

# Privacy Policy

Aizu-bandai snow resort alliance(hereinafter collectively, "Alliance" or "we" .), acknowledging that it is an important social responsibility of the Alliance to protect and appropriately use information relating to individuals provided by our customers and business partners (hereinafter the "Customer(s)" or "you") (such information, as set forth in Article 1 (Information We Collect), will be called the "Personal Information"), establishes and faithfully implements its Privacy Policy (hereinafter "this Policy").

## 1. Information We Collect

### 1.) Personal Information provided by the Customers and Travel agents:

Personal Information to be collected by the Alliance includes names, addresses, telephone numbers, e-mail addresses, birth dates, gender, nationality, passport, visa information, marketing preferences, other information that the Customers input on the entry form provided by the Alliance, or Alliance's staff members input at the instruction of the Customers, information about the Customers' previous transaction with us including dates of arrival and departure, goods and services purchased or utilized at our plans, personal preferences information which the Alliance learns about during the Customer's stay, information that the Customers provide the Alliance for using the Alliance's service, information that the Customers provide travel agents (e.g., travel agents, group travel organizers, the Customer's employer, credit card companies, and airline operators, involved in making the Customer's travel arrangements, hereinafter collectively, the "travel agents"), upon reservations, information of credit card number or other payment methods and information that is indispensable for the provision of services or transactions.

### 2.) Information collected by the Alliance from the Customers' visit to the Alliance's websites:

The Alliance may collect information on the occasion of a visit to its websites including:

Device information;

Log information;

Cookies and anonymous ID; and

IP address and device identification information."

### 3.) Sensitive Information

To the extent any of the categories of information we collect are sensitive categories of information under applicable law, we process such information only for the limited purposes permitted by applicable law. We do not sell or use sensitive categories of information for purposes of targeted advertising or to make inferences.

※“targeted advertising” is the display of advertising that you are interested in on the Company’s websites, other websites, or web services.”

## 2. Purposes of Use of Personal Information

The Alliance collects the Personal Information since the Personal Information is required for the Alliance’s legitimate interests (as detailed below), for the performance of legal obligations that the Alliance is subject to or for fulfilling contractual obligations to the travel agents.

The Alliance’s legitimate interests include:

1.) To contact the Customers for the confirmation of a reservation or similar purposes;

2.) To provide the Customers with a service, product or information;

3.) To process payments;

4.) To conduct marketing activities that fall under the following;

(a) Distribution of targeted advertising through ad distributors such as Google and Yahoo. (\*1, and \*3)

(b) Provision of advertising and information on products, services, campaigns, etc., through information letters, emails, etc, based on the analysis of attribute information and activity history acquired by the Alliance in order to understand the hobbies and tastes of the Customers (\* 2)

(c) Other matters which shall be treated pursuant to items (a) through (b).

(\* 1)The Alliance’s websites uses cookies to make your experience more convenient. For more information about how the Company handles cookies, see in article 6 (Cookies and other similar related technologies).

(\* 2)The Alliance’s websites uses Google Analytics, a service provided by, Google-owned to track the Customers’ visits to the websites. When the Customers visit the websites, we collect, record, and analyze the history of the Customers’ visits to the Alliance’s websites based on cookies issued by the Alliance. The Alliance receives the results of the analysis from Google to track the Customers’ visits to the Alliance websites. The Customers can stop Google Analytics from collecting information about you by disabling it in your browser’s add-on settings. For more information about the Google Analytics, please visit the Google Analytics Terms of Service website, and for more information about Google’s privacy policy, please visit the Google’s Privacy Policy website. To disable Google Analytics, visit the Google Analytics opt-out add-on website.

**【Google Analytics Terms of Service】**

<https://marketingplatform.google.com/about/analytics/terms/us/>

**【Google’s Privacy Policy】**

<https://policies.google.com/privacy?hl=en>

**【Google Analytics opt-out add-on】**

<https://tools.google.com/dlpage/gaoptout?hl=en>

(\* 3) The Alliance's websites may hash ("hash" means the process that generates a value from a string of text taking measures prescribed by laws and regulations and makes it impossible to restore the personal information.) the email address provided by the Customers and may send the hashed email address to Google. Please visit the Google's opt-out site below to disable advertising.

**【Google optout】**

[https://support.google.com/My-Ad-Center-](https://support.google.com/My-Ad-Center-Help/answer/12155764?hl=en&visit_id=638471226864490912-662105129&rd=1&sjid=16503022507909407840-AP)

[Help/answer/12155764?hl=en&visit\\_id=638471226864490912-](https://support.google.com/My-Ad-Center-Help/answer/12155764?hl=en&visit_id=638471226864490912-662105129&rd=1&sjid=16503022507909407840-AP)

[662105129&rd=1&sjid=16503022507909407840-AP](https://support.google.com/My-Ad-Center-Help/answer/12155764?hl=en&visit_id=638471226864490912-662105129&rd=1&sjid=16503022507909407840-AP)

- 5.) To make an analysis for improvement of services or products;
- 6.) To send a questionnaire for further improvement of the Alliance's service;
- 7.) To request compliance with the terms of use for services provided through the Alliance's websites or mobile sites;
- 8.) To protect services provided through the Alliance's websites or mobile sites, or the Customers;
- 9.) To verify the Alliance's identity if the Customers make requests regarding the Personal Information pursuant to this Policy;
- 10.) To meet legal obligations the Alliance is required to subject, which includes Japanese law and laws of the area that the Alliance's hotels are located;
- 11.) To manage events of prize, drawings or other promotions;
- 12.) To fulfill contractual obligations to the travel agents;
- 13.) To engage in targeted advertising.

We work with agencies, ad networks, technology providers, and other third parties to place advertising about our products and services on other websites and services. For example, we place advertising through Google that you may view on their platforms as well as on other websites and services. As part of this process, we incorporate tracking technologies into our own Service as well as into our advertising displayed on other websites and services. Some of these tracking technologies may track your activities over time and

across non-affiliated services and obtain or infer information about you for purposes of targeted advertising.

14. ) For purposes separately notified or announced to the Customer; and

15. ) To administer record keeping.

### 3. How We Collect the Personal Information

The Alliance collects the Personal Information in the following methods:

1.) Directly from the Customers: Regarding the information as described in Article 1 (Information We Collect) (1), the Alliance may collect the Personal Information when the Customers book a reservation, use the Alliance's plans, create an account, answer a questionnaire, apply for a prize or a prize draw, contact customer service, or apply for the Alliance's service

2.) From the Customers' devices and the Alliance's networks: Regarding the information as described in Article 1 (Information We Collect) (2), the Alliance may collect the Personal Information automatically through cookies and related technologies from the Customers' devices when the Customers view the Alliance's websites or other websites and services.

3.) From other businesses when they operate as our service providers: To offer more comfortable services, the Alliance may collect the Personal Information by using other company's services. The Alliance may also receive the Personal Information from (i) the Customer's travel agents, (ii) the Customer's travel provider, such as an airline, or (iii) credit card companies used by the Customers, when such parties are operating as the Alliance's service providers.

4.) From social media: If the Customers voluntarily apply for or participate in activities or services which the Alliance host on a social media, the Alliance may receive contact and identification information, stay and purchase information, internet and network activity, and any other personal information contained in the Customer's social media posts or profiles.

### 4. How We Handle the Personal Information

1.) We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect the Personal Information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of the Personal Information.

2.) The Alliance will manage the Personal Information appropriately in accordance with applicable laws.

#### 5. Disclosure of the Personal Information

1.) The Alliance may disclose the Personal Information to service providers in order to improve the quality of the Alliance's services, for the convenience of the Customers, and for other permitted business purposes. In this case, the Alliance will instruct and supervise the service provider to ensure appropriate management of the Personal Information. To the extent required by laws, the Alliance will contractually prohibit its service providers from processing the Personal Information they collect on the Alliance's behalf for purposes other than performing services for the Alliance, although the Alliance may permit them to use non-personal information, including de-identified or anonymized information, for any purpose to the extent permitted by applicable laws.

2.) Some of the third parties we work with to perform services act as our service providers in some contexts, but in other contexts independently control the purposes and means of processing your information. For example, we disclose the Personal Information to ad networks, technology providers, and other third parties that help us provide targeted advertising, but they may also use your information for their own purposes. For these third parties, including service providers and other relevant technology providers we work with to perform targeted advertising, we encourage you to familiarize yourself with and consult their policies and terms of use.

3.) The Alliance will not disclose or provide the Personal Information to any third party (which does not include Shared Users as described in Article 7 (Shared Use)) except for the following cases:

- ① If the Customer consents to the disclosure or provision;
- ② If the disclosure or provision is required under the laws and regulations;
- ③ If the disclosure or provision is necessary to protect human life, body or property, and it is difficult to obtain the Customer's consent;
- ④ If the disclosure or provision is specifically necessary for the improvement of public health or the promotion of the sound development of children, and it is difficult to obtain the Customer's consent;
- ⑤ If the Company is required to cooperate with a national government organ, local government or person entrusted thereby in performing business prescribed in legislation, and obtaining the consent of the person may impede the performance of such business;
- ⑥ If the Personal Information is disclosed or provided to an outside contractor to the extent necessary for providing services to the Customers; or
- ⑦ If the Company transfers the Personal Information or the right of management of the Personal Information as a part of the transfer of assets in connection with a corporate reorganization such as a

business transfer.

## 6. Cookies and Other Similar Technologies

1.) The Alliane uses cookies and related technologies on the Alliane's websites to allow the Alliance to evaluate and improve the functionality of the websites. These cookies and related technologies also allow the Alliance, advertising networks, social media companies, and other providers, to place advertisements and customized content. With respect to use of cookies for advertising, the Customer can find different methods of managing the Customer's cookies preferences by referring to user instructions of the Customer's own internet browser including blocking certain cookies by adjusting the settings on the Customer's Internet browser. A cookie preference set by the Customer is unique to the websites, devices, and browsers, and it will be deleted if the Customer clears the cache in the browser. If the Customers block cookies, the Customers will not be able to use a part of the features of the Alliance's websites.

2.) If the Customers visit the Alliane's websites and make an activities reservation, the Customers may be redirected to websites maintained by third parties. In this case, the Alliane's responsibility is limited to its own websites except some particular websites. The Alliane will not be responsible for personal information collection practices or privacy policies of other websites maintained by third parties where the Customers submit its personal information directly. The Alliane recommends that the Customers review the privacy and security policies of such websites before access and provide any personal information.

## 7. Shared Use

The Alliane may share the Personal Information as follows:

1.) Items of the Personal Information shared : the items in "Article 1 (Information We Collect).

2.) Scope of users of sharing : Aizu-bandai snow resort alliance

3.) Purposes of sharing: the purposes in "Article 2 (Purposes of Use of Personal Information).

4.) Name of the corporation responsible for the management of shared use:

Aizu-bandai snow resort alliance

Chairman Junichi Sato"

## 8. Compliance with Laws and Regulations

The Alliance will comply with laws, regulations and applicable guidelines on personal information aimed at

protecting the Personal Information.

#### 9. International Transfers

Because the Allianace is based in Japan, if the Customers access the Allianace's websites from outside Japan, the Personal Information may be transferred to, stored, and processed in Japan and other countries where the Allianace's servers are located and its central database is operated. The Allianace will endeavor to take reasonable steps to ensure that the Personal Information is protected, but the data protection and other laws of Japan and other countries might not be as comprehensive as those in the Customer's country.

#### 10. Choice

The Customers may always choose what the Personal Information the Customers wish to provide to the Allianace and receive (or deny) communications from the Allianace. However, if the Customers choose not to provide the Personal Information, some services of the Allianace may not be available. The Allianace may contact the Customers for introducing services and events which the Allianace thinks the Customers are interested in. The Customers may always choose not to receive any or all of these communications or wish to update the way the Allianace communicates the Customer by contacting the Allianace as described below in Article 14 (Contact Information). For California residents, to opt out of sales or shares (as those terms are defined by applicable law) or the processing of the Personal Information for targeted advertising purposes, as permitted under your jurisdiction, please refer to the jurisdiction-specific sections below.

#### 11. Retention Period

The Allianace will retain the Personal Information for the period necessary to fulfill the purposes listed in this Policy according to the criteria as described below:

- 1.) If the Allianace has an ongoing relationship with the Customers and provide the services to the Customers (for example, as long as the Customers have accounts with the Allianace or keep using the Allianace's services);
- 2.) If there is a legal obligation to which the Allianace is subject; or
- 3.) If the Allianace determines that retention is advisable considering the Allianace's legal position (such as, for statutes of limitations, litigation or regulatory investigations).

#### 12. Minor Children

The Allianace does not sell products or provide services to children under the age of 18 and the Allianace does not knowingly collect the Personal Information (as that term is defined by the U.S. Children's Privacy

Protection Act, or “COPPA” in this Article.) from children under the age of 18. If you are a parent or guardian and believe we have collected the Personal Information from children under the age of 18, please contact us as described below in Article 14 (Contact Information). We will delete the Personal Information in accordance with COPPA.

#### 13. Respect for the Rights of Customers

The Allianace will respect the rights of the Customers, and if disclosure, correction, restriction, deletion of the Personal Information, the right to data portability or object to processing is exercised, the Allianace will verify the identity of the applicant and accommodate such request to the extent reasonable and necessary. If the Customers have agreed to provide the Personal Information to the Allianace, the Customers also have the right to withdraw its consent at any time by contacting us as described below in Article 14 (Contact Information).

#### 14. Contact Information

"Please click “Contact Us” or contact us by any of the following means if you have any opinions, questions, inquiries, complaints about this Policy and handling of the Personal Information or if you would like to submit a request under the applicable law to exercise your rights in relation to the Personal Information that we maintain about you.

- by mail

Personal Information Management Officer, Aizu-bandai snow resort alliance

Mailing address: 1-1 Ekimaemachi, Aizuwakamatsu-shi, Fukushima-ken 965-0041 Japan"

#### 15. Revision of Privacy Policy

The Allianace may review and, if necessary, modify this Policy from time to time. If the Allianace modifies this Policy, the Allianace shall take appropriate measures, such as posting the modified policy on the Allianace’s websites. If the revisions are material, the Allianace may provide you additional notice to your email.

Last Updated: August 10, 2024