Announcement on Handling of Personal Information

The JTB Communication Design, Inc. (hereinafter, "the Company" or "we") will announce the following matters pursuant to Article 27 "Public Disclosure etc. on Matters relating to Retained Personal Data" of the Act on the Protection of Personal Information, and JISQ15001:2006 3.4.4.3 "Dissemination of matters on personal information subject to disclosure."

*However, the Company shall disclose the following matters as the "personal information subject to disclosure" (*1), regardless of any length of retention period, without considering the condition for exemption "data other than those set to be deleted within a period of no longer than one year (six months) that is prescribed by cabinet order" as defined as "retained personal data" in Article 2 of the Personal Information Protection Act.

(1*) "Personal information subject to disclosure" refers to

a collective body of information systematically organized so as to allow easy search for a specific individual which the Company has the authority to respond to request from the principal to notify the purpose of use of, disclose, correct, add or delete the contents of, cease the use of or erase, or cease providing to a third party.

1. Name of Business Operator

JTB Communication Design, Inc.

2. Name or Title, Division/Dept. and Contact of the Privacy Officer (or His/her Representative)

Division/Dept.: Personal Information Help Desk, JTB Communication Design, Inc. E mail: <u>p-mark@jtbcom.co.jp</u> / Phone: 03-5657-0600

3. Purpose of Use of Personal Information

Category	Purpose of use	Disclosure category
(1) Purpose of use in the case of directly obtaining personal information stated on the documents, etc. (including those on the website, by email, etc.; hereinafter		
"documents") from t		
Information	To operate various event operations, e.g., soliciting	Disclosable
handled in	participants and providing information, confirming	
various event	applications, registering participation, sending various	
businesses, etc.	materials, documents, etc. and contacting, preparing	
	participants list, settling registration fee and exhibit fee,	
	confirming and introducing speakers, confirming and	
	contacting posters/contributors/comment submitters, and	
	visa procedures for events, conventions, training businesses,	
	etc. organized by the Company	
	To provide information regarding various events, services,	
	seminars, etc. continuously organized by the Company	
Information	To operate IT and marketing solution services provided by	Disclosable
handled in	the Company, provide related after-sales services, send and	
providing IT and	provide various information related to service provision or	
marketing	products	
solution services		
Information	To carry out translation services such as the delivery, check	Disclosable
handled in	or the like of deliverables	
translation		
services		
Information	To confirm the delivery destinations and manage rental	Disclosable

handled in rental services of	equipment such as video, sound, light equipment, and telecommunication equipment	
equipment, etc.		
Talent fan club	To operate fan clubs and manage members thereof such as	Disclosab
member information	providing information on the relevant talent	
Information	To collect data, administer questionnaire survey, analyze,	Disclosab
concerning	prepare statistical materials or the like of opinions,	
survey such as	intention, etc. about various services and programs (events,	
various	seminars, courses, training, etc.) conducted by the Company	
questionnaire	(In conducting analysis, statistics, etc., the Company will use	
independently	personal information after processing it in a form that would prevent	
administered by	identification of individuals. Data after processing will not be	
the Company	disclosed.)	
Shareholder	To disclose information, send handouts, and make contact	Disclosab
information		
Business partner	For making contacts in the course of sales negotiation and	Disclosab
information	business, operation of receiving/placing orders, billing and	
	payment operations	
Registered staff	For registered staff management such as job placement and	Disclosab
information	payroll accounting	
Employee	For the personnel and labor management, business	Disclosab
information	management, and health management of employees, and	
	security control	
Specified	For the purpose of use stipulated in the Act on the Use of	Disclosab
personal	Numbers to Identify a Specific Individual in Administrative	
information	Procedures (hereinafter referred to as the "Individual	
	Numbers Act") such as tax affairs, social security, or disaster	
	response	
Personal	To contact applicants for employment and manage the	Disclosab
information	Company's recruitment operations	
concerning		
applicants for		
employment		
Purpose of use in the	e case of directly obtaining personal information other than in	
writing from the prin		
Audio, video, etc.	To prepare various records, e.g., materials attached to	Non-
of participants	reports, materials for retention, press release concerning	disclosab
and visitors at	academic conference, events, seminars, etc.	
the venues of		
academic		
conference,		
events,		
seminars, etc.		
Footage taken by	To ensure safety of visitors, etc. and security and	Non-
surveillance	maintenance of facilities	disclosab
cameras in		
relation to		
events and		
facilities		
operation		

Personal	<information as<="" businesses="" entrusted="" handled="" in="" such="" th="" the=""><th>Non-</th></information>	Non-
information	various event operations>	disclosable
entrusted in	To carry out the entrusted businesses of operation of event	
relation to	operations, e.g., soliciting participants, providing	
undertaking the	information, conforming applications, registering	
entrustment of	participation, sending various materials, documents, etc.	
business	and contacting, preparing participants list, settling	
	registration fee and exhibit fee, confirming and introducing	
	speakers, confirming and contacting	
	posters/contributors/comment submitters, and visa	
	procedures for entrusted events, conventions, training	
	businesses, etc.	
	<information businesses="" entrusted="" handled="" in="" of<="" td="" the=""><td>Non-</td></information>	Non-
	advertising and promotion businesses>	disclosable
	To carry out entrusted businesses, e.g., consigned	
	advertising and promotion activities, promotion events,	
	prizes, and campaigns	
	<information as="" businesses="" entrusted="" handled="" in="" such="" td="" the<=""><td>Non-</td></information>	Non-
	operation of various examinations and tests>	disclosable
	To carry out the entrusted businesses of operations, e.g.,	
	providing information on application and accepting	
	applications for taking various examinations and tests,	
	managing examinees, scoring test results, pass/fail	
	judgement, sending pass/fail notices, etc. and management	
	of those who passed	
	<information club="" fan="" handled="" in="" on="" operations="" td="" their<=""><td>Non-</td></information>	Non-
	behalf>	disclosable
	To carry out the entrusted businesses of operation, e.g., fan	
	club operation and member management such as providing	
	information on the relevant talent	
Information	To provide services for organization members	Non-
received from	To provide school commuting notification information e-mail	disclosable
corporations that	delivery services	uiseiosasi
use IT and		
marketing		
solution services		
provided by the		
Company		
Information	To conduct training for MSQ (Motivation of Status Quo)	Non-
handled in MSQ	individuals and organizations analysis operations and the	disclosable
(Motivation of	utilization of the results thereof, mutual communication,	uisciosabi
Status Quo)	<i>Manejin</i> (motivation and management diagnosis) analysis	
Status Quo/	and mutual communication of the results thereof	
Terformention of		Disalasahl
Information of	To contact applicants for employment and manage the	Disclosabl
applicants for	Company's recruitment operations	
employment		
obtained via		
recruiting		
companies		

In the case of directly receiving personal information stated in documents, we will clearly specify the purpose of use each time, except in the following cases:

(1) if informing the principal of or publicly announcing the purpose of use would harm the life, body, property or any other rights and interests of the principal or a third party;

(2) if informing the principal of or publicly announcing the purpose of use would harm the rights or legitimate

interests of the Company;

- (3) in the case where there is a need to cooperate in regard to a central government organization or a local government performing affairs prescribed by laws and regulations, if informing the principal of or publicly announcing the purpose of use would interfere with the performance of the such affairs; or
- (4) if the purpose of use is found to be clear in light of the circumstances of the acquisition.

4. Provision of Personal Information to Third Parties

We will not furnish your personal information to any third party except in the following cases:

- (1) if the principal has agreed to such provision;
- (2) if it is based on laws and regulations;
- (3) in the case where such provision is needed to protect a human life, body or property, and if it is difficult to obtain the consent of the principal;
- (4) in the case where such provision is especially needed to enhance public hygiene or promote fostering healthy children, and if it is difficult to obtain the consent of the principal;
- (5) in the case where there is a need to cooperate in regard to a central government organization or a local government, or a person entrusted by them performing affairs prescribed by laws and regulations, and if obtaining the consent of the principal would interfere with the performance of the said affairs; or
- (6) in the case of entrusting whole or part of the handling of personal information within the scope necessary to achieve the purpose of use in order to smoothly perform affairs.

5. Sharing of Personal Information

We will share your personal data in our possession within a minimum scope necessary for contacting you, e.g., name, address, telephone number or email address, with the group companies listed below:

Such group companies may use the same at each responsibility to provide sales information of each company, simplify your application procedures, provide information of the details of events, products, services, campaigns, benefits services, etc. or ship products purchased by you.

Company name	Address	Name of manager
JTB Corp.	JTB Bldg., 2-3-11 Higashi-Shinagawa,	Senior Manager of
	Shinagawa-ku	Legal Affairs, Legal
		Affairs Department
JTB Business Travel Solutions, Inc.	NBF Toyosu Canal Front, 5-6-52, Toyosu, Koto-	General Manager,
	ku	Human Resources &
		General Affairs
		Dept.
JTB Benefit Service, Inc.	2-7-6, Fukagawa, Koto-ku	General Manager,
		Business
		Management Head
		Quarter

Personal information to be shared shall be information obtained by group companies via the internet (Web and email), in writing or the like. The Company will take appropriate safety measures in delivering personal information.

6. Entrustment of Handling of Personal Information

The Company outsources part of operations in order to provide its customers with good services. Personal information may be furnished to contractors. In this case, the Company will select subcontractor(s) who are deemed to properly handle personal information, arrange the matters necessary to prevent the leakage of your personal information, including proper management and confidentiality of personal information, in contracts, etc., and have them conduct proper management.

7. Request for Disclosure, etc. of Personal Information

You may contact us at our contact desk regarding disclosure (the notification of the purpose of use, disclosure, correction, addition and deletion of contents, cessation of use or erasure, and/or cessation of provision to third parties) of your own personal information. In the case, we will respond to your demand within a reasonable period of time

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after verifying the identification of the requesting person. For the details of request for disclosure, etc., please refer to the "Procedures for Requesting Personal Information Subject to Disclosure" stated later.

8. Personal Information Provided on a Voluntary Basis

Whether or not the principal provides us with personal information is voluntary. If any necessary item is not furnished, however, we might not be able to provide you with services, etc. in proper conditions.

9. Acquisition of Personal Information by Any Method That Is Not Easily Recognizable by the Principal

We do not acquire your personal information by any method that is not easily recognizable by the principal, by using Cookie or the like. All portions of our website into which personal information is entered use SSL (Secure Sockets Layer) data encryption system. Further, we take measures such as installing firewalls to protect information in the website. Please be noted in advance, however, that we cannot completely guarantee security due to the nature of communications via the Internet.

10. Accredited Personal Information Protection Organization to Which the Company Belongs

An accredited personal information protection organization refers to an organization accredited by the competent minister in charge pursuant to Article 47 of the Personal Information Protection Act, which is an organization aimed at ensuring the proper handling of personal information through dealing with complaints about the handling of personal information subject to disclosure, etc., or providing information to the covered business operators, etc.

The Company is registered as a covered business operator with "JIPDEC" accredited as an accredited personal information protection organization by the Minister of Economy Trade and Industry and the Minister of Internal Affairs and Communications pursuant to the provisions of Article 37 of the Personal Information Protection Act. JIPDEC accepts complaints and consultation concerning the handling of personal information of covered business operators.

Name of accredited personal information protection organization: JIPDEC Contact for settlement of complaints: Personal Information Protection Consultation Service Office PrivacyMark Promotion Center Address: Roppongi First Building 1-9-9 Roppongi, Minato-ku, Tokyo 106-0032 Phone Number: 03-5860-7565 0120-700-779

11. Handling of Specified Personal Information

- (1) The Company will use personal information only within the scope of purpose of use as set forth in the Individual Numbers Act.
- (2) The Company shall not furnish it to any third parties other than those set forth in the Individual Numbers Act.
- (3) Upon completion of any process related to individual numbers as set forth under the Individual Numbers Act, the Company shall promptly delete or erase such individual numbers.

Contact Desk:

We accept your requests for disclosure, etc. concerning the personal information subject to disclosure, as well as inquiries and complaints concerning personal information, at the contact desk stated below:

Celestine Shiba Mitsui Bldg., 3-23-1 Shiba, Minato-ku, Tokyo 105-8335

Personal Information Contact Desk, JTB Communication Design, Inc.

Email address: p-mark@jtbcom.co.jp TEL: 03-5657-0600 (Reception hours: 9:30-18:00*)

* Please note that we respond to questions and inquiries received on Saturdays, Sundays, national holidays, during the

year-end and new-year period or Golden Week holiday on the next business day or later.