. For example, we may use Google Analytics for analysis and marketing purposes.

Google Analytics collects information about customers using cookies and other technologies. For information on how Google Analytics collects and uses information when customers use the Company Website, please see here (www.google.com/policies/privacy/partners).

Customers who wish to stop using Google Analytics should visit here (tools.google.com/dlpage/gaoptout).

10. Links to third-party websites, etc.

The Service may provide customers with links to third-party websites or apps. The Company does not manage how those websites or apps handle personal information, and those websites or apps are not

subject to this Global Privacy Policy. Customers should check the privacy policies of other websites and apps they use and understand how those websites or apps handle personal information.

11. Customer rights

The Company respects the rights that customers have under applicable personal information protection regulations. Customers can request the disclosure, correction, addition, deletion, suspension, erasure, or cessation of third-party provision of personal information, as well as the disclosure of records of third-party provision, in accordance with the procedures established by the Company based on Japan's Personal Information Protection Act. In addition, customers may be granted rights under the applicable personal information protection regulations of each country. If you wish to exercise your rights, please contact us at the contact information listed in Article 13 (Contact Information) of this Global Privacy Policy, stating the following items (1) to (5) as "Inquiry Items."

[Inquiry Items]

(1) Email address, (2) Name, (3) Address, (4) Phone number, (5) Inquiry details: (* Please provide the relevant items below)

Cancellation of email newsletter, email distribution, and direct mail delivery

- I wish to make corrections (including changes and additions) to the customer information held by the company
- I wish to request notification of the purpose of use of the customer information held by the company
- I wish to request deletion of the customer information held by the company
- Other details

12. Personal information of children

The Company will take necessary measures regarding the personal information of children in accordance with applicable laws and regulations.

13. Contact information

For questions, complaints, or other inquiries regarding our handling of personal information and this Global Privacy Policy, please contact the Company using the details below.

Cosmos Initia Co., Ltd.

E-mail: box-uchiwastay-sys@ci.cigr.co.jp

For the Company's address and the name of our President, please refer to [Corporate Profile](#). Please note that depending on the content of your inquiry, the Company may ask you to follow separate

procedures for identity verification as specified by the Company.

14. About SSL communication

The transmission of personal information between customers and the internet on the Company Website uses SSL (Secure Sockets Layer) encrypted communication. If you are using a browser that does not support SSL, you may not be able to access SSL secure pages or input information.

15. Changes to this Global Privacy Policy

In the event that the Company makes changes to this Global Privacy Policy, it may change or make additions to all or part of the Policy and notify customers through a notice on the Company Website, via email, or by other method that the Company deems appropriate (if a method is required by applicable laws, we will comply with that method.). If there are required procedures under other applicable personal information protection regulations, we will follow those procedures.

We recommend that you visit this page regularly to check for updates. You can find out when this Global Privacy Policy was last updated by checking the “Last Updated” date.

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