

For those who are located in the European Economic Area (EEA) and the UK

This subsection applies to those who are located in the EEA and the UK. This subsection supplements the Policy and prevails over any conflicting provisions in the Policy.

1. Purpose and Legal Basis for Processing Personal Data

The legal bases which we rely upon for each of the purposes of use of personal data set forth in “4. Purpose of Use of Personal Data” above are as follows. When we process special categories of personal data, we will obtain your explicit consent as the legal basis for processing such personal data.

- 1) To operate our invitation business
 - (1) Invitation Business
 - To administrate our invitation of you to Japan, including any arrangements on transportations, meals, accommodations, activities participation and required visas and related communications (Legal basis: contract, legitimate interests, consent);
 - To facilitate, support or contribute to your (i) inspection of tourist spots in Japan, (ii) creation of or engagement in publication, article or social media related works on such spots, and/or (iii) creation, marketing or promotion of in-bound travel related products or services into Japan (Legal basis: contract, legitimate interests, consent); and
 - To prepare and distribute letters of invitation and materials introducing our invitation business (Legal basis: legitimate interests, consent).
 - (2) Business meetings, seminars and events
 - To administrate business meetings, seminars or events, including management of attendees, accommodations and venue security and related communications (Legal basis: contract, legitimate interests, consent);
 - To send participants letter of invitation, notice of seminar, seminar materials and information of traveling to Japan (Legal basis: legitimate interests);
 - To facilitate, support or contribute to any business negotiations or collaborations between buyers (travel companies outside Japan) and sellers (participants in Japan) or any other attending parties (Legal basis: legitimate interests, consent);
 - To conduct surveys for marketing (Legal basis: legitimate interests, consent); and
 - To prepare and distribute materials introducing our business meetings, seminars and events (Legal basis: legitimate interests, consent).
 - (3) To promote traveling to Japan
 - To provide information of traveling to Japan (Legal basis: legitimate interests, consent);
 - To construct networks for marketing (Legal basis: legitimate interests); and
 - To create a brochure, image material, video materials (Legal basis: legitimate interests, consent).
 - (4) To operate our website
 - To operate our website including the Japan Tourism Statistics (<https://statistics.jnto.go.jp/en/>) and Japan Safe Travel Information (<https://www.japan.travel/en/japan-safe-travel-information/>) (Legal basis: contract, legitimate interests, consent); and
 - To respond to, handle, and process enquiries and requests regarding our websites (Legal basis: legitimate interests, consent).

- 2) To operate business meetings, seminars and events
 - To analyze your activities or access through the Internet and SNS for marketing purposes including retargeting advertisements (Legal basis: legitimate interests, consent);
 - To prepare mediums promoting our business and services such as websites and SNS (Legal basis: legitimate interests, consent);
 - To provide the Internet or SNS users with information of traveling to Japan (Legal basis: legitimate interests, consent); and
 - To manage information on copyright holders of images to be used as promotional materials (Legal basis: legitimate interests).
- 3) To operate an exam of National Government Licensed Guide Interpreter
 - To prepare a list of examinees and successful applicants (Legal basis: contract, legitimate interests);
 - To prepare a list of those who are exempt from the first examination or some subjects (Legal basis: contract, legitimate interests);
 - To notify scoring and pass/fail results (Legal basis: contract, legitimate interests); and
 - To perform various procedures for examiners (Legal basis: legitimate interests).
- 4) To recruit staff
 - To communicate with applicants (Legal basis: legitimate interests, consent); and
 - To conduct recruitment examinations (Legal basis: legitimate interests, consent).
- 5) To respond to inquiries
 - To respond to, handle, and process enquiries, requests, applications, complaints, and feedback from you (Legal basis: legitimate interests).
- 6) To support Good-will Guide
 - To register as a Good-will Guide for foreign visitors or Good-will Guide organization (Legal basis: legitimate interests, consent); and
 - To commend a person or an organization that performs notable activities (Legal basis: legitimate interests, consent).

Notwithstanding the foregoing, we may process your personal data in order to comply with applicable laws and regulations, to respond to court orders and legal proceedings, or to establish, exercise, and defend our legal rights and interests (Legal basis: legal obligations, legitimate interests).

2. Transfers of Personal Data Outside the EEA or the UK

Your personal data may be transferred to third parties outside the EEA or the UK. When we transfer personal data to a third party outside the EEA or the UK, we ensure that:

- 1) The recipient destination countries or regions has been subject to a finding from the European Commission or has been designated by the government of the UK as ensuring an adequate level of protection for the rights and freedoms that you possess in respect of your personal data; or
- 2) The recipient third party enters into with us standard data protection clauses that have been approved by the European Commission or the government of the UK.

By contacting us at contact details set forth in “13. Contact Us” above, you can confirm further details of the protection afforded when personal data is transferred outside the EEA or outside the UK.