



# CAPCOM USA ONLINE PRIVACY STATEMENT

Last updated January 3, 2023

Here is a [PDF version](#) of our Privacy Policy for those who wish to save or print the contents of this page.

Welcome to Capcom USA!

## OUR PRIVACY COMMITMENT

Capcom U.S.A., Inc. (collectively, “Capcom USA,” “Capcom,” “we,” or “us”) respects the privacy of our online visitors and users of our games, online, downloadable products, websites, newsletters, applications, and other services (each a “Service” or collectively, the “Services”), and we recognize the importance of protecting all information that you may choose to share with us. To further this commitment, we have adopted this Capcom USA Online Privacy Policy (“Privacy Policy”) to outline for you how we collect and process your information.

This Privacy Policy explains when we collect information about you, what we collect, why we collect it, how we use and handle it, and your associated choices and rights. Your use and continued use of our Services indicates your acceptance of these practices and this Privacy Policy.

Capcom is an authorized licensee, and participating member, of the Entertainment Software Rating Board’s Privacy Certified Program (“ESRB Privacy Certified”). To help protect your privacy, we have voluntarily undertaken this privacy initiative. As a licensee in this privacy certification program, we are subject to audits of our Services and other enforcement and accountability mechanisms administered independently by ESRB Privacy Certified. Our Services containing the ESRB Privacy Certified seal have been reviewed and certified by ESRB Privacy Certified to meet established online information collection and use practices. For more information about ESRB Privacy Certified, please see <https://www.esrb.org/privacy/>.

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### • **Q1. What information does this Privacy Policy cover?**

This Privacy Policy applies only to information collected on or through the Services offered to you by Capcom USA, to information shared with Capcom USA by affiliates in the Capcom group and certain third parties (as further described in this Privacy Policy), and to information collected by Capcom USA for employment-related purposes. It does not apply to any other information collected by Capcom USA through any other means.

Please note that this Privacy Policy applies only to information submitted and collected via the Internet from the websites, newsletters or other electronic communication means where the Privacy Policy is incorporated by reference, and does not apply to information that may be collected by Capcom via offline means with the exception of employment-related information. This Privacy Policy does not apply to any websites, services, games, and/or applications offered and/or maintained by our international affiliates (e.g., Capcom Asia, Capcom Europe, and Capcom Japan), or, unless otherwise described in this Privacy Policy, any other companies or organizations to which we link. Capcom USA is therefore not responsible for the content or activities provided on those websites, except as expressly provided in this Privacy Policy.

#### **Third-Party Websites**

Once you have clicked on an advertisement or a third-party link on our site and have

left our websites or other Services, our Privacy Policy no longer applies and you must read the privacy policy of the advertiser/third party to see how your information will be collected and processed on its website.

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## • Q2. What types of information do we collect about you?

Capcom respects your privacy and, accordingly, we strive to minimize our collection of your personal information. Personal information is information that can be used to directly, or indirectly with other collected information, identify and contact you. If required by applicable law, Capcom will request your specific consent prior to collecting any of your personal information. If you prefer, however, not to disclose your personal information to Capcom, you may not be able to enjoy certain features of our Services.

### Our Services and European Economic Area Users

Data protection law in Europe requires a “lawful basis” for collecting and processing personal information from citizens or residents of the European Economic Area. Our lawful bases include:

**Specific Affirmative Consent:** As stated above, Capcom will request your specific affirmative consent, if required by applicable law, in a clear, concise, and specific manner prior to collecting and processing your personal information.

**Performance of Contract:** In some instances, we will need to collect your personal information to comply with our contractual obligation to deliver the Services to you (e.g., pursuant to our End User License Agreement for a Service), such as by collecting your IP address to facilitate matchmaking in an online multiplayer video game, or collecting your telemetry data to display your player statistics and rankings to you.

**Legal Compliance:** Sometimes the law says we need to collect and process your personal information. For example, a court may order us to process your data for a particular purpose other than that for which it was initially collected.

**Legitimate Interests:** On occasion, we may collect and process your personal information when we have a good and fair reason to use your data, and we do so in

ways which do not hurt your interests and rights. In other words, we may collect and process your data to pursue our legitimate interests in a way that might reasonably be expected as part of running our business and that does not materially impact your rights, freedom, or interests.

## **Our Services and Children**

We do not knowingly collect or maintain personal information from users under 13 in the United States, and under the applicable age of consent in other countries ("Child" or "Children") other than as permitted by law, for example, in support of our internal operations (in the U.S.) and legitimate interests or contractual or legal obligations (in the EU). We take Children's privacy seriously and encourage parents to play an active role in their Children's online experience at all times.

If Capcom learns that a Child's personal information has been collected, we will delete the account. If parents believe that we have unintentionally collected their Child's personal information, they should contact us to request the deletion of the information at:

### **Capcom USA**

Attn.: Privacy Policy Administrator

185 Berry Street, Suite 1200

San Francisco, CA 94107

(650) 350-6500

[privacy@capcom.com](mailto:privacy@capcom.com)

## **Personal Information That We Collect**

To offer our users certain features of our Services, and to create certain user accounts (e.g., to create a Capcom Fighters Network account), we collect several types of personal information from you directly. Typically, this information includes:

- Name
- Username/Online ID
- E-mail address
- Date of birth/Age
- Telephone number

- Country of residence

Other times, we collect your personal information automatically when you use our Services, including sometimes through cookies. Typically, this information includes:

- IP address
- Device identifiers
- Browser information, including browser type
- Platform type
- Details about the Services you are using and your use of them, such as:
  - Game telemetry data
  - Purchase behavior
  - User and gameplay progression information

## **Non-Personal Information That We Collect**

Additionally, we may also collect other types of non-personal information (known as demographic information) such as your game preferences, platform preferences, and other game ownership information.

## **Information Collected Through Third Party Services**

We may receive information, including the following, from third-party sources and combine it with information we already directly collect from you. We will handle the information in accordance with this Privacy Policy.

### **i. Information Collected Through Social Networking Services**

You can engage with our Services on or through third-party social networking websites such as Facebook, Google/YouTube, Twitch, Twitter, or other third-party social media plug-ins and applications which may be hosted on separate websites, or embedded within or integrated with our Services. When practicable, we will provide clear notice before you are directed to a third-party social networking website, plug-in, or application. When you engage with our Services on or through a third-party social networking website, plug-in, and/or application, you may authorize us to have access to certain information from your social media profile (e.g., name,

e-mail address, photo, birthday, location, your list of friends, people you follow and/or who follow you, the posts or "likes" you make) to deliver content or as part of the operation of the Service. We may also obtain non-personal information from your interaction with our Services (e.g., content viewed, game performance and scores, and information about advertisements within the content you have been shown or may have clicked on).

By engaging with our Services on and through third-party social networking websites, you consent to the sharing of such personal information with Capcom in accordance with this Privacy Policy. Please note that when you provide personal information to us through social networking websites, it may be publicly viewed by other members of those social networking websites, and we cannot prevent further use of the information by third parties. Further, any use of third-party social networking websites, plug-ins, or applications will be subject to such third-party social network's respective terms of service and privacy policy, and may result in the collection of information about your use of our Services by those third parties.

## ii. Information Collected Through First Party Platforms

You can also engage with certain portions of our Services through certain first-party and/or mobile platforms (the "First-Party Platform(s)"). For instance, if you desire to use features of our Services by signing in through or otherwise linking with, for example, your PSN account or Steam account to authenticate yourself, some information from those First-Party Platforms (e.g., your account ID, date of birth/age, username, language preference, entitlement information, achievement/trophy information, and/or geographic information), and/or information regarding your usage of our Services (e.g., web analytics data or game telemetry data) (collectively, the "Platform Information"), which may have been collected by the First-Party Platform may be transmitted to Capcom. Further, some First-Party Platforms, such as mobile platform providers, may provide to us additional information such as your precise location or contact list information. We will collect this information only if you provide your consent.

Where required by applicable law, Capcom will request your specific affirmative consent prior to collecting and processing any Platform Information. Otherwise, by signing in and/or linking with a First-Party Platform in connection with your use of the Services, you hereby acknowledge and agree that Platform Information may be transmitted to us, and that all Platform Information transmitted to us may be used by Capcom in accordance with this Privacy Policy and any applicable terms of consent required by a First-Party Platform provider. Further, your use of the First-Party

Platform will be subject to such First-Party Platform's respective terms of service and privacy policy.

## Information Collected Through Cookies and Other Web-Based Technologies

We collect information through web-based technologies, such as "cookies," to improve our Services. For example, when you use one of our Services, we collect your IP address. An IP address is often associated with your ISP (Internet Service Provider), your company, or your university. At times, we use IP addresses to collect information regarding the frequency with which our users visit various parts of our websites. At other times, we collect your IP address to facilitate location-based matchmaking in our online multiplayer Services.

### i. Cookies

Our web-based Services use cookies. A cookie is a small file consisting of letters and numbers that is downloaded to and stored on your computer or mobile device when you visit a website. Each cookie is unique to your web browser or device. There are several different types of cookies:

- Session cookies, which only last as long as your visit to the website. Session cookies are used for things such as remembering what you put into your shopping cart as you browse a website or to ensure that your bank account information cannot be accessed after you leave the bank's website.
- Persistent cookies, which last for a longer period of time, including in between sessions. Persistent cookies are used for things like remembering your preferences and choices when you re-visit a website or for keeping you logged in to a website.
- First-party and third-party cookies, refer to the entity that is placing the cookie on your computer or device. First-party cookies are placed by the website that you are visiting; third-party cookies are placed by a third party, such as an advertising company that is posting ads on the website that you are visiting.

We use the cookies for the following purposes:

- Strictly necessary functionality: We use several persistent cookies that which are strictly necessary to enable you to move around the website and use its features. Without these cookies, we would not be able to provide certain functions of our sites.

- To provide additional functionality: To remember the settings you've chosen to use when viewing our site, and to tailor our site to you. For example, if you set your location to France, we know to translate the site into the French language for you.
- Analytical or Performance purposes: To measure visitor behavior, such as how many times a visitor visits the site, so that we can improve our site and provide you with a better experience.

Depending on your choice of browser (e.g., Edge, Chrome, Firefox, etc.), you may be able to modify your browser so that it notifies you when cookies are sent to it. Alternatively, you can refuse to accept cookies altogether, and you can also delete cookies that have already been set. You can do this through your browser settings. Each browser is a little different, so refer to your browser's help menu to learn the correct way to modify your settings. However, if you turn cookies off, you will not have access to many features that make your web experience smoother, such as the features mentioned above, and some of our services may not function properly.

To support our web pages, we sometimes also embed content from third-party websites, such as video content from YouTube. As a result, when you visit a page containing such content, you will be presented with third-party cookies from those third-party websites. Similarly, you will also see embedded 'share' buttons on Capcom web pages that enable users to easily share content with their friends through a number of popular social networks. When you click on one of those buttons, a cookie will be set by the service through which you have chosen to share content, such as Facebook, Google/YouTube, or Twitter. Capcom does not control the placement of those cookies and you should check the relevant third-party's website for more information on how to restrict the placement of those cookies.

When visiting Capcom's websites, the third-party cookies that may be present include, but are not limited to, these listed in the chart below. Please reach out to Capcom at any time for a comprehensive list of third-party cookies.

Source	Purpose	How to Block
Google/YouTube /DoubleClick	Cookies are used to deliver content	You can find out more about Google's privacy practices and the cookies that



	<p>on this website using Google Products. Data collected by Google may also be used for other purposes, including advertising.</p>	<p>it uses via YouTube here (<a href="http://www.google.com/intl/en/policies/privacy/">http://www.google.com/intl/en/policies/privacy/</a>). You can also change your browser settings to accept or refuse these cookies as mentioned above.</p>
Twitter	<p>Twitter uses cookies to enable visitors to share website pages and content through third party social networking and other websites. Twitter may also use visitors' information to serve targeted advertising on other websites.</p>	<p>Further information about how Twitter uses cookies, including how you can opt-out is available here (<a href="https://twitter.com/privacy">https://twitter.com/privacy</a>). You can also change your browser settings to accept or refuse these cookies as mentioned above.</p>
Facebook	<p>Cookies are used to deliver content on this website using Facebook. Data collected by Facebook may also be used for other purposes, including advertising.</p>	<p>Cookies are used to deliver content on this website using Facebook. Data collected by Facebook may also be used for other purposes, including advertising. You can find out more about Facebook's privacy practices and the cookies that it uses here (<a href="https://www.facebook.com/about/privacy/">https://www.facebook.com/about/privacy/</a>). You can also change your browser settings to accept or refuse these cookies as mentioned above.</p>
CookieBot	<p>Cookies are used to manage consent preferences on the website including CookieBot scripts. Data collected by</p>	<p>Further information about how CookieBot uses cookies, including how you can request data erasure is available here (<a href="https://cookiebot.com/en/privacy-policy">https://cookiebot.com/en/privacy-policy</a>). You can also change your browser settings to accept or refuse these cookies as mentioned above.</p>

	CookieBot may also be used for other purposes.	
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Name	Source	Expiry
_utma	Google Analytics	2 years from set/update
_utmb	Google Analytics	30 minutes from set/update
_utmc	Google Analytics	Upon the browser closing
_utmv	Google Analytics	2 years from the visitor's last visit
_utmz	Google Analytics	6 months from set/update
_gat_xxx	Google Tag Manager	2 years from the visitor's last visit
_ga	Google Tag Manager	2 years from the visitor's last visit
_gid	Google Tag Manager	2 years from the visitor's last visit
YSC	YouTube/Google	Upon the browser closing
PREF	YouTube/Google	2 years from set/update
GPS	YouTube/Google	6 hours from set/update
VISITOR_INFO1_LIVE	YouTube/Google	3 months from set/update
personalization_id	Twitter	2 years from set/update
_fbp	Facebook	3 months from set/update
_fbc	Facebook	3 months from set/update
CookieConsent	CookieBot	1 year from the visitor's last visit

ii. California’s “Do Not Track” Disclosure and Global Privacy Control

At this time, Capcom’s websites do not recognize browser-based “Do Not

Track” instructions. You can, however, change your privacy preferences regarding the use of cookies and similar technologies through your browser, as mentioned above.

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## • **Q3. How is your personal information used and shared?**

We use your personal and non-personal information, both individually and in the aggregate, in the following ways:

To operate our business and to enhance and personalize your game experience, including to:

- Operate, improve, and develop our games and Services;
- Enable online matchmaking and provide online statistic tracking;
- Help you find your friends or tell your friends about a Service;
- Facilitate sharing on social networks;
- Serve and measure the effectiveness of advertising;
- Measure the health of our Services;
- Set up and maintain accounts you register for;
- Provide game experiences that you may like;
- Set up loyalty programs;
- Identify, fix, and troubleshoot bugs and service errors;
- Provide software updates;
- Adhere to your preferences and to deliver dynamic content; and
- Help keep our Services safe and fair, resolve disputes, investigate and help curb fraud and illegal behavior, comply with the law, and to enforce our agreements and policies.

To provide you support, including to:

- Help identify and troubleshoot problems with your use of our Services;
- To survey your opinions through surveys or questionnaires;
- Communicate with you and respond to your specific requests or questions; and
- Manage and send you confirmations and important information about your account, products, purchases, subscriptions, and warranties.

To personalize our communications with you, including to:

- Present offers and/or information relating to Services you might like;
- Make recommendations to you on our and third-party websites and services based on the information we have collected about you; and
- Manage and personalize advertising for you and deliver targeted marketing, newsletters, service updates, and promotional offers.

Whatever the purpose may be, we will collect and process your information to the extent you have provided to us your consent, or, alternatively, as reasonably necessary to fulfill our contracts with you, perform our legitimate business objectives, or as otherwise required under applicable law. More importantly, we will not collect and use your personal information for any purposes other than as set forth in this Privacy Policy without your consent.

## **Capcom USA Activities and Updates**

Information collected from those who voluntarily submit it to us is used to provide services like newsletter subscriptions, updates on special events, game news, and e-mail announcements of interest to our users, as well as to provide our users with exclusive content, awards, prizes, and/or access to special promotions. You may opt-out of such services by following the process set forth in Q7 below.

## **Operational Uses**

We may also use your personal information for other purposes, such as operational uses necessary to conduct our business or provide the Services. For

example, we may use your information to send you administrative communications either about your account with us or about features of our Services.

## **Aggregated and Anonymous Information**

Finally, we may take your personal information and make it anonymous. We do this either by combining it with information about other individuals (aggregating your information with information about other individuals), or by removing characteristics (e.g., your name or other identifying information) that make the information personally identifiable to you. This process is known as de-personalizing your information. Given the non-personal nature of this information, no restrictions apply under this Privacy Policy on our right to de-personalize your personal information. We may use de-personalized information in any way and share it with third parties without your consent.

## **Purchase or Sale of Businesses**

From time to time, we may purchase a business or sell one or more of our businesses, and your personal information may be transferred as a part of the purchase or sale. If we purchase a business, the personal information received with that business would be treated in accordance with this Privacy Policy, to the maximum extent possible. If we sell a business, we will include provisions in the selling contract requiring the purchaser to treat your personal information in the same way required by this Privacy Policy (including any amendments to this Privacy Policy).

## **Third Party Processing**

Capcom engages third parties, including contractors and third-party advertisers to support our Services, such as ad networks, data exchanges, traffic management service providers, social networks and marketing analytics service providers, located both within and outside of the United States, to collect and/or process your personal information on our behalf in connection with our offering and maintenance of the Services, such as for providing back-end server/matchmaking services, customer support services, analytics services, conducting market surveys, sending newsletters, or otherwise in accordance with the purpose(s) for which your personal information was originally collected. When these contractors or third-party service providers collect or receive your personal information, we require that they: (i) use your personal information only on our behalf; (ii) not sell your personal information to third parties; and (iii) not

disclose your personal information except as may be required by law, or as permitted by us or as stated in this Privacy Policy.

To the extent that your personal information may be transferred to countries outside of the United States, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your personal information remains protected to the standards described in this Privacy Policy.

## No Third Party Marketing

Without your consent, our company does not share and does not rent or sell your personal or demographic information to third-parties for their direct marketing purposes.

## Disclosures Required by Law and Disclosures to Help Protect the Security and Safety of Our Services and Others

We will disclose personal information when we believe in good faith that disclosure is required by law (e.g., court order or subpoena) or to help:

- Enforce our Terms of Service/Use or contests, sweepstakes, eSports tournaments, promotions, or game rules;
- Protect your safety or security, including the safety and security of your property; or
- Protect the safety and security of our Services or third parties.

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## • Q4. What are your California Privacy Rights?

California Civil Code Section 1798 et seq. permits our customers who are California residents to request certain information regarding our disclosure of personal information to third-parties for their direct marketing purposes. However, as previously stated, we do not share information with third-parties for their direct marketing purposes. If you still have inquiries regarding our disclosure policy, please contact us at:

Capcom USA  
Attn.: Privacy Policy Administrator

185 Berry Street, Suite 1200  
San Francisco, CA 94107  
(650) 350-6500  
[privacy@capcom.com](mailto:privacy@capcom.com)

## CALIFORNIA CONSUMER PRIVACY ACT OF 2018 (as amended by CALIFORNIA PRIVACY RIGHTS ACT OF 2020) (collectively “CCPA”)

### Categories of Personal Information Collected

In the chart below, we identify each category of personal information that we have collected about our users in the last 12 months using the categories enumerated in the CCPA. Except for Employment Data (please see Employment Data section below), if we have collected that category of personal information in the last 12 months, an “X” appears in the corresponding row in the second column of the chart.

<b>Categories of Personal Information</b>	<b>Collected (in the last 12 months)</b>
Name	X
Alias	X
Signature	X
Postal address	X
Email address	X
Telephone number	X
Unique personal identifier (e.g., device ID, ad ID, IP address, etc.)	X
Account or policy number (e.g., banking, insurance, credit, etc.)	X
Government ID number (e.g., SSN, driver’s license, passport, etc.)	
Physical characteristics or description	
Biometric information	
Professional or employment-related information	

Education information	
Medical information	
Financial information	X
Insurance information	
Commercial information (e.g., purchase history)	X
Geolocation data	X
Internet or other electronic network activity information (e.g., browsing or search history, interaction with an online service, etc.)	X
Audio information	
Visual information	X
Electronic, olfactory, thermal, or similar information	
Inferences drawn from any of the above information to create a profile	

## Personal Information Collection and Use

See the Capcom USA Online Privacy Statement, “Q2. What types of information do we collect about you?” for more information on the sources of personal information collected and the purposes for which information is used. Note that Capcom may retain information needed to resolve disputes, enforce our user agreements, protect our legal rights, and comply with technical and legal requirements and constraints related to the security, integrity, and operation of our products. Otherwise, we will retain your personal information only for as long as reasonably necessary to provide you Services, create and improve our products, comply with the law, or to run our business.

## No Sale of Personal Information

For purposes of the CCPA, Capcom has not sold personal information relating to California residents in the last 12 months.

## Rights of California Residents

**Right to Know:** If you are a California resident, you may submit, free of



charge, but no more than twice in a 12-month period, a verifiable request for the following information:

- The specific pieces of personal information we have about you;
- The categories of personal information we collected, sold, or disclosed for a business purpose about you within the last 12 months;
- The categories of sources from which the personal information was collected;
- The purposes for which the information was collected or sold; and
- The categories of third parties to whom the information was sold, disclosed for a business purpose, or otherwise shared.

If possible, we will provide this information to you in a readily usable format that allows transmission to another entity.

To submit a request, please email us at [privacy@capcom.com](mailto:privacy@capcom.com) or use our online web form located at <https://capcomusa.com/ccpa/>. Email requests must include “Your California Privacy Rights” in the subject field. Within 5 business days of receipt, we will let you know we received your request. We will provide a substantive response as soon as possible thereafter, unless we need more time, in which case we will notify you. If we need additional information to verify your identity, we will contact you to request that information. If we are not able to verify your identity, we will deny your request, but if applicable, we will refer you to the applicable sections of this Privacy Policy that address our data collection and use practices. If we deny your request, even if only in part, we will explain the reason in our response.

**Right to correct inaccurate personal information:** If you are a California resident, you may submit a verifiable request for us to correct any personal information or we have collected about you. To submit a request, please email us at [privacy@capcom.com](mailto:privacy@capcom.com). Email requests must include “Your California Privacy Rights” in the subject field.

**Right to Delete:** If you are a California resident, you may submit a verifiable request for us to delete any personal information we have collected about you. To submit a request, please email us at [privacy@capcom.com](mailto:privacy@capcom.com) or use our online web form located at <https://capcomusa.com/ccpa/>. Email requests must include “Your California Privacy Rights” in the subject field.

Within 5 business days of receipt, we will confirm receipt of your request. We will provide a substantive response as soon as possible thereafter, unless we need more time, in which case we will notify you. If we need additional information to verify your identity, we will contact you to request that information. If we are not able to verify your identity, we will deny your request to delete. If we deny your request, even if only in part, we will explain the reason in our response.

**Right to be Free from Discrimination:** We may not discriminate against you because you have chosen to exercise your rights, including, for example, by denying you access to our online services or charging you different rates or prices for the same online services, unless that difference is reasonably related to the value provided by your data.

**Exercising Your Rights:** To submit a verifiable request or to otherwise contact us for more information about how to exercise your rights, please follow the instructions above.

If you would like to designate an authorized agent to make a request on your behalf, please be sure the agent is able to (i) demonstrate you have provided written permission for the agent to submit the request on your behalf, and (ii) provide proof of his or her own identity. If the agent does not satisfy these requirements, we will deny the request.

### **Employment Data:**

California-resident employees, applicants, emergency contacts, beneficiaries, independent contractors, and members of boards of directors (collectively, “Employees”) have the aforementioned rights included in the California Privacy Rights section. Verifiable requests will be processed according to the procedures laid out in this CCPA section.

In connection with your employment application or employment-relationship with Capcom, we collect the following categories of personal information from Employees (“Employment Data”): Government ID number (e.g., SSN, driver’s license, passport, etc.); Education information (e.g., your level of education, degrees in-progress or obtained, professional licenses and certificates); Professional or employment-related information (e.g., contents of your resume, CV, cover letter, or application documents); Medical information and Insurance Information (e.g. as necessary to process

employment-related benefits, etc.).

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## • **Q5. What kinds of security measures do we take to safeguard your personally identifiable information?**

The security and confidentiality of your information is extremely important to us. We have technical, administrative, and physical security measures in place to protect your personal information from unauthorized access and improper use. We also review our security procedures periodically to consider appropriate new technology and updated methods. But, despite our best efforts, no security measure is ever perfect or impenetrable.

Specific security measures we currently implement to prevent unauthorized physical or electronic access to users' personal and demographic information include:

- User data is stored behind a firewall to protect your data from unauthorized access or against loss, misuse, or alteration.
- Data is stored in a secure physical environment (e.g. behind locked doors).
- Data is stored in a database accessible to authorized employees on a need-to-know basis only.
- Employees must have a unique password before gaining access to user data.
- We use industry-standard encryption technology when transferring or receiving sensitive personal information.
- Endpoint protection.
- We maintain written security policies to which all employees must adhere.

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- **Q6. How can you ask questions, or send us comments, about this Privacy Policy?**

Capcom USA  
Attn.: Privacy Policy Administrator  
185 Berry Street, Suite 1200  
San Francisco, CA 94107  
(650) 350-6500  
[privacy@capcom.com](mailto:privacy@capcom.com)

Any personal information you provide to the above e-mail and postal mail addresses will not be used to send you promotional materials, unless you request it.

Capcom is a member of the ESRB's Privacy Certified Program. If you believe that we have not properly responded to your inquiry, please contact the ESRB at <https://www.esrb.org/privacy/contact>, or [privacy@esrb.org](mailto:privacy@esrb.org).

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- **Q7. How can you access and control the use of your personal information?**

Capcom provides you choices when it comes to the collection and use of your personal information. For example, you can choose to opt-in or opt-out of marketing emails. If you would like to opt-out of marketing emails at any time after granting consent, click the “Unsubscribe” hyperlink included in every marketing email, or contact us at:

Capcom USA  
Attn.: Privacy Policy Administrator  
185 Berry Street, Suite 1200  
San Francisco, CA 94107  
(650) 350-6500  
[privacy@capcom.com](mailto:privacy@capcom.com)

You also may adjust your browser settings to block certain online tracking, such as cookies.

## European Union/European Economic Area Users

Users residing in certain countries, including the EU/EEA users, are afforded certain additional rights regarding their personal information. Except where an exception or exemption applies, these rights include the ability to access, correct, and request deletion of your personal information; request a portable copy of your personal information; or otherwise object to or restrict how we use your personal information.

At any time, you may contact us to deactivate your Capcom accounts, or delete the personal information associated with your accounts or otherwise collected in connection with your use of our Services, by contacting our Privacy Policy Administrator at the address above. If you choose to do so, you may no longer have access to the Services associated with your accounts. Note that Capcom may retain information needed to resolve disputes, enforce our user agreements, protect our legal rights, and comply with technical and legal requirements and constraints related to the security, integrity, and operation of our products. Otherwise, we will retain your personal information only for as long as reasonably necessary to provide you Services, create and improve our products, comply with the law, or to run our business.

You may exercise your rights concerning your personal information at any time. To exercise your personal data rights, send us an email at [privacy@esrb.org](mailto:privacy@esrb.org) and include "Subject Access Request" in the subject field. Before we process any request, we may ask you for certain personal information in order to verify your identity. Where permitted by local law, we may reject requests that are unreasonable or impractical. We will respond to your requests within a reasonable timeframe.

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### • **Q8. How will you know if we amend this Privacy Policy?**

We may amend this Privacy Policy at any time. If we make any material changes in how we collect, use, or share your personal information, we will make reasonable efforts to notify you via our Services, and we will

prominently post a notice of the changes covered by this Privacy Policy on our website located at [www.capcomusa.com](http://www.capcomusa.com). Any material changes to this Privacy Policy will be effective when posted, and your continued use of any of the Services covered by the Privacy Policy after the posting will constitute your acceptance of and agreement to be bound by those changes, to the extent permitted by applicable law. In the event that a material change in this Privacy Policy affects the collection and/or processing of your personal information which was previously collected pursuant to your prior consent, we will request a re-affirmation of your consent to any new collection and/or processing, as required by applicable law.

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- **Q9. How is information treated when it is collected from non-US residents?**

For personal information transferred from a European Union or European Economic Area member country or Switzerland to the United States, Capcom will provide adequate protection for such data in compliance with applicable legal standards.

Capcom commits to resolve complaints about our collection or use of your personal information. European Union, European Economic Area and/or Swiss individuals with inquiries or complaints regarding our Privacy Policy should contact us at [privacy@esrb.org](mailto:privacy@esrb.org), or regular mail at:

Capcom USA  
Attn.: Privacy Policy Administrator  
185 Berry Street, Suite 1200  
San Francisco, CA 94107

You can also contact to our Data Protection Officer by sending an email to: [dpo@capcom.com](mailto:dpo@capcom.com). If a European Union, European Economic Area, or Swiss individual's complaint cannot be resolved through our internal process, we will cooperate with JAMS pursuant to the JAMS International Mediation Rules, available on the JAMS website. Mediation shall be conducted in English and shall take place in the City and County of San Francisco in the State of California before one mediator selected in accordance with such rules and procedures. All documents submitted to such mediation shall be in

English. JAMS mediation may be commenced as provided for in the relevant JAMS rules, and at no cost to you.

Our data protection representative within the EEA is:

Capcom Entertainment Germany GmbH

Borselstraße 20, 22765 Hamburg, Germany

Email: [ceg.gdpr@capcom.com](mailto:ceg.gdpr@capcom.com)

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