HOTEL MANAGEMENT JAPAN

As of March 23, 2026

Privacy Policy

Oriental Hotel Okinawa Resort & Spa (hereinafter referred to as "the Hotel") and Hotel Management Japan Co., Ltd., the operator of the Hotel, recognize personal information as a vital asset. We are committed to protecting your privacy by complying with the Act on the Protection of Personal Information, other applicable laws, regulations, and guidelines, as well as the EU General Data Protection Regulation (GDPR) (collectively referred to as "Laws and Regulations").

We may collect information on our individual guests and personal information on individuals related to our corporate or group guests in the course of providing various services.

Collecting such personal information is important to provide our guests with the highest level of services, but at the same time we fully recognize that we are expected to properly handle such personal information.

This Policy states what personal information we collect, for what purposes we use personal information, with which third parties we share personal data, and what safeguards we take to protect personal data.

1. When We Collect Personal Information (Sources of Personal Information)

We collect your personal information mainly through the interactions listed below. The personal information provided by you is necessary for us to provide our services to you. Certain services may not be available to you if your personal information is not provided to us.

(1) Guest registration card to be submitted by you;
(2) Application form for wedding/banquet;
(3) Application form for use of our accessory facilities;
(4) Application form for our membership program and other similar documents;
(5) Records made at the time of your visit or telephone call to the Hotel; and
(6) Booking information through certain websites.

2. Personal Information We Collect and Purposes of Its Use

We use the personal information collected from you for the purposes shown in the below table.

	Personal Information	Purposes of Use
1	Name, address, telephone number, e-mail address and other contact information	(1) For contacting you by mail, telephone, e-mail, facsimile or other means in connection with the use of the Hotel

2	Attribute information such as age, date of birth, sex, occupation, job position, title, and main duties, etc.	(2) For providing you with information on products and/or services provided by the Hotel or Group Hotels (3) For facilitating business operations within the Hotel such as the administration of your usage of the Hotel (including the provision of your personal information to third parties and the provision of your personal information to service providers in association with the entrustment of certain services to them, with your consent set forth in Section 3) (4) For facilitating business operations between certain Group Hotels or within all the Group Hotels (5) For conducting analyses in order to improve the Hotel's or Group Hotels' services and products (6) For providing you with information on the Hotel's or Group Hotels' services and/or products (7) For other purposes similar to or closely related to any of the above purposes
3	Information on your usage history, hobbies, etc.	

If you are receiving our services through our website, the information listed in the below table is also used for the following purposes.

	Personal Information	Purposes of Use
1	Your cookies (A cookie is a small text file containing information designated by a website and temporarily placed on your personal computer via a web browser.)	(1) For ensuring security (2) For facilitating your use of our website

2	Your access logs (Examples: which pages of our website you have accessed, how often you have accessed our website, etc.)	(1) For analyzing your use of services of the Hotel, as well as the value, performance etc. of the Hotel (2) For displaying our listings and/or targeted advertisements on your device (3) For improving our services and the convenience of visitors to our website
3	Hashed date (data irreversibly transformed to prevent the identification of specific individuals) address / email address / phone number data	For delivering advertisements tailored to user interests and improving the accuracy of advertising effectiveness measurement through the use of Google Enhanced Conversions Google LLC Service Description Terms of Service Privacy Policy Opt-out Method

Even if the relationship between you and the Hotel terminates due to your withdrawal from our membership program or for any other reasons, we continue to handle your personal information in accordance with this Policy as long as we retain your personal information subject to the provisions of Section 5.

We strive to keep the personal data held by us accurate and updated. If there are any changes to your personal information, please inform us of such changes promptly.

3. Provision of Your Personal Data to Third Parties

We do not provide your personal data to any third party unless we have obtained your consent. If we entrust the handling of your personal data to a third party to the extent necessary to achieve the purposes of use of your personal data, we instruct the third party to properly control your personal data and also properly supervise the third party.

Please note, however, that we may provide your personal data to a third party in order to cooperate in responding to a request for disclosure of such personal data that has been made based on legal

grounds by a person who is duly authorized by judicial or administrative authorities, or otherwise as permitted by the Laws.

4. The Basis for Processing Your Personal Information

We process your personal information based on one or more of the items listed below:

(1) You have given your consent to the processing of your personal data for one or more specific purpose set forth in Section 2;
(2) Processing of your personal data is necessary for the performance of a contract between you and the Hotel, or in order to take steps at your request prior to entering into a contract;
(3) Processing of your personal data is necessary for compliance with a legal obligation that the Hotel is subject to;
(4) Processing of your personal data is necessary in order to protect your vital interests or those of a third party;
(5) Processing of your personal data is permitted for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Hotel; and
(6) Processing of your personal data is necessary for the purpose of the legitimate interests (which are listed below) pursued by the Hotel or a third party, except where such interests are overridden by your fundamental rights and freedoms:

a. Our business operations;
b. Improving our services and developing new services;
c. Researching and analyzing your usage of the Hotel;
d. Ensuring the safety of our guests, employees, and officers of the Hotel;
e. Direct marketing to you;
f. Making legal claims, insurance claims, or other similar claims by us or a third party;
g. Increasing vital public interests by us or a third party;
h. Providing public authorities with information relating to a criminal offence or threat to public security.

As it is necessary to provide services to guests, we process personal information of guests that has been collected within the EEA after transferring such personal information from the EEA to Japan in accordance with Article 49, Paragraph 1 (b) of the GDPR.

5. Retaining and Erasing Your Personal Information

We retain your personal information under our control only for the period required for achieving the purposes of its use and erase it within a reasonable period of time after the retaining period has elapsed.

6. Rights of Guests

You have the following rights if you satisfy certain requirements under the Law. (Please refer to Section 9 regarding the methods for exercising the rights or contacting us.)

(1) You have the right to request us to explain about your information held by us and how we use

such information;

(2) You have the right to obtain a copy of your personal data held by us upon payment of a fee set by us;

(3) You have the right to have us correct your personal data held by us if such data is incorrect;

(4) You may request us to erase your personal data under our control, and we will erase your personal data in accordance with your request. However, we may retain your personal data under certain circumstances permitted by the Law;

(5) You have the right to receive your personal data and transfer it to another controller;

(6) **You have the right to object to any use of your personal data. However, even if you raise an objection, we may continue to process your personal data to the extent permitted by the Law;**

(7) **You have the right to request us to restrict our processing of your personal data. Specifically, you have the right to object to use of your personal data for direct marketing purposes;**

(8) You may lodge a complaint with the supervisory authorities; and

(9) You may withdraw your consent to us regarding use of your personal data.

7. Safeguards for Personal Data

We have adopted the highest standards on information security in order to protect your privacy and the confidentiality of your personal data. We only allow authorized employees or agents to access your personal data. In addition, we impose strict confidentiality obligations on service providers that we use. We are taking physical, electronic, and procedural safeguards to prevent loss, misuse, damage, falsification and leakage of, and unauthorized access to, your personal data.

The other features of our information security program include:

(1) Using specialized technologies such as Firewall;

(2) Testing the safety and operability of products and services that will be used on the internet before actually using them, and closely examining the generally known vulnerabilities of technologies on a constant basis;

(3) Conducting internal and external audits of services that are provided through our website or the internet;

(4) Striving to identify vulnerabilities or possible threats of hacking by monitoring the infrastructure of our systems;

(5) Controlling access to various websites and systems by verifying the identity and authority of persons; and

(6) Training our employees and addressing new risks and development of technology in order to always keep our security measures updated.

8. About This Policy

This Policy is subject to change to reflect our actual collection and use of your personal information.

The policy after such changes becomes effective at the time when the changed policy is published on our website. The latest revision of this Policy was made on March 23, 2026.

9. Contact Us

You may request us to disclose your personal data held by us. When requesting such disclosure, you need to submit an identification document to us in order to prevent the leakage of your personal data to any person other than you. We handle such requests for disclosure in accordance with the Law.

If we receive your request made in accordance with Laws to correct, add, or delete the content of your personal data held by us, or to stop using, erase, or suspend the provisions to a third party of your personal data held by us, we handle such requests in accordance with the Law.

If you wish to request the disclosure, correction, etc. of your personal data held by us, or if you need detailed information on our Privacy Policy or the protection of personal information, please contact us below. (If you wish to request the disclosure, correction, etc. of your personal data held by us, please download the application form below on our website, complete it, and send it to the contact below by mail.)

Please note that the Hotel may charge you expenses actually incurred in association with the procedure for disclosure of your personal data held by us.

Contact for Inquiries Regarding the Protection of Personal Information:
Oriental Hotel Okinawa Resort & Spa, General Affairs & Personnel Dept.
1490-1 Kise, Nago-City, Okinawa 905-0026 Japan
Contact Us: info@okinawa.oriental-hotels.com
Procedures for Disclosure of Retained Personal Data (PDF: 135KB)
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