

Protection of Personal and other Confidential Information Policy- December 2021

Introduction

TS Japan Railway Travel Planning Company Limited (Japanese name TS 日本鉄道旅行企画株式会社) hereafter “TS Japan Rail” is committed to protecting all personal and other confidential information it holds belonging to its clients, staff, contractors, suppliers and business associates and complying with all relevant laws and regulations in this respect.

As a Japanese company based in Japan we are subject to the Japanese Personal Information Protection Act (PIPA).

Definitions

Personal Information: Is any information that identifies an individual and includes, but not limited to, such things as name, address, telephone numbers, email addresses, pictures etc..

Confidential Information: Is any information that is not intended to be made public or shared with anyone, other than those it is intended for and includes but is not limited to personal information, business information etc.. Information that has been obtained from a public source or has already been published by the owner is not regarded as confidential information.

Legal and Administrative Authorities: Includes but is not limited to Government and Local Governments that have jurisdiction over TS Japan Rail, tax and social insurance agencies (particularly in respect of staff and contractors), law courts and officials carrying out instructions on behalf of a court or as required by law, statute or regulation.

Collection, Use and storage of Personal and other Confidential Information

TS Japan Rail will only collect, use and store personal and confidential information that is relevant to conducting its business or it's required to collect and store by legal or administrative authorities. Such information will only be used for such purposes and will only be stored only for the time that it is required to conduct business or is required by law, regulation or as required by Legal and Administrative Authorities.

Sharing of Personal and other Confidential Information

TS Japan Rail will only share Personal and Confidential Information with persons whether our staff, contractors, suppliers, or business associates where it is absolutely required to do so in order to provide services to the client or where we are required to by Legal and Administrative Authorities or a court of law. Examples of where we may share your information are shown below.

TS Japan Rail outsources some of its administrative functions to a third party in order to provide a more efficient service to our clients and this may require the sharing of some Personal or Confidential Information. The contract between TS Japan Rail and the third-party outsourcing company includes Non-Disclosure and Confidentiality clauses.

TS Japan Rail, not being a travel agent, will work with one or more selected travel agents, tour operators and others in order to complete travel arrangements for clients and will share relevant information with those agents or operators. We would ask the clients permission before engaging these third parties and sharing any information.

In all other cases we would seek approval from our clients, staff, contractors, suppliers and business associated before disclosing any personal or confidential information unless instructed not so by a Legal or Administrative Authority.

Selling of Personal or Confidential Information, providing such information for commercial purposes

TS Japan Rail will not sell any personal or confidential information to a third party and TS Japan Rail will not provide any such information for any commercial purposes, except where outlined above. Any exception to this rule required the client, staff member, contractor, suppliers or business associates prior written approval.

TS Japan Rail may provide anonymized data to third parties for purposes of analysing that data to improve our services or where required to by a legal or administrative authority.

Use of Cookies and similar technologies

“Cookies” and similar technologies are used in websites and mobile device apps to provide functionality and analysis and will be downloaded on to the user’s machine or device. TS Japan Rail’s website(s) and Apps use cookies and similar technologies in order for those websites and apps to function and to collect data for analytical purposes so that we can improve both our services and the operation of the said websites and apps. We do not collect, store or use or sell any personal information that may be collected by cookies or similar technologies.

If a user of our website or apps does not approve of the use of cookies or similar technologies they should stop using, continued use is taken as consent. At the time of first use and periodically thereafter users will be reminded of our use of cookies etc..

This policy was approved by the Representative Director of TS Japan Railway Travel Planning Company Limited on the 13th December 2021 and supersedes the previous policy (Protection of Personal and other confidential data Policy V1.0 20190923)

TS日本鉄道旅行企画株式会社
代表取締役 Representative Director
ターナー・ステイブン・ダビド
Turner Stephen David