

# Privacy Policy

**Enacted:** August 1, 2025

**Last Revised:** August 1, 2025

**Honey J Corporation**

**Junichi Ito**

**President and Representative Director**

Honey J Corporation (hereinafter referred to as "the Company"), as a company engaged in the travel industry, recognizes that the appropriate protection of customers' personal information is the foundation of our business and our social responsibility. The Company complies with Japan's "Act on the Protection of Personal Information" (APPI), the European Union's "General Data Protection Regulation" (GDPR), and other international data protection regulations. We hereby declare that we have established, and will implement and maintain, the following Privacy Policy.

## 1. Compliance with Laws, Norms, and Transparency

The Company complies with laws, government guidelines, and international norms such as the GDPR regarding the handling of personal information. This policy is made public domestically and internationally through our website and other means to ensure the transparency of our personal information protection system. (In compliance with GDPR Article 24)

## 2. Acquisition, Use, and Consent of Personal Information

When acquiring personal information, the Company specifies the purpose of use and acquires it through lawful and fair means. At the time of acquisition, we notify the data subject (the individual) and process the information only after obtaining explicit consent. If personal information is to be used beyond the scope of the specified purpose, we will obtain the individual's consent again. (In compliance with APPI Article 18 and GDPR Article 6)

## 3. Handling of Travelers' Personal Information

For travel arrangements and safety management, the Company handles the following information:

- **Basic Information:** Name, address, contact details.
- **Travel Document Information:** Passport number, date of issue, expiration date, visa information.
- **Travel Records:** Travel history, transportation used, accommodation information.
- **Special Categories of Data:** Information requiring special consideration (health status, religious dietary restrictions, etc. *Acquired only based on the individual's explicit consent*).

## 4. Use of Cookies and Tracking Technologies

The Company's website may use cookies and similar tracking technologies to improve user convenience and analyze usage status. When using these technologies, a banner will be displayed to obtain consent upon the first visit. Users can refuse or manage cookies at any time through their browser settings. (In compliance with GDPR Article 7)

## 5. Security Control Measures and Risk Assessment

To prevent unauthorized access, loss, destruction, alteration, or leakage of personal information, the Company implements the following technical and organizational measures: (In compliance with APPI Articles 20-22 and GDPR Article 32)

- **Technical Measures:** Data encryption, installation of firewalls, implementation of backups, and minimization of access privileges.
- **Organizational Measures:** Regular education and training for all employees, and the signing of confidentiality pledges.
- **Risk Assessment:** Implementation of Privacy Impact Assessments (PIA) when introducing new systems, and regular risk assessments considering external environmental changes such as natural disasters or pandemics.

## 6. Retention Period and Disposal

The retention period for personal information is clearly set within the scope necessary to achieve the purpose of use. Except where there is a legal obligation, data that has passed its retention period or is no longer necessary will be promptly disposed of or deleted using non-restorable methods. (In compliance with APPI Article 19 and GDPR Article 5)

## 7. Provision to Third Parties and International Data Transfer

The Company will not provide personal information to third parties without the individual's consent, except as required by law or for the protection of human life. When transferring or providing personal data from within the EU to Japan or a third country (that has not received an adequacy decision), we will implement appropriate protection measures based on GDPR Articles 44 to 50, such as concluding Standard Contractual Clauses (SCC), and provide details thereof to the individual.

## 8. Disclosure, Correction, Deletion, and Suspension of Use of Personal Information

The Company has established a system to promptly respond to requests from data subjects (the individuals) regarding their personal information, such as disclosure, correction, deletion (the right to be forgotten), suspension of use, and data portability, upon confirmation of identity. (In compliance with APPI Articles 28-30 and GDPR Articles 15-18)

## 9. Response to Data Breaches

In the event of an accident such as a leak of personal information, we will immediately report through the internal emergency contact network and strive to prevent the expansion of damage. Furthermore, we will notify the Personal Information Protection Commission of Japan and relevant supervisory authorities (including those under the GDPR), in principle within 72 hours, and promptly notify and follow up with the affected data subjects. (In compliance with GDPR Articles 33-34 and APPI amendments)

## 10. Continuous Improvement and Auditing

The Company regularly conducts internal and external audits to verify compliance with this policy and internal regulations. Based on the audit results and changes in social conditions, we will continuously review and improve our personal information protection management system.

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### [Inquiry Desk]

**Personal Information Protection Manager**

**Honey J Corporation**

**Address:** 2nd Floor, Morimatsu Headquarters Bldg., 3 Nyorai-cho, Kita-ku, Nagoya-shi, Aichi, Japan

**Email:** [info@honeyj.co.jp](mailto:info@honeyj.co.jp)