

# PRIVACY POLICY

## 1. Introduction

[Company Name] (located at [Company Address]), hereinafter “we”, “us” or “our”) protects your personal data and, in accordance with applicable personal information protection laws, the EU and EU Member States’ regulations on data protection (in particular, the “General Data Protection Regulations 2016/679” (the “GDPR”)) and other laws and regulations relating to personal information protection, processes personal data of customers to whom these laws and regulations apply (“Customers” or “you”). We do not provide service to minors under 20 years of age. Minors under the age of 20 may use our service only if valid consent has been obtained from their parent or guardian.

This PRIVACY POLICY provides how we, as a data controller, process personal data of Customers.

## 2. Legal Bases for Processing/Categories of Personal Data Subject to Processing

We process the following categories of your personal data based on the legal bases specified below.

(1) When processing is required for the pursuit of legitimate interests

We obtain and process the following categories of your personal data for the purposes specified below because it is necessary to do so in order to pursue our legitimate interests.

Purposes of Processing	Categories of Personal Data to be Obtained and Processed
<ul style="list-style-type: none"><li>• Support of Customers</li></ul>	<ul style="list-style-type: none"><li>• Name, address, telephone number of family member or relative and relationship to the person</li><li>• Flight information to Japan</li></ul>
<ul style="list-style-type: none"><li>• Research for the improvement of our service</li></ul>	<ul style="list-style-type: none"><li>• Nationality</li><li>• Hobby, preference, etc.</li><li>• Current address</li><li>• Gender</li><li>• Purpose of visit to Japan</li><li>• Name, address and telephone number of the school to attend</li><li>• Gender, date of birth, nationality and current address of co-occupant(s)</li><li>• Occupation</li><li>• Name, address and telephone number of the place of work</li></ul>

(2) When processing is required for us to provide products and services to you in accordance with our contract with you

We obtain and process your personal data for the following purposes because it is necessary to do so in order to provide products and services to you in accordance with our contract with you.

Purposes of Processing	Categories of Personal Data to be Obtained and Processed
<ul style="list-style-type: none"><li>• Execution of lease contracts with Customers and receipt of rent</li></ul>	<ul style="list-style-type: none"><li>• Name</li><li>• Passport, certificate of status of residence or other identification data</li></ul>

	<ul style="list-style-type: none"> <li>• Date of birth</li> <li>• Cookie</li> </ul>
<ul style="list-style-type: none"> <li>• Communication with Customers necessary for the performance of lease contracts</li> </ul>	<ul style="list-style-type: none"> <li>• Name</li> <li>• E-mail address</li> <li>• Skype ID, LINE ID, etc.</li> <li>• Telephone number</li> <li>• Preferred language</li> <li>• Name, telephone number and e-mail address of co-occupant(s)</li> <li>• Name, address and telephone number of contact person for emergency and relationship to the person</li> </ul>

(3) When your express consent is obtained in advance

Lastly, if we have obtained your express consent in advance, we obtain and process your personal data for the following purposes as well.

Purposes of Processing	Categories of Personal Data to be Obtained and Processed
<ul style="list-style-type: none"> <li>• Analysis and optimization of our website</li> </ul>	<ul style="list-style-type: none"> <li>• Cookie</li> </ul>

You have the right to withdraw your consent at any time by the method separately designated by us upon obtaining your consent. However, your withdrawal of consent will not affect the legality of processing conducted with your consent prior to your withdrawal.

We do not conduct any solely data-based and automated decision-making which may produce any legal or similar effect on you.

We will notify you separately, if the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, whether the data subject is obliged to provide the personal data as well as the possible consequences of failure to provide such data.

### 3. Sources of Personal Data

We obtain your personal data directly from you or indirectly through DID-GLOBAL Co., Ltd. (located at 2-4-16, Uchon-machi, Chuo-ku, Osaka 540-0026, Japan, hereinafter “DID-GLOBAL”) operating Apartment Japan.com, a rental property search website which provides you with an opportunity to know our rental properties (the service provided through the search website shall be hereinafter referred to as “APJ Service”).

### 4. Retention Period of Personal Data

We will retain your personal data only for a period of time necessary for us to achieve the purposes of obtaining and processing described hereinabove.

### 5. Sharing of Personal Data with Third Parties

We share with and disclose to the following third parties your personal data in accordance with applicable laws and regulations for the purposes of processing described in 2 above.

- DID-GLOBAL:  
A company operating APJ Service which enables search of rental properties and administering the server related to the provision of an online application procedure system for lease contracts.
- iThinkRent Co., Ltd.:

Our affiliated settlement agent which provides the rental guarantee service, 24-hour emergency rush service and credit card payment collection agency service upon concluding the lease contracts of rental properties.\*

- SB Payment Service Corp.:

Our affiliated payment service provider providing the credit card payment service which you will use when making an online application procedure for lease contracts of rental properties.\*

\*We do not obtain your credit card payment information.

## 6. Your Rights

You have the rights to request the following with respect to personal data obtained and processed by us.

- Obtaining information regarding data processing:  
You have the right to obtain from us all the requisite information regarding our data processing activities that concern you.
- Access to personal data:  
You have the right to obtain from us confirmation as to whether personal data concerning you is being processed, and, if so, the right to access to the personal data and certain related information.
- Rectification or erasure of personal data:  
You have the right to have us rectify inaccurate personal data concerning you without undue delay and the right to have us complete any incomplete personal data concerning you (Article 16 of the GDPR). In addition, if certain requirements are satisfied, you will have the right to have us erase personal data concerning you without undue delay.
- Restriction of processing of personal data:  
If certain requirements are satisfied, you will have the right to have us restrict processing of personal data concerning you.
- Objection to processing of personal data:  
If certain requirements are satisfied, you will have the right to object to processing of personal data concerning you.
- Data portability of personal data:  
If certain requirements are satisfied, you will have the right to receive personal data concerning you in a structured, commonly used, and machine-readable format and the right to transfer those data to another controller without hindrance from us.

If you intend to exercise any of the aforementioned rights, please contact us using our inquiry form.

You may lodge a complaint in relation to our processing of your personal data with the Data Protection Supervisory Authority of the Member State of your habitual residence, place of work or place of the alleged infringement of the GDPR.

## 7. Use of Cookies

- `_ga, _gid`

We use "Google Analytics", an access analysis tool provided by Google.

Google Analytics uses cookies to collect traffic data. Such traffic data is collected anonymously and does not identify individuals.

For the details of the cookies used by Google Analytics in our website, please refer to the following URL.

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

As to the method to reject tracking by Google Analytics, please refer to the following URL.

<https://developers.google.com/analytics/devguides/collection/analyticsjs/user-opt-out>

You can reject collection of data by those cookies by disabling functions in browser settings. Please confirm your browser settings.

## **8. Modifications or Amendments to this PRIVACY POLICY**

This PRIVACY POLICY may be modified from time to time. We will notify you through this website and, if necessary, by e-mail when we make any substantial or material modifications.

## **9. Contact Information**

For any questions or inquiries regarding this PRIVACY POLICY, please contact the data controller below or its representative.

Data Controller

[Name]

TEL: [Number]

Address: [Address]

Please use our inquiry form to contact the data controller.

## **10. Effective Term**

This PRIVACY POLICY takes effect from [Date], 2020.