

Privacy policy

Sekisui House Hotel Management, Ltd.

Established September 1, 2025

Privacy policy

1. Basic Policy

Sekisui House Hotel Management, Ltd. (hereinafter referred to as "the Company") acquires, holds, and uses personal information related to our business. We recognize that protecting and appropriately handling such information is the minimum social responsibility required to maintain the reliability and trust of our customers, which are the foundation of our business activities. We will comply with the Act on the Protection of Personal Information (hereinafter referred to as the "Act on the Protection of Personal Information") and other related laws, regulations and guidelines, and strive to appropriately manage and protect the handling of personal information by all stakeholders (customers, recruiters, partner business operators, those who have provided us with personal information through websites, etc.).

2. What is personal information?

Personal Information in this Privacy Policy shall mean such information concerning a living individual that can identify a specific individual based on the name, date of birth, and other descriptions contained in such information and that falls under the category of "Personal Information" defined in Paragraph 1 of Article 2 of the Personal Information Protection Law. In this Privacy Policy, personal data constitutes a database that can easily retrieve specific personal information and falls under the category of "personal data" defined in Paragraph 3 of Article 16 of the Personal Information Protection Law.

3. Collection of Personal Information

Personal information shall be acquired through legal and fair means to the extent necessary to achieve the purpose of use. Prior to acquiring personal information, we will clearly indicate the purpose of use by publishing it on our website or giving notice to the employee. Provided, however, that in the event the purpose of use is clear from the circumstances at the time of provision or where otherwise permitted by laws and regulations, the clarification of the purpose of use may be omitted.

4. Intended use of personal information

We will use the obtained personal information only within the scope of the following purposes of use. In addition, I will not use personal information in a manner that encourages or threatens to induce illegal or unfair acts.

(1) Personal information of customers

① Personal information to be acquired

Name, age, sex, date of birth, occupation, address, telephone number, e-mail address, nationality, passport number, and other information required within the scope of the following purposes:

② Purpose of Use

<1> In order to fulfill the duties necessary for the provision of services and products in our business.

- <2> In order to provide services and products, including online reservations and sales, as well as to respond incidentally to them.
- <3> To respond to inquiries, requests for documents, etc.
- <4> To notify necessary information concerning our products, services, and events and to notify necessary information concerning our business activities.
- <5> To provide information on our products, services, and events to those who have received permission to distribute via e-mail, etc.
- <6> For the implementation of sweepstakes, campaigns, questionnaires, etc.
- <7> For the purpose of analyzing the status of use of our products, services and events and improving their quality.
- <8> To exercise rights and fulfill obligations under laws and regulations and accommodation contract provisions.
- <9> In addition, for the purpose of use clearly indicated at the time of acquisition of personal information.

(2) Personal information of applicants for employment

① Personal information to be acquired

Necessary information, such as name, age, sex, date of birth, address, telephone number, and e-mail address, within the scope of the following purposes of use:

② Purpose of Use

- <1> To fulfill the contract concerning the recruitment screening and the procedures for employment, and to perform other necessary duties.
- <2> To respond to inquiries, requests for documents, etc.
- <3> In addition, for the purpose of use clearly indicated at the time of acquisition of personal information.

(3) Personal information of partner companies

① Personal information to be acquired

Business card information and other information related to partner business operators that is necessary within the scope of the following purposes of use.

② Purpose of Use

- <1> To conclude and perform contracts with partner business operators and to perform other necessary duties.
- <2> To respond to inquiries, requests for documents, etc.
- <3> In addition, for the purpose of use clearly indicated at the time of acquisition of personal information.

In addition, in order to provide such information to third parties in order to achieve the purposes of use listed in (1) to (3) above.

5.Provision of personal information to third party

In principle, we will not provide personal information to any third party without obtaining your consent. Provided, however, that in addition to cases based on the provisions of laws and regulations, personal data acquired may be provided to the Group companies

and third parties, such as outsourcees, to the extent necessary to achieve the goals set forth in (1) to (3) above in the "Purpose of Use of Personal Information."

In addition, we may acquire or retain personal information (personal information stipulated in the Act on the Protection of Personal Information) such as the history of browsing the website. If we provide such information to a third party, we will handle it in an appropriate manner in accordance with relevant laws and regulations.

6.Measures for Safe Management of Personal Information

With regard to personal information, in addition to general crime measures, we will appropriately grasp the status of systems related to the protection of personal information at home and abroad. We will implement necessary and appropriate safety measures to protect personal information from leakage, loss, or damage in terms of the organizational structure, such as the establishment of rules for the handling of personal information, the assignment of persons responsible for management, and the development of a reporting and communication system; personnel management, such as the implementation of employee education; physical management, such as the management of access control and the use of devices; measures to prevent unauthorized access using networks; and information and communications technology, such as firewalls.

In the event personal information is provided to an outsourcee as necessary through outsourcing of business operations, the outsourcee shall be obliged to protect personal information under our supervision after confirming in advance that the safety management measures of the outsourcee are appropriate. In the event of the protection of personal information, the outsourcee shall be directly responsible for management. Upon completion of the outsourced operations, the provided personal information shall be safely collected or deleted at an appropriate time.

When managing and using personal data, we shall prepare and preserve necessary records, such as when providing personal data to a third party or receiving provision from a third party, in accordance with applicable laws and regulations. We shall also endeavor to keep personal data accurate and up-to-date to the extent necessary to achieve the purpose of use, and to erase personal data without delay when the need for use is eliminated.

In the event that we are aware of the leakage, loss, or damage of personal information, or any risk thereof, we will take necessary measures, such as investigating and investigating the facts, identifying the scope of impact, considering and implementing preventive measures, reporting to the Personal Information Protection Committee, and notifying the Individual Concerned, in accordance with applicable laws and regulations, depending on the event and situation.

7.Requests for Personal Information

The Customer of Personal Information possessed by the Company may request that the Personal Data related to the Personal Information be disclosed, corrected, added or deleted, eliminated, or discontinued from being provided to a third party as set forth in the Personal Information Protection Law, and request that the Record of Provision to a Third Party be disclosed through the following request or inquiry address. Provided, however, that the applicable personal data shall be limited to those that fall under the category

of "retained personal data" under the Personal Information Protection Law, except for such information that we are not authorized to respond to such information, such as information on deposit, and those that are not required to respond to such information by laws and regulations. If we cannot respond to your request, we will explain the reason.

Please note that in the event of a request, the Company will cooperate with the Company in implementing the necessary procedures, such as the verification procedures for the identity of the applicant, and in identifying and extracting the retained personal data. In addition, it will take a certain period of time to respond to the request and prepare and provide an explanation, and in some cases, the Company will request the Company to pay a reasonable fee in consideration of the actual cost.

We will also respond appropriately and promptly to complaints about the handling of personal information (including complaints related to the above claims). If you have any complaints, please contact the following contact persons for inquiries.

8. Billing/inquiries

Human Resources and General Affairs Department, Sekisui House Hotel Management, Ltd.

〒531-6112 Umeda Sky Building Tower West, 1-1-30, Oyodonaka, Kita-ku, Osaka

Telephone Number :06-6743-4580