

1. Introduction

This Privacy Policy (“**Policy**”) provides information on the personal data processing by Hankyu Hanshin Express. Milan-Rep.Office in the Italy, a private company with limited liability established under Italian law, having its statutory seat in Milan, and its registered office at Corso Buenos Aires 2, Milano (hereinafter referred to as: “**Hankyu Hanshin**”, “**we**” or “**us**”):

Hankyu Hanshin can be reached via the following contact details:
Hankyu Hanshin Express. Milan-Rep.Office.
Corso Buenos Aires 2 | Milano | | 20124.
Main Tel: +39-02-2940-3690

Hankyu Hanshin is part of a global network, with its headquarters in Tokyo, Japan.

This Policy applies to the personal data that identify or may identify a natural person (“**Personal Data**”). These natural persons involved are hereinafter collectively referred to as data subjects (“**Data Subjects**”).

Hankyu Hanshin reserves the right to review and/or alter the Policy periodically, in order to comply with (local and/or European) legislation, and for any other purpose deemed reasonably necessary by Hankyu Hanshin.

For queries and inquiries about this Policy, please contact Atsushi Inomata of Hankyu Hanshin at GDPR@eu.hh-express.com

2. Handling of Personal Data

This Policy sets out the elements necessary for Hankyu Hanshin’s compliance with applicable privacy legislation, principles and practice, including but not limited to the General Data Protection Regulation (GDPR) (“**applicable laws**”).

The Policy is an external policy, and is directed towards the users (“**users**” or “**you**”) of the website <http://www.hhe-global.com/emea> (“**Website**”). This Policy applies to the processing of Personal Data, in which Hankyu Hanshin acts as the data controller, within the meaning of the applicable laws. This is the case when Hankyu Hanshin determines the purpose and the means for the processing of Personal Data of users.

To use the Website, you may be asked to provide your Personal Data. If this is the case, Hankyu Hanshin and our partners shall be required to keep such information confidential.

3. Personal data, purpose and legal basis for data processing

Personal Data mentioned herein and defined by Hankyu Hanshin refers to information of all kinds related to each individual person that is electronically transmitted to Hankyu Hanshin by users.

The types of Personal Data Hankyu Hanshin collects and processes on the Website, include:

- identification data, such as your first and last name and country;
- contact details, such as address, telephone number and email address;
- professional details, such as company name, department and data relating to required services.

On the basis of legitimate interest, Hankyu Hanshin processes Personal Data for the following purpose(s):

- making the Website available to the users;
- provide the information and documentation necessary for the use of the Website; and
- researching the cause of or solution to any problem arising in its servers.

The legitimate interest pursued is making the website available for the users. For these purposes, Hankyu Hanshin retains the Personal Data for a period of 5 years

On the basis of consent, Hankyu Hanshin processes Personal Data for the following purpose(s):

- registration of users for services offered by Hankyu Hanshin;
- optimizing the use of the Website; and
- notifying users about changes to policies and services.

For these purposes, Hankyu Hanshin retains the Personal Data for a period of 5 years

On the basis of the performance of a contract, Hankyu Hanshin processes Personal Data for the following purpose:

- business inquiries.

For this purpose, Hankyu Hanshin retains the Personal Data for a period of 5 years.

4. Purpose limitation

The Personal Data may only be processed to the extent necessary for the described purposes. Personal Data may in principle not be processed for other purposes other than that for which the personal data were collected.

5. Security of your Personal Data

Hankyu Hanshin handles your Personal Data carefully and confidentially, and uses all suitable physical, managerial, and technical safeguards to preserve the integrity and security of your Personal Data.

6. Transfer of your Personal Data

Hankyu Hanshin processes your Personal Data Your information may be accessed or transferred by Hankyu Hanshin entities and other third parties as outlined in this Policy.

Group entities

Personal Data may be shared with Hankyu Hanshin's group entities in compliance with applicable law, for purposes consistent with this policy. Where Hankyu Hanshin's group entities qualify as Processors, Hankyu Hanshin will enter into a Data Processing Agreement with them.

Vendors and suppliers

Hankyu Hanshin occasionally hires other companies to provide limited services on its behalf, including service providers, such as transport companies or airlines. Hankyu Hanshin will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

In all cases, Hankyu Hanshin will expressly state why such information is necessary, so that you may provide the information at your own discretion. Hankyu Hanshin will not disclose Personal Data provided by users to any party, other than Hankyu Hanshin itself, without prior permission from the users.

For the purpose of product development and identification of business needs, Hankyu Hanshin may use Personal Data, personal opinions, and the like presented by users, though such use shall be limited only to Hankyu Hanshin itself and Hankyu Hanshin 's affiliates and business partners.

Law enforcement purposes

In certain circumstances, it is possible that Personal Data may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders.

Hankyu Hanshin may disclose Personal Data in case such disclosure is mandatory under applicable laws or is reasonably judged to be essential in order to protect and safeguard the rights, property and safety of other users, Hankyu Hanshin itself, and/or Hankyu Hanshin 's affiliates.

Sale or merger of business

Circumstances may arise where, whether for strategic or other business reasons, Hankyu Hanshin decides to sell, buy, merge or otherwise reorganize businesses. Such a transaction may involve the disclosure of Personal Data to prospective or actual purchasers, or receiving it from sellers. It is Hankyu Hanshin's practice to seek appropriate protection for information in these types of transactions.

Transfer of data to third countries

Hankyu Hanshin may transfer Personal Data to a third country or international organisations outside of the EU/EEA, such as to the Headquarters Hankyu Hanshin in Japan, which shall take place only in compliance with the applicable laws, and where appropriate safeguards are in place that ensure the level of protection of users as required by the applicable laws (e.g. transfers on the basis of an adequacy decision or standard EU Model clauses).

These safeguards include entering into EU Model Clauses with the recipient of the Personal Data who is established outside the EER. A copy of the relevant EU Model Clauses can be requested by sending such request to GDPR@eu.hh-express.com .

The website [<http://www.hhe-global.com/emea>] also refers to other websites. This Privacy Statement is only applicable to this website. Therefore we advise you to visit the Privacy Policies of the other websites to which this website is referring to.

7. Rights in relation to Personal Data

Users have the right of information, access, rectification, addition and erasure of Personal Data, and the right to object against or restrict the processing of Personal Data (or withdraw an earlier given consent), as well as the right to data portability. The procedure of Hankyu Hanshin that enable you to exercise these rights, is described below.

Users may file a request for access with Hankyu Hanshin, and Hankyu Hanshin shall respond as soon as possible, and in any event within one (1) month, about:

- a) whether Hankyu Hanshin holds any Personal Data relating to the respective user; and,
- b) if so, information is provided on the purposes of the processing, the categories, the recipients (if applicable), retention periods, the rights of the Data Subject and the source(s) of the Personal Data.

After a user has accessed the Personal Data, he/she may request Hankyu Hanshin to correct, restrict, amend, add, erase and/or transport the Personal Data. Hankyu Hanshin informs the user within one (1) month after receiving the request whether the request shall be complied with (in time), and if not, accompanied with the reasons for the delay or rejection.

Hankyu Hanshin will comply with a legitimate request of a user if the Personal Data are factually incorrect, incomplete, or irrelevant for the purpose(s) of the data processing, or otherwise processed in violation with the applicable laws.

With regard to a request to erase Personal Data, it should be taken into account that Hankyu Hanshin shall not comply with such request, if it is incompatible with any legal obligations of Hankyu Hanshin.

If a request is allowed, Hankyu Hanshin shall execute the decision to correct, amend, erase and/or transport the Personal Data as soon as possible.

Information provided shall be free of charge. You can exercise these rights at reasonable intervals. You can exercise your rights by contacting Hankyu Hanshin in writing (see address above) or per e-mail at GDPR@eu.hh-express.com

In the event of concerns about the handling of Personal Data, users also have the right to lodge a complaint with a local supervisory authority.

8. Cookie policy

A 'cookie' is a small unit of information which can be passed to your browser while you are using the Website and/or another Hankyu Hanshin website. In most cases, cookies are used to ensure an efficient use of the Website. If you do not want websites to use cookies with your browser, you may deny the cookies (this only applies for cookies for which an explicit consent is required) for each website, and/or change the settings on your internet browser so that the cookies are deleted or deactivated. If you do not allow the use of cookies and have deactivated the cookies or arranged to have the cookies deactivated, this may have consequences for the ease of use of a Website.

The Website automatically generates log files that register the use by you and other users of the Website. Hankyu Hanshin maintains user data, such as source addresses of pages requested, IP (internet protocol) addresses and domain names, dates and times of page requests, links from other websites and other parameters in the URLs (universal resource locators). These log files and data will be used, on an anonymous basis, for statistical purposes and for improving the services offered via the Hankyu Hanshin website, such as the Website.

9. Modifications in this Policy

This Policy can be modified at any time by Hankyu Hanshin. For that reason we advise you to visit this website periodically.

10. Questions and inquiries

For queries and inquiries about this Policy of Hankyu Hanshin, please contact Atsushi Inomata at GDPR@eu.hh-express.com or telephone number +39 02 2940-3690