

California Consumer Privacy Act Disclosures

In these California Consumer Privacy Act Disclosures ("CCPA Disclosures"), we disclose information about our data processing practices as required by the California Consumer Privacy Act of 2018 ("CCPA"). These CCPA Disclosures are effective January 1, 2020. You can download a PDF version [here](#)

I. Who and what information is subject to these CCPA Disclosures?

California residents are protected as "consumers" by the California Consumer Privacy Act of 2018 ("CCPA") with respect to personal information.

A number of statutory exceptions apply under the CCPA and to these CCPA Disclosures, including the following:

- (1) personal information reflecting a written or verbal communication or a transaction between a business and a consumer, where the consumer is a natural person who is acting as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit, or government agency and whose communications or transaction with the business occur solely within the context of the business conducting due diligence regarding, or providing or receiving a product or service to or from such company, partnership, sole proprietorship, non-profit, or government agency;
- (2) personal information that is collected by a business about a natural person in the course of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the natural person's personal information is collected and used by the business solely within the context of the natural person's role or former role as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or a contractor of that business;
- (3) personal information that is collected by a business that is emergency contact information of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of having an emergency contact on file;
- (4) personal information that is necessary for the business to retain to administer benefits for another natural person relating to the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of administering those benefits.

II. How can a consumer with a disability access these CCPA Disclosures?

Consumers who have a visual disability may be able to use a screen reader or other text-to-speech or text-to-Braille tool to review the contents of this notice.

III. CCPA Notice at Collection Online

In this CCPA Notice at Collection Online, we are addressing disclosure requirements under California Civil Code §1798.100(b) at or before the point of online collection:

We collect the following categories of personal information about consumers:

A. Order Placement and Fulfillment: If you place an order online or contact us online regarding its fulfillment, we collect personal information (such as first and last name, e-mail address, mailing address, billing address, phone number, credit card information, username, password and information on your particular order) in order to receive, process, confirm and fulfill your order. For this purpose we may particularly verify your identity and delivery address and process or collect payments from you.

B. Customer Support: If you request information or support in connection with our products or services, we collect personal information (such as first and last name, e-mail address, mailing address, billing address, phone number, credit card information, username, password, and information on your particular request) in order to respond to your customer service request and provide information or support to you.

C. Operation of Our Online Services: We collect personal information (such as the items in your shopping cart and (such as first and last name, e-mail address, mailing address, billing address, phone number, credit card information, username, password and information on your particular order) in order to operate, and enable you to use, our online services and technologies.

D. Promotions: We collect personal information (such as first and last name and email address and other) in order to communicate with you and send you information regarding our products and services or our company.

E. Contests and Surveys: If you participate in contests or surveys, we collect personal information (such as first and last name, email address, mailing address, phone number, user name, password, and your submissions, contributions or responses to the particular contest or survey) in order to enroll you in the contest or survey, manage your participation and, where applicable, communicate with you on the results.

F. Product Development: We collect personal information (such as first and last name, e-mail address, mailing address, billing address, phone number, credit card information, username, password and information on your particular order) in order to develop new products and services.

G. Legal Matters: We collect personal information (such as first and last name, e-mail address, mailing address, billing address, phone number, credit card information, username, password and information on your particular order) in order to comply with a law, regulation or legal requests, facilitate and engage in dispute resolution, enforce our agreements and terms and conditions, and protect our rights and property.

H. Security and Fraud Protection: We collect personal information (such as first and last name, e-mail address, mailing address, billing address, phone number, credit card information, username, password and information on your particular order) to prevent, detect, mitigate, and investigate fraud, security breaches and prohibited or illegal activities, protect the security of individuals, and address other security issues.

I. Browsing Activity: We collect personal information that your browser or device sends to us in connection with your access to our website (such as IP address, MAC address, computer type, domain name, and session length). We also collect personal information about your use of our website (such as the pages you are visiting, products and services you are looking at, clickstream data, and (such as first and last name, e-mail address, mailing address, billing address, phone number, credit card information, username, password and information on your particular order). We use this information in order to understand your preferences based on previous or current website activity, enhance and personalize your website experience, deliver the type of content and product offerings you are most interested in, learn more about shopping preferences and market trends, and to compile aggregate data about website traffic and website interaction in order to offer better website experiences and tools in the future.

J. Reorganization or Sale: Personal information collected from you (such as first and last name, e-mail address, mailing address, billing address, phone number, credit card information, username, password and information on your particular order) may be disclosed or otherwise processed as necessary where we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets.

Our online CCPA Privacy Policy can be found [here](#):

IV. CCPA Privacy Policy

Beyond the disclosures in the preceding "Notice At Collection Online" segment, we are providing additional disclosures about consumer rights and our personal information handling practices in the preceding twelve months, as required by the CCPA.

1. Right to Know About Personal Information Collected, Disclosed, or Sold

This CCPA Privacy Policy describes the personal information we generally collect, use, and disclose about California residents. You have the right to request that we disclose what personal information we collect, use, disclose and sell about you specifically ("right to know"). To submit a request to exercise the right to know, please visit <https://www.wifi-hire.com/en/contact>, call our toll-free phone number +81-50-5810-5700 or submit an email request to mn_eca@vision-net.co.jp and include "California Request to Know" in the subject line. Please specify in your request the details you would like to know, including any specific pieces of personal information you would like to access.

We will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. We will respond to your request in accordance with the CCPA. If we deny requests, we will explain why.

2. Our Personal Information Handling Practices in 2019

We have set out below the categories of personal information we have collected about California residents in the preceding 12 months and, for each category of personal information collected, the categories of sources from which that information was collected, the business or commercial purposes for which the information was collected, and the categories of third parties with whom we shared the personal information.

Category of personal information	We collected such personal information to use for the following business or commercial purposes:	We have collected such personal information from the following categories of sources:	We shared such personal information with the following categories of third parties:
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	To receive, process, confirm and fulfill orders; to respond to customer service requests and provide support; to operate and provide our online services; to send promotional communications; to organize and carry out contests and surveys; for compliance with legal obligations; to resolve disputes and enforce agreements; for security purposes; and to understand website usage, provide a more customized web experience, and improve the content of our website.	From the California resident	Cloud hosting and internet service providers, government entities, operating systems and platforms
Any categories of personal information described in subdivision (e) of Section 1798.80: "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records."	To receive, process, confirm and fulfill orders; to respond to customer service requests and provide support; to send promotional communications; to organize and carry out contests and surveys; for compliance with legal obligations; and to resolve disputes and enforce agreements.	From the California resident	Cloud hosting and internet service providers, government entities, operating systems and platforms/
Characteristics of protected classifications under California or federal law, including age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)

familial genetic information).			
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	To receive, process, confirm and fulfill orders; to respond to customer service requests and provide support; to send promotional communications; to organize and carry out contests and surveys; to resolve disputes and enforce agreements; for security purposes; and to understand website usage, provide a more customized web experience, and improve the content of our website.	From the California resident	Cloud hosting and internet service providers, government entities, operating systems and platforms/
Biometric information.	N/A	N/A	N/A
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	To operate and provide our online services; for security purposes; and to understand website usage, provide a more customized web experience, and improve the content of our website.	From the California resident	Cloud hosting and internet service providers, government entities, operating systems and platforms/
Geolocation data.	N/A	N/A	N/A
Audio, electronic, visual, thermal, olfactory, or similar information.	N/A	N/A	N/A
Professional or employment-related information.	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	To send promotional communications; to organize and carry out contests and surveys; and to understand website usage, provide a more customized web experience, and improve the content and of the website.	Based on personal information collected from the categories of sources described above.	Cloud hosting and internet service providers, government entities, operating systems and platforms/

3. Disclosures of Personal Information, No Sale

Over the preceding 12 months, we disclosed certain categories of California residents' personal information to the categories of third parties as shown in the table above.

We have not sold California residents' personal information over the preceding 12 months and will not do so. We have not and will not sell the personal information of minors under 16 years of age without affirmative authorization.

4. Right to Request Deletion of Personal Information

You have a right to request the deletion of personal information that we collect or maintain about you. To submit a request to delete personal information, please visit <https://www.wifi-hire.com/en/contact> or submit an email request to mn_eca@vision-net.co.jp and include "California Request to Delete" in the subject line. Please specify in your request the personal information about you that you would like to have deleted, which can be all of your personal information as required by the CCPA.

We will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

5. Right to Opt-Out of the Sale of Personal Information

You have the right to opt-out of the sale of your personal information by a business. We do not and will not sell your personal information.

6. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

You may not be discriminated against because you exercise any of your rights under the CCPA in violation of Cal. Civ. Code §1798.125.

7. Authorized Agent

You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity registered with the Secretary of State of California; and
- You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps described in Sections 2 and 3 above:

- Mail your written declaration authorizing the authorized agent to act on your behalf, certified by a California notary public, to mn_eca@vision-net.co.jp and
- Provide any information we request in our response to your email to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

8. Contact for More Information

If you have questions or concerns regarding our privacy policy or practices, you may contact us using the following details:

Email address: mn_eca@vision-net.co.jp

Postal address: **5F KDX Higashishinjuku Building, Kabukicho 2-4-10, Shinjuku-ku, Tokyo. Japan**

Date this CCPA Privacy Policy was last updated: January 1, 2020.