

## CFN-California Consumer Privacy Policy Addendum

**EFFECTIVE DATE: [01, Jul, 2020]**

DISCO Inc. (“DISCO,” “we,” “us,” “our”) provides the Career Forum.Net (“CFN”) services, which provide individuals with career opportunity information and training programs that will allow them to maximize their unique potential, including the services available on the internet at <<https://careerforum.net/en/>> and through the mobile application you can download at < <https://careerforum.net/en/news/49/>>.

At DISCO, we take the privacy rights of California consumers under the California Consumer Privacy Act (“CCPA”) seriously. If you are a California resident, the following provisions apply to our processing of information in relation to the CFN services that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household subject to the CCPA (“California Personal Information”). For such residents, the provisions of this CFN - California Consumer Privacy Policy Addendum (“California Addendum”) supplements our Privacy Policy available at: <<https://www.disc.co.jp/en/privacy/>> and prevails over any conflicting provisions therein.

We reserve the right to update this California Addendum from time to time at our discretion. When we make changes to this California Addendum, we will post the updated notice on our website and update the effective date of the updated California Addendum. It is your responsibility to regularly review this California Addendum.

### **I. California Personal Information**

We describe our general practices of handling personal information in the section of our Privacy Policy titled, “**Types and Purposes of Use of Personal Information Obtained by the Company**” [<https://www.disc.co.jp/en/privacy/#section2>].

#### **1. Categories of California Personal Information**

In the past 12 months, we have collected the following categories of California Personal Information.

<b>Category</b>	<b>Example</b>
Identifiers.	A real name, nickname, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, Skype ID, Facebook ID, IMEI, UUID Cookie, work permit/visa status.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	The identifiers above, telephone number, education information, employment information, and employment history.  This category may overlap with other categories.
Protected classification characteristics under California or federal law.	Characteristics of protected classifications under California or federal law, including demographic information (such as age, sex, gender, and citizenship).
Internet or other similar	Internet or other electronic network activity information,

Category	Example
network activity.	including, but not limited to, browsing history, search history, referrer URL, and other information regarding a consumer’s interaction with our websites.
Professional or employment-related information.	Current or past job history or performance evaluations, including company name, type of business, position title, period at position, job category, career level, employment type, job description, and current/most recent annual income.
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 and transcripts.

California Personal Information does not include publicly available information from government records, deidentified or aggregate consumer information, or other personal information excluded from the CCPA’s scope.

## 2. Categories of Sources of California Personal Information

Within the past 12 months we have obtained California Personal Information from the following sources:

- directly and indirectly from you, with respect to both online and offline interactions you may have with us or our service providers including from the devices you use to access our websites, mobile applications, and online services; and
- from third parties, including third parties to which you have previously provided your information and authorized them to disclose your information to us, such as social media platforms (e.g., Facebook log-in).

## 3. Our Use of California Personal Information.

We use the California Personal Information we collect for the business purposes described in the section of our Privacy Policy titled, “**Types and Purposes of Use of Personal Information Obtained by the Company**” [<https://www.disc.co.jp/en/privacy/#section2>].

We may also use the California Personal Information we collect for purposes for which we provide you additional notice or for purposes compatible with the context in which the California Personal Information was collected.

## 4. Recipients of California Personal Information

Within the preceding 12 months, we have disclosed California Personal Information to the following categories of third parties

Categories of Personal Information	Categories of 3Ps with Whom we Shared Personal Information for a Business Purpose
Identifiers.	✓ Recruiting/hiring companies to whom you apply through the CFN services

Categories of Personal Information	Categories of 3Ps with Whom we Shared Personal Information for a Business Purpose
	<ul style="list-style-type: none"> <li>✓ Marketing and sales promotion service providers</li> <li>✓ System development and maintenance service providers</li> <li>✓ Our subsidiaries (which serve as marketing, sales promotion or event management service providers)</li> </ul>
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<ul style="list-style-type: none"> <li>✓ Recruiting/hiring companies to whom you apply through the CFN services</li> <li>✓ Marketing and sales promotion service providers</li> <li>✓ System development and maintenance service providers</li> <li>✓ Our subsidiaries (which serve as marketing, sales promotion or event management service providers)</li> </ul>
Protected classification characteristics under California or federal law.	<ul style="list-style-type: none"> <li>✓ Recruiting/hiring companies to whom you apply through the CFN services</li> </ul>
Internet or other similar network activity.	N/A
Professional or employment-related information.	<ul style="list-style-type: none"> <li>✓ Recruiting/hiring companies to whom you apply through the CFN services</li> </ul>
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	<ul style="list-style-type: none"> <li>✓ Recruiting/hiring companies to whom you apply through the CFN services</li> </ul>

We do not sell, and, within the preceding 12 months, we have not sold, California Personal Information, including the California Personal Information of consumers who we actually know are less than 16 years of age.

## II. Your Rights Regarding California Personal Information.

California residents have certain rights with respect to California Personal Information collected by businesses. If you are a California resident, you may exercise the following rights regarding your California Personal Information, subject to certain exceptions and limitations:

- The **right to know** the categories of California Personal Information we collect, use, disclose, and sell about you, the categories of sources from which we collected your California Personal Information, our purposes for collecting or selling your California Personal Information, the categories of your California Personal Information that we have disclosed for a business purpose, and the categories of third parties with which we have shared personal information. You also have the right to request a copy of specific pieces of your California Personal Information.
- The **right to delete** the California Personal Information we have collected from you or maintain about you.

- The right to **opt out of a sale** of your California Personal Information. Please note however that we do not sell your California Personal Information, and therefore we do not support requests to opt out of a sale of California Personal Information.
- The **right not to receive discriminatory treatment** for the exercise of the privacy rights conferred by the CCPA. We will not discriminate against you for exercising any of your CCPA rights, including by denying you goods or services, charging different prices or rates for goods or services, providing you a different level or quality of goods or services, or suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services. However, we may charge different prices or rates, or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to us by your California Personal Information. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.
- **Other California Privacy Rights.** Under California’s “Shine the Light” law (Civil Code Section § 1798.83), you, as a California resident, may ask us to provide a list of what personal information (if any) we disclosed to third parties for their direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. You may also ask us to refrain from sharing your personal information with third parties for their marketing purposes. Please note however that we do not disclose your personal information to third parties for their direct marketing purposes, and therefore we do not support aforementioned requests.

To exercise any of the above rights, please contact us using the following information and submit the required verifying information, as further described below

E-mail: [privacy-madoguchi@disc.co.jp](mailto:privacy-madoguchi@disc.co.jp)

Physical Address: 9F Iidabashi First Bldg.,2-5-1 Koraku,Bunkyo,Tokyo 112-0004 Japan

**Verification Process and Required Information.** Note that we may need to request additional information from you to verify your identity or understand the scope of your request. Although you will not be required to create an account with us to submit a request or have it fulfilled, we may ask you to provide certain California Personal Information as part of our verification process, including name, email address and member ID, which we already maintain

**Authorized Agent.** You may designate an authorized agent to make a CCPA request on your behalf by submitting the written power of attorney or by providing the agent with written permission to act on your behalf. As permitted by law, we may require verification of the agent’s authorization or require you to verify your own identity in response to a request even if you choose to use an agent.

Please note that we may not be able to respond to your request or provide you with your California Personal Information if we cannot verify your identity or authority to make the request and confirm the California Personal Information relates to you.

### **III. California Do Not Track Disclosure.**

Our website and mobile app are not designed to respond to “do not track” signals or other consumer choice mechanisms from browsers for personal information collected over time and across third-party websites or online services.

#### **IV. Contact for More Information.**

For questions or concerns about our Privacy Policy, this California Addendum, or our data practices, please contact us by using the information below.

E-mail: [privacy-madoguchi@disc.co.jp](mailto:privacy-madoguchi@disc.co.jp)

Physical Address: 9F Iidabashi First Bldg.,2-5-1 Koraku,Bunkyo,Tokyo 112-0004 Japan