# **Privacy Policy**

# Acquisition, use and provision of personal information

We will specify the purposes for which personal information is to be used within the scope of our business activities, and will acquire, use, and provide personal information fairly and appropriately to the extent necessary to achieve those purposes. We will also take measures to ensure that personal information acquired will not be used for purposes other than those specified.

#### Compliance with laws, regulations and norms

We will comply with laws, national guidelines, other norms, and social order concerning personal information, and strive to protect personal information appropriately.

## Appropriate management of personal information

We are fully aware of the risks of unauthorized access to, and loss, destruction, falsification, or leakage of, personal information we handle, and we take reasonable security measures and appropriate corrective actions in the event of a problem.

#### **Responding to inquiries**

We will respond appropriately to inquiries from the person concerned regarding disclosure, correction, suspension of use, or complaints about personal information handled by us.

#### **Continuous Improvement**

We have established management regulations and a management system for the protection of personal information, which are thoroughly implemented by all employees, and are regularly reviewed for continual improvement.

November 20, 2018 Enacted. June 18, 2019 Revised.

Guts-japan Inc. President and Representative Director Mahito Kojima

[Personal Information Inquiry Desk] Personal Information Protection Manager General Manager, Administration Dept. +81 (0)52 482 5228 (Weekdays 9:00-17:30)



# Personal information handled by us

We are committed to the appropriate protection of personal information in accordance with our "Personal Information Protection Policy". We would like to inform you of the personal information that we obtain or retain for use in our car rental business as follows.

# 1. Name of business operator handling personal information

Guts-japan Inc.

2. Name or title of the personal information protection administrator (or his/her representative), affiliation and contact information

Personal Information Protection Manager General Manager, Administration Dept. +81 (0)52 482 5228 (Weekdays 9:00-17:30)

#### 3. Purpose of use of personal information

The purposes of use of personal information handled by the Company in its car rental business activities are as follows.

#### (1) Personal Information Subject to Disclosure

Personal information obtained from the borrower

(contractor information, place of employment, emergency contact)

- To use personal information in accordance with our Car Rental Terms and Conditions, Chapter 9, Article 34.
- To use personal information in cases that fall under the contents described in Chapter 9, Article 35 of our Car Rental Regulations and Terms and Conditions.
- To submit personal information for other emergency contact when we deem it necessary, or to provide necessary cooperation to the police.

Information about the person who contacted us

- To respond to inquiries.

Information about the person in question and his/her agent

(at the time of request for disclosure, etc.)

- To respond to requests for disclosure, etc.For other purposes of use that are individually specified in writing.

#### (2) Other personal information to be acquired

Information obtained from job sites.

- To determine and notify whether or not a job applicant is hired.

# 4. Provision of Personal Information to Third Parties

Personal information obtained may be provided to third parties except when required by law.

Purposes of providing information to third parties

- To be used for car rental reservations and member registration.

Items of personal information to be provided

- Reservation holder information, membership information.

Means or method of provision

- Provided through data communication using the core system.

Type of organization and attributes of the person or persons to whom such information is provided

- Merchant

Contract regarding the handling of personal information, if any

- Membership agreement

We will take necessary and appropriate measures for other matters stipulated by the Rules of the Personal Information Protection Committee as necessary to protect the rights and interests of individuals.

# 5. Contact for inquiries regarding personal information

Complaints, consultations, and inquiries regarding the handling of personal information, including those related to retained personal data, should be directed to the [Contact for complaint resolution] below.

# 6. Name of the authorized personal information protection organization to which you belong and contact information for resolution of complaints

[Contact for complaint resolution] JIPDEC (Japan Institute for Promotion of Digital Economy and Community) Personal Information Protection Complaint Consultation Office Roppongi First Building 12F, 1-9-9 Roppongi, Minato-ku, Tokyo +81 (0)3 5860 7565

(1) Procedures for Disclosure, etc.

We will promptly respond to requests for disclosure, etc. (notification of purpose of use, disclosure, correction, addition, or deletion of content, suspension of use, elimination, suspension of provision to third parties, and disclosure of records of provision to third parties) by the person in question with respect to personal data in our possession. If you wish to make such a request, we will respond to your request within a reasonable period of time and to a reasonable extent after confirming that the person making such a request is you or your representative.

#### (2) Method and Contact for Receipt of Disclosure, etc.

To request disclosure of personal information subject to disclosure, please contact the reception desk below. Please fill out the prescribed application form, enclose the necessary documents, and send it by mail, fax, or e-mail. (Please fill in the required items and enclose the necessary documents by mail.)

After confirming your identity (or that of your representative), we will disclose the information by the method you specify (or by delivering a written document if disclosure is difficult, such as when a large amount of money is required).

[Personal Information Inquiry Desk] Personal Information Protection Manager General Manager, Administration Dept. +81 (0)52 482 5228 (Weekdays 9:00-17:30)

