

PERSONAL INFORMATION PROTECTION POLICY

Rakuten LIFULL STAY, Inc. (hereinafter referred to as "us," "we," "our" or the "Company") sets the following policy on the handling of personal information concerning customers (hereinafter referred to as the "Policy") in relation to the lines of services, among the services offered by the Company, that consist of "Vacation STAY," a *minpaku* (private-home stay) booking service, and other services incidental thereto (hereinafter referred to as the "Minpaku Services"). Please note that the policy applicable in relation to services other than the Minpaku Services can be found at <https://rakuten-lifull-stay.co.jp/privacy.html>.

1. Purposes of use of personal information

We use personal information concerning customers for the following purposes, and shall promptly delete personal information concerning customers after achieving the purpose of use. We may continue to retain personal information from time to time, however, for the purpose of retaining the records of the supply thereof, or otherwise for the purposes of exercising and carrying out our rights and obligations, or on the basis of consent from the customer.

- (1) To supply, maintain, protect and improve the Minpaku Services, including but not limited to registering with, and receiving bookings and performing personal identification for, private-home lodgings and other lodging establishments (hereinafter each referred to as "lodging establishment");
- (2) To supply personal information concerning a customer to the provider of lodging services at a lodging establishment (hereinafter referred to as "lodging services") to the extent necessary for said provider of the lodging services to provide the customer with the lodging services on the basis of a booking received by the Company through the Minpaku Services;
- (3) To give notifications to customers and address inquiries, etc., from customers;
- (4) To address any act that violates our rules associated with the Minpaku Services;
- (5) To give notifications of products and services offered by the Company and of campaign information, etc.;
- (6) To give notice of a change, etc., of rules associated with the Minpaku Services;
- (7) To exercise any rights, and perform any obligations, pursuant to an agreement with a

customer or to a law, etc.; and

(8) To serve a purpose of use related to any purpose of use stated hereinabove.

2. Information to be collected and how it is collected

(1) Information that customers are asked to supply

We collect from customers their name, telephone number, address, e-mail address, and information on the lodging establishment that the customer has registered with, as well as information on the lodging services, and any such other information as may be necessary in the course of providing the Minpaku Services, to the extent necessary for providing the Minpaku Services.

(2) Information to be collected by the Company in the course of use by customers of the Minpaku Services

In relation to the Minpaku Services, we may from time to time acquire the following information with respect to the status of the customer's access to our website, etc., and how the customer used the same:

- (i) Information on the identity of information and communication devices, such as device ID;
- (ii) OS information on information and communication devices, and information on the customer's connection to the Internet;
- (iii) Referrer;
- (iv) IP address;
- (v) URL accessed, and time stamp for the time at which the access was made;
- (vi) Server log information other than the above; and
- (vii) Information on the establishments or services, etc., displayed or retrieved.

3. Cookies

Our website is configured so that the following three types of cookie are used thereon:

(1) Cookies essential for the website's actions

This type of cookie is one that is essential for the purposes of use of the website's functions, such as moving between pages of the website and accessing secure pages. If a user refuses this type of cookie, the action desired by the user may not function as requested.

(2) Cookies for effectiveness measurement purposes

This type of cookie is used for the purpose of collecting information as to how users use the website, such as the number of visitors and which page is viewed the most frequently. Information collected with this type of cookie is used for the purpose of making improvements in the performance of the website, such as giving users an easy means to find the information they require.

More specifically, we use Google Analytics cookies as described below:

Cookie's role	Cookie's time to expiry
Cookies used for the purpose of distinguishing users.	2 years
Cookies used for the purpose of throttling the request rate.	10 minutes

If you do not wish to allow Google Analytics cookies, they can be refused by installing an opt-out plug-in offered by Google:

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

(3) Cookies for advertising purposes

In addition to what is stated in items (1) and (2), we also use cookies issued by our partner indicated below for the purposes of online advertisements, report creation and service and website improvements. If you do not wish to allow cookies for advertising purposes, they can be disabled (you can opt out) from the website of our partner indicated below:

Google

<https://www.google.com/settings/u/0/ads/authenticated>

4. Third-party supply of personal information

As stated in Section 1, item (1), we supply personal information concerning a customer to the provider of lodging services to the extent necessary for said provider of the lodging services to provide the customer with the lodging services on the basis of a booking received by the Company through the Minpaku Services.

5. Disclosure of personal information

If we are requested by a customer to disclose personal information on the basis of a provision of the Personal Information Protection Act, we will, after verifying that the same is a request from the customer which the personal information concerns, without

delay disclose the same to the customer (if no such personal information exists, we will notify the customer thereof). This will not apply, however, if we are subject to a non-disclosure obligation by virtue of the Personal Information Protection Act or any other law or regulation. If you wish to have personal information disclosed, please let us know through the point of contact indicated in Section 8 so that we can inform you of the specific procedures.

6. Correction, etc., or suspension of use, etc., of personal information

If we are requested by a customer to (1) perform a correction, addition or removal of the content of any personal information (hereinafter referred to as "correction, etc."), on the grounds that the same is not true, pursuant to a provision of the Personal Information Protection Act or (2) suspend the use of, or erase, any personal information (hereinafter referred to as "suspension of use, etc."), on the grounds that the same is handled beyond the scope of the purpose of use that has been made public in advance, or on the grounds that the same was collected by deceit or any other illicit means, pursuant to a provision of the Personal Information Protection Act, we will, after verifying that the same is a request from the customer which the personal information concerns, without delay conduct any necessary investigation, and on the basis of the results thereof, perform the correction, etc., of the content, or the suspension of use, etc., of the personal information and then notify the customer thereof. If we decide not to perform the correction, etc., or the suspension of use, etc., pursuant to the Personal Protection Information Act or any other law or regulation, we will inform the customer thereof.

7. Security and overseas transfer

We comply with applicable laws and regulations, and also strive for the handling of personal information at high information security levels, with the aim of preventing unauthorized access to, or the divulgence of, personal information concerning customers, maintaining the accuracy of personal information, and where necessary, effecting appropriate disposal. When acquiring or transferring any personal information, we have communications encrypted, as well as set restrictions on privileges for access to personal information stored with us and have the personal information handled only by the personnel required for the execution of tasks. In addition, we conduct regular reviews so as to ensure that our actions described hereinabove are effectively taken in

an appropriate fashion and kept at a proper level.

If necessary for business operation purposes, we may from time to time contract the handling of personal information concerning customers to third parties, which may include business service vendors. Such third parties may from time to time include parties located outside of Japan. If we contract the handling of personal information concerning customers to such third parties, we do so in compliance with applicable laws and regulations, with appropriate control and supervision exercised over said third parties.

Governmental agencies, judicial authorities, etc., may from time to time request that we provide them with access to, or to supply, personal information concerning customers for law enforcement purposes, in which case, provided that such a request is made on the grounds of proper and legitimate needs (in particular, such a request may be issued in the course of a criminal investigation or other judicial procedures, etc.), we address said request in accordance with our internal regulations and with applicable laws and regulations.

8. Point of contact

If you have a comment or question or wish to file a complaint or otherwise make an inquiry in connection with the handling of personal information, please contact us at the following point of contact:

http://support.itcom21.com/rls_inquiry/

9. Procedures for changing the Policy

We may from time to time change or amend the Policy as required, according to the need to address the change of a law or regulation or for business reasons, in which case we post information on said change, etc., on this website. Customers are kindly advised to adequately check the latest content of the Policy subsequent to any such change, etc., as may be posted on this website.

If there is any discrepancy or conflict between the English version and the Japanese version of the agreement herein, the Japanese version shall take precedence.