

## **PRIVACY POLICY**

This website <https://hospitality.rugbyworldcup.com/en/> ("Site") is operated by STH Japan K.K ("we", "us", "our").

We are committed to safeguarding your privacy and we ask that you read this privacy policy carefully as it contains important information on:

- The personal information we collect about you;
- What we do with your personal information; and
- Who your personal information will be shared with.

By visiting the Site you are accepting and consenting to the practices described in this Privacy Policy.

### **1. Who we are**

1.1 STH Japan K.K is a company incorporated under Japanese law. Its registered office and principal place of business is at 8F 4-1 Kasumigaoka-machi, Shinjuku-ku, Tokyo Japan, 160-0013.

1.2 We are the data controller in relation to the personal information that you submit or that we collect from you via the Site.

1.3 For users based in the European Economic Area, our representative in the EEA is Sports Travel and Hospitality Limited with its registered address at One Southampton Row, London, WC1B 5HA and its principal place of business at Avalon House, 72 Lower Mortlake Road, Richmond, United Kingdom, TW9 2JY.

### **2. INFORMATION THAT WE COLLECT FROM YOU**

We will collect and process the following personal information about you: 2.1 Personal information you give us. This is personal information about you which you give us by filling in forms on the Site or by corresponding with us by phone, email or otherwise. For instance, if you submit your information on the Enquiry or Register page of the Site, you will be asked to provide certain personal information about yourself including your name and contact details and we will collect and keep this information. Also, if you choose to subscribe to our newsletters and updates you may provide your contact information and possibly also some information about your preferences.

2.2 Personal information we collect about you. We use temporary cookies on the Site. Many websites use cookies whenever a user visits their website in order to track online traffic flows. A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer browser from a website's computer and is temporarily stored on your device's hard drive. Information supplied by cookies can help us to analyse the profile of our visitors and help us to provide you with a better user experience.

Please see our Cookie Policy for more information.

2.3 Personal information we receive from other sources. We may obtain your personal information from other sources. For instance, if you have submitted personal information to any of our or our group companies' websites, we may obtain information about you from them and combine it with personal information that you submit via this Site. We may also work with third parties such as payment service providers, credit reference agencies, list brokers and advertising networks and we may receive your personal information from them and combine it with personal information that you provide to us. We will use such collected information in accordance with this Privacy Policy.

2.4 Where you submit personal information to us about another person, such as personal information about your guests for a product that you have purchased, you must only do so where you have their consent. We will use that information in accordance with this Privacy Policy.

2.5 Under applicable Japanese laws on data protection, we are required to keep a record of personal information that we receive from other sources, and we may make certain enquiries to these other sources on how the personal information was obtained. These records will be maintained by us in accordance with applicable laws. Therefore, as part of our protocol, we may ask you certain questions if and when you submit personal information to us about another person.

### **3. USE OF PERSONAL INFORMATION**

3.1 Personal information you give to us. We will use this information:

- (a) to provide you with the information, products and services you have requested from us;
- (b) to carry out our obligations arising from any contracts entered into between you and us;
- (c) to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- (d) to manage our relationship with you or your business;
- (e) to notify you about changes to our services;
- (f) to develop and carry out marketing activities (see marketing section below for more information);
- (g) to study how our customers use products and services from us and other organisations;
- (h) to develop and manage our brands, products and services;
- (i) to manage how we work with other companies that provide services to us and our customers;
- (j) to detect, investigate, report, and seek to prevent fraud and other crimes;
- (k) to obey laws and regulations that apply to us;
- (l) to respond to complaints and seek to resolve them;
- (m) to exercise our rights set out in agreements or contracts; and
- (n) to run our business in an efficient and proper way.

In relation to some of these uses of your personal information listed above, we may disclose your personal information to certain third parties. Please see Section 4 below for more details on how your personal information may be disclosed to other third parties as part of our uses.

3.2 Personal information we collect about you. We may use the personal information that we collect about you for some or all of the following purposes:

- (a) to administer the Site and the operation of our business;
- (b) to make improvements to the Site so we can present it in the best possible manner for you;
- (c) as part of our efforts to maintain the safety and security of the Site;
- (d) to make suggestions and recommendations to users of our Site about products or services that may interest them.

3.3 Personal information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

3.4 Marketing. When you sign up to receive news and information from us or use the Site, we will use your personal information to create a profile based on the information we hold about you. This is necessary for the purposes of our legitimate interests in ensuring we have accurate information about you. We create a profile for you based on your preferences in order to provide you with the best experience and to send you personalised marketing communications and newsletters. This is necessary for the purposes of our legitimate interests in ensuring that we provide you a personalised experience and provide you with the most relevant products.

If you have given us your consent to send you marketing communications (including by email, text, SMS, social media, on-screen message/push notification) or if we are permitted by law to send such communications without obtaining your consent, we use the information that you have provided to us for sending you personalised marketing messages about our products or services, events, and promotions.

#### **4. DISCLOSURE OF YOUR PERSONAL INFORMATION**

4.1 We may share your information with the sports rights holder and others

Because this Site offers official hospitality packages to Rugby World Cup 2019, we may be required to share your personal information with the Tournament organiser or venue operator of the event you have purchased in relation to.

Your personal information will be used by us and those third parties for the purposes of:

- (a) administering and allocating your ticket to your requested event and/or hospitality packages;
- (b) the prevention of crime and for supporter security purposes;
- (c) the regulation of unauthorised aftermarket ticket sales; and
- (d) for market research and analytical purposes necessary to develop and improve the customer experience at future events.

Your personal data may also be shared with selected IT providers, such as third party cloud platform providers, in order to administer the above purposes.

We or the other parties may contact you directly where this is necessary to fulfil your booking.

In carrying out the above purposes, we or our third party partner may need to transfer your personal data to countries which may not have data protection laws providing the same level of protection as those in the European Economic Area or those in Japan. Where such a transfer occurs, we shall make sure that your personal data is kept safe by entering into a contractual undertaking which is approved by (or in accordance with guidelines stipulated by) the relevant data protection regulator in your region.

4.2 We may also, in the usual course of our business and for the purposes of the processing, share your personal information with personnel of:

(a) any member of our other group companies, which means our subsidiaries, our ultimate holding company and its subsidiaries;

(b) other third parties selected by us including:

i. suppliers and sub-contractors whom disclosure is necessary for the performance of any contract we enter into with them or you (this may include payment service providers, service contractors, and marketing fulfilment partners) or any other data processor who undertakes any data processing on our behalf;

ii. analytics and search engine providers that assist us in the improvement and optimisation of our site; and

iii. credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

4.3 We may also disclose your personal information:

(a) to any purchaser or prospective purchaser of the shares or business of STH Japan KK, or any purchaser of the Site (and in each case the purchaser shall be entitled to use your personal information for the same purposes for which we are entitled to use that information);

(b) to third parties in order to enforce or apply the Sites terms of use or our terms and conditions of supply;

(c) to advertisers, advertising networks and other third parties chosen by us; or

(d) to third parties in order to protect the rights, property, or safety of STH Japan KK, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

4.4 Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, we will not share, sell or distribute any of the personal information you provide to us without your consent.

## **5. STORING PERSONAL INFORMATION**

5.1 We collect personal information from wherever users are situated, but our Site servers are situated in Japan. The personal information that we collect will therefore be transferred to

Japan from any other country in which you may be located and will be subject to Japan data protection laws rather than the laws of the country in which you are resident.

5.2 We implement security measures to maintain the security of your personal information which is in our control. Unfortunately, information transmitted via the internet cannot be completely secure and so we cannot completely guarantee the security of your data transmitted to our site. In particular, any transmission of data to us via the internet is at your own risk.

5.3 Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

Please check these policies before you submit any personal information to these websites.

5.4 We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. If we have not been in contact with you for 3 years then your account may be classed as dormant or your personal information may be deleted in line with our data retention policy. We will email to remind you before deletion so please check your inbox regularly to see if we have sent you any emails about this.

## 6. YOUR RIGHTS

We are committed to ensuring protection of your rights under applicable laws. You will find below a table summarizing your different rights, which you may exercise by contacting us via the contact information provided in Section 8 below or as otherwise stated:

Right of access (disclosure, correction, addition and/or deletion)	<p>You can request access to your personal information. You may also request rectification of inaccurate personal information, or to have incomplete personal information completed.</p> <p>You can request any available information as to the source of the personal information, and you may also request a copy of your personal information being processed by us.</p>
Right to request notification of our purposes of use	You can request a notification on how we are using the personal information we collected from you.
Right to be forgotten	<p>Your right to be forgotten entitles you to request the erasure of your personal information in cases where:</p> <ul style="list-style-type: none"> <li>(i) the data is no longer necessary in relation for the purposes of its collection or processing;</li> <li>(ii) you choose to withdraw your consent;</li> <li>(iii) you object to the processing by automated means using technical specifications;</li> <li>(iv) your personal information has been unlawfully processed or collected;</li> <li>(v) there is a legal obligation to erase your personal information; or</li> <li>(vi) erasure is required to ensure compliance with applicable laws.</li> </ul>

Right to restriction of processing	You may request the restriction of processing in the cases where: <ul style="list-style-type: none"> <li>(i) you contest the accuracy of the personal information;</li> <li>(ii) your personal information has been unlawfully processed or collected;</li> <li>(iii) we no longer need the personal information, for the purposes of the processing; or</li> <li>(iv) you have objected to processing for legitimate reasons.</li> </ul>
Right to restriction of disclosure to third parties	You may request the restriction of disclosure of your personal information to third parties in the case where: <ul style="list-style-type: none"> <li>(i) you choose to withdraw your consent; or</li> <li>(ii) your personal information has been unlawfully disclosed.</li> </ul>
Right to data portability	You can request, where applicable, the portability of your personal information that you have provided to us, in a structured, commonly used, and machine-readable format and you have the right to transmit this data to another controller without hindrance from us where: <ul style="list-style-type: none"> <li>(a) the processing of your personal information is based on consent or on a contract; and</li> <li>(b) the processing is carried out by automated means.</li> </ul> <p>You can also request to transmit directly your personal information to a third party of your choice (where technically feasible).</p>
Right to object to processing for the purposes of direct marketing	You may object to the processing of your personal information (notably to profiling or to marketing communications). When we process your personal information on the basis of your consent, you can withdraw your consent at any time.
Right not to be subject to automated decisions	You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
Right to lodge a complaint to the competent Supervisory Authority	If you have a privacy-related complaint against us, you may make your complaint by email to <a href="mailto:privacy@sthjapan.com">privacy@sthjapan.com</a> .  If you are unsatisfied with our response, you may then seek further recourse by contacting the competent supervisory authority or the competent court. You can notably contact our lead supervisory authority, being the Personal Information Protection Commission of Japan (the "PPC", <a href="http://www.ppc.go.jp/en">www.ppc.go.jp/en</a> ).

## 7. CHANGES TO OUR PRIVACY POLICY

We reserve the right to make changes to this Privacy Policy from time to time. Any such changes to our Privacy Policy will be posted to the Site and, where appropriate, through e-mail notification.

## **8. CONTACT US**

If you have any requests concerning personal information or any other queries about this Privacy Policy, please contact us by sending an email to [privacy@sthjapan.com](mailto:privacy@sthjapan.com) or by post to our address under Section 1 above.

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