

## Supplement to Tokaido Sanyo Kyushu Shinkansen Internet Reservation Service Privacy Policy (the “Global Privacy Policy”)

### Hong Kong Customers

#### 1 Hong Kong Privacy Policy Supplement

This Hong Kong Privacy Policy Addendum (the “**HK Policy**”) should be read together with, and considered part of, the Global Privacy Policy. If there is a conflict or inconsistency between this HK Policy and the Global Privacy Policy, this HK Policy shall prevail in respect of customers in Hong Kong and/or personal information collected in Hong Kong.

#### 2 Purposes of collection, use, processing and retention of personal information

2.1 Paragraph 2 herein replaces in their entirety Sections 2 and 5 of the Global Privacy Policy in respect of customers in Hong Kong and/or personal information collected in Hong Kong.

2.2 JR Central, JR West and JR Kyushu (collectively, the “**Three Companies**”), and JR TOKAI TOURS, INC. and Nippon Travel Agency Co., Ltd. (collectively, with the Three Companies, “**Parties**”) provide travel products, exclusively for members of the Tokaido Sanyo Kyushu Shinkansen Internet Reservation Service, based on the contract between the Three Companies, and/or any person authorised by the Parties shall collect, use, process and retain personal information of a Party’s or the Parties’ customers (whether provided by the customers or any other person and whether provided before or after the date of the customer’s membership registration) for the following purposes:

- 2.2.1 For transactions with customers concerning, or for provision to customers of, train tickets, travel-related products and other services related thereto and the like;
- 2.2.2 For delivery of service information by the Internet or any other means;
- 2.2.3 For sales analysis and product development; and
- 2.2.4 For conducting investigations necessary to respond to requests made by customers and analysing and preparing statistics on member trends;
- 2.2.5 any purpose relating to or in connection with compliance with any law, regulation, court order or order of a regulatory body;
- 2.2.6 transfer of such data to any place outside Hong Kong for any of the above purposes; and
- 2.2.7 any other purposes directly related to the above.

### **3 Transfer of personal information**

**3.1** Paragraph 3 herein replaces in its entirety Section 3 of the Global Privacy Policy in respect of customers in Hong Kong and/or personal information collected in Hong Kong.

**3.2** In addition to the cases specified in Section 4 of the Global Privacy Policy, for the purposes set out above in Paragraph 2 and subject to applicable law, customers' personal information may be provided to the following parties (in Hong Kong or elsewhere):

**3.2.1** any consolidated subsidiaries of the Three Companies as indicated in the Securities Reports of the Three Companies (and for this purpose "Securities Reports" are reports containing information on the operation of the Three Companies prepared in accordance with the Financial Instrument and Exchange Act of Japan);

**3.2.2** any agent, contractor or third party service provider who provides general administration, data processing, telecommunications, computer, payment, call centre, mailing, printing, research and/or survey services to the Parties and who has a duty of confidentiality to the Parties;

**3.2.3** any person(s) with a right under the Personal Data (Privacy) Ordinance (the "PDPO" ) to gain access to such data; and

**3.2.4** any government departments or other appropriate governmental or regulatory authorities.

**3.3** The Parties may retain collected personal information for the purposes set out above for 190 days after your membership is terminated (or, if your membership is terminated due to you having not used the Service for more than 25 months, your personal information will immediately be destroyed or erased). At the expiry of the retention period, personal sensitive information will be securely destroyed or erased so that the information is unreadable, indecipherable through any means, and the Member cannot be personally identified.

### **4 Access or correction**

**4.1** Without prejudice to a customer's rights to request for disclosure of retained personal data under Section 6 of the Global Privacy Policy, in general, and subject to certain exemptions under the PDPO, a customer is entitled to:

**4.1.1** request access to the customer's personal data;

**4.1.2** request the correction of the customer's personal data; and

**4.1.3** be given reasons if a request for access or correction is refused.

**4.2** Tokaido Sanyo Kyushu Shinkansen Internet Reservation Service Customer Center is responsible for handling any request for access to and/or correction of personal data and

any such request should be addressed to such responsible person by e-mail at the e-mail address indicated in Section 6(2) of the Global Privacy Policy.

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