

“Pocket Concierge” Privacy Policy

For your convenience, we have provided a translation of this page below. This translation is for informational purposes only, and the definitive version of this page is the Japanese version.

Pocket Concierge Inc. (hereinafter “the Company”) shall handle the information of users and registered restaurants (hereinafter “Customer Information”) in the “Pocket Concierge” services (tools and a platform provided and operated by the Company) and dining services offered through American Express Company or its subsidiaries (hereinafter “the Services”) in the manner prescribed below.

Article 1 (General Provisions)

1. The Company shall comply with the Act on the Protection of Personal Information, guidelines issued by government ministries and agencies, and other related laws, etc. in order to protect Customer Information.
2. The “Pocket Concierge” Privacy Policy (hereinafter “this Policy”) shall apply to the Services (including other services provided by the Company that are incidental to the Services). In addition, where the handling of Customer Information is stipulated in privacy policies or personal information protection policies other than this Policy, or in the “Pocket Concierge” Terms of Use, etc., which are posted on a website operated by the Company, then those provisions shall also be applied. However, where such provisions, etc. conflict with the content of this Policy, this Policy shall take precedence.
3. This Policy shall not apply to services related to the Services that are provided by parties other than the Company. For information about the handling of Customer Information by such external services, please refer to the privacy policy, etc. separately established by the business providing the service in question.

Article 2 (Information to Be Acquired and Means of Acquisition, etc.)

1. The Company shall acquire Customer Information, including personal information (as defined Article 2.1 of the Act on the Protection of Personal Information; hereinafter, “Personal Information”), in the manner stipulated below in the Services.

(1) Information provided by users

- a. Name, e-mail address and telephone number
- b. Name, e-mail address, gender, telephone number, date of birth and other information specified by the Company relating to the person(s) visiting the restaurant
- c. The credit card's brand information, the last four digits of the credit card number and the expiration date of the credit card

(2) Information provided by registered restaurants (and their representatives)

- a. Name of the registered restaurant; and the name, e-mail address, telephone number, date of birth, address, information stated on identification documents with a photo, etc. and IP address of the representative of the registered restaurant
- b. Publicly available information contained in official gazettes and telephone directories, etc., and information notified by the registered restaurant, etc. to the Company at the time of and after registration as a member

(3) Information collected by the Company through use of the Services

- a. Information on usage status
- b. Device information (Individual identification information such as device-specific ID, etc.)
- c. Log information and action history information
- d. Location information

Note that although it is possible to change the settings of an information terminal to halt the transmission of location information, doing so may prevent utilization of certain aspects of the Services.

e. Cookies and anonymous IDs (ANIDs)

The Services may utilize a technology called "cookies" and other similar technology. "Cookies" are an industry-standard technology used by web servers to identify users' and registered restaurants' computers. Although "cookies" enable identification of users' and registered restaurants' computers, they cannot be used to identify individual users and registered restaurants. Note that although it is possible to change the settings of an information terminal to disable cookies, doing so may prevent utilization of some or all aspects of the Services.

f. Voice information derived from recorded phone calls

- 2. The Company shall acquire Customer Information in a legitimate manner and shall not use deceitful or other improper methods to obtain Customer Information. In addition, if the Company is to acquire Customer Information through methods other than through users' and registered restaurants' use of the Services, the Company

shall notify the users and registered restaurants or publicize the purpose of use in advance.

3. Users and registered restaurants are able to deactivate their account for the Services via the account page at any time. Please be aware that any outstanding reservations or payments will need to be handled through fulfilment or cancellation before the system will allow the deactivation of an account.

Article 3 (Purpose of Use)

1. The Company shall handle Customer Information acquired through the Services in a legitimate manner within the scope of the purposes listed below. Customer Information will not be used beyond the scope of the purposes listed below without the consent of the user or registered restaurant in question.

Purposes of use	Details of purposes of use	Information used
Provision, maintenance, or enhancement of the Services for users	<ul style="list-style-type: none">• For identification of users registering accounts for the Services and prevention of improper use of the Service• For identification of person(s) visiting restaurants, and provision of food served at restaurants and other information and services related to food and beverages• For smooth provision, maintenance, and enhancement of the Services or fraud prevention• For confirmation of eligibility to use the Services and other verification processes	<ul style="list-style-type: none">• Name, e-mail address and telephone number of the user• Name, e-mail address, gender, telephone number, date of birth and other information relating to the person(s) visiting the restaurant required for the provision of services, etc.• The credit card's brand information, the last four digits of the credit card number and the expiration date of the credit card• Information on usage status• Location information• Device information

Purposes of use	Details of purposes of use	Information used
	<ul style="list-style-type: none"> • For operation of the system necessary for implementation of the Services • For determination of the location of restaurants based on the current location information of users and registered restaurants, and for the provision of services that utilize such information 	<ul style="list-style-type: none"> • Log information and action history information • Cookies • Voice information derived from recorded phone calls
Provision, maintenance, or enhancement of the Services for registered restaurants	<ul style="list-style-type: none"> • For identification of the registered restaurant, etc. registering as a member of the Services and prevention of improper use of the Service • For smooth provision, maintenance, and enhancement of the Services or fraud prevention • For operation of the system necessary for implementation of the Services • For determination of the location of restaurants based on the current location information of users and registered restaurants, 	<ul style="list-style-type: none"> • Name, e-mail address, telephone number, date of birth, address, information stated on identification documents with a photo, etc. and IP address of the representative of the registered restaurant • Publicly available information contained in official gazettes and telephone directories, etc., and information notified by the registered restaurant, etc. to the Company at the time of and after registration as a member • Information on usage status

Purposes of use	Details of purposes of use	Information used
	and for the provision of services that utilize such information	<ul style="list-style-type: none"> • Location information • Device information • Log information and action history information • Cookies • Voice information derived from recorded phone calls
Notification and response, etc. to users and registered restaurants	<ul style="list-style-type: none"> • For provision of information relating to the Services and response to inquiries, etc. • For notifications regarding new services relating to the Services or for provision of such services • For notifications regarding the terms of use of the Services; changes to this Policy; termination or suspension of the Services or contract cancellation; or other important notifications, etc. regarding the Services. 	<ul style="list-style-type: none"> • Name, e-mail address, telephone number, date of birth, gender and other information relating to the user required for the provision of services, etc. • Name of the registered restaurant; and name, e-mail address, telephone number and address of the representative of the registered restaurant • Publicly available information contained in official gazettes and telephone directories, etc., and information notified by the registered restaurant, etc. to the Company at the time of and after registration as a member • Information obtained by the Company through customer inquiries

Purposes of use	Details of purposes of use	Information used
		(including voice information derived from recorded phone calls)
Dissemination of information regarding the business of the Company and American Express Company	<ul style="list-style-type: none"> • Dissemination of business information by mail, telephone or e-mail, etc., regarding membership registration for the Services • Sales and solicitation of financial instruments and services, etc. of American Express Company • Market research, the creation of statistics, and product development 	<ul style="list-style-type: none"> • Name and e-mail address of the user • Name of the registered restaurant; and name, e-mail address, telephone number and address of the of the representative of the registered restaurant • Publicly available information contained in official gazettes and telephone directories, etc., and information notified by the registered restaurant, etc. to the Company at the time of application for and after registration as a member restaurant

2. Any personally identifiable information (PII) provided by users and registered restaurants will be treated with absolute sensitivity without exception.

Article 4 (Protection of Personal Information)

The Company shall appoint staff responsible for the handling of Personal Information, and shall strive to establish a system to provide appropriate management of Personal Information that prevents unauthorized access to Personal Information, and loss, alteration, leakage, etc. of Personal Information.

Article 5 (Provision to Third Parties)

1. The Company shall not provide Customer Information that constitutes Personal Information to third parties, except in the cases below.
 - (1) When the Company has obtained the consent of the applicable user or registered restaurant;
 - (2) Provision based on laws and regulations;
 - (3) When taking necessary measures in response to the actions of users or registered restaurants that, in the course of using the Services, engage or attempt to engage in actions that violate the terms of use of the Services, such as harming the interests of others, or acting in a manner contrary to public order and morals;
 - (4) When it is necessary for the protection of a person's life, health or property, and obtaining direct consent from the customer (the applicable user or registered restaurant) is difficult;
 - (5) When the Company is required to cooperate with the execution of duties stipulated by laws and regulations by government institutions or local authorities, or parties entrusted by them, and there is a possibility that obtaining the consent of the customer may interfere with the execution of such duties; or
 - (6) When business succession resulting from mergers, demergers, or business transfers, etc. occurs and involves the transfer of users' and registered restaurants' Personal Information
2. Notwithstanding the provisions of the preceding paragraph, the Company may provide Personal Information handled by the Company to third parties in the following cases:
 - (1) Provision of user information to third parties: The provision of information to advertising distribution services affiliated with the Company for provision of services affiliated with the Company's services (hereinafter referred to as "Affiliated Services") (including qualification confirmation and other authentication procedures when using the service), or for delivery of advertisements tailored to the needs, interests and concerns of users, analysis of the effectiveness of such advertising, market analysis, and other marketing activities and the provision of information to a company that provides an inquiry management tool service in cooperation with us, for the purpose of providing a service in cooperation with us (including qualification confirmation and other authentication procedures for service use) and for the management of inquiries from users.
 - (2) Provision of registered restaurant information to third parties: The provision of information to online payment companies affiliated with the Company for the purpose of providing online payment services.

(3) In addition to the preceding paragraph, the Company shall be able to provide Customer Information to businesses that provide Affiliated Services (hereinafter "Affiliated Companies") after obtaining the consent of the relevant users and registered restaurants.

(4) The Company will provide Customer Information to the following Affiliated Companies in order to provide the Services

Name: Salesforce

Company: Salesforce Japan Co., Ltd.

• Information to be provided: Name, e-mail address and telephone number of the user; and name, e-mail address, gender, telephone number, date of birth and other information relating to the person(s) visiting the restaurant required for the provision of services, etc.

Article 6 (Outsourcing of the Handling of Personal Information)

The Company may entrust the handling of the Personal Information received from users and registered restaurants to third parties in whole or in part (this refers to cases in which the management of data including Personal Information is outsourced, etc.) In such cases, the Company will sign non-disclosure agreements, etc. in advance with the third-party contractor, with the equivalent terms and conditions of this Policy. The Company will also provide the proper supervision necessary to ensure that information security is being managed appropriately by the third-party contractor.

Article 7 (Joint Use of Information)

The Company may jointly use the Personal Information of users and registered restaurants with its parent company, other group companies, Affiliated Companies and other third parties within the scope necessary for the provision of the Services or Affiliated Services. In this case, the Company shall publicly announce in advance the name of the Affiliated Companies, the purpose of information sharing, the type of information to be shared, and the name and address of the party responsible for the management of such information (including the name of the representative, if such party is a corporation).

Article 8 (Data Collection Modules)

The following data collection modules are integrated into the Services in order to analyze how the Services are being utilized. Along with this, the Company may provide user or registered restaurant data to the providers of the data collection modules listed below. The

data collection modules use cookies, etc. to collect user or registered restaurant data that does not include personally identifiable information, and the data gathered is managed in accordance with the privacy policies and other regulations of each data collection module provider.

Data collection module provider	Purpose of use of collected information	Information to be collected	Purpose of use of collected information by module provider
Adobe Inc.	<ul style="list-style-type: none"> • Analysis of how the Services are being used 	IP address, browser, mobile device ID	https://www.adobe.com/privacy.html
American Express Int'l Inc.	<ul style="list-style-type: none"> • Dissemination of business information by mail, telephone or e-mail, etc., regarding membership registration for the Services • Sales and solicitation of financial instruments and services, etc. of American Express Company • Market research, the creation of statistics, and product development 	IP address, browser, mobile device ID, online activity time and website transitions	https://www.americanexpress.com/us/company/privacy-center/online-privacy-disclosures/
Datadog	<ul style="list-style-type: none"> • Modification and enhancement of the Services 	IP address, browser, information about your interactions with the	https://www.datadoghq.com/legal/privacy/

		Datadog Products, including identifiers, usage data, session information, links clicked, pages visited, and mouse movements	
Salesforce Japan	<ul style="list-style-type: none"> • Provision of customer support 	History of website browsing and usage, language settings and choices; link clicks, browsing history, etc.	https://www.salesforce.com/company/privacy/
Stripe Japan	<ul style="list-style-type: none"> • For use of payment services (including prevention of unauthorized use, analysis of usage status, etc.) 	Device and browser information across websites, apps and other online services (including IP address, plugins, languages used, time spent on the Company website, pages visited, links clicked, payment methods used, and pages leading to or referring to the Stripe website)	https://stripe.com/privacy

Article 9 (Security Management Measures)

The Company shall properly handle personal data in accordance with the Act on the Protection of Personal Information and other relevant laws and regulations concerning the

protection of Personal Information. In addition, the Company shall implement the following security management measures to protect Personal Information, including the prevention of leakage, loss and damage.

1. Appoint the representative director of the Company as the person responsible for the management of Customer Information who shall appropriately manage Customer Information and strive for continuous improvement.
2. Carry out regular self-verification of the status of handling of personal data.
3. Provide regular training to employees on the protection of Personal Information and information security.
4. Place restrictions on and manage persons entering and leaving the Company buildings and offices, as well as manage devices and electronic media, etc. that handle personal data.
5. Implement access control to limit the scope of persons in charge and Personal Information databases, etc. handled, review access authority in the event of changes, etc. to the duties of the persons in charge, record access logs, and take measures such as introducing security software to prevent unauthorized external access.
6. Implement security management measures based on an understanding of the system for the protection of Personal Information in each country where personal data is stored.

Article 10 (Disclosure and Correction, etc. of Customer Information)

The Company will respond to a request from a customer or their agent for “disclosure”, “correction, etc.” (as described below) or “discontinuance of use, etc.” (as described below) of Personal Information subject to disclosure in the manner set out below.

1. Main items of Personal Information subject to disclosure, correction, etc.

Users:

The name, e-mail address and telephone number of the user; and name, gender, telephone number, date of birth and other information relating to the person(s) visiting the restaurant registered for the provision of information and services related to food and beverages

Registered restaurants:

Name, e-mail address, telephone number, date of birth, address, information stated on identification documents with a photo, etc. and IP address of the representative of the registered restaurant; publicly available information contained in official

gazettes and telephone directories, etc., and information notified by the registered restaurant, etc. to the Company at the time of and after registration as a member

2. Cases where the Company may refuse to respond to requests for disclosure.

The Company will not respond to requests for disclosure in the following cases. In this case, the Company will give notice of the reason for the refusal of the request.

- (1) The Company cannot verify the identity of the customer;
- (2) The Company cannot verify the power of attorney of the agent, in the case the request is made by an agent;
- (3) There are omissions in the application form, identity verification documents or other similar documents;
- (4) The item of information for which there has been a request for disclosure, etc. does not fall under any of the items of Personal Information subject to disclosure.
- (5) Responding to the request may harm the life, health, property or other right or interests of the customer or any third party;
- (6) Responding to the request may seriously impede the proper execution of the Company's business; or
- (7) Responding to the request would result in a violation of any other laws or regulations.

3. Request for correction, etc. or discontinuance of use, etc.

If the Company has received a request for the correction, etc. (which means correction, addition or deletion) of a customer's Personal Information subject to disclosure on the grounds that such information is incorrect or false, or a request for the discontinuance of use, etc. (which means discontinuance of use, erasure, discontinuance of provision to third parties) of a customer's Personal Information subject to disclosure based on laws and regulations, from the customer, then the Company will conduct an investigation and comply with such request if the Company deems the reason for such request to be legitimate.

4. Parties who may request disclosure.

- (1) The customer
- (2) Statutory agent
- (3) Appointed agent

5. Point of contact for requests for disclosure.

Please contact the Company via the inquiry form below to request disclosure, correction, deletion, or discontinuance of use or provision of Personal Information,

or to make any other inquiries about the handling of Personal Information. To request disclosure, please attach the required documents to the application form prescribed by the Company (the Company will send the prescribed application form after receiving the request from the inquiry form) and submit it by mail or e-mail. Please note that the Company will not provide documentation on external storage media such as CDs, DVDs and USB media.

[Inquiry form](#)

6. Documents to be submitted

(1) Company's prescribed application form

Customer | ☐

Statutory agent | ☐

Appointed agent | ☐

(2) Documentation to verify the identity of the customer or agent (*1)

Customer | ☐

Statutory agent | ☐

Appointed agent | ☐

(3) Documentation to certify the power of attorney (*2)

Customer | ☐

Statutory agent | ☐

Appointed agent | ☐

*1 Documentation to verify the identity of the customer or agent

The documents to verify the identity of the customer or agent are as follows (limited to valid documents that are not expired, or documents issued within the last 3 months). Please submit either: (i) a copy of one document listed as photo ID below; or (ii) copies of two or more types of the documents listed as non-photo ID below.

Photo ID

Driver's license, certificate of driving history, passport, basic resident register card with a photo, special permanent resident certificate, crew member's pocket ledger, My Number Card (front side only *You do not need to submit a copy of the backside of the card where your individual number (My Number) is stated. My Number notification cards are not accepted.), other certificates with a photo issued by a public organization.

Non-photo ID

Health insurance card, national pension handbook, employee' pension insurance handbook, certificate/abstract of family register (original copy issued by a public organization within the last 3 months), resident record (original copy issued by a public organization within the last 3 months), certificate of seal registration (original copy issued by a public organization within the last 3 months, with the registered seal affixed in the margin), other certificates issued by a public organization.

If submitting a copy of a document that includes your individual number (My Number), basic pension number, place of your registered domicile, or insurance number and code or number of the insured, etc., please black out or redact those numbers or information so that they are unreadable. If your health insurance card has a QR code, please black it out so that it is unreadable.

*2 Documentation to certify the power of attorney

●For statutory agents

A document to certify the power of attorney. (One of the following documents. Limited to those issued within the last 3 months. Documents marked with * below are accepted only if they are original copies issued by a public organization. If submitting a copy of a document that includes the place of registered domicile, please black it out and redact the same so that it is unreadable.)

Person who has parental authority: Certified copy of family register (*), resident record (*)

Guardian of a minor: Certified copy of family register (*), court decision on appointment, or certificate of registration of guardianship (*)

Guardian of an adult: Court decision on appointment, or certificate of registration of guardianship (*)

●For appointed agents

The Company's prescribed authorization letter (Please affix the principal's signature and registered seal to the letter and attach a certificate of seal registration. If the appointed agent is a lawyer or certified judicial scrivener, please indicate the registration or certification number.)

7. Fees

The Company does not charge any fees for requests for disclosure, etc. In addition, the Company will publicly announce any change to the fees in advance.

8. Method of reply

The customer or statutory agent

In principle, a written disclosure report will be sent to the person who made the request for disclosure by postal mail. For security reasons, files can also be sent by e-mail when the software/applications designated by the Company may be used.

Appointed agent

In principle, a disclosure report will be sent to the address or e-mail address of the principal who is a party to the agreement that has been notified to the Company via the above methods. (If the principal has not notified the Company of their address in advance, then the principal shall notify the Company of their address when submitting the request for disclosure).

Article 11 (Revision to this Policy)

1. The Company shall review the operation status regarding its handling of Customer Information as necessary and strive to make continuous improvements. This Policy may therefore be revised from time to time as necessary.
2. When a revision is made to this Policy, the details of the revision shall be announced in an easily understood manner, such as through the Services or on the website operated by the Company, etc.; provided, however, that when a revision is made that legally requires the consent of users and registered restaurants, the Company shall obtain the consent of users and registered restaurants through methods prescribed separately by the Company.

Article 12 (Inquiries)

Please direct any opinions, questions, and complaints regarding the Company's handling of Customer Information as well as other inquiries regarding the handling of Customer Information to the contact below.

Pocket Concierge Inc.

Representative: Seolhyung Yang

Address: 1-1 Toranomon 4-chome, Minato-ku, Tokyo 105-6920

[Personal Information Management Inquiries Desk](#)

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