# Japanet America's Privacy Policy

Japanet America, Inc. (Japanet America) is committed to protecting your privacy. Our Privacy Policy is designed to assist you in the understanding of how we collect, use and protect the personal information provided to us. All of our employees (officers, executive officers, regular employees, contract employees, part-time employees, temporary employees, dispatched employees), employees permanently stationed in our business partners, and our other related persons will observe this Policy and endeavor to protect your personal information.

- 1. We will securely handle your personal information under the supervision of our personal information protection administrator.
- We will ask you to provide your personal information only after you have understood our purpose and intent of acquiring your personal information, and will appropriately manage and protect the provided personal information.
- 3. We will not use your personal information for any purpose other than the purposes for which you have understood.
- 4. We will implement appropriate measures against any unauthorized access, leakage, loss, destruction or falsification of your personal information, and take preventive and corrective action.
- 5. We will strictly and promptly respond to your inquiries concerning your personal information and your request for changing or deleting your personal information.
- 6. We will conduct enlightenment activities and offer internal training to all employees for observing personal information-related laws and regulations and other rules.
- 7. We will make our Privacy Policy available to you at all times by posting it on our website.
- 8. We will observe personal information protection-related laws and other

- social norms, and endeavor to continuously maintain and improve our personal information protection measures.
- We will review this Privacy Policy as needed when any relevant laws are formulated or revised or when there are any changes to our management environment or business description, and thereby endeavor to maintain and improve this Privacy Policy.

By continuing to access Japanet America's website (the "Site"), you acknowledge that you have had the chance to review and consider our Privacy Policy, and that you agree to its terms, including the use of information and grounds for disclosure as described herein.

#### THE INFORMATION WE COLLECT

When you visit our Site, we collect two types of information: personal information you actively choose to disclose ("Active Information") and information not visible to you that arises out of your browsing of our Site ("Passive Information"). Please note that Passive Information is collected on an aggregate and anonymous basis.

# 1. Personally Identifiable Information

Personally Identifiable Information (PII) is information that identifies and is reasonably linked to you. We collect the following PII:

- a) Upon tour registration: Name, email, address, phone, DOB, dietary restrictions/allergies, medical conditions/medications, Nationality, emergency contacts (and relationship).
- b) For some tours, we will need to collect passport information to fulfill transit requirements. (booking internal flights, ships that require it for passenger manifest, visa applications, etc)

### 2. Passive Information

We store and collect various types of passive information on an aggregate and anonymous basis. This information may include such technical information as usage patterns, pageviews, browser type, device type, OS type, language, geo location, screen size, and referrer.

# 3. Aggregate Information

This refers to information that does not, by itself, identify you as a specific individual. Such information would include the Uniform Resource Locator ("URL") of the website that referred you to our Site, your Internet Protocol ("IP") address (a number automatically assigned to your computer whenever you surf the web), your operating system and browser type, and any search terms that you enter on our Site. Our web server aggregates this information in order to monitor the level of activity on our Site, evaluate its effectiveness, and improve the content or our Site in order to make your visit an easy and enjoyable experience.

We may collect, compile, store, publish, promote, report, or otherwise disclose or use any Aggregate Information, provided that such information does not personally identify you. We do not correlate any Personally Identifiable Information with the Aggregate Information that we collect on our Site. If we do correlate any Aggregate Information to you, it will be protected like any other Personally Identifiable Information under this Privacy Statement.

#### **HOW WE COLLECT USER INFO**

- a) Google Analytics <u>Privacy Disclosures Policy Analytics Help</u> (google.com)
- b) Google Tag Manager <u>Data privacy and security Tag Manager Help</u> (google.com)
- c) Meta pixel Terms and Policies Meta Pixel (facebook.com)
- d) Google Ads Google Privacy Policy Advertising Policies Help
- e) These technologies use cookies, beacons, and transparent GIFs.
- f) We will collect server statistics as well that capture IP addresses, browser identification strings, and referrers.

# What is a Cookie?

Cookies are a feature of web browser software that allows web servers to recognize the computer used to access a site. They are small pieces of data stored by a user's browser to simplify subsequent interactions with the site. This makes it easier for a user to move from site to site and to complete transactions over the Internet. Cookies should make your online experience easier and more

personalized.

Our Site utilizes cookies to collect information about how our Site is used. Passive Information gathered may include the date and time of visits, the Site pages viewed, time spent at our Site, the sites visited just before and just after visiting our Site. You can set or amend your web browser controls to accept or refuse cookies whenever you like, but please remember if you do choose to reject cookies, your access to some of the functionality and areas of our Site may be restricted. For further information and support, visit the specific help page for the web browser you are using.

Our Site's servers also automatically identify your computer by its Internet Protocol address, which is a unique string of numbers that are assigned to your computer by your Internet Service Provider. The IP address may be used to address problems with our server or to gather broad demographic information about our users. We passively collect your IP Address.

## HOW WE USE THE INFORMATION COLLECTED

JAPANET AMERICA DOES NOT SELL YOUR PERSONALLY INDENTIFIABLE INFORMATION TO THIRD PARTIES. We may share your Personally Identifiable Information as described below, and elsewhere in this Privacy Policy, as permitted or required by applicable law:

Broadly speaking, parties we employ directly, or as contractors or agents at our direction, use Active Information for purposes of administering our core business functions, such as the fulfillment of services and the furnishing of customer care and support.

We use Passive Information to gather information about our users and to enhance our Site to make it easier, faster and friendlier for users. Additionally, cookies help us better understand the usage pattern of the people that visit our site, which helps us improve our services. Passive Information may result in your viewing of particular advertising based on your user habits.

We reserve the right to use Personally Identifiable Information in order to prevent, detect and investigate fraud, security breaches, or any other potentially prohibited or illegal activity.

We may use any Personally Identifiable Information provided to contact you about various changes to our Site, new services, features or products we offer. If at any time you do not wish to receive such information, you may "opt-out" of doing so by email to the following email address: contact@japanetamerica.com

# Your Information and Hyperlinks

You might be able to access other websites through our Site via hyperlinks. When you do so, you are subjecting yourself to their privacy policies and data collection. Please read the privacy policies of those sites to ensure you agree with the terms before using such sites.

# Receiving and Sharing of Information from and with Third Parties

We reserve the right to receive information about you from other third party sources which helps us to update, expand and analyze our records and identify new customers. Furthermore, we may share Personally Identifiable Information necessary to the prevention of fraud, illegal activities, and security breaches. Because of this, it's possible some of your Personally Identifiable Information may be shared with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified, details of this fraud may be passed on to these agencies.

We may disclose your Personally Identifiable Information to enforce our policies, or where we are permitted (or believe in good faith that we are required) to do so by applicable law, such as in response to a request by a law enforcement or governmental authority, in connection with actual or proposed litigation, or to protect and defend our property, people and other rights or interests. We may also share your Personally Identifiable Information pursuant to a subpoena or other legal request, or as necessary to remit certain taxes in the course of processing payments as required by law or legal process. This applies to information as it relates to both open and closed accounts.

Additionally, third parties who perform services for us as it relates to security, payment, etc. (such as Internet Service Providers, credit card processors, and merchant banks) may also have access to your information in the performance of such necessary services.

We also may share your Personally Identifiable Information in connection with a corporate transaction, such as a divestiture, merger, consolidation, assignments

or asset sale, or in the unlikely event of bankruptcy. In the case of any acquisition, we will inform the buyer it must use your Personally Identifiable Information only for the purposes disclosed in this Privacy Policy

Finally, we may disclose information about user habits and use of the Site with our social media, advertising and analytics partners.

#### HOW WE SECURE ACTIVE AND PASSIVE INFORMATION

We secure your personal information submitted by you by using reasonable efforts to prevent unauthorized access or disclosure, or accidental loss of Active and Passive Information. These efforts include encryption, password protection.

# **Accessing and Correcting Your Information**

We take reasonable measures to ensure that any Personally Identifiable Information we collect on our Site is accurate, current, complete, and reliable for its intended use. If you wish to update or otherwise correct Personally Identifiable Information provided to us, you may edit your information by email to the following email address: contact@japanetamerica.com

# **Protecting Your Information**

We acknowledge your trust and are committed to take reasonable steps to protect Personally Identifiable Information provided from loss, misuse, and unauthorized access. We employ physical, electronic, and managerial processes to safeguard and secure your information. It is your responsibility to safeguard the password you use to access our Site and to promptly advise us if you ever suspect that your password has been compromised. We strongly encourage you to change your password regularly to prevent unauthorized access. Because your identification number and password are specific to you, you acknowledge sole responsibility for any and all use of our Site conducted with your identification number and password.

# **Children's Privacy Protection**

We take special care to protect the privacy needs of children and encourage parents to be an active participant in their child's online activities. Our Site does not target and is not intended for users under the age of 18, and we will not knowingly collect Personally Identifiable Information directly from them. You may

learn more about protecting children's privacy online by visiting:

www.consumer.ftc.gov/articles/0031-protecting-your-childs-privacy-online

# **U.S. State Privacy Rights**

Nevada Residents: Your Nevada Privacy Rights

Nevada law (SB 220) requires Website operators to provide a way for Nevada consumers to opt out of the sale of personal identifiable information that the Website operator may collect about them. Please note we do not sell your personal information to third parties as defined in Nevada law, and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law. If you have any questions regarding our data privacy practices or our compliance with Nevada data privacy law, please email us at contact@japanetamerica.com

# **Do-Not-Track Signals**

Some web browsers may transmit "do-not-track" (DNT) signals to sites with which the browser communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether users are even aware of them. Until a universal standard for DNT is set, our Site will not support DNT signals.

#### International Data Transfer

The Personally Identifiable Information we process may be transmitted or transferred to countries other than the country in which you reside. Those countries may have data protection laws that are different from the laws of your country.

We are located in the United States, while third-party service providers operate in many countries around the world. When we collect your Personally Identifiable Information, it may be processed in any of those countries. We have taken appropriate steps and put safeguards in place to help ensure that your Personally Identifiable Information remains protected in accordance with this Privacy Policy.

#### **Record Retention**

We will retain your Personally Identifiable Information in accordance with all applicable laws, for as long as it may be relevant to fulfill the purposes set forth in this Privacy Policy, unless a longer retention period is required or permitted by law. We will deidentify, aggregate, or otherwise anonymize your Personally Identifiable Information if we intend to use it for analytical purposes or trend analysis over longer periods of time.

The criteria we use to determine our retention periods include:

- The duration of our relationship with you, including any open accounts or recent bookings or other transactions you have made
- Whether we have a legal obligation related to your Personally Identifiable Information, such as laws requiring us to keep records of your transactions with us
- Whether there are any current and relevant legal obligations affecting how long we will keep your Personally Identifiable Information, including contractual obligations, litigation holds, statutes of limitations, and regulatory investigations

# **Changes to Our Privacy Policy**

Japanet America may update our Privacy Policy in response to changing laws and/or technical or business developments. You can see when this Privacy Policy was last updated by checking the "last updated" date displayed at the bottom of this Policy. It is your responsibility to review Japanet America's Privacy Policy each time you provide Personally Identifiable Information to Japanet America as the Policy may have changed since the last time you used our services. By using our Site, you acknowledge acceptance of this Privacy Policy in effect at the time of use.

## **Contacting Japanet America**

If you have any questions or concerns about our use of your Personal Information, please contact us via Email: contact@japanetamerica.com

**Last Updated: 1/9/2024** 

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