

gumi Inc. Privacy Notice for California Residents

Effective Date: September 29, 2020

This **Privacy Notice for California Residents** supplements the information contained in gumi Inc.'s (“gumi”, “we”, “us” or “our”) general Privacy Policy (<https://gu3.co.jp/en/policy/>) and applies solely to all customers, prospective customers, visitors, users, players, and others who reside in the State of California (“users” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular user, consumer, household, or device (“**personal information**”). Personal information does not include:

- Publicly available information from government records.
- Anonymous or de-identified, consumer information.
- Aggregated consumer information.

In particular, we have collected the following categories of personal information from users within the last twelve (12) months:

Category	Collected
A. Identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	YES
C. Protected classification characteristics under California or federal law.	YES
D. Commercial information.	YES
E. Biometric information.	NO
F. Internet or other similar network activity.	YES
G. Geolocation data.	YES
H. Sensory data.	NO
I. Professional or employment-related information.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	NO
K. Inferences drawn from other personal information.	NO

We obtain the categories of personal information listed above from the following categories of sources:

Category	Sources
Category A: Identifiers.	Users of our website, applications and services, users’ devices, data services, social network services, and service providers

Category B: California Customer Records personal information categories.	Users of our website, applications and services, users' devices, data services, service providers, and social network services
Category C: Protected classification characteristics under California or federal law.	Users of our website, applications and services, users' devices, data services, service providers, and social network services
Category D: Commercial information.	Users of our website, applications and services, users' devices, data services, service providers, and social network services
Category E: Biometric information.	NA
Category F: Internet or other similar network activity.	Users of our website, applications and services, users' devices, data services, service providers, and analytic services
Category G: Geolocation data.	Internet Protocol address, device shared location, and wi-fi connection location.
Category H: Sensory data.	NA
Category I: Professional or employment-related information.	Users of career and job opening pages of our website.
Category J: Non-public education information.	NA
Category K: Inferences drawn from other personal information.	Users of our website, applications and services, users' devices, data services, service providers, social network services, and analytic services

Use of Personal Information

We may use, or disclose the personal information we collect for one or more of the following purposes:

Category	Purposes
Category A: Identifiers.	To provide, support, personalize, and develop and operate our website, applications and services; to create, maintain, customize, and secure your account with us; to process your requests, purchases, transactions, and payments and prevent transactional fraud; to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses; to update, debug content, mechanics and functionality in our applications and services, to facilitate user's community and social interactions, user acquisition and advertising; to help maintain the safety, security, and integrity of our website, applications and services, databases and other technology assets, and business; for testing, research, analysis, and development, including to develop and improve our website, applications, and services; to respond to law enforcement requests and as required by applicable law, court order,

	<p>or governmental regulations; and as described to you when collecting your personal information or as otherwise set forth in the CCPA.</p>
<p>Category B: California Customer Records personal information categories.</p>	<p>To provide, support, personalize, and develop and operate our website, applications, and services; to create, maintain, customize, and secure your account with us; to process your requests, purchases, transactions, and payments and prevent transactional fraud; to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses; to update, debug content, mechanics and functionality in our applications and services, to facilitate user’s community and social interactions, user acquisition and advertising; to help maintain the safety, security, and integrity of our website, applications and services, databases and other technology assets, and business; for testing, research, analysis, and development, including to develop and improve our website, applications, and services; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; and as described to you when collecting your personal information or as otherwise set forth in the CCPA.</p>
<p>Category C: Protected classification characteristics under California or federal law.</p>	<p>To provide, support, personalize, and develop and operate our website, applications, and services; to create, maintain, customize, and secure your account with us; to process your requests, purchases, transactions, and payments and prevent transactional fraud; to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses; to update, debug content, mechanics and functionality in our applications and services, to facilitate application player’s community and social interactions, user acquisition and advertising; to help maintain the safety, security, and integrity of our website, applications and services, databases and other technology assets, and business; for testing, research, analysis, and development, including to develop and improve our website, applications and services; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; and as described to you when collecting your personal information or as otherwise set forth in the CCPA.</p>
<p>Category D: Commercial information.</p>	<p>To provide, support, personalize, and develop and operate our website, applications, and services; to create, maintain, customize, and secure your account with us; to process your requests, purchases, transactions, and payments and prevent transactional fraud; to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses; to update, debug content, mechanics and functionality in our applications and services, to facilitate application player’s community and social interactions, user acquisition and advertising; to help maintain the safety, security, and integrity of our website, applications and services, databases and other technology assets, and business; for testing, research, analysis, and development, including to develop and improve our website, applications and services; internal research; to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal</p>

	information held by us about our website, application and service users is among the assets transferred; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; and as described to you when collecting your personal information or as otherwise set forth in the CCPA.
Category E: Biometric information.	NA
Category F: Internet or other similar network activity.	To provide, support, personalize, and develop and operate our website, applications, and services; to create, maintain, customize, and secure your account with us; to process your requests, purchases, transactions, and payments and prevent transactional fraud; to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses; to update, debug content, mechanics and functionality in our applications and services, to facilitate application user’s community and social interactions, user acquisition and advertising; to help maintain the safety, security, and integrity of our website, applications and services, databases and other technology assets, and business; for testing, research, analysis, and development, including to develop and improve our website and services; to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets and intellectual property, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our website, applications and services users is among the assets transferred; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; and as described to you when collecting your personal information or as otherwise set forth in the CCPA.
Category G: Geolocation data.	To provide, support, personalize, and develop and operate our website, applications, and services; to create, maintain, customize, and secure your account with us; to process your requests, purchases, transactions, and payments and prevent transactional fraud; to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses; to update, debug content, mechanics and functionality in our applications and services, to facilitate application user’s community and social interactions, user acquisition and advertising; to help maintain the safety, security, and integrity of our website, applications and services, databases and other technology assets, and business; for testing, research, analysis, and development, including to develop and improve our website, applications and services; to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets and intellectual property, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our website, application and service users is among the assets transferred; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; and as described to you when collecting your personal information or as otherwise set forth in the CCPA.

Category H: Sensory data.	NA
Category I: Professional or employment-related information.	To evaluate applications for employment made through our career and job opening pages of our website.
Category J: Non-public education information.	NA
Category K: Inferences drawn from other personal information.	To provide, support, personalize, and develop and operate our website, applications and services; to create, maintain, customize, and secure your account with us; to process your requests, purchases, transactions, and payments and prevent transactional fraud; to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses; to update, debug content, mechanics and functionality in our applications and services, to facilitate application player’s community and social interactions, user acquisition and advertising; to help maintain the safety, security, and integrity of our website, applications, and services, databases and other technology assets, and business; for testing, research, analysis, and application development, including to develop and improve our website and services; to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets and intellectual property, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our website, application and service users is among the assets transferred; to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; and as described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, gumi had disclosed the following categories of personal information for a business purpose:

Category	Disclosure for Business Purpose
----------	---------------------------------

Category A: Identifiers.	YES
Category B: California Customer Records personal information categories.	YES
Category C: Protected classification characteristics under California or federal law.	YES
Category D: Commercial information.	YES
Category E: Biometric information.	NA
Category F: Internet or other similar network activity.	YES
Category G: Geolocation data.	YES
Category H: Sensory data.	NA
Category I: Professional or employment-related information.	NO
Category J: Non-public education information.	NA
Category K: Inferences drawn from other personal information.	YES

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- Customer Service Vendors;
- Computer Cloud Storage Providers;
- Payment and Auditing Processors;
- Quality Assurance Vendors;
- Social Media Services, Advertising and Marketing Partners;
- Security Vendors and other Service Providers;
- Subsidiaries, Parent Companies, Joint Ventures and other Corporate Entities under Common Ownership; and
- Government entities, including law enforcement.

No Sales of Personal Information

In the preceding twelve (12) months, gumi had not sold personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see [Exercising Access, Data Portability, and Deletion Rights](#)), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a separate list disclosing:
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see [Exercising Access, Data Portability, and Deletion Rights](#)), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug applications to identify and repair errors that impair existing intended functionality of services.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et seq.*).
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
7. Comply with a legal obligation.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing us at privacy@gu3.co.jp.

- Visiting us at <https://gu3.co.jp/>.
- Write us at gumi Inc. Attn: Legal Department Sumitomo Fudosan Nishi-Shinjuku Building No. 5, 3F Nishi-Shinjuku 4-34-7 Shinjuku, Tokyo 160-0023 Japan.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:
 - game ID (a unique number that our applications and services applies to each user or player).
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

In addition, if you do not have an account and you ask us to provide you with specific pieces of personal information, we reserve the option to require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing including by email.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information of Minors under Age 16

We do not sell the personal information of consumers we actually know are less than 16 years of age.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you our applications and services.
- Charge you different prices or rates for our applications and services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of our applications or services.
- Suggest that you may receive a different price or rate for our applications or services or a different level or quality of our applications or services.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@gu3.co.jp or write us at: gumi Inc. Attn: Legal Department Sumitomo Fudosan Nishi-Shinjuku Building No. 5, 3F Nishi-Shinjuku 4-34-7 Shinjuku, Tokyo 160-0023 Japan.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which gumi Inc. collects and uses your information described here and in the **Privacy Policy**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: <https://gu3.co.jp/>

Email: privacy@gu3.co.jp

Postal Address: gumi Inc. Attn: Legal Department Sumitomo Fudosan Nishi-Shinjuku Building No. 5, 3F Nishi-Shinjuku 4-34-7 Shinjuku, Tokyo 160-0023 Japan