

GDPR Privacy Policy for Railway Operation

Effective Date : 31/3/2025

Revision Date : --/--/----

If you are accessing this website from other than the EEA or the UK, please read our general privacy policy [here](#).

1. About this Privacy Policy

This privacy policy (hereinafter referred to as the "Policy") is for our customers residing in the European Economic Area ("EEA") or the United Kingdom ("UK"). This Policy explains how we collect, use and protect your personal data in accordance with the EU and UK General Data Protection Regulation (the "GDPR") in relation to our railway operation.

2. Controller

Keihan Electric Railway Co.,Ltd (hereinafter referred to as the "we," "our" and "us") is the controller in the meaning of the GDPR and we are responsible for the processing of your personal data as described below. Our contact details:

Keihan Electric Railway Co.,Ltd

Address: 173-1, Okahigashimachi, Hirakata City, Osaka, Japan 573-0032

TEL: +81-6-6944-2532 FAX: +81-6-6944-2503

Email: is@ml.keihan.co.jp

3. How and From Whom We Collect Your Personals Data

We collect your personal data either directly from you or indirectly from our travel agencies through which your booking is made.

4. Purposes and Legal Bases for Processing Personal Data

We process the following categories of your personal data for the respective purpose with the respective legal basis as described below.

Purpose	Categories of Your Personal Data We Process	Legal Basis
(1) To provide passengers with our services, including verification of the contracting party and	Your basic information, including your name, e-mail address, telephone number, country of residence, and purchased train tickets, etc.	The necessity of processing for the performance of the railway transportation contract with the data subject.

Purpose	Categories of Your Personal Data We Process	Legal Basis
handling cancellations		
(2) To analyze and improve our website	Information obtained through device identifiers (e.g. cookies), including browser identification information, and website browsing history.	the consent of data subjects.
(3) To maintain the security and proper functioning of our website	Information obtained through device identifiers (e.g. cookies), including browser identification information, website browsing history, and other necessary for this purpose.	The necessity of processing for our legitimate interest in managing the website security and maintaining normal functionality of our website.
(4) To establish, exercise and/or defend our rights.	Personal data including your basic information necessary for this purpose.	The necessity of processing for our legitimate interest in asserting, proving, or defending our rights.

You may choose not to provide your personal data; in such cases, however, we may not be able to offer railway ticket sales service to you.

5. Sensitive Personal Data

We will not collect your personal data that is classified as sensitive personal data under GDPR.

6. Security Measures to Protect Personal Data

We will take the following security measures in managing your personal data.

1. Formulation of the basic policy

We have formulated the Basic Policy (the Personal Data Management Regulations) to ensure our compliance with relevant laws and regulations and to respond to complaints and inquiries in handling personal data.

2. Establishment of rules for handling personal data

We have established the rules and regulations to ensure the protection of personal data at each

stage of the collection, use, storage, provision, deletion and disposal of personal data, setting out the methods of handling, responsible persons and persons in charge and their duties.

3. Organisational security measures

We have appointed the Chief Privacy Officer as our chief officer in charge of personal data protection, and the Chief Personal Information Protection Managers and Personal Information Protection Managers in each department who handles personal data. The Chief Privacy Officer limits the number of persons who can access personal data, manages the access privileges, prepares a record to monitor the status of personal data processing, and conducts periodic self-inspections. In addition, we have appointed the Chief Audit Officer to carry out audits on our handling of personal data. We have also established a system to respond to any possible data leakages.

4. Security measures regarding personnel

We provide our employees with regular education and training on information security, including precautions regarding the handling of personal data. In addition, we require all employees who handle personal data to sign a confidentiality pledge.

5. Physical security measures

Regarding the offices where equipment handling personal data is installed, we have implemented controls such as locking and restricting access to it only to the relevant persons.

6. Technical security measures

We limit the persons who can access to personal data and personal information databases they can handle by setting and managing access privileges, and we take measures such as encrypting personal data where necessary.

7. Understanding of foreign legal environments

We implement security measures based on our research and understanding of relevant laws and regulations concerning the protection of personal data in countries where your personal data is stored.

7. Retention Period of Personal Data

We will retain your personal data for as long as it is necessary for the purposes described in Section 4. When the retention period of personal data has expired, we will delete or anonymize it within a reasonable period in a secure manner.

8. Disclosure of Personal Data to Third Parties

We may disclose your personal data to third parties for as long as necessary for the purposes described below. If our processing of personal data goes beyond the scope of the legal basis specified in Section 4, we will obtain your consent or complete other necessary procedures to conform with GDPR before disclosing it.

Categories of personal data to be disclosed	Recipients	Purposes of disclosure
Categories listed in Section 4 (1) above	Our service providers for railway operations	Purposes (1) in Section 4 above
Categories listed in Section 4 (2) above	Advertising technology companies	Purposes (2) in Section 4 above
Categories listed in Section 4 (3) above	Our service providers operating and maintaining our website	Purposes (3) in Section 4 above
Categories listed in Section 4 (4) above	Court or other dispute resolution organizations, attorneys, etc. that we use to execute our contracts with you and to assert, prove, or defend our rights in legal disputes	Purposes (4) in Section 4 above

9. Cross-Border Transfer of Personal Data

Our disclosure of your personal data to third parties may constitute cross-border transfer of personal data. When we transfer your personal data to a country or region other than the EEA member countries or the UK, we either rely on adequate decisions made by the European Commission or the UK government, use the Standard Contractual Clauses (SCCs) adopted by the European Commission, the International Data Transfer Agreement (IDTA) or the International Data Transfer Addendum to the European Commission's SCCs approved by the UK Parliament, or take other necessary measures to protect your personal data.

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10. Your Rights

You have the following rights set out in the GDPR with the processing of your personal data by us. You may exercise the rights by contacting us via the Point of Contact below. We generally respond to you within one month after receiving your request and verifying your identification unless there are any of the exceptions set out in the GDPR and applicable laws and regulations.

(1) Withdrawal of consent: You can revoke at any time previously given consent to our processing of your personal data.

- (2) Right of access (we disclose information including purposes to process, categories of personal data, recipients to disclose, retention period, sources to collect): You have the rights to make an inquiry, to review and to request us for copies of your personal data we hold.
- (3) Right to rectification: You have the right to request us to correct any of your personal data we hold which you believe is inaccurate. You also have the right to request us to complete your personal data we hold which you believe is incomplete.
- (4) Right to erasure: You have the right to request that we erase your personal data, under certain conditions.
- (5) Right to restrict processing: You have the right to request that we restrict the processing of your personal data, under certain conditions.
- (6) Right to object to processing: You have the right to object to our processing of your personal data, subject to certain conditions as set out in Section 11.
- (7) Right to data portability: You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

11. Right to Object to Processing

You have the right to object at any time to the processing of your personal data on the basis of our legitimate interests. Please contact us if you wish to exercise this right.

12. Lodging Complaint with Data Protection Authority

In accordance with the GDPR, you have the right to lodge complaints about how we process your personal data with competent data protection supervisory authority. However, we appreciate the opportunity to address your concerns before you lodge a complaint to the data protection supervisory authority. We kindly request that you consider contacting us through the Point of Contact below in Section 13.

13. Point of Contact

We have appointed DataRep as our data protection representative in the EEA and the UK. Please contact the representative by either of the following channels. Please visit [this URL](#) for information on how to contact the representative.

Email: datarequest@datarep.com

Webform: www.datarep.com/data-request

Postal mail: Please mail your inquiry to the representative at the address listed on [this URL](#), whichever is most convenient for you.

14. Update of this Policy

We may update this Policy to comply with amendments to the GDPR and applicable laws and regulations. If we update this Policy, we will post it on our website without delay and announce the revision date.