## Revision "Supplement to Tokaido Sanyo Shinkansen Internet Reservation Service Privacy Policy (the "Global Privacy Policy")"

Current	Revision
For European Economic Area ("EEA") Customers	For European Economic Area ("EEA") and UK Customers
Besides "Tokaido Sanyo Shinkansen Internet Reservation Service Privacy Policy", this Privacy Policy sets forth the <u>policy</u> which will be applied <u>with respect</u> to the processing of Personal Data <u>concerning</u> data subjects in the European Economic Area (" <b>EEA</b> ") in accordance with the General Data Protection Regulation (" <b>GDPR</b> "). In the event of the provisions resulting in a conflict between "Tokaido Sanyo Shinkansen Internet Reservation Services Privacy Policy" and this Privacy Policy, this Privacy Policy will prevail.	Besides "Tokaido Sanyo Shinkansen Internet Reservation Service Privacy Policy", this Privacy Policy sets forth the <u>policies</u> which will be applied to the processing of Personal Data <u>of</u> data subjects in the European Economic Area (" <b>EEA</b> ") <u>and the UK</u> in accordance with <u>both</u> the General Data Protection Regulation (Regulation (EU) 2016/679) (" <b>EU</b> <b>GDPR</b> ") and domestic law in the UK which will be enforced by adding necessary amendments to the EU GDPR, so that the same contents under the EU GDPR, which were previously enforceable in the UK as part of EU law prior to its departure from the EU, will apply to the UK post-Brexit ("UK GDPR"). In the event of the provisions resulting in a conflict between "Tokaido Sanyo Shinkansen Internet Reservation Services Privacy Policy" and this Privacy Policy, this Privacy Policy will prevail.
<b>1. Types of Personal Data</b> In this Privacy Policy, " <b>Personal Data</b> " means any data relating to an identified or identifiable natural person. We may collect and process Personal Data such as <u>Membership</u> <u>ID, name, date</u> of birth, e-mail <u>address</u> , credit card expiration date, IC card <u>number</u> of transportation system, IP <u>address</u> , <u>Cookie</u> information, <u>terminal ID of smartphone</u> , transaction <u>history</u> , voice recordings, opinions, questions, inquiries and the like which concern the use of the service and which are collected through the communication between you and us by phone <u>or</u> e-mail <u>and so on</u> .	<b>1. Types of Personal Data</b> In this Privacy Policy, " <b>Personal Data</b> " means any data relating to an identified or identifiable natural person. We may collect and process Personal Data, such as <u>membership</u> <u>IDs</u> , <u>names</u> , <u>dates</u> of birth, email <u>addresses</u> , credit card expiration dates, IC card <u>numbers (for</u> transportation systems), IP <u>addresses</u> , <u>cookie</u> information, <u>smartphone terminal IDs</u> , transaction <u>histories</u> , voice recordings, opinions, questions, inquiries, and the like which concern the use of the service and which are collected through the communication between you and us by phone, email, <u>or other forms of communication</u> .
<ul> <li>2. Collection, use and disclosure of Personal Data</li> <li>(1) Purposes of use of Personal Data</li> <li>a) We collect, process and provide your Personal Data in order to achieve the purposes set forth below.</li> <li>• For transactions with you concerning or for provision to you of, train tickets, travel-related</li> </ul>	<ul> <li>2. Collection, use, and disclosure of Personal Data</li> <li>(1) Purposes of use of Personal Data</li> <li>a) We collect, process, and provide your Personal Data in order to achieve the purposes set forth below.</li> <li>For transactions with you concerning or for <u>the</u> provision of train tickets, travel-related</li> </ul>

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products and other services related thereto and the like;	products, and other services related thereto and the like;
• For the purposes of conducting investigations necessary to respond to requests made by	· For the purposes of conducting investigations necessary to respond to requests made by
you and analyzing and preparing statistics on our customers' trends; and	you and analyzing and preparing statistics on trends related to our customers; and
For sales analysis and product development.	For sales analysis and product development.
b) We collect, process and provide your Personal Data in order to achieve the purposes set	b) We collect, process, and provide your Personal Data in order to achieve the purposes se
forth below only if we obtain your explicit consent separately;	forth below only if we obtain your explicit consent separately;
• For delivery of advertising and other items and printed materials, as a way of advertising	• For the delivery of advertising and other items and printed materials, as a way o
our business, by the Internet or any other means.	advertising our business, by the Internet or via any other means.
(2) Legal Grounds for handling <u>the</u> Personal Data	(2) Legal Grounds for handling Personal Data
We may handle the Personal Data based on the following legal grounds:	We may handle Personal Data based on the following legal grounds:
• To perform your instructions or <u>fulfil</u> the obligations under other contracts with you;	• To perform your instructions or <u>fulfill</u> the obligations under other contracts with you;
• Your consent expressly given to us to handle the Personal Data in such manner. You may	• Your consent expressly given to us to handle the Personal Data in such manner. You may
withdraw the consent to this handling at any time; however, this will not affect the	withdraw your consent to this handling at any time. However, this will not affect the
lawfulness of any handling activity carried out by us <u>before</u> such withdrawal of <u>the</u> consent.	lawfulness of any handling activity carried out by us prior to such withdrawal of consent.
<ul> <li>To comply with legal and regulatory obligations; and</li> </ul>	<ul> <li>To comply with legal and regulatory obligations; and</li> </ul>
· Legitimate interests or those of any third-party recipients of the Personal Data, provided	· Legitimate interests or those of any third-party recipients of the Personal Data, provided
that such interests are not overridden by your interests or fundamental rights and freedoms.	that such interests are not overridden by your interests or fundamental rights and freedoms.
(3) Additional processing	(3) Additional processing
In the case of processing <u>the</u> Personal Data for purposes other than the foregoing, we will	In the case of processing Personal Data for purposes other than the foregoing, we will notify
notify you in advance of such purposes of use and other matters as required by applicable laws.	you in advance of such purposes of use and other matters as required by applicable laws.
(4) Necessity of providing Personal Data	(4) Necessity of providing Personal Data
The Personal Data that you are to provide is necessary in order for us to provide our services	The Personal Data that you provide is necessary in order for us to provide our services to
to you. Therefore, without the Personal Data, there may be cases where we will not be able	you. Therefore, without such Personal Data, there may be cases where we will not be able
to provide the services to you, in whole or in part.	to provide the services to you, <u>either</u> in whole or in part.
(5) Retention period	(5) Retention period

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We will retain your Personal Data for <u>a</u> following period.	We will retain your Personal Data for the following periods.
-Membership information: 190 days after withdrawal from membership.	-Membership information: 190 days after withdrawal from membership.
-Usage history information: 2 years and 1 month	-Usage history information: 2 years and 1 month
-Emergency Report: 8 years and 3 months.	-Emergency Report: 8 years and 3 months.
-Certificate of receipt: 8 years and 3 months	-Certificate of receipt: 8 years and 3 months
Other than above, we will retain your Personal Data as long as such data is necessary to	Other than <u>as indicated</u> above, we will retain your Personal Data as long as such data is
provide the services to you, but we will promptly delete the same in the case such data is	necessary to provide the services to you, but we will promptly delete the same in the case that
no longer needed.	such data is no longer needed.
(6) Transfer of Personal Data	(6) Transfer of Personal Data
We may provide your Personal Data to third parties such as our subsidiaries and affiliates,	We may provide your Personal Data to third parties, such as our subsidiaries and affiliates,
cloud vendors, outside contractors and professionals (including tax firms and law firms),	cloud vendors, outside contractors, and other professionals (including tax firms and law
etc., and your Personal Data will be processed by such third parties in order to carry out the	firms), etc., and your Personal Data will be processed by such third parties in order to carry
purposes of use specified above.	out the purposes of use specified above.
The Personal Data may be transferred to entities in countries or jurisdictions outside the	The Personal Data may be transferred to entities in countries or jurisdictions outside the
EEA, such as Japan, if required for the purposes as described above. Please note that such	EEA and UK, such as Japan, if required for the purposes as described above. Please note
countries or jurisdictions may not have the same data protection laws as the EEA and that	that such countries or jurisdictions may not have the same data protection laws as the
they may not afford many of the rights conferred upon you in the EEA. We will ensure that	EEA and UK and that they may not afford many of the rights conferred to you in the EEA and
any such international transfers are made subject to appropriate and suitable safeguards as	<u>UK</u> . We will ensure that any such international transfers are made subject to appropriate
required by the GDPR or other relevant laws. When doing so, we will comply with	and suitable safeguards as required by the <u>EU GDPR, UK GDPR</u> , or other relevant laws.
applicable data protection requirements and take appropriate safeguards to ensure the	When doing so, we will comply with applicable data protection requirements and take
security and integrity of the Personal Data.	appropriate safeguards to ensure the security and integrity of your Personal Data.
security and integrity of the reisonal Data.	appropriate sateguards to ensure the security and integrity of your reisonal Data.
3. Data subject's rights	3. Data subject's rights
You may $\underline{make}$ a request to us for access to, correction or deletion of, or restriction of	You may <u>submit</u> a request to us for access to, correction or deletion of, or restriction of the
processing of your Personal Data, and may make a request for data portability with regard	processing of your Personal Data, and may submit a request for data portability in regard to
to your Personal Data retained by us. When we receive a request based on the <u>right</u> specified	your Personal Data retained by us. When we receive such a request based on

the rights specified above, we will conduct any necessary investigation without undue delay

above, we will conduct any necessary investigation without undue delay and provide you or a nominated third party with the Personal Data or respond to such rights without undue

delay.

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Please note that you may raise an objection to the data protection authorities having	Please note that you may raise an objection to the data protection authorities having
jurisdiction over us or the location of your domicile with regard to the processing of	jurisdiction over us or the location of your domicile with regard to the processing of
your Personal Data.	your Personal Data.
4. Inquiries	4. Inquiries
If you have any questions or concerns regarding this Privacy Policy or our processing of	If you have any questions or concerns in regard to this Privacy Policy or our processing of
Personal Data, or any requests concerning the access to, correction or deletion of, or	Personal Data, or any requests concerning the access to, correction or deletion of, or
restriction of processing of Personal Data, or with regard to data portability, please contact	restriction of processing of Personal Data, or with regard to data portability, please contact
us at the following after confirming Section 6(2) of the Global Privacy Policy:	us <u>via</u> the following <u>contact information</u> after confirming Section 6(2) of the Global Privacy
	Policy:
Tokaido Sanyo Shinkansen Internet Reservation Service Customer Center	Tokaido Sanyo Shinkansen Internet Reservation Service Customer Center
JR Central Shinagawa Building A	JR Central Shinagawa Building A
2-1-85 Konan, Minato-ku, Tokyo 108-8204	2-1-85 Konan, Minato-ku, Tokyo 108-8204
Email Address: privacy@jr-central.co.jp	Email Address: privacy@jr-central.co.jp
Phone Number (Not toll-free): +81-(0) 03-6632-5130 (English only)	Phone Number (Not toll-free): +81-(0) 03-6632-5130 (English only)
Representative	Representative
The contact information for our representative is as follows:	The contact information for our representative is as follows:
DP-Dock GmbH	
Smart EX	EEA representative
Ballindamm 39	DP-Dock GmbH
20095 Hamburg, Germany	Smart EX
Email Address: smart-ex@gdpr-rep.com	Ballindamm 39
	20095 Hamburg, Germany
	Email Address: smart-ex@gdpr-rep.com
	UK representative
	DP Data Protection Services UK Ltd.
	Smart EX

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16 Great Queen Street, Covent Garden,
London, WC2B 5AH, United Kingdom
Email Address: smart-ex@gdpr-rep.com
5. Revision of this Privacy Policy
We may change the contents of this Privacy Policy when necessary, and we will announce
the revised Privacy Policy on our website when a revision is made. Please make sure to
regularly check the contents of this Privacy Policy.
After the policy is revised, you <u>will</u> be deemed to have agreed to the revised policy when
you use our services or view this Privacy Policy.

Revision date: March 6, 2021