

Kao Americas Region Privacy Policy

Effective and last modified: January 1, 2023

Our privacy policy is available in PDF form [here](#).
Our previous policy is available in PDF form [here](#).

This privacy policy has been drafted to explain how the companies of the Kao Americas Region (together “we,” “us,” or “our”) collect, use, disclose, and protect information that we collect about you, and to explain your rights with respect to that information. The Kao Americas Region companies covered by this Privacy Policy include:

Kao USA Inc.

Oribe Hair Care, LLC

Molton Brown USA LLC

Kao Canada Inc.

Kao Australia Pty. Limited

Kao New Zealand Limited

This policy covers all personal information collected from and about our consumers, including when you use our websites. If in any case our privacy practices differ from those explained in this policy, we will let you know at the time we ask for or collect your information.

If you are a resident of [California](#), [Nevada](#), [Canada](#), Australia, or New Zealand, additional location-specific disclosures apply. Likewise, additional disclosures apply to [California residents applying for jobs](#) at one of the above companies.

1. Overview

We understand that your time is valuable. Therefore, we have set out some important highlights from the privacy policy in this Overview. This is simply an abbreviated summary, and does not contain all of the details of the policy. Please click the link corresponding to each section for the full details. We encourage you to read our full Privacy Policy, as it contains important information for you.

- [What information we collect about you](#)

We may collect various types of personal information, including from the following categories:

- Identity or contact
- Payment and financial
- Transaction
- Technical
- Geolocation
- Profile
- Usage
- Marketing and communications
- Demographic and preferences
- Personal or physical characteristics
- User contributions and content
- Audio, visual and sensory

Anonymous data, or data for which you cannot be identified, is not considered personal information and may be used without restriction or limitation.

- [Children's Online Privacy](#)

We do not direct our websites to minors, and we do not knowingly collect personal information from children under the age of 13. If we learn we have collected or received personal information from a child under 13 without the consent of a parent or guardian, we will delete that information.

- [How we collect your information](#)

We may collect your personal information from:

- You (e.g., when you communicate with us, complete a form, register an account, etc.)
- Our websites and emails (particularly via cookies and other automatic data collection tools)
- Our affiliates and third parties
- User contributions

- [Cookies and automatic data collection technologies](#)

Our websites use automatic data collection technologies, including cookies, flash cookies, and web beacons. We may use Google Analytics and Meta Pixel. We use these tools to distinguish you from other website visitors, to delivery better and more personalized service, and to improve our websites. These technologies may allow us to track your online activities over time and across third-party websites or other online services.

- [How we use your information](#)

We may use your personal information for various purposes, including to:

- Provide products and services

- Communicate with you
- Conduct marketing and promotions
- Administer programs
- Perform analytics and to personalize your experience
- Conduct security and fraud prevention
- Comply with our obligations and to protect our rights
- Perform core business functions
- Facilitate our actual or potential business relationship
- Accomplish another purpose

We may use non-personal or anonymized information for any purpose.

- [Disclosure of your information](#)

We may share your personal information with:

- Our affiliated companies
- Our service providers
- Our third-party partners
- Social media platforms and networks
- An acquiring or successor company
- Other third parties

We may also share your personal information with anyone to fulfill a purpose that:

- you provide it for;
- we indicate to you when you provide the information; or
- is with your consent.

We may share non-personal or anonymized information with anyone without restriction.

- [Interest-Based Advertising](#)

Third-party advertisers, content providers or others may serve content or applications on our websites that use automatic tracking technologies to collect information about you, and they may use that information to serve you targeted advertising and content. Your browser settings may not block these technologies, but you may be able to block them via certain platforms of self-regulatory programs.

- [Third Party Content, Apps, and Links](#)

Our sites may offer social media plugins (e.g., Facebook, Twitter, Pinterest, etc.). By interacting with a plugin, or by remaining logged into a social media account when you visit our websites, you knowingly transfer information to that social media company, and the collection and use of your information is subject to the social media company's privacy policy and terms.

If you rate a purchase, review our products, or upload content, or if you tag our brand and we reshare, any such information will become public information. We do not control how others may use, disclose or publish the content that you submit, and we are not responsible for the actions of third parties, even if they do not comply with our privacy policy, the law, or your intellectual property rights.

We do not control links to third-party websites that might be on our websites. Those websites have their own privacy policies and terms.

- [Your Rights and Choices](#)

You may exercise control over your personal information in the following ways:

- Subscribe to or opt out of marketing communications
- Access, correct, update and delete your information
- Delete your user contributions
- Disable or refuse cookies and automatic data collection technologies
- Opt out of interest-based advertising

If you are a resident of California, Nevada, Canada, Australia or New Zealand, additional rights and choices may apply.

- [Data Security and Risks](#)

We use various safeguards to protect your personal information. But we cannot guarantee absolute security, and there always remains a risk of loss, misuse, unauthorized access, alteration or disclosure.

The safety and security of your personal information also depends on you. Protect your passwords that we give you, and be careful what you post to the public areas of our websites.

- [Changes to Our Privacy Policy](#)

We may revise this privacy policy from time to time. The updated version of the policy will be available at this webpage.

- [Contact Us](#)

To submit customer service, retail, or press-related inquiries, we have provided a list of our brand contacts, and the mailing address for our companies.

To exercise your privacy rights, we have provided an online webform, as well as a toll-free phone number.

- [For California Residents](#)

If you are a resident of California, please see this section for additional disclosures, as well as your rights and choices under California law.

- [For Nevada Residents](#)

If you are a resident of Nevada, please see this section for additional disclosures.

- [For Canada Residents](#)

We will only use your personal information for the purposes described in this privacy policy unless we have obtained your consent, or we are otherwise permitted or required by applicable law.

We may process, store, and transfer your personal information in and to a foreign country, which has different privacy laws that may or may not be as comprehensive as those of Canada. Your information may be accessible to courts, law enforcement and national security authorities in other countries.

We may store your personal information in the Province of Ontario in Canada, as well as the United States and Germany. Personal information will be accessible to our employees who have a “need to know” such information for the purposes described in this privacy policy.

To exercise your privacy rights, including to access or correct your personal information or to adjust your consent, please use one of the methods we have provided in the Contact Us section of this privacy policy.

- [For Australia and New Zealand Residents](#)

If you are a resident of Australia or New Zealand, please see this section for additional disclosures.

- [Job applicant privacy notice for California Residents](#)

If you are a resident of California and you are applying for a job with one of our companies, please see this section for additional disclosures.

2. What information we collect about you

We may collect the following types of information about you:

- **Identity or contact information** includes your name, date of birth, mailing or delivery address, email address, telephone numbers, username, or similar identifiers or contact information.
- **Payment and financial information** includes your billing address, credit or debit card number, and other payment-related information.
- **Transaction information** 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 information** 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, browsing history, and site interactions.
- **Geolocation information** includes information that allows for determination of your physical location.

- **Profile information** 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 information** includes information about how you use our websites and our products and services.
- **Marketing and communications information** includes your preferences in receiving marketing from us and your communication preferences.
- **Demographic information and preferences** include personal characteristics and preferences, such as your age, gender, shopping preferences, household demographic data, data from social media platforms, hobbies and interests and propensity scores from third parties (likelihood of purchase, experiencing a life event, etc.).
- **Personal or physical characteristics** include age (40 years and older), race, ethnicity, ancestry, national origin, citizenship, religion, marital status, gender identity, sexual orientation, military status, genetic information, skin tone and type, hair color and type, and eye color.
- **User contributions and content** include product reviews and other feedback that you provide on our products, locations, and services. If you choose to provide user contributions, it may be made available on public areas of our website.
- **Audio, visual and sensory information** includes photos, images, videos, and recordings, as well as olfactory and similar sensory data.

Some of the information we collect about you may be personal information, or personal data, that can be used to identify you, including, for example, your name, email address, mailing address or delivery address. In some jurisdictions, certain unique identifiers like IP addresses and other usage or technical information may be considered personal information.

Personal information does not include data where your identity has been removed so that we can no longer identify you (anonymous data). We may use anonymous data for any purpose.

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 consent by a parent or guardian, we will delete that information. If you believe we might have any information from or about a child under 13 please contact us as directed in the [Contact Us](#) section of this privacy policy.

4. How we collect your information

We collect information from and about you in the following ways:

- **From you.** 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.

- **From our websites and emails.** As you interact with our websites or websites employing our cookies, or our emails, we may automatically collect information about your equipment, browsing actions, other activities (like opening emails), and patterns. We may collect this information by using cookies, web beacons, pixels, 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.
- **From affiliates or third parties.** We may receive information about you from third parties including, for example, our affiliated companies, business partners, sub-contractors, analytics providers, social media companies, and service providers. For example, if you enter a co-branded promotion, that is being sponsored by one of our brands and another party, our co-sponsor may provide us with information about you. As another example, if you sign up for a promotion using your social media credentials, we may receive information about you from that social media company.
- **From 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 rate or review one of our products, then your product review may be made available on public areas of our website.

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](#).

We may also use Meta Pixel from time to time. This tool allows us to understand and deliver ads and make them more relevant to you. The collected data remains anonymous and we cannot see the personal data of any individual user. However, the collected data is saved and processed by The Meta Companies (“Meta,” formerly known as Facebook). Meta may be able to connect the data with your Facebook account and use the data for their own advertising purposes (in accordance with Meta’s Data Use Policy found under <https://www.facebook.com/about/privacy/>). Meta has ultimate control of the information gathered through Meta Pixel.

6. How we use your information

We collect and use your information for various purposes, including the following:

- **To provide products and services.** We may use your personal information to register you as a new customer, to send you products that you have ordered, to process payment, to provide you with receipts or notifications, to provide updates about the status of your order, and to process product returns. We may also use your personal information to provide you with information or support, or to send samples that you have requested.
- **To communicate with you.** We may use your personal information to manage our relationship with you, which may include notifying you about changes to our terms or privacy policy, providing you with notices about your account, asking you to leave a review or take a survey, and to respond to or address comments, questions or concerns that you may have about our products and services.
- **To conduct marketing and promotions.** We may use your personal information to deliver relevant content, advertisements, and messaging, and to measure or understand the effectiveness of such content, advertisements, and message. We may contact you for market research purposes. We may also make suggestions or recommendations to you about our products or services that may be of interest to you. We may also use your personal information to allow you to enter a sweepstake, contest or promotion that we may offer. Please note that if we offer a co-branded promotion, our co-sponsor may have different privacy practices, which we will inform you about.

- **To administer programs.** We may use your personal information to administer programs, rewards or benefits, including by setting up and verifying an account, communicating with you regarding the program, evaluating your application, and tracking rewards points.
- **To perform analytics and to personalize your experience.** We may use your personal information to use data analytics to improve our website, products or services, marketing, customer relationships, and experiences.
- **To conduct security and fraud prevention.** We may use your personal information to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions, attempts to manipulate or violate our policies, procedures, and terms and conditions.
- **To comply with our obligations and to protect our rights.** We may use your personal information to comply with contractual, legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.
- **To perform core business functions.** We may use your personal information to maintain records related to business process management, to conduct loss prevention, to collect amounts owed to us, to provide and maintain functionality of our website and apps, to identify and repair errors or problems, and to verify, correct, or update our records and databases.
- **To facilitate our actual or potential business relationship.** We may use your personal information in furtherance of our potential or actual business relationship, including if we are exploring a potential partnership in which you would carry or distribute our products.
- **To accomplish another purpose.** We may use your personal information for any other purpose either: as we indicate when we collect the information from you; consistent with the purpose for which you provided it; upon your consent; or as required or permitted under applicable law.

If you do not want us to use your personal information for a purpose described above, or if you would like information on how to adjust your preferences, please see [Your Rights and Choices](#) below.

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

7. Disclosure of your information

We may share your personal information with:

- **Our affiliated companies.** We may share your personal information with any member of our corporate group, including our subsidiaries and affiliates, or our holding company and its subsidiaries and affiliates.
- **Our service providers.** We may share your personal information with our service providers, contractors, and other third parties that we use to support our business. The following are some examples of the information that we may provide and the reason for sharing it:

- Your identity or contact information, transaction information, and financial information to our service providers who facilitate and processes payments on our behalf.
- Your identity or contact information and transaction information to our service provider who follows up with you and asks you to provide a review and rate your purchase.
- Your identity or contact information and transaction information to our service provider who follows up with you when you abandon your cart and/or assists us with email marketing campaigns.
- Your identity or contact information, technical information, profile information, marketing and communications information, usage information, and/or your user contributions to our website host and the marketing agency who supports our website and social media channels.
- Your identity or contact information, financial information, transaction information, technical information, and profile information with the software as a service provider that we use to help manage that aspect of our business.
- Your identity or contact information to a service provider that assists us in verifying, updating and correcting our lists, systems and databases.
- Your transaction information and usage information available to our marketing partners.
- Your technical information and usage information to our website analytics providers.
- **Our third-party partners.** We may share your personal information with a third-party partner that we work with to jointly create and offer a product, service, or joint or co-branded promotion.
- **Social media platforms and networks.** We may share your personal information with social media providers via plugins, widgets, or other tools that are on our website.
- **An acquiring or successor company.** We may share your personal information with a prospective or actual buyer or other successor in connection with a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, in which one of the transferred assets is the personal information that we hold.
- **Other third parties.** We may also share your personal information with other third parties, including without limitation courts, lawyers or law firms, agents, consultants, and investigators, as required or permitted by applicable law, for reasons that may include (without limitation):
 - To comply with any court order, law, or legal process, including to respond to any governmental or regulatory request.
 - To enforce our Terms of Use and other terms or 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.

We may also share your personal information with any of the above parties to fulfill any purpose that:

- you provide it for;
- we indicate to you when you provide the information; or
- is with your consent.

We may share non-personal or anonymized information with anyone without restriction.

8. Interest-Based Advertising

Some content or applications on our website may be served by third parties, including advertisers, ad networks, social media companies, content partners, or application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies (such as Meta Pixel) to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. 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 National Advertising Institute's (NAI's) opt-out platform: www.networkadvertising.org/choices
- The Digital Advertising Alliance (DAA) U.S. opt-out platform: www.aboutads.info/choices
- The DAA's Canadian page: youradchoices.ca/en/tools

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

We may 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:

Facebook

We use the plugins of social network facebook.com, operated by Meta Platforms Inc., 1601 Willow Road, Menlo Park, CA 94025, U.S.A. Please see Meta’s Privacy Policy, which can be found at the following link: [Meta Privacy Policy](#).

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. Please see Twitter’s Privacy Policy, which can be found at the following link: [Twitter Privacy Policy](#).

Pinterest

We use the plugins of social network Pinterest, operated by Pinterest Inc., 505 Brannan Street, San Francisco, CA 94107, U.S.A. Please see Pinterest’s Privacy Policy, which can be found at the following link: [Pinterest Privacy Policy](#).

YouTube

We use the plugins of the YouTube website, operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, U.S.A. Please see Google’s Privacy Policy, which can be found at the following link: [Google Privacy Policy](#).

Instagram

We use the plugins of social network Instagram, operated by Instagram, LLC, 1601 Willow Road, Menlo Park, CA 94025, U.S.A. Please see Instagram’s Privacy Policy, which can be found at the following link: [Instagram Privacy Policy](#).

TikTok

We use the plugins of social network TikTok, operated by TikTok Inc., 5800 Bristol Parkway, Suite 100, Culver City, CA 90230, U.S.A. Please see TikTok’s Privacy Policy, which can be found at the following link: [TikTok Privacy Policy](#).

Twitch

We may use the plugins of social network Twitch, operated by Twitch Interactive, Inc., 350 Bush Street, 2nd Floor, San Francisco, CA 94104, U.S.A. Please see Twitch’s Privacy Notice, which can be found at the following link: [Twitch Privacy Notice](#).

b. User Contributions.

We may ask you to rate your purchases and/or review our products. We may post your ratings and reviews on our website. In addition, in some cases we may allow you to directly upload your own content to public areas of the website. If you tag our brand, we may like or reshare your social media posts. Any information you submit becomes public information, and we do not control how others may use or further disclose/publish the content you submit. We are not responsible for uses or further disclosure / publication by third parties, which may not comply with 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.

- **Subscribe to or opt out of marketing communications.** You can join our email marketing list by entering your email when prompted on our website. If you purchase products from us, we may also send you marketing information about our products. You may opt-out of further marketing communications by contacting Customer Care as set forth below in the [Contact Us](#) section or by clicking UNSUBSCRIBE and following the instructions in any promotional email that we send to you. This opt-out may not apply to communications we send related to a product purchase, warranty registration, product service experience or other transaction between us. 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 also 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.
- **Access, correct, update and delete 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, or to the extent you wish to access personal information that is not available to you directly, 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.
- **Delete your user contributions.** To request that your User Contributions be deleted, please contact us as set forth in the [Contact Us](#) section below. Proper access and use of information provided on the Website, including User Contributions, is governed by our Terms of Use.
- **Disable or refuse 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.

However, if you disable or refuse cookies, please note that some parts of the 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 may be able to opt-out of Meta Pixel through settings on your Facebook account. Please note that Meta has ultimate control of the information gathered through Meta Pixel. You should consult Meta's Privacy Policy for potential opt-out options, which can be found [here](#). Finally, in some cases, you may be able to set your browser or email program to not download certain web beacons.

- **Opt out of 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 resident of California, you may have additional personal rights and choices regarding your personal information. Please see the section below titled [For California Residents](#) for more information.

Nevada Residents. If you are a resident of Nevada, you may have additional personal rights and choices regarding your personal information. Please see the section below titled [For Nevada Residents](#) for more information.

Canada Residents. If you are resident of Canada, you may have additional personal rights and choices. Please see the section below titled [For Canada Residents](#) for more information.

Australia and New Zealand Residents. If you are a resident of Australia or New Zealand, you may have additional personal rights and choices regarding your personal information. Please see the section below titled [For Australia and New Zealand Residents](#) for more information.

11. Data Security and Risks

The security of your personal information is 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. Notwithstanding these measures, "perfect security" does not exist. In particular, we cannot guarantee the security of information communicated to us online or by email. It is possible that third parties may unlawfully intercept or access such information.

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. We cannot control the actions of other users of the website with whom you may choose to share information on public areas of our websites. Therefore, we cannot and do not guarantee that such information will not be viewed or copied by unauthorized persons. We are not responsible for uses or further disclosure or publication by third parties, even though it may not be consistent with our privacy policy.

12. Changes to our privacy policy

We may revise this privacy policy from time to time. The updated version of the policy will be available at this webpage.

13. Contact Us

A. Customer service inquiries.

If you have any customer service, retail, or press-related inquiries, please use the following relevant phone numbers and web or email addresses:

| Brand | Phone Number | Web Link |
|----------------|---------------------------------|---|
| ban | 1-866-226-3363 | https://www.feelbanfresh.com/contact-us/ |
| Biore´ | 1-888-246-7311 | https://www.biore.com/en-us/contact-us/ |
| Curel | 1-800-572-2931 | https://www.curel.com/en-us/contact/ |
| Goldwell | 1-800-333-2442 | https://www.goldwell.us/contact/ |
| Jergens | 1-800-742-8798 | https://www.jergens.com/en-us/contact-us/ |
| John Frieda | 1-800-521-3189 | https://www.johnfrieda.com/en-us/contact-us/ |
| KMS | 1-800-742-8798 | https://www.kmshair.com/en-US/contact-us/ |
| MyKirei by KAO | 1-800-521-3189 | https://www.mykirei.com/pages/contact-us/ |
| Molton Brown | 1-866-933-2344 | uscustomerservice@moltonbrown.com |
| Wakati Hair | 1-800-521-3189 | https://www.wakatihair.com/contact |
| Oribe | 1-888-ORIBE-99 (1-888-674-2399) | https://www.oribe.com/oribestorefront/oribe/en/-/contact-us |

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| | or 1-877-670-6767 (if you in Canada) | |
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You may write to Kao USA Inc. or Oribe Hair Care, LLC at:

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

You may write to Molton Brown USA LLC at:

Molton Brown USA LLC
Attention: Customer Care
One Penn Plaza, Suite 4118
New York, NY 10119

You may write to Kao Canada Inc. at:

Kao Canada Inc.
Attention: Customer Care
#2-75 Courtneypark Drive West
Mississauga, Ontario, L5W 0E3

You may write to Kao Australia Pty Limited at:

Kao Australia Pty Limited
Attention: Customer Care
Level 2, 293 Camberwell Road
Camberwell, Victoria 3124

You may write to Kao New Zealand Limited at:

Kao New Zealand Limited
Attention: Customer Care
Level 2, 109 Wellesley Street
Auckland 1010

B. To exercise your privacy rights.

To exercise privacy rights that you may have under this policy or applicable law, please submit your request via our Privacy Web Form, which can be accessed at this [link](#). Alternatively, if you prefer, you may call us toll-free at 1-888-914-9661. If you have general questions, comments, complaints or requests regarding our compliance with this privacy policy or our handling of your personal information, please contact us by either of these means, or via the phone or web links provided in Section 13(A) above.

14. For California Residents

The California Consumer Privacy Act of 2018, as amended and expanded by the California Privacy Rights Act of 2020 (together known as the “CCPA”), requires us to provide the following notice to California residents.

This notice does not apply to information we collect from our California-based employees, job applicants, contractors, or similar individuals. Our California notice for job applicants is available [here](#).

A. Information we collect

The information we collect and have collected about California residents in the last 12 months is described in [What information we collect](#) above. That information corresponds with the following categories of personal information under the CCPA:

| Category | Description | Do we collect this information? |
|--|--|---------------------------------|
| A. Identifiers | Your name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers. | YES |
| B. Personal information described in subdivision (e) of California Civil Code Section 1798.80 (known as the California Customer Records Act) | Your name, signature, address, telephone number, credit or debit card number, bank account number, or any other financial information. Some personal information included in this category may overlap with other categories. | YES |
| C. Characteristics of protected classifications under California or federal law | 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). | YES |

| | | |
|--|--|-----|
| D. Commercial information | Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | YES |
| E. Biometric information | Physiological, biological, or behavioral characteristics, including information pertaining to an individual’s DNA, that is used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity. This may include things like 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 electronic network activity information | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. | YES |
| G. Geolocation data | Physical location or movements (for example, to provide location-related services). | YES |
| H. Audio, electronic, visual, thermal, olfactory, or similar information | Electronic or audio messages, recordings, and sensory data. | YES |
| I. Professional or employment-related information | 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 included in a resume, CV, or cover letter, and information created, stored or transmitted | YES |

| | | |
|--|--|-----|
| | using our networks, devices, computers or communications equipment. | |
| J. Education information that is defined as information that is not publicly available personally identifiable information as defined by the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)) | Non-public 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 personal information to create a profile about the consumer | Inferences drawn from personal information to create a profile reflecting a person's preferences (including brand or product preferences), characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | YES |
| L. Sensitive personal information | <p>Under California law, "Sensitive Personal Information" refers to:</p> <p>Personal information that reveals: Social Security Number, driver's license number, state identification card, or passport number; account log-in, financial account, debit card, or credit card, in combination with any required security or access code, password, or credentials allowing access to an account; geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of mail, email, and text messages; and genetic data.</p> <p>Processing of biometric information for the purpose of uniquely identifying a consumer.</p> <p>Personal information collected and analyzed concerning a consumer's health.</p> | YES |

| | | |
|--|---|--|
| | Personal information collected and analyzed concerning a consumer's sex life or sexual orientation. | |
|--|---|--|

In the last 12 months, we have collected personal information from the sources described in [How we collect your information](#) above.

B. Use of personal information

In the last 12 months, we have used your personal information for the business and commercial purposes described in [How we use your information](#) above.

C. Sharing of personal information

The business and commercial purposes that we have shared your personal information in the last 12 months are described above in [Disclosure of your information](#). More specific information on that sharing is as follows:

- *Sharing your personal information for business purposes.* We have shared, or may, share the following categories of personal information with our affiliated companies and service providers for our business purposes:
 - 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 I: Professional or employment related information.
 - Category K: Inferences drawn from other personal information.
 - Category L: Sensitive personal information.

As described above, examples of business purposes include performing transactions, fulfilling orders, registering accounts, managing our relationship with you, and monitoring for security threats and fraud.

- *Sharing your personal information for commercial or other purposes:* We have shared, or may share, the following categories of your personal information with business partners and other third parties in a manner that may be considered to be a "sale" under the CCPA:

- 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 I: Professional or employment related information.
- Category K: Inferences drawn from other personal information.
- Category L: Sensitive personal information.

As described above, this information may be shared for personalization, analytics, marketing, retargeting, and sales. We do not sell personal information of consumers we know are less than 16 years of age.

D. Your Rights under the CCPA

The CCPA provides California residents (called “consumers” under the statute) with specific rights regarding their personal information. This section describes your CCPA rights.

- ***Right to know what personal information is being collected:*** You have the right to request that we provide certain information to you about our collection, use, disclosure, and sale of your personal information over the past 12 months. This includes:
 - 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.
 - If we sold or shared your personal information:
 - The categories of personal information that we collected about you;
 - The categories of personal information that we sold or shared about you and the categories of third parties to whom the personal information was sold or shared, by category or categories of personal information for each category of third parties; and
 - The categories of personal information that the business disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

- **Right to access personal information:** You have a right to obtain a copy of the specific pieces of personal information we collected about you.
- **Right to correct inaccurate personal information:** You have a right to request that we correct inaccurate personal information about you.
- **Right to delete your personal information:** 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.
- **Right to limit the use or disclosure of sensitive personal information:** You have the right to request that we limit our use of your sensitive personal information to the use that is necessary to provide the goods or perform the services that are reasonably expected by an average consumer who requests goods or services, for other certain statutorily-permissible purposes (e.g., ensuring security and integrity, short-term transient use, maintaining and servicing accounts, etc.), and as otherwise authorized by regulations.
- **Right to opt-out of the sale or sharing of your personal information:** You have the right to direct us not to sell or share your personal information to third parties. Please note that we do not sell our email lists or other personal information we collect about you for money. However, our websites use cookies and similar technologies in a way that may be considered a “sale” of your personal information under the CCPA. Where that is the case, we will comply with California “Do Not Sell” requirements.
- **Right of no retaliation:** Under the CCPA, a business must not discriminate against a consumer because the consumer exercised any of its rights under the CCPA, including, but not limited to, by:
 - Denying goods or services to the consumer.
 - Charging different prices or rates for good or services, including through the use of discounts or other benefits or imposing penalties.
 - Providing a different level or quality of goods or services to the consumer.
 - Suggesting that the consumer will receive a different price or rate for goods or services or a different level or quality of goods or services.
 - Retaliating against an employee, applicant for employment, or independent contractor for exercising their rights under the CCPA.

E. How to exercise your CCPA rights

To exercise any of your rights under the CCPA (other than the “right of no retaliation,” which does not require any action from you), please use our Privacy Web Form, which can be accessed at this [link](#). As an alternative, if you prefer, you may call us toll-free at 1-888-914-9661.

Please note that opting out of sales in the context of cookies will not stop us from advertising to you. We may still present contextual or other advertisements to you that do not rely on “sales” to our advertising partners.

F. 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. To designate an authorized agent, you must provide the authorized agent with signed permission to make the request. If your authorized agent is a business entity, then the authorized agent must be registered with the California Secretary of State to conduct business in California. We may deny a request from an authorized agent that does not submit proof that it has been authorized to submit a request on your behalf. Further, before responding to a request from an authorized agent, we will still require you to (1) verify that you have provided the authorized agent permission to submit the request on your behalf; and (2) verify your identity directly with us.

G. How often can you submit requests?

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

H. How we verify and respond to requests

Before fulfilling your request, we take steps to verify you are who you say you are or that you have authority to act upon someone else's behalf. Therefore, upon receipt of your request, we will request additional information that we need to verify you and, if you are submitting a request on behalf of someone else, to verify that you are permitted to act on that person's behalf.

When we contact you to request verification information, please respond and provide the information that we have requested. Depending on the nature of the request you make, we may require you to verify your identity to either a reasonable degree of certainty or high degree of certainty. This may mean that we need to match two or three pieces of information that we hold about you with information that you provide to us. In some cases, we may require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request or that you are authorized to make the request on behalf of someone else.

In addition to providing the information we need to verify you or your authority, you must provide us with enough information so that we can understand, evaluate, and respond to your request. We cannot respond to your request or provide you with personal information if we cannot confirm the personal information relates to you.

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

We generally will only retain your personal information for so long as it is necessary to fulfill the

purposes indicated in this Policy, unless a longer period of retention is required or permitted by law. We cannot delete personal information in those situations where our retention is necessary to comply with our legal obligations, resolve disputes, enforce agreements, prevent fraud or other deceptive or illegal activity, or for our own internal business purposes.

I. Response Timing and Format

We make a reasonable effort to respond to verifiable consumer requests within 45 days of receipt. If we require more time, we will inform you of the reason and extension period in writing within 45 days of receiving your verifiable consumer request.

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. When you request a copy of your personal information, 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 easily.

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.

J. Other California Privacy Rights

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

15. For Nevada Residents

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

16. For Canada Residents

We comply with applicable Canadian privacy laws and regulations, including the *Personal Information Protection and Electronic Documents Act* (PIPEDA), in connection with processing Canadian personal information.

We will only use your personal information for the purposes described in this privacy policy unless (1) we have obtained your consent to use it for other purposes; or (2) we are otherwise permitted or required by applicable law to use it for such other purposes.

- ***Transferring your personal information outside Canada***

We may transfer personal information that we collect, or that you provide, to third parties (including affiliates, service providers and others) as described in the [Disclosure of your information](#).

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country.

You are welcome to contact us if you have questions regarding the collection, use, disclosure or storage of personal information by our service providers and affiliates outside Canada, and/or to obtain access to written information about our policies and practices with respect to service providers (including affiliates) outside Canada. For questions about our privacy practices, please contact us as directed in the [Contact Us](#) section of this policy.

By submitting your personal information or engaging with the website, you consent to the transfer, storage, and processing of such information outside of Canada.

- ***Data retention***

Your personal information will be kept in the Province of Ontario in Canada, and may also be held in the United States and Germany. Personal information will be accessible to our employees who have a “need to know” such information for the purposes described in this privacy policy, which may include personnel from our Sales, Marketing, Customer Care, Finance and Accounting, Information Technology, Human Resources, and Legal Departments, as well as personnel supporting business administration or operations.

Except as otherwise permitted or required by applicable law or regulation, we will generally only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, and/or for the purposes of satisfying any legal, accounting, or reporting requirements. Please note, however, that we may retain personal information in those situations where it is necessary to comply with our legal obligations, resolve disputes, enforce agreements, prevent fraud or other deceptive or illegal activity, or for our own internal business purposes. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you, either directly or indirectly, alone or in combination with any other information. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

- ***Accessing and correcting your personal information***

By law you have the right to request access to and to correct or rectify the personal information that we hold about you, subject to certain exceptions as required or permitted by applicable law.

You can review and change your personal information by logging into your account and visiting the pages that correspond to the information you want to review and change.

If you want to access, review, verify, correct, rectify, update, or withdraw consent to the collection, use or disclosure of your personal information you may also contact Kao USA as directed in the [Contact Us](#) section of this policy to make such a request.

We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons, subject to any legal or regulatory restrictions.

We will provide access to your personal information, subject to exceptions set out in applicable privacy legislation. Examples of such exceptions may include (without limitation):

- Information protected by solicitor-client privilege.
- Information that is part of a formal dispute resolution process.
- Information that would reveal the personal information or confidential commercial information of another person.
- Information that is prohibitively expensive to provide.

If you are concerned about our response or would like to correct the information provided, you may contact us as described in the [Contact Us](#) section of this policy.

17. For Australia and New Zealand Residents

In Australia, we comply with the Australian Privacy Principles (APPs) as contained in the *Privacy Act 1988* (Cth). In New Zealand, we comply with the Information Privacy Principles (IPPs) as contained in the *Privacy Act 2000* (NZ).

It may be possible for you to deal with us on an anonymous basis (ie, providing no name or personally identifying details), or on a pseudonymous basis (ie, providing a name or descriptor that is different to your true identity). However, there will be some scenarios where the use of your true identity is a legal requirement (for example, to verify consumer identity, to process and collect payments on transactions, etc.), or where anonymity or pseudonymity will be impracticable.

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to fulfill the business purposes that we have identified in this policy. It may also impact your interactions with our various products, services and platforms. For example, you may be unable to access certain portions of our websites, or you may experience certain limitations in the scope of interactions and services that we can provide.

In the case of “sensitive” personal information (which includes, without limitation, racial and ethnic origin, sexual orientation, health information, etc.), we will comply with the applicable laws of Australia and New Zealand, and will obtain your consent to collection to the extent required by law, and will only

collect or use such sensitive personal information to the extent it is necessary for one or more of our functions or activities.

We make a reasonable effort to respond to verified requests within 45 days of receipt. If we require more time, we will inform you of the reason and extension period in writing within 45 days of receiving your verified request.

Our business is affiliated with other businesses, organisations and people located overseas. In the course of doing business with you, we are likely to disclose some of your personal information to these overseas recipients. We typically only do so where it is necessary to complete the transaction you have entered into, or you have provided your consent, or it is permitted by the relevant privacy and data protection laws in your jurisdiction. We also take reasonable steps to ensure that the overseas recipients are bound by privacy and data protection obligations. Our corporate group affiliates and external service providers are located in Australia, New Zealand, the United States of America, Canada, Germany, the United Kingdom, Spain, Switzerland, Italy, Finland, Norway, Sweden, Denmark, the Netherlands, Belgium, the Czech Republic, France, and Austria.

Job Applicant Privacy Notice for California Residents

Effective Date: January 1, 2023

Last Updated on: January 1, 2023

1. Introduction

This Privacy Notice for California Residents describes how the Kao Americas Region companies (named at the beginning of our Privacy Policy)(“we,” “our,” or “us”) collect and use personal information about you if you are a natural person applying for a job at one of our companies and are a California resident (“**Covered Person**”).

We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended and expanded by the California Privacy Rights Act of 2020 (CPRA), and as may be further amended, replaced, or superseded, as well as any implementing regulations. 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 may be used.

2. Categories of Personal 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 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 (FCRA), 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 | Description | 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 described in subdivision (e) of California Civil Code Section 1798.80 (known as the California Customer Records Act) | 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. Characteristics of protected classifications under California or federal law | 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 | YES |

| Category | Description | Do we collect this information? |
|--|--|---------------------------------|
| | 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. | NO |
| E. Biometric information | Physiological, biological, or behavioral characteristics, including information pertaining to an individual's DNA, that is used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity. This may include things like 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 electronic network activity information | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. | NO |
| G. Geolocation data | Physical location or movements (for example, to provide location-related services). | NO |
| H. Audio, electronic, visual, thermal, olfactory, or similar information | Electronic or audio messages, recordings, and sensory data. | NO |
| I. Professional or employment-related information | 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 | YES |

| Category | Description | Do we collect this information? |
|--|--|---------------------------------|
| | 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 included in a resume, CV, or cover letter, and information created, stored or transmitted using our networks, devices, computers or communications equipment. | |
| J. Education information that is defined as information that is not publicly available personally identifiable information as defined by the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)) | Non-public 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 personal information to create a profile about the consumer | Inferences drawn from personal information to create a profile reflecting a person’s preferences (including brand or product preferences), characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | YES |
| L. Sensitive personal information | Under California law, “Sensitive Personal Information” refers to: Personal information that reveals: Social Security Number, driver’s license number, state identification card, or passport number; account log-in, financial account, debit card, or credit card, in combination with any required security or access code, password, or credentials allowing access to an account; | YES |

| Category | Description | Do we collect this information? |
|----------|--|---------------------------------|
| | <p>geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of mail, email, and text messages; and genetic data.</p> <p>Processing of biometric information for the purpose of uniquely identifying a consumer.</p> <p>Personal information collected and analyzed concerning a consumer's health.</p> <p>Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.</p> | |

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 our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us 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.

Phone: 1-888-914-9661

Web: [Kao Privacy Web Form](#)