

## Kao USA Privacy Policy

Effective and last modified: January 1, 2020

At Kao USA Inc. we respect your privacy and are committed to protecting it.

This notice covers all personal information collected in the use of this website, as well as any other websites or applications on which it is posted. If in any case our privacy practices differ from those explained in this policy, we will let you know you at the time we ask for or collect your information.

Some pages on our websites may contain links to third-party websites. We do not endorse and have no control over the privacy practices or content of such websites. We recommend you carefully read the privacy policy of each site you visit – including ours.

### 1. Overview

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### 2. What information we collect about you

Personal information, or personal data, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data), which we can use for any purpose.

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity or Contact Data** includes your name, mailing or delivery address, email address, telephone numbers, username, or similar identifiers or contact information.
- **Financial information** may include your billing address and other payment-related information.
- **Transaction Data** includes details about payments to and from you and other details of products you have purchased from us or other details about your transactions with us.

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting, location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our websites, applications, or connected products.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, age, gender, product reviews, survey responses, information about your experiences with our products, contact preferences, and other similar information.
- **Usage Data** includes information about how you use our websites and our products and services
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

### 3. Children’s Online Privacy

We do not direct our websites to minors, and we do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this website. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13 please contact us using our Contact Us page.

### 4. How we collect personal information about you

We use different methods to collect information from and about you including through:

- **Direct interactions.** You may give us information about you by filling in forms or by communicating with us by text, e-mail, or otherwise. This includes information you provide when you register for an account, subscribe to one of our newsletters or other communications, conduct a search, place an order, engage in a promotional event, complete a survey, or when you contact us about one of our websites, products, or services. We may also collect information when you respond to our request to voluntarily provide information regarding your personal or professional interests, demographics, experience with our products, and contact preferences
- **Automated technologies or interactions.** As you interact with our websites or websites employing our cookies, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this information by using cookies, web beacons, and other similar technologies. Our [Cookies and automatic data collection technologies](#) section contains more information and options to control or opt-out of certain data collection or uses.
- **Third parties or publicly available sources.** We may receive information about you from third parties including, for example, our affiliated companies, business partners, sub-contractors, analytics providers, and service providers. If you enter a co-branded promotion, that is being sponsored by Kao and another party, our co-sponsor may provide us with information about you.
- **User contributions.** You also may provide information to be published or displayed (“posted”) on public areas of the websites or transmitted to other users (collectively, “**User Contributions**”). For example, if you review one of our products, then your product review may be made available on public areas of our websites.

### 5. Cookies and automatic data collection technologies

Our websites use automatic data collection technologies to distinguish you from other website users. This helps us deliver a better and more personalized service when you browse our website. It also allows us to improve our websites by enabling us to:

- Estimate our audience size and usage patterns.
- Store your preferences so we may customize our websites according to your individual interests.

- Speed up your searches.
- Recognize you when you return to our website.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). For more information, see the [Interest Based Advertising](#) section of this privacy policy.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. For information about managing browser settings to refuse cookies, see [Your Rights and Choices](#).
- **Flash Cookies.** Certain features of our websites may use Flash cookies (local stored objects) instead of browser cookies to collect and store information about your preferences and navigation to, from, and on the website. For information about managing Flash cookies see [Your Rights and Choices](#).
- **Web Beacons.** Our website pages and e-mails may contain small transparent embedded images or objects known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count website page visitors or email readers, or to compile other similar statistics such as recording website content popularity or verifying system and server integrity. For information about managing web beacons, see [Your Rights and Choices](#).

Depending on which website this notice is posted on, we may use Google Analytics to provide certain analytics services for us. More information about Google Analytics can be found in the [Google Analytics Terms of Use](#) and the [Google Analytics Privacy Policy](#).

On some of our websites, we use Adobe Analytics (a service available from the web analysis provider Adobe Systems Software Ireland Limited (“Adobe”), to 1) help us measure the performance of the website, 2) allow us to share relevant information and advertising with you based on your and other visitors’ past visits to this website when you surf the web, and 3) help us measure your interactions with any Kao advertising you see on other websites. Finally, Kao may use data from Adobe’s interest-based advertising or third-party audience data, such as age, gender and interests, together with our own data, to deliver relevant advertising to you based upon your demographic profile and interests. More information can be found in Adobe’s [Privacy Policy](#).

We do not respond to or honor “do not track” (a/k/a DNT) signals or similar mechanisms transmitted by web browsers.

## 6. How we use your personal information

We use your information to provide you with products, offer you services, communicate with you, deliver advertising and marketing, and to conduct other business operations, such as using information to improve and personalize your experiences. Examples of how we may use the information that we collect include:

- To register you as a new customer.
- To send you products that you have ordered, including to process payment, provide you updates about the status of your order, and process product returns.
- To manage our relationship with you which may include notifying you about changes to our terms or privacy policy, providing you notices about your account, asking you to leave a review or take a survey, addressing any concerns you may have about our products or services.
- To send samples that you have requested or to contact you for market research purposes.
- To provide you with the information, products, services or support that you request from us or to fulfill any other purpose for which you provide it.

- To deliver relevant content, advertisements, and messaging to you and to measure or understand the effectiveness of such content, advertisements, and messaging. We believe that content, messages and advertising are more relevant and valuable to you when they are based upon your interests, needs and demographics. Therefore, we may deliver content, messages and advertising specifically to you that are based upon your prior activities on our websites and information provided to us or gathered as described in this policy. For example, if you have previously expressed an interest in hair care products through your activities on our website, we may deliver more information to you about hair care products than other products for which you have not expressed an interest or interacted with on the website.
- To allow you to enter a sweepstake, contest or promotion that we may offer. If we plan to make additional uses of data collected in connection with any sweepstake, contest, or promotion, we will inform you at the time of entry. If we offer a co-branded promotion, then our co-sponsor may have different privacy practices, which we will inform you about before you provide your information.
- To use data analytics to improve our website, products or services, marketing, customer relationships, and experiences.
- To make suggestions and recommendations to you about our own and third-parties' products or services that may be of interest to you. If you do not want us to use your information in this way or for more information on how to adjust your preferences, see [Your Rights and Choices](#).
- To carry out our obligations and enforce our rights.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use information that is not personal information for any purpose. For example, we may aggregate usage data from many people in a way that does not identify any individuals to calculate the percentage of users accessing a feature on the website.

## **7. Disclosure of Your Information**

We may share non-personal information without restriction. We may share your personal information with:

- Any member of our corporate group, which means our subsidiaries, affiliates, our ultimate holding company and its subsidiaries, and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To an actual or prospective buyer or other successor in the event of merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, where one of the transferred assets is the personal information we hold.
- If we offer a co-branded promotion, to our co-sponsor.
- To fulfill the purpose for which you provide it.
- For any other purposes that we disclose when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including responding to any government or regulatory request.
- To enforce Terms of Use and other agreements including for billing and collections purposes.

- To protect the rights, property, or safety of our business, our employees, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of cybersecurity, fraud protection and credit risk reduction.
- To investigate suspected violations of any law, rule or regulation, or the terms or policies for our website.

## **8. Interest-Based Advertising**

Our websites may integrate technology of trusted advertising partners (third-party companies) that allows the recognition of your device and the collection of information about your browsing activity in order to provide advertisements about our products and services likely to be of greater interest to you. In particular, these partners collect information about your activity on our websites or websites owned by other companies to enable us to show advertisements for our products and/or service to you on third-party websites or apps.

We may share data, such as technical identifiers derived from your registration information on our websites or our CRM system with our trusted advertising partners. This allows them to link your devices or browsers and to provide you a seamless experience across the different environments used or likely used by you.

Our partners may use non-cookie technologies on which browser settings that block cookies might have no effect. Your browser may not permit you to block such technologies. For this reason, keep in mind that you can block the collection and use of information related to you by advertising companies for the purpose of serving interest based advertising by visiting the following platforms of self-regulatory programs of which those companies are members:

- The NAI's opt-out platform: [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices)
- The DAA's opt-out platform: [www.aboutads.info/choices](http://www.aboutads.info/choices)

## **9. Third Party Content, Apps, and Links**

Some content or applications on our websites may be served by third parties, content providers and application providers including the following:

### **a. Plugins**

Our websites make available the option for you to use “plugins” that are operated by social media companies. If you choose to use one of these plugins, then it may collect information about you and send it back to the social media company that owns it. This may happen even if you do not click on the plugin, if you are logged into the social media website that owns the plugin when you visit our website. Information collected by a plugin is subject to the privacy policy and terms of the social media company that makes it. If you do not want the social media company who owns a plugin to collect information about you when you visit our websites, sign out of the social media network before visiting. By interacting with a plugin when you are on our websites (for example, clicking the Facebook “Like” button), you are intentionally transferring information to that social media company. Further, if you are logged into a social media website when you visit our websites, then you are directing us to share your data with the social media company that owns the plugin.

We may use the following plugins on our websites: Facebook, Twitter, Pinterest, YouTube, Instagram, and SnapChat.

### **Facebook**

We use the plugins of social network facebook.com, operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA. The link to Facebook's data privacy declaration can be found here: [Data Privacy Information Facebook](#).

## Twitter

We use the plugins of social network twitter.com, operated by Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103 U.S.A. The link to Twitter’s data privacy declaration can be found here: [Data Privacy Information Twitter](#).

## Pinterest

We use the plugins of social network Pinterest, operated by Pinterest Inc., 635 High Street, Palo Alto, CA, USA (“Pinterest”). The link to Pinterest’s data privacy declaration can be found here: [Data Privacy Information Pinterest](#).

## YouTube

We use the plugins of the YouTube website, operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States. The link to the data privacy declaration can be found here: [Data Privacy Information](#).

## Instagram

We use the plugins of social network Instagram, operated by Instagram, LLC Instagram Inc., 1601 Willow Road, Menlo Park, CA 94025, USA. The link to Instagram’s data privacy declaration can be found here: [Data Privacy Information Instagram](#).

## SnapChat

We use the plugins of the social network Snapchat, owned by Snap, Inc., 2772 Donald Douglas Loop North, Santa Monica, CA 90405. The link to SnapChat’s Privacy Center can be found here: [Privacy Center](#).

- b. **User Content.** Our websites may allow you to upload your own content to public areas of the website. Any information you submit becomes public information, and we do not control how others may use the content you submit. We are not responsible for uses that may violate our privacy policy, the law, or your intellectual property rights.
- c. **Third-party links.** Our websites may contain links to other sites, which we do not control. Those websites have their own privacy policies and terms.

## 10. Your Rights and Choices

Your rights may vary depending on where you are located. We have created mechanisms to provide you with the following control over your information.

- **Marketing.** If you do not want us to use your email address or other contact information to promote or recommend our own products and services, or third parties’ products or services, you can opt-out by checking the relevant box located on the form where we collect your contact information or, if presented with the option to opt-in, do not opt-in. If you have an account with our website, you may be able to log in and check or uncheck relevant boxes. If you do not have an account, you can adjust your preferences by contacting us as set forth below in the [Contact Us](#) section. You may also opt-out of further marketing communications by replying to any promotional email we have sent you or following the opt-out links on that message. This opt-out may not apply to information provided to us as a result of a product purchase, warranty registration, product service experience or other transactions.
- **Accessing, Updating and Deleting Your Information.** If you have an account with us, you may have the ability to access your information and make updates to or delete your data. If not, you can contact us as set forth in the [Contact Us](#) section below to request access to, correction of, or deletion of personal information that you have provided to us. We may not accommodate a request to change

information if we believe the change would violate any law or legal requirement or negatively affect the information's accuracy.

- **Cookies and Automatic Data Collection Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Flash cookies are not managed by the same browser settings as are used for browser cookies. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on [Adobe's website](#). However, if you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. If you do not want Google Analytics to be used in your browser, Google Analytics provides an opt-out tool which can be found [here](#). You can opt-out of Adobe Analytics by using Adobe's opt-out browser add-on at <http://www.adobe.com/privacy/opt-out.html>. In some cases, you may be able to set your browser or email program to not download web beacons.
- **Interest Based Advertising.** Please see [Interest Based Advertising](#) above for information on how to opt-out of interest-based advertising.
- **California Residents.** If you are a California resident, you may have additional personal rights and choices with regard to your personal information. Please see [Your California Privacy Rights](#) for more information.
- **Nevada Residents.** If you are a Nevada resident, you may have additional personal rights and choices with regard to your personal information. Please see our [Nevada Privacy Rights](#) section below for more information.

## 11. Data Security

The security of your personal information is very important to us. We use physical, electronic, and administrative safeguards designed to protect your personal information from loss, misuse and unauthorized access, use, alteration or disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to take care when providing information in public areas of our websites like message boards, which any website visitor can view.

## 12. Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, you can view our Privacy Notice for California Residents.

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. At this time, we do not engage in this type of disclosure.

## 13. Nevada Privacy Rights

Nevada residents have the right to opt out of the sale of certain "covered information" collected by operators of websites or online services. We currently do not sell covered information, as "sale" is defined by such law, and we don't have plans to sell this information.

#### **14. Changes to Our Privacy Policy**

We will post any changes we may make to our privacy policy on this page. If the changes materially alter how we use or treat your information we will notify you by email to the primary email address specified in your account (if you have an account with us) and/or through a notice on the website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring that we have an up-to-date email address for you and for periodically visiting our website and this page to check for any changes.

#### **15. Contact Us**

If you have any comments or questions about our privacy policy, please use our [Contact Us](#) page (<http://kaocareers.com/contact/>) to reach out to us. You may also call us at 1-800-742-8798.

*(If you are a California Resident, please continue to the next page for the **Privacy Notice for California Residents**)*

**Kao USA Inc.**

**Privacy Notice for California Residents**

**Effective Date:** January 1, 2020

**Last Reviewed:** January 1, 2020

**I. Overview**

You should read Kao USA Inc.'s entire Privacy Notice for California Residents, but here is a partial list of some of the key topics.

- [Click here](#) to learn who we are and who is covered by this Privacy Notice.
- [Click here](#) to learn what categories of information we collect from California consumers and why we collect it.
- [Click here](#) to learn about our data collection, use, and disclosure practices during the 12-month period preceding the Effective Date.
- We do not, and will not, sell personal information of consumers. We have not sold any such information in the last 12 months.
- [Click here](#) to learn about your rights and choices with respect to your personal information and how to exercise those rights.
- We will not discriminate against you for exercising any rights you may have been granted under the California Consumer Privacy Act.
- [Click here](#) to learn how to contact us for more information about our privacy practices.

**II. Introduction**

This **Privacy Notice for California Residents** supplements the information contained in Kao USA, Inc.'s ("**Kao**," "**we**," "**us**," or "**our**") website privacy policies and describes our privacy practices with respect to individuals who reside in the State of California ("**consumers**" or "**you**").

This Privacy Notice does not apply to information we collect when:

- You are acting as a job applicant to us;
- You are acting in your capacity as a current or former employee, owner, director, officer, medical staff member, or contractor for us;
- You have been designated as an emergency contact for one of the persons listed above and your information has been collected for use solely within that context;
- We need your personal information to administer benefits obtained through one of the persons listed above.

For information on our privacy practices as they relate to any of the above persons contact us by using the contact information in [Section IX \(Who to contact for more information\)](#) below.

We adopt this notice to comply with the California Consumer Privacy Act of 2018, as may be amended, replaced, or superseded as well as any implementing regulations (CCPA). Any terms defined in the CCPA have the same meaning when used in this notice.

The CCPA temporarily exempts personal information reflecting written or verbal business-to-business communications (“**B2B personal information**”) from many of its requirements. This Privacy Notice does not disclose our practices with respect to B2B personal information.

### III. Information we collect about California consumers

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 consumer or device (“**personal information**”). However, personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Specifically, we collect the following categories of personal information:

Category	Examples	Do we collect this information?
A. Identifiers.	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.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A 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, credit or debit card number, bank account number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics	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	NO

under California or federal law.	military status, genetic information (including familial genetic information).	
D. Commercial information.	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	In some cases, we may collect your location to provide you location-related services	YES
H. Sensory data.	If you call our offices and leave a voicemail, audio information	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
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)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, including brand or product preferences and purchasing preferences.	YES

We collect and share personal information in the above categories for the following business purposes:

- To register you as a new customer.
- To verify your identity so that we can respond to a request you make under the applicable law.

- To send you products that you have ordered, including to process payment, provide you updates about the status of your order, and process product returns.
- To manage our relationship with you which may include notifying you about changes to our terms or privacy policy, providing you notices about your account, asking you to leave a review or take a survey, addressing any concerns you may have about our products or services.
- To send samples that you have requested or to contact you for market research purposes.
- To provide you with the information, products, services or support that you request from us or to fulfill any other purpose for which you provide it.
- To deliver relevant content, advertisements, and messaging to you and to measure or understand the effectiveness of such content, advertisements, and messaging.
- To allow you to enter a sweepstake, contest or promotion that we may offer. If we plan to make additional uses of data collected in connection with any sweepstake, contest, or promotion, we will inform you at the time of entry. If we offer a co-branded promotion, then our co-sponsor may have different privacy practices, which we will inform you about before you provide your information.
- To use data analytics to improve our website, products or services, marketing, customer relationships, and experiences.
- To make suggestions and recommendations to you about our own and third-parties' products or services that may be of interest to you. If you do not want us to use your information in this way or for more information on how to adjust your preferences, see *Your Rights and Choices*.
- To help maintain the safety, security, and integrity of our services, databases and other technology assets, and business.
- To report to regulatory authorities as required by law.
- To respond to law enforcement requests and other requests as required by applicable law, court order, or governmental regulations.
- To protect and enforce our and others' intellectual property rights; to protect or defend our legal rights or property, our services, or other users; and to protect the health and safety of our services' users or the general public.
- 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 information held by us about consumers is among the assets transferred.
- As described to you when collecting your personal information.
- For any purpose with your consent.

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.

#### **IV. We do not sell your personal information**

We do not, and will not, sell personal information of consumers and have not sold any such personal information within the last twelve (12) months.

#### **V. Notice of personal information that we have collected or disclosed in the last 12 months**

In the last twelve (12) months, we have collected or disclosed the following categories of personal information for a business purpose:

##### *1. Categories of information collected in the last 12 months*

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category D: Commercial information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category H: Sensory data.
- Category K: Inferences drawn from other personal information.

##### *2. How we collected this information*

We collected the above categories of your personal information from the following sources:

- **Directly from you.** For example, from forms you complete to enter promotions, to make comments or inquiries concerning products you purchase and services you may obtain when you reach out to us online or offline.
- **Indirectly from you.** For example, from observing your actions as you use our Services.
- **From our service providers.** This includes businesses that collect your personal information on our behalf in order to help us respond to consumer inquiries, conduct market research, and comply with legally mandated disclosure requirements.
- **From other third parties.** For example, when you make a comment on a third-party website such as social media, we may collect your name and contact information to respond to your concern.

##### *3. Why we collected personal information*

We have collected and disclosed personal information in the above categories for the following business purposes:

- To register you as a new customer.
- To verify your identity so that we can respond to a request you make under the applicable law.
- To send you products that you have ordered, including to process payment, provide you updates about the status of your order, and process product returns.

- To manage our relationship with you which may include notifying you about changes to our terms or privacy policy, providing you notices about your account, asking you to leave a review or take a survey, addressing any concerns you may have about our products or services.
- To send samples that you have requested or to contact you for market research purposes.
- To provide you with the information, products, services or support that you request from us or to fulfill any other purpose for which you provide it.
- To deliver relevant content, advertisements, and messaging to you and to measure or understand the effectiveness of such content, advertisements, and messaging.
- To allow you to enter a sweepstake, contest or promotion that we may offer. If we plan to make additional uses of data collected in connection with any sweepstake, contest, or promotion, we will inform you at the time of entry. If we offer a co-branded promotion, then our co-sponsor may have different privacy practices, which we will inform you about before you provide your information.
- To use data analytics to improve our website, products or services, marketing, customer relationships, and experiences.
- To make suggestions and recommendations to you about our own and third-parties' products or services that may be of interest to you. If you do not want us to use your information in this way or for more information on how to adjust your preferences, see *Your Rights and Choices*.
- To help maintain the safety, security, and integrity of our services, databases and other technology assets, and business.
- To report to regulatory authorities as required by law.
- To respond to law enforcement requests and other requests as required by applicable law, court order, or governmental regulations.
- To protect and enforce our and others' intellectual property rights; to protect or defend our legal rights or property, our services, or other users; and to protect the health and safety of our services' users or the general public.
- 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 information held by us about consumers is among the assets transferred.
- As described to you when collecting your personal information.
- For any purpose with your consent

4. *Who we have shared this information with for a business purpose*

For each of the above categories, we shared your personal information with the following categories of third parties:

- Service providers and vendors

- Taxing entities
- Insurance companies
- Legal counsel
- Our parent and affiliated companies who directly support our activities

## **VI. 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.

### ***A. Access to Specific Information and Data Portability Rights***

You have the right to request that we disclose certain information to you about our collection, use, disclosure, and sale 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* below), 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 or selling 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 sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### ***B. 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* below), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

### ***C. Exercising Access, Data Portability, and Deletion Rights***

- ***How to submit requests***

We provide our customers with several brand options. Accordingly, to exercise your access, data portability, and deletion rights described above, please submit a verifiable consumer request by contacting us via the phone number or web link below that corresponds to the appropriate brand:

<b>Brand</b>	<b>Phone Number</b>	<b>Web Link</b>
ban	1-866-226-3363	<a href="https://www.feelbanfresh.com/contact-us/">https://www.feelbanfresh.com/contact-us/</a>
Biore <sup>®</sup>	1-888-246-7311	<a href="https://www.biore.com/en-us/contact-us/">https://www.biore.com/en-us/contact-us/</a>

Curel	1-800-572-2931	<a href="https://www.curel.com/en-us/contact/">https://www.curel.com/en-us/contact/</a>
Goldwell	1-800-333-2442	<a href="https://www.goldwell.us/contact/">https://www.goldwell.us/contact/</a>
Jergens	1-800-742-8798	<a href="https://www.jergens.com/en-us/contact-us/">https://www.jergens.com/en-us/contact-us/</a>
John Frieda	1-800-521-3189	<a href="https://www.johnfrieda.com/en-us/contact-us/">https://www.johnfrieda.com/en-us/contact-us/</a>
KMS	1-800-742-8798	<a href="https://www.kmshair.com/en-US/contact-us/">https://www.kmshair.com/en-US/contact-us/</a>
Wakati Hair	1-800-521-3189	<a href="https://www.wakatihair.com/contact">https://www.wakatihair.com/contact</a>

- ***Who may submit requests***

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 designate an authorized agent to make a request on your behalf by registering such person or entity with the California Secretary of State.

- ***How often you can submit requests***

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

- ***How we verify and respond to requests***

Your request must be verifiable. The 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 requiring you to provide us at least two data points, depending on the type of personal information you are requesting to know or are requesting to be deleted.
- Describe your request with enough detail that allows us to properly understand, evaluate and respond to it.

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

- ***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, we will inform you of the reason and extension period in writing within forty-five (45) days of receiving your verifiable consumer request.

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.

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.

**VII. Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. You have a right not to receive discriminatory treatment by us for exercising your privacy rights.

**VIII. Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. At this time, we do not engage in this type of disclosure.

**IX. Who to contact for more information?**

For questions or concerns about our privacy policy and practices, you can contact us at the method set forth below.

**Phone:** 1-800-742-8798

**Web:** <http://kaocareers.com/contact/>

**Postal Address:**

Kao USA Inc.  
Attention Customer Care  
2535 Spring Grove Avenue  
Cincinnati, OH 45214

*(If you are a California Resident and are applying for a job with Kao USA, please continue to the next page for the **Privacy Notice for California Job Applicants**)*

# Kao USA Inc.

## Privacy Notice for California Residents

**Effective Date:** January 1, 2020

**Last Updated on:** January 1, 2020

### 1. Introduction

This Privacy Notice for California Residents describes how Kao USA Inc. and its subsidiaries and affiliates (collectively, “**Kao**,” “**we**,” or “**us**”) collect and use personal information about you if you are a natural person applying for a job at Kao and are a California resident (“**Covered Person**”).

We adopt this Notice to comply with the California Consumer Privacy Act of 2018, as may be amended, replaced, or superseded as well as any implementing regulations (CCPA). Any terms defined in the CCPA have the same meaning when used in this Notice.

This Privacy Notice describes the categories of personal information that we collect from Covered Persons and the purposes for which the categories of personal information shall be used.

### 2. Categories of Personal Information We Collect

Kao collects 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 Covered Person or device (“**personal information**”). However, personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Specifically, we collect the following categories of personal information:

<b>Category</b>	<b>Examples</b>	<b>Do we collect this information?</b>
A. Identifiers.	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.	YES

<p>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</p>	<p>A 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, credit or debit card number, bank account number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	<p>YES</p>
<p>C. Protected classification characteristics under California or federal law.</p>	<p>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 familial genetic information).</p>	<p>YES</p>
<p>D. Commercial information.</p>	<p>Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>NO</p>
<p>E. Biometric information.</p>	<p>Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.</p>	<p>NO</p>
<p>F. Internet or other similar network activity.</p>	<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p>	<p>NO</p>
<p>G. Geolocation data.</p>	<p>Physical location or movements.</p>	<p>NO</p>
<p>H. Sensory data.</p>	<p>Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<p>NO</p>
<p>I. Professional or employment-related information.</p>	<p>Current or past job history, performance information, wage and benefit information (including retirement accounts, pensions, insurance, beneficiary information, disability, vacation, and leaves of absence), payroll information, education, training, professional memberships and certifications, references, residency and work permit status, credit and criminal background checks, the results of drug and alcohol testing, vehicle registration, driving history, emergency contact information, other personal details</p>	<p>YES</p>

	included in a resume, CV, or cover letter, and information created, stored or transmitted using our networks, devices, computers or communications equipment.	
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)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	YES

**3. Why We Collect Your Personal Information**

We may use the above categories of personal information we collect about you, for one or more of the following purposes:

- Job applicant administration, which may include:
  - Identifying and evaluating job applicants, including assessing skills, qualifications, and interests for the purposes of determining suitability for the position for which you have applied.
  - Verifying your information and carrying out employment, background, and reference checks, where applicable, subject to your consent where required by applicable law.
  - Communicating with you about the recruitment process and your application.
  - Keeping records related to our hiring processes.
  - Creating and submitting reports as required by applicable laws or regulations.
  - Complying with our legal, regulatory, or other corporate governance requirements.
  - Analyzing and improving our application and recruitment process.
  - To inform you about and consider you for other positions that may be appropriate for you.
- For our own legitimate interests including:
  - To prevent fraud.
  - To ensure network and information security, including preventing unauthorized access to

our computer and electronic communications systems and preventing malicious software distribution.

- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Kao's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Kao about job applicants is among the assets transferred.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- For a purpose that we describe when collecting the information.

We will not collect additional categories of personal information or use the personal information collected for materially different, unrelated, or incompatible purposes without providing notice[and if required by law, your explicit consent.

#### **4. Contact Us**

For questions or concerns about our privacy policy and practices, you can contact us at the method set forth below.

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