

CCPA Privacy Policy

Date last updated: August 01, 2023

This Privacy Policy intends to inform you about how JTB Global Marketing & Travel Inc. (“we”, “our” or, “us”) collects and uses your Personal Information (as defined below) that you provide or disclose to us, where the California Consumer Privacy Act (“CCPA”) applies to such collection or use, and what your rights and our obligations are in relation to the processing of your Personal Information in accordance with the CCPA. For the purpose of this Privacy Policy, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

1. Categories and Purposes of Your Collected Personal Information

The following is a list of categories of Personal Information as listed in the CCPA which we have collected within the preceding 12 months, and the business or commercial purposes for which such Personal Information was collected:

Category

Personal Information Collected

Identifiers, such as

- | | |
|----------|---|
| Category | <ul style="list-style-type: none">• Name |
| A | <ul style="list-style-type: none">• E-mail• Phone number• Physical address• Passport information |

Personal information, as defined in the California customer records law, such as

Category

- | | |
|---|--|
| B | <ul style="list-style-type: none">• Name• Gender• E-mail |
|---|--|

Category	Personal Information Collected
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- Phone number
- Physical address
- Passport information
- Credit card number
- Mileage plan number
- Date of birth
- Allergy information

Characteristics of protected classifications under California or federal law, such as

- | | |
|---------------|--|
| Category
C | <ul style="list-style-type: none"> • Gender • Date of birth • Allergy information |
|---------------|--|

Commercial information, such as

- | | |
|---------------|--|
| Category
D | <ul style="list-style-type: none"> • Purchasing history |
|---------------|--|

Category E	We do not collect any biometric information.
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Internet or network activity information, such as

- | | |
|---------------|--|
| Category
F | <ul style="list-style-type: none"> • Cookie |
|---------------|--|

Category G	We do not collect any geolocation data.
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Category H	We do not collect any audio, electronic, visual and similar information.
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Category I	We do not collect any professional or employment-related information.
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Category J	We do not collect any education information subject to the federal Family Educational Rights and Privacy Act.
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Category**Personal Information Collected**

Category K We do not collect any inferences drawn from any of Personal Information listed above to create profile / summary about, for example, an individual's preferences and characteristics.

The following is the Business or Commercial Purposes of why we collect the personal data for Categories A, B, C, D and F:

For the purpose of operating and arranging travel services, we

1. Make accommodation or hotel services
2. Make ground transportation arrangements
3. Make air arrangements
4. Make restaurant arrangement or other food arrangements
5. Make other related services arrangement
6. Consider, enter into or perform contracts or other relationship
7. Respond to queries or requirements only for Group Tours with the option to make separate payments, (i.e. deposit and a final payment) the credit card used to make the deposit is kept on file to process the remainder of the payment at a later date

For the performance of its commercial agreements and to facilitate travel, hospitality, meetings and events, we

1. Manage travel, transportation and hospitality reservations and bookings
2. Manage meetings and events reservations and bookings
3. Provide meeting badges, stationary, catering and audio-visual services
4. Provide quality assurance and training
5. Manage corporate client relationships, account administration and reconciliation, and corporate client invoicing
6. Communicate travel information including itineraries, safety alerts and fare optimization, and related help desk support
7. Communicate satisfaction surveys
8. Communicate information on JTB products and services as well as process information for internal aggregated statistics on market and corporate client account analysis and business forecasting

2. Sources of Personal Information

For Personal Information collected under Categories A, B, C, D and F, we collect such information directly from data subject when the data subject makes travel arrangements for themselves, or from our business partners and clients when the event/travel is arranged and booked by a company on behalf of the employees.

3. Disclosure of Personal Information

We have disclosed the following categories of Personal Information as listed in the CCPA to third parties for our operational business purposes within the preceding 12 months, and we have disclosed these categories of Personal Information to the following business entities:

Categories A, B, C, D and F

- Tour operators
- Hotels
- Restaurants
- Airlines
- Railroad companies
- Other transportation services
- Tour guides
- Online payment service provider

4. Sales of Personal Information

We have not sold any personal information in the preceding twelve (12) months.

5. Your Rights and Requests

If you are a California resident, you have the following rights under the CCPA:

I. Request to disclose to you the following information covering the 12 months preceding your request:

- (I) The categories of Personal Information we collected about you;
- (II) The categories of sources from which we collected such Personal Information;

- (III) The business or commercial purpose(s) for collecting such Personal Information about you;
- (IV) The categories of third parties with whom we shared such Personal Information; and
- (V) The specific pieces of Personal Information we have collected about you.

II. Request to delete Personal Information we collected from you

III. Non-Discrimination for the exercise of the rights under the CCPA

To make a request for the disclosure or deletion described I. and II. above, please contact us by using the following means:

Telephone Number: +81-3-5796-5400

E-mail address: private@gmt.jtb.jp

When we receive your request to know or delete, we will contact you with instructions for verification. Depending on the sensitivity of the information, we will either ask you two or three pieces of information to match against our records.

If you use an authorized agent to submit a request to know or a request to delete described I. and II. above, you may specify your agent by providing the authorized agent written permission to do so.

6. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. The “Date last updated” mentioned at the top of this page states when this Privacy Policy was last updated and any changes will become effective upon our posting the revised Privacy Policy.

Where required by CCPA or other applicable law, we will request your consent to any such changes. We will provide the revised Privacy Policy by email or by posting notice of the changes on our website or through any relevant services.

7. Contact Us

If you have any questions or concerns regarding this Privacy Policy or our privacy practices, please contact us at:

JTB Global Marketing & Travel Inc.

4F, 2-3-14, Higashi-Shinagawa, Shinagawa-ku, Tokyo, Japan

Telephone Number: +81-3-5796-5400

E-mail address: private@gmt.jtb.jp