# **Privacy Policy**

#### 1. Introduction

Toyoko Inn Co., Ltd. and Toyoko Inn Korea Co., Ltd. (hereinafter collectively referred to as "we" or "us") have established and hereby publish the following privacy policy (hereinafter referred to as "this Policy") pursuant to Article 30 of the Personal Information Protection Act in order to protect and properly manage customers' personal information and to respond promptly and smoothly to any related complaints or inquiries.

# 2. Purpose of use, items and retention period of personal information

We collect and use customers' personal information only for the following purposes. If we change the purpose or items of use, we will take necessary measures such as obtaining separate consent from our customers pursuant to Article 18 of the Personal Information Protection Act.

We will collect the following personal information through our online web/app services in managing our customers' reservations and web accounts and operating the Toyoko INN Club Card membership service, and when our customers make reservations for accommodation and ancillary services, register membership and use our facilities.

Classification	Purpose of collection and	Item	Period of retention
	use		
Booking and provision of accommodation and ancillary services	<ul> <li>Acceptance and management of reservations</li> <li>Provision of food and beverages, and parking</li> <li>Sales of goods</li> </ul>	Residential address, name, gender, date of birth, nationality, e-mail address, phone number, facsimile number, and postal address Passport number, visa and other government-issued identification information Credit card No. and bank account information Vehicle number	From the start of the reservation until the service is completed.
Web membership account	<ul> <li>Account creation and management</li> <li>Identity verification</li> </ul>	Residential address, name, gender, date of birth, nationality, e-mail address, phone number, and postal address Accommodation history, facility usage, usage history of various plans, and product purchase status	From account creation to its deletion.
Subscription and use of individual membership services, complaint handling, and satisfaction survey	<ul> <li>Provision of Toyoko INN Club Card membership services</li> <li>Responding to requests from data subjects to</li> </ul>	Common items Residential address, name, gender, date of birth, nationality, passport number, e-	From account creation to its deletion.

		D 1114	
	view, correct,	Facial photo	
	delete, or suspend		
	the processing of		
	their personal	Name, date of birth, nationality,	
	information	e-mail address and telephone	
	<ul><li>Customer</li></ul>	number of the statutory agent if	
	satisfaction survey	the member is under 14 years of	
	and quality	age	
	assurance survey		
		Toyoko INN Club Card	
		membership account	
		Passport number, visa and other	
		government-issued	
		identification information	
		<b>Corporate</b> business	
		membership account	
		Occupation, work information	
		(company name, office address,	
		telephone number, department,	
		and position)	
Service	<ul><li>Conducting</li></ul>	Residential address, name,	From account
improvement	questionnaires	gender, nationality, e-mail	creation to 1
	<ul><li>Understanding</li></ul>	address, and phone number	month after its
	information on	address, and phone number	deletion
			(anonymized to
	the usage of services		ensure that the
	(accommodation		individual cannot
	`		be identified and
	history, facility		
	usage, usage		the information is
	history of various		rendered un-
	plans, and		restorable)
	product purchase		
	status)		
Use in marketing	• Provision of	,	From account
and advertising	information on	gender, date of birth,	creation to its
	new services, new	nationality, e-mail address, and	deletion.
	products and	phone number	
	events;		
	conducting		
	campaigns;		
	sending email		
	magazines; and		
	distributing and		
	sending targeted		
	advertisements		
	• Use of each		
	customer's usage		
	data		
	Market research		
	- Maiket research		

Website management	•	Development, improvement and optimization of websites Provision of personalized services	Service usage, access logs, and access IP information	3 years
Safety management of facilities	•	Identification of suspicious objects and persons	Appearance and behavior information obtained via CCTV	1 month

Notwithstanding the above retention period, customers' personal information will be stored in accordance with the following if we are obliged to do so under the provisions of the Commercial Act or other relevant laws and regulations. We will use such personal information only for the purpose of preserving it.

- (1) Information concerning important documents and slips related to the company's commercial ledger and business: 10 years for important documents and 5 years for slips (Commercial Act)
- (2) Information on books and relevant documents concerning all transactions: 5 years (Framework Act On National Taxes, Corporate Tax Act )
- (3) Records relating to contracts or the revocation of subscriptions; records relating to payment and the supply of goods, etc.: 5 years (Act On The Consumer Protection In Electronic Commerce)
- (4) Records relating to consumer complaints or dispute resolution: 3 years (Act On The Consumer Protection In Electronic Commerce)
- (5) Books and tax forms or receipts: 5 years (Value-added Tax Act)

Customers may refuse to allow us to collect and use the personal information described above. However, if customers refuse to do so, customers may not be able to use the services provided by us, such as membership registration or room reservation services.

# 3. Procedures and methods for destruction of personal information

Unless we are obligated to retain the personal information under other laws and regulations, when the personal information becomes unnecessary for reasons such as expiration of the retention period or achievement of the purpose of processing the personal information, such personal information will be destroyed without delay or anonymized to ensure that individuals cannot be identified and the information is rendered un-restorable.

Personal information recorded and stored in electronic file format is disposed of to ensure that it cannot be reproduced, and personal information recorded and stored in paper documents is disposed of by shredding or incineration.

# 4. Outsourcing of personal information processing

We outsource the processing of customers' personal information to external service providers as follows.

When outsourcing, pursuant to Article 26 of the Personal Information Protection Act, we will specify, in service agreements, clauses on the prohibition of handling personal information for purposes other than the performance of the outsourced operations, implementation of technical and administrative protection measures, restriction on sub-

outsourcing by the outsourcing contractor, management and supervision of the outsourcing contractor, and liability for damage, etc., and we will supervise the outsourcing contractor to ensure that personal information is processed securely.

Name of the outsourcing contractor	Details of the outsourced operations	Name of the sub-outsourcing
		contractor, if any
Amazon Web Services, Inc.	Storing data using AWS	-
Google Inc.	Collection and analysis of website	-
	browsing history	
Toyoko INN IT Solution Co., Ltd.	Support for the entire Toyoko Inn	-
	Group reservation system and	
	maintenance of IT infrastructure	
Microsoft Corporation	Conducting campaigns	-

# 5. Provision of personal information to third party

We will provide and share customers' personal information with third parties, as follows. We and our affiliates will properly manage and protect customers' personal information in accordance with applicable laws.

# Recipients

- Toyoko Inn Development Co., Ltd.
- Toyoko Inn International Limited (Japan Branch)
- Hotel Syoutoku Co., Ltd.
- Toyoko Inn Jr. Co., Ltd.
- Toyoko Inn Hospital Inn Dokkyo Medical University Co., Ltd.
- Hospital Inn Planning & Development Co., Ltd.
- Shotoku Building Planning Co., Ltd.
- PHILIPPINE TOYOKO INN INC.
- Mongolia Toyoko Inn LLC

The purposes of use, items to be provided, and retention period and use period of personal information by these recipients are as follows.

Classification	Purpose of use	Items of personal information to be provided	Retention period and use period by the recipient
Booking and provision of accommodation and ancillary services	<ul> <li>Acceptance and management of reservations</li> <li>Provision of food and beverages, and parking</li> <li>Sales of goods</li> </ul>	Residential address, name, gender, date of birth, nationality, e-mail address, phone number, facsimile number, and postal address Passport number, visa and other government-issued identification information Credit card No. and bank	From the start of the reservation until the service is completed.

		account information	
		Vehicle number	
Web membership account	<ul> <li>Account creation and management</li> <li>Identity verification</li> </ul>	Residential address, name, gender, date of birth, nationality, e-mail address, phone number, and postal address Accommodation history, facility usage, usage history of various plans, and product purchase status	From account creation to its deletion.
Subscription and use of individual membership services, complaint handling, and satisfaction survey	<ul> <li>Provision of Toyoko INN Club Card membership services</li> <li>Responding to requests from data subjects to view, correct, delete, or suspend the processing of their personal information</li> <li>Customer satisfaction survey and quality assurance survey</li> </ul>	Common items Residential address, name, gender, date of birth, nationality, passport number, e-mail address, phone number, facsimile number, and postal address Facial photo  Statutory agent information Name, date of birth, nationality, e-mail address and telephone number of the statutory agent if the member is under 14 years of age  Toyoko INN Club Card membership account Passport number, visa and other government-issued identification information  Corporate business	From account creation to its deletion.
		membership account Occupation, work information (company name, office address, telephone number, department, and position)	
Service improvement	<ul> <li>Conducting questionnaires</li> <li>Understanding information on the usage of services (accommodation history, facility usage, usage history of various plans, and</li> </ul>	Residential address, name, gender, nationality, e-mail address, and phone number	From account creation to 1 month after its deletion (anonymized to ensure that the individual cannot be identified and the information is rendered unrestorable)

	product purchase status)		
Use in marketing and advertising	<ul> <li>Provision of information on new services, new products and events; conducting campaigns; sending email magazines; and distributing and sending targeted advertisements</li> <li>Use of each customer's usage data</li> <li>Market research</li> </ul>	gender, date of birth, nationality, e-mail address, and	From account creation to its deletion.

Customers may refuse to allow the provision of the above personal information to third parties. However, if customers refuse to do so, customers may not be able to use the services provided by such providers.

# 6. Measures to ensure the security of personal information

We take the following technical and administrative measures to ensure the security of our customers' personal information in order to prevent it from being lost, stolen, leaked, falsified or damaged, etc.

#### (1) Technical measures

- (i) Personal information that is required to be encrypted by law, such as customers' unique identification information and credit card numbers, is encrypted and stored in a database so that it cannot be used if customers' personal information is leaked due to an external intrusion.
- (ii) For sections where customer information is entered and transmitted, such as membership registration and login through the website, we take encryption measures to securely transmit customer information through encrypted communication such as SSL.
- (iii) We will deploy security solutions and apply database access control and screen capture prevention solutions as needed to securely manage customer information through the installation of antivirus programs, regular updates and regular inspections of personal information processing systems. In addition, we have introduced intrusion interception and detection systems in preparation for external intrusions such as hacking.

#### (2) Administrative measures

- (i) In order to securely manage personal information, we have established Regulations on Personal Information Management internally and have established and operate a personal information management system.
- (ii) We regularly conduct personal information protection training for those who handle customers' personal information to ensure that they thoroughly understand the importance of customer information and manage

it safely. We also ensure that permissions are set and managed to minimize unnecessary access to and leakage of customers' personal information.

# 7. Matters concerning installation, operation, and refusal of automatic collection of personal information

(1) We may use "Cookies" to store and retrieve usage information from time to time in order to provide personalized services to customers in their capacity as users.

A Cookie is a mechanism for temporarily storing data, such as usage history and entry content created when browsing a website using a browser, on the hard disk of a customer's PC.

(i) Purpose of use of Cookies

We use Cookies to provide customers with optimized information by identifying the type of visit and usage status for each service and website they visit and whether they have a secure connection. Customers have the right to choose whether or not to install Cookies. Therefore, by setting options on their web browser, customers can either accept all Cookies, confirm each time they are stored, or refuse to store all Cookies.

(ii) How to reject Cookie settings

By selecting an option in the web browser used by customers, customers can allow all Cookies, confirm each time a Cookie is stored, or refuse to store all Cookies.

**\*** How to set Cookies

Microsoft Edge: Select Settings > Cookies and Site Permissions > How to Configure at the top of your web browser.

Google Chrome: Choose Settings > Privacy & Security > How to set cookies and other site data at the top of your web browser.

- (2) We use Google Analytics, provided by Google, to understand how our services are used and to improve the convenience of our services.
  - (i) Purpose of use of Google Analytics

Google Analytics uses Cookies, etc. to collect and analyze browsing history in a form that does not include information that identifies specific individuals, and we receive the results of the analysis. Knowing how customers use our services allows us to use such information to develop and improve our services.

(ii) How to reject information processing by Google Analytics

The processing of information by Google Analytics can be rejected by changing the browser add-on settings from the following Google Analytics opt-out add-on. Please note that information collected by Google Analytics is managed in accordance with Google's Privacy Policy.

Google Analytics Terms of Service

http://www.google.com/analytics/terms/kr.html

Google Privacy & Terms

http://www.google.com/intl/ko/policies/privacy/

Google Analytics Opt-out Browser Add-on

https://tools.google.com/dlpage/gaoptout?hl=ko

How Google uses information from sites or apps that use Google services

https://policies.google.com/technologies/partner-sites?hi=ko

Customers may also opt-out of the advertising features of Google Analytics by configuring options in their web browser or mobile device.

#### **%** How to set Cookies

Google Chrome: Settings > Google Account Management > Data & Privacy > Ad Settings > Disable Ad Customization.

Android: Settings > Privacy > Ad Opt-Out > Ad Customization.

iOS: Settings > Privacy > Apple Ads > Personalized Ads.

Microsoft Edge: Click on "..." in the top right corner of the browser > Extensions > Manage Extensions > Turn on Google Analytics Opt-out Add-on (by Google).

#### 8. Matters concerning collection, use, provision and refusal of behavioral information

#### (1) Processing of behavioral information

In the course of customers' use of our services, we collect and use behavioral information to provide data subjects with optimized and customized services and benefits, as well as personalized online advertising. When collecting behavioral information, we only collect the minimum behavioral information necessary for online customized advertising, and do not collect sensitive behavioral information such as thoughts, beliefs, family information, educational background, medical history, or other social activity history that could clearly violate an individual's rights or interests or privacy.

- (2) How to deny (standard method is described. The setting procedure may vary depending on the version of the app or browser)
  - (i) Mobile apps

Mobile apps collect and use advertising identifiers for personalized ads online. Customers may block personalized ads in their app by changing the settings on their mobile device.

\* Setting procedure (depending on your mobile OS version, the menus and methods may vary slightly)

Android: Settings > Privacy > Advertising > Ad ID Reset or Ad ID Removal.

iPhone: Settings > Privacy > Tracking > turn off "Allow apps to make tracking requests."

#### (ii) Web browser

Customers may block customized ads online by changing their web browser's Cookie settings. Please note that changing these Cookie settings may affect the use of certain services, such as automatic website login.

#### ※ How to set Cookies

Microsoft Edge: Click on "..." in the top right corner and choose Settings > Privacy, Search, Services > Prevention of Tracking section, choose "Always use "strict" tracking protection when browsing in InPrivate" in the privacy section, choose Send Do Not Track Request.

Google Chrome: Click on ":" in the top right, choose Settings > Privacy & Security > choose "Block Third Party Cookies."

Safari: Settings > Privacy tab > turn off Tracking by Website.

# 9. Rights and obligations of customers and statutory agents and method of exercising rights

Customers and statutory agents (if the customer is a child under the age of 14) may contact us at any time to withdraw consent to the collection and use of personal information and to exercise rights such as requesting access to, correction of, deletion, or suspension of the processing of personal information.

If we receive such a request or customers exercise such rights, we will respond without delay after going through the identity verification process.

- (1) Method of requesting and exercising rights
  - Customers may do so by accessing our website or by contacting our Personal Information Protection Officer in writing, by phone, or by email, etc.

#### (2) Our response

- (i) In accordance with customers' rights, we verify that the person requesting the access, correction, deletion, or suspension of processing is the principal or an authorized agent of the principal.
- (ii) Requests to view or suspend the processing of personal information may be restricted under Paragraph 4, Article 35 and Paragraph 2, Article 37 of the Personal Information Protection Act.
- (iii) Customers cannot request personal information subject to collection under other laws and regulations to be corrected or deleted.
- (iv) If we are requested by customers to correct an error in their personal information, the customer's uncorrected personal information will be used until the correction is completed. If we have already provided such personal information to a third party at the time of correction, we will notify such third party without delay and correct the error.
- (v) When customers or their statutory agents revoke consent to the processing of personal information, we will destroy the relevant personal information without delay, but if we are required to retain such information under applicable laws and regulations, we will take measures to ensure that it is handled in accordance with this Policy "2. Purpose of Use, Items and Retention Period of Personal Information," and only available for viewing and use to the extent necessary.

# 10. Remedies for infringement of customers' rights and interests

Customers may contact the following organizations for damage remedies and consultation regarding personal information breaches.

- Personal Information Infringement Reporting Center (operated by the Korea Internet Information Agency)
  - · Description of services: Reporting and consultation on personal information infringement
  - · Website privacy.kisa.or.kr
  - · Phone: 118 (no area code)
- Personal Information Dispute Mediation Committee
  - Duties in charge: Petitions for personal information dispute mediation, group dispute mediation (civil resolution)
  - Website www.kopico.go.kr

· Phone:(no area code) 1833-6972

Supreme Prosecutors' Office: 1301 (www.spo.go.kr)

• National Police Agency: 182 (ecrm.cyber.go.kr)

Personal Information Protection Commission of Japan

· Description of services: Reporting and consultation on personal information infringement

· Website https://www.ppc.go.jp

· Phone: +81 3-6457-9849

# 11. Personal Information Protection Manager (inquiries)

We have designated our Personal Information Protection Manager and Officer who are responsible for ensuring our proper processing of personal information.

Personal Information Protection Manager: Masatoshi Abe

Customers may make inquiries to the above Personal Information Protection Manager or the following Personal Information Protection Officer regarding questions, complaints, infringement remedies and the exercise of rights as a data subject with respect to the customers' personal information processed by us. We will respond to and process your inquiry without delay.

Personal Information Protection Officer: Na Eunjo

Contact: privacy@toyoko-inn.com

## 12. International transfer of personal information

We will transfer customers' personal information outside of Korea as follows.

We will notify customers and obtain their consent if there are any changes to the below details.

(1) Transfer to Toyoko Inn Co., Ltd.

Personal Information Protection Manager: Masatoshi Abe

Personal Information Protection Officer: Na Eunjo

Contact: privacy@toyoko-inn.com

The purpose of use, items to be transferred, and processing period by the transferee are as follows.

Classification		Purpose of use		Items to be transferred	Processing period
Booking and	•	Acceptance	and	Residential address, name, gender, date	From the start of the
provision of		management	of	of birth, nationality, e-mail address,	reservation until the
accommodation		reservations		phone number, facsimile number, and	service is completed.
and ancillary	•	Provision of food and postal address		postal address	
services		beverages,	and	Passport number, visa and other	
		parking		government-issued identification	
	•	Sales of goods		information	
				Credit card No. and bank account	

		information	
Web membership account	<ul> <li>Account creation and management</li> <li>Identity verification</li> </ul>	Vehicle number  Residential address, name, gender, date of birth, nationality, e-mail address, phone number, and postal address  Accommodation history, facility usage, usage history of various plans, and product purchase status	From account creation to its deletion.
Subscription and use of individual membership services, complaint handling, and satisfaction survey	<ul> <li>Provision of Toyoko INN Club Card membership services</li> <li>Responding to requests from data subjects to view, correct, delete, or suspend the processing of their personal information</li> <li>Customer satisfaction survey and quality assurance survey</li> </ul>	Common items Residential address, name, gender, date of birth, nationality, passport number, e-mail address, phone number, facsimile number, and postal address Facial photo  Statutory agent information Name, date of birth, nationality, e-mail address and telephone number of the statutory agent if the member is under 14 years of age  Toyoko INN Club Card membership account Passport number, visa and other government-issued identification information  Corporate business membership account Occupation, work information (company name, office address, telephone number, department, and	From account creation to its deletion.
Service improvement	<ul> <li>Conducting questionnaires</li> <li>Understanding information on the usage of services (accommodation history, facility usage, usage history of various plans, and product purchase status)</li> </ul>	position)  Residential address, name, gender, nationality, e-mail address, and phone number	From account creation to 1 month after its deletion (anonymized to ensure that the individual cannot be identified and the information is rendered unrestorable)
Use in marketing and advertising	<ul> <li>Provision of information on new services, new products and events; conducting campaigns; sending email magazines; and distributing and sending targeted advertisements</li> <li>Use of each customer's usage data</li> <li>Market research</li> </ul>	Residential address, name, gender, date of birth, nationality, e-mail address, and phone number	From account creation to its deletion.

Website	•	Development,		Service usage, access logs, and access	3 years
management		improvement	and	IP information	
		optimization	of		
		websites			
	•	Provision	of		
		personalized ser	vices		

# (2) Transfers to our group companies

The transferee is as follows.

The transferee	Country to	Timing and method of transfer
	which data is	
	transferred	
Toyoko Inn Development Co., Ltd.	Japan	Data sharing when Toyoko Inn
Toyoko Inn International Limited (Japan Branch)	Japan	Co., Ltd. acquires data.
Hotel Syoutoku Co., Ltd.	Japan	
Toyoko Inn Jr. Co., Ltd.	Japan	
Toyoko Inn Hospital Inn Dokkyo Medical University Co.,	Japan	
Ltd.		
Hospital Inn Planning & Development Co., Ltd.	Japan	
Shotoku Building Planning Co., Ltd.	Japan	
PHILIPPINE TOYOKO INN INC.	The Philippines	
Mongolia Toyoko Inn LLC	Mongolia	

The contact information of the above is as follows. Personal Information Protection Manager: Masatoshi Abe

Personal Information Protection Officer: Na Eunjo

Contact: privacy@toyoko-inn.com

The items to be transferred, purpose of use and processing period by these transferees are as follows.

Classification	Items to be transferred	Purpose of use	Processing period
Booking and provision of accommodation and ancillary services	Residential address, name, gender, date of birth, nationality, e-mail address, phone number, facsimile number, and postal address  Passport number, visa and other government-issued identification information  Credit card No. and bank account information  Vehicle number	<ul> <li>Acceptance and management of reservations</li> <li>Provision of food and beverages, and parking</li> <li>Sales of goods</li> </ul>	From the start of the reservation until the service is completed.
Web membership account	Residential address, name, gender, date of birth, nationality, e-mail address, phone number, and postal address Accommodation history, facility usage, usage history of various plans, and product purchase status	<ul> <li>Account creation and management</li> <li>Identity verification</li> </ul>	From account creation to its deletion.
Subscription and use of individual	Common items Residential address, name, gender, date of birth, nationality, passport number, e-mail	<ul> <li>Provision of Toyoko INN Club Card membership services</li> </ul>	From account creation to its deletion.

membership	address, phone number, facsimile number,	Responding to requests
services,	and postal address	from data subjects to
complaint	Facial photo	view, correct, delete, or
handling, and	-	suspend the processing
satisfaction	Statutory agent information	of their personal
survey	Name, date of birth, nationality, e-mail	information
	address and telephone number of the	<ul><li>Customer satisfaction</li></ul>
	statutory agent if the member is under 14	survey and quality
	years of age	assurance survey
	Toyoko INN Club Card membership	
	account	
	Passport number, visa and other	
	government-issued identification	
	information	
	Corporate business membership account	
	Occupation, work information (company	
	name, office address, telephone number,	
	department, and position)	

# (3) Transfer to our service provider

The transferee and contact	Country to	Date and	Items to be	Purpose of use	Processing
information	which	timing and	transferred		period
	data is	method of			_
	transferred	transfer			
Amazon Web Services, Inc.	EU	Data transfer		Provision and	From
https://d1.awsstatic.com/legal/	Japan	through	Residential	performance	account
privacypolicy/AWS_Privacy_		information	address, name,	of AWS	creation to
Notice_Korean_2023-09-22.p		networks as	gender, date of	services	its
df		needed	birth, nationality,		termination.
			e-mail address,		
			phone number,		
			facsimile number,		
			and postal address		
			Passport number		
			and visa, as well		
			as other		
			government-		
			issued		
			identification		
			information,		
			credit card		
			number, bank		
			account		
			information,		
			vehicle number,		
			accommodation		
			history, facility		
			use, usage history		
			of various plans,		
			product purchase		
			status, facial		
			photo, Toyoko		
			INN Club Card		

			membership account, corporate business membership account Occupation, work		
			information (company name, office address, telephone number, department, and position)		
Google Inc. https://policies.google.com/pri vacy?hl=ko	United States	Data transfer through information networks as needed	Information obtained from Cookies, etc., including browsing history	Understanding the usage status of our services Improving the convenience of our services	From analysis of browsing history until we receive the results thereof.
Microsoft Corporation https://privacy.microsoft.com/j a-jp/privacystatement#mainho wtocontactusmodule	United States	Data transfer through information networks as needed	Residential address, name, gender, e-mail address, and phone number	Conducting campaigns	From the start until the completion of campaigns.

Customers may refuse to allow any such personal information to be transferred outside of their country. However, if customers refuse to allow personal information to be transferred outside of their country, customers will not be able to use the services provided by us.

# 13. Change in Privacy Policy

Before changing this Policy, we will announce the content of the change, the reason for the change, and the effective date and time of the changed policy on our website.