

## **Tokyo American Club's Commitment to Data Privacy Protection**

Protecting the security and privacy of our member's personal data is important to the Club; therefore, we endeavor to conduct our business in compliance with applicable laws on data privacy protection and data security. The policy outlined below will help you to understand what type of data the Club may collect, how it is used and safeguarded and with whom we may share it.

### **Personal data**

Through our Web site, the Club will not collect any personal data about you (e.g. your name, address, telephone number or e-mail address), unless you voluntarily choose to provide us with it (e.g. by registration, survey), respectively, provide your consent, or unless otherwise permitted by applicable laws and regulations for the protection of your personal data.

As new Memberships are activated, the respective data is posted onto the Club's website. Members may choose to opt out of this feature by logging on to the site at [www.tokyoamericanclub.org](http://www.tokyoamericanclub.org) and ticking the appropriate boxes.

### **Purpose of Use**

When personal data is provided to us, it is used primarily to respond to your inquiry, process your order or provide you access to specific information or offers. Also, to support the Club to Member relationship:

- Stored and processed Member data may be shared with our worldwide affiliates to better understand your business needs and determine how we can improve our products and services; or
- Personal data may be used to contact you about a Club offer in support of your business needs or to conduct online surveys to understand better our Members' needs.
- Data may be shared with a third party in order to complete delivery of necessary Club communications/documents to the entire Membership.

If you choose not to have your personal data used to support our Member relationship (especially direct marketing or market research), we will respect your choice. Your personal data will not be sold or transferred to a third party for any use other than listed above.

### **Purpose Limitation**

The Club will collect, use or disclose personal data supplied by you online only for the purposes disclosed to you, unless the disclosure:

- is a use of the personal data for any additional purpose that is directly related to the original purpose for which the personal data was collected,
- is necessary to prepare, negotiate and perform a contract with you,
- is required by law or the competent governmental or judicial authorities,
- is necessary to establish or preserve a legal claim or defense,
- is necessary to prevent fraud or other illegal activities, such as willful attacks on Tokyo American Club's information technology systems.

### **Communications or Utilization Data**

Through your use of telecommunications services to access our Web site, your communications data (e.g. Internet protocol address) or utilization data (e.g. information on the beginning, end and extent of each access, and information on the telecommunications services you accessed) are technically generated and could conceivably relate to personal data. To the extent that there is a compelling necessity, the collection, processing and use of your communications or utilization data will occur and will be performed in accordance with the applicable data privacy protection legal framework.

### **Non-Personal Data Collected Automatically**

When you access our Web site, we may automatically (i.e., not by registration) collect non-personal data (e.g. type of Internet browser and operating system used, domain name of the Web site from which you came, number of visits, average time spent on the site, pages viewed). We may use this data and share it with our business partners to monitor the attractiveness of our Web site and improve its performance or content.

### **"Cookies" - Information Stored Automatically on Your Computer**

When you view our Web site, we may store some data on your computer in the form of a "cookie" to automatically recognize your PC next time you visit. Cookies can help us in many ways, for example, by allowing us to tailor a Web site to better match your interests or to store your password to save you having to re-enter it each time. If you do not wish to receive cookies, please configure your Internet browser to erase all cookies from your computer's hard drive, block all cookies or to receive a warning before a cookie is stored.

### **Children**

The Club will not knowingly collect personal data from children without insisting that they seek prior parental consent if required by applicable law. We will only use or disclose personal data about a child to the extent permitted by law, to seek parental consent pursuant to local law and regulations or to protect a child. The definition of "child" or "children" should take into account applicable laws as well as national and regional cultural customs.

### **Security**

To protect your personal data against accidental or unlawful destruction, loss or alteration and against unauthorized disclosure or access, Tokyo American Club uses technical and organizational security measures.

### **Links to Other Web Sites**

Tokyo American Club's Web site contain links to other Web sites. The Club is not responsible for the privacy practices or the content of other Web sites.

### **Questions and Comments**

Tokyo American Club will respond to reasonable requests to review your personal data and to correct, amend or delete any inaccuracies. If you have any questions or comments about the Club's Data Privacy Protection Policy (e.g. to review and update your personal data), please click on "Contact Us" in the upper right-hand corner of this window and send us your inquiry. As the Internet matures, so will our Data Privacy Protection Policy. We will post changes to our Data Privacy Protection Policy on this page. Please check this page regularly to keep up-to-date.