

## Nagano Fan Community Privacy Policy

The Nagano Tourism Organization (hereinafter referred to as the "Organization") will handle personal information appropriately to the extent required by law on the Nagano Fan Community member website operated and managed by the Organization, as set forth below (unless otherwise defined, the meanings of the terms used will conform to the definitions provided in the Act on the Protection of Personal Information (hereinafter referred to as the "Protection Act") and the Enforcement Rules of the Protection Act (hereinafter referred to as the "Enforcement Rules")).

Matters not covered by this Privacy Policy shall be governed by the Act on the Protection of Personal Information and its Enforcement Rules.

The Organization may disclose information that does not constitute personal information (such as statistical information that indicates trends among users as a whole) to cooperating companies, advertisers, gift providers, and others with whom the Organization has concluded nondisclosure agreements, in order to explain the nature of the administrator's business or for other purposes that the Organization deems appropriate.

### 1. Personal Information to be Obtained

The Organization obtains the following personal information from community members in connection with the Service:

1. Information provided by the member at the time of registration for the service, such as their name, address, gender, date of birth, telephone number, or e-mail address;
2. Postings on the Community Site or other information posted, entered, uploaded, or otherwise made by members within the Service;
3. Information provided through responses to questionnaires, etc.;
4. Information provided in connection with inquiries, communications, etc. related to the Service;
5. Other information voluntarily provided by the members.

Of the above information, the information in (1) includes information that members are required to provide to the Organization in order to register for the Service. The Organization will clearly indicate whether information is required or not on the screen at the time of registration.

#### (1) Personal Information Automatically Obtained from Member Devices

When members use the Service, the Organization obtains the following personal data from member's PCs, tablets, smartphones, or other devices they use:

1. Website browsing history, mobile application usage history, and other usage history of the

Service;

2. Online identifiers such as cookie IDs, ad identifiers, IP addresses, etc.;
3. Rough location information inferred from IP addresses;
4. Technical information about member devices, such as browser types, language settings, etc.

(2) Personal Information Obtained from Third Parties

The Organization may obtain a member's personal information from third parties when permitted by the applicable data protection laws, such as when the Organization has received member consent.

**2. Purpose of Use of Personal Information and Legal Basis**

The purposes for which the Organization uses members' personal information and the legal basis for such use are as follows:

	Purpose of Use	Legal Basis
①	To register members for a Service they wish to join and to provide that Service to the member. To provide notices, etc., regarding the Service. To respond to inquiries from members regarding the Service. This purpose includes customizing the contents of the Service for each member based on member attributes and usage history of the Service.	Necessary to fulfill a contract with the member regarding the service or to fulfill procedures at the request of the member prior to the conclusion of such contract.
②	To monitor and prevent unauthorized use of this service and other security measures.	Necessary to fulfill our legal obligations or to protect the important interests of our clients or third parties.
③	To conduct surveys and analysis on the usage of the Service for the purpose of providing customers with higher quality services.	Necessary for the normal conduct of the Organization's business and within its legitimate interest.
④	To publish or provide to third parties after converting the data into a statistical form or processing it in a way prevents the identification of members. To collect the content of posts sent by customers to the community site and other services, and to provide or disclose such content to third parties. To check for duplication between member personal information held by partners with that held by the Organization.	Based on member consent to this policy. For more information, please see "3. Provision of Personal Information to Third Parties".

### **3. Provision of Personal Information to Third Parties**

The Organization may provide or disclose the contents of questionnaire responses collected from members to affiliated businesses or other third parties in a form that does not identify the member. In addition, the Organization may provide or disclose the results of questionnaires, etc. and statistics of member use of the Service to third parties.

#### (1) Provision of Posted Content within the Service

The Service may include features that allow members to post comments or content. Submitted content will be made public within the Service. The Organization will also collect the publicly posted content and provide or publicize it to affiliated businesses or other third parties.

#### (2) Confirmation of Duplicate Information with Affiliates

In order to check for the duplication of members' personal information held by partners with that held by the Organization, the personal data of members will be linked with such affiliates. This enables the Organization, for example, to ensure that members do not receive the same survey request from both the Organization and an affiliated entity, while also enabling the Organization and the affiliated entity to send surveys to only those members with duplicate data. The Organization will only link the personal data (e.g., hashed email addresses and phone numbers) necessary to confirm duplicates.

#### (3) Other

In addition to cases based on the member consent, the Organization will also provide members' personal information to a third party in any of the following cases:

1. When necessary for the Organization to comply with its legal obligations;
2. When necessary to protect the vital interests of our members or third parties;
3. When other applicable data protection laws do not require member consent.

### **4. Outsourcing the Handling of Personal Information**

The Organization will entrust the handling of members' personal information to other business entities within the scope necessary to achieve the purpose of use. The Organization will evaluate and select contractors in accordance with standards separately established by the Organization in advance, and will supervise the contractor appropriately.

### **5. Security Control Measures**

The Organization will take necessary and appropriate measures to prevent the leakage, loss, or damage of members' personal information and to otherwise securely manage such personal information. If you

would like to know the details of the security control measures taken by the Organization, please contact via the information listed in Article 9.

## **6. Transfer of Personal Information Overseas**

Member personal information may be transferred to or stored in countries or regions outside of Japan. Please note that such countries may not have the same level of data protection legislation as Japan. In such cases, we will take appropriate safeguards to protect member personal information with respect to such transfers and in accordance with the Japanese Personal Data Protection Act and other applicable data protection laws.

## **7. Retention Period of Personal Data**

The Organization will not retain data longer than is necessary for the purposes of use of personal information as listed in "2. Purpose of Use of Personal Information and Legal Basis". When a member withdraws from the Service, the Organization will erase the member's personal data within approximately two months from the date of withdrawal. However, if the retention of personal data is required by relevant laws and regulations, the Organization will comply with such laws and regulations.

## **8. Member Rights Regarding Personal Information**

Members may have rights with respect to their personal information, including the right to request access to, copy, correct, and delete such personal information, in accordance with the applicable data protection laws. These rights must be exercised in accordance with the applicable data protection laws.

\*When the Japanese Personal Data Protection Act applies, members have the right to request disclosure, correction, addition, deletion, suspension of use, elimination, and suspension of provision to third parties of such personal data, as well as the right to request disclosure of records of provision to third parties. These rights are subject to the limitations set forth in the Personal Information Protection Act.

If you wish to exercise such rights, please contact via the information listed in "9 Contact Information" below, and we will respond appropriately after confirming your identity.

## **9. Contact Information**

Please contact the following for any questions or requests regarding the handling of personal information in this service.

Nagano Tourism Organization  
Hotel Shinanoji 3F, 131-4 Naka-Gosho Okada-cho,  
Nagano City, Nagano Prefecture 380-0936  
Phone number: 026-219-5271 (main)

Email : [dmarketing@nagano-tabi.net](mailto:dmarketing@nagano-tabi.net)