

ANNEX

1. PROCESSING OF YOUR PERSONAL DATA

For the purposes specified in this Annex of the Privacy Policy, we process the personal data obtained from you directly (when you decide to communicate such data to us, i.e., when you contact us, or when you fill in forms displayed on the Website) or indirectly (data provided to us by a third-party). The data subjects in question are users, followers, subscribers, (potential) customers, business partners, contractors, vendors, seminar participants and their respective employees and other third parties outside the Japan National Tourism Organization (“Organization”). We ensure that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. We will always process your personal data based on one of the legal basis provided for in the GDPR (Articles 6 and 7).

For which purposes we process your personal data and on which legal ground

We may collect and process your personal data based on the following legal grounds for the following purposes:

I. Purpose: Marketing and Public Relations (PR) Activities

Personal data obtained from you directly

Specific Purpose	Legal Basis	Controller
Processing of subscribers receiving publications/brochures in the UK, as well as Netherlands, Norway, Denmark, Finland, Sweden, Ireland, Turkey, Israel, Cyprus, Liechtenstein and/or sending enquiries or forms for competition entries	Legitimate interest Consent (concerning direct marketing, including newsletters and for using cookies and similar technologies)	JNTO London
Processing of data of the users accessing JNTO’s SNS pages and making general enquiries through JNTO’s website	Legitimate interest Consent (for direct marketing and for using cookies and similar technologies)	JNTO London
Processing of personal data of the entrants to the JNTO’s competition through website	Legitimate interest Consent (for direct marketing)	JNTO London

We may have legitimate interest in collecting, directly or/and indirectly, and processing your personal data for the purposes listed in the tables above, which is required to provide our services, organize business events and contests, send information and communicate with the press, send the requested brochures/newsletters to data subjects, update the social networking pages and improve our online presence, reply to enquiries etc. A balancing test has been carried out in order to rely on legitimate interest as a lawful basis for processing and data subjects can obtain information on the balancing test upon request. If we need to process any special category of personal data from you (e.g., health data), we will do it subject to your explicit consent (Article 9(2)(a) GDPR). In certain processing activities listed above the processing may rely on the consent given by the data subject to the processing of his/her personal data for a specific purpose.

II. Purpose: Business Operations

Personal data obtained from you directly

Specific Purpose	Legal Basis	Controller
Processing of personal data of the event participants in the UK, as well as Netherlands, Norway, Denmark, Finland, Sweden, Ireland, Turkey, Israel, Cyprus, Liechtenstein	Legitimate interest	JNTO London
Processing of personal data of the respondents to questionnaires at events in the UK, as well as Netherlands, Norway, Denmark, Finland, Sweden, Ireland, Turkey, Israel, Cyprus, Liechtenstein	Legitimate interest	JNTO London
Processing of personal data of participants in Press trip and Familiarization trips to Japan	Legitimate interest For the processing of sensitive data, the legal basis is explicit consent (GDPR Article 9(2)(a))	JNTO London
Processing of personal data of the registrants for the online training (through JNTO's website) in the UK, as well as Netherlands, Norway, Denmark, Finland, Sweden, Ireland, Turkey, Israel, Cyprus, Liechtenstein	Legitimate interest JNTO also obtains consent by users accepting JNTO's Privacy Policy on their webpage	JNTO London
Processing of business partners' personal data (and their employees')	Legitimate interest	JNTO London

We may have legitimate interest in collecting, directly or/and indirectly, and processing your personal data for the purposes listed in the tables above, which is required to organize the familiarization/media trips and make all the necessary arrangements regarding travel and accommodation, organize e-learning programs, business events, seminars etc., maintain operational contact details, manage and evaluate our relationship with the business partners and communicate with them. A balancing test has been carried out in order to rely on legitimate interest as a lawful basis for processing and data subjects can obtain information on the balancing test upon request. If we need to process any special category of personal data from you (e.g., health data), we will do it subject to your explicit consent (Article 9(2)(a) GDPR). In certain processing activities listed above the processing may rely on the consent given by the data subject to the processing of his/her personal data for a specific purpose.

III. Purpose: Information Technology (IT) and General Administration

Personal data obtained from you directly

Specific Purpose	Legal Basis	Controller
Processing of office lease agreement	Legitimate interest	JNTO London

We may have legitimate interest in collecting, directly or/and indirectly, and processing your personal data for the purposes listed in the tables above, which is required to keep record of and ensure contract management of lease agreement for EEA office space/buildings, enable employees to utilize the Cybozu cloud services and process visitors' personal data for security measures (see also our Cookie Policy] for more information). A balancing test has been carried out in order to rely on legitimate interest as a lawful basis for processing and data subjects can obtain information on the balancing test upon request.

We will process your data for all these specified, explicit and legitimate purposes listed above, and will not further process the data in a way that is incompatible with these purposes. If we intend to process personal data originally collected for one purpose in order to attain other objectives or purposes, we will ensure that you are informed of this. We will keep your personal data only for as long as it is necessary for us to comply with our legal obligations to ensure that we provide an adequate service, and to support its business activities (Article 5 and 25(2) GDPR).