

Kura Sushi USA Personnel Privacy Notice

Effective Date: December 9, 2025

This Personnel Privacy Notice (“**Notice**”) describes how Kura Sushi USA, Inc and its parents, subsidiaries, and affiliates, and their respective stockholders, directors, officers, employees, agents, successors, and assigns (collectively, “**Kura Sushi**,” “**we**,” “**us**,” or “**our**”) processes personal information (“**Personal Information**”) of Personnel (defined below) in various human resources (“**HR**”) contexts. This Notice is designed to meet obligations under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (together, the “**CCPA**”), and other applicable state consumer privacy laws. In the event of a conflict between any other Kura Sushi policy, statement, or notice and this Notice, this Notice will prevail as to California Personnel, unless stated otherwise. Capitalized terms used but not defined in this Notice shall have the meanings given to them under the CCPA.

As permitted by applicable law, we do not treat deidentified data or aggregate consumer information as Personal Information and we reserve the right to convert, or permit others to convert, your Personal Information into deidentified data or aggregate consumer information, and may elect not to treat publicly available information as Personal Information. We will not attempt to reidentify data that we maintain as deidentified.

Applicability: This Notice applies to the following U.S. residents whose Personal Information we collect in HR contexts:

- Job applicants who have applied for a position with Kura Sushi.
- Current/former employees of Kura Sushi.
- Independent contractors of Kura Sushi.

This Notice also applies to U.S. residents whose family member or friend has provided Personal Information about you to Kura Sushi in an HR context, such as if:

- You are listed as an emergency contact for one of the foregoing.
- You are a beneficiary or dependent of one of the foregoing.

The individuals referred to in the foregoing bullet points are collectively referred to as “**Personnel**” throughout this Notice. Section 1 of this Notice provides notice of our data practices, including our collection, use, retention, and disclosure of Personal Information. Sections 2-4 of this Notice apply only to California residents and those sections provide information regarding California Personnel rights under the CCPA and how California residents may exercise them.

Non-Applicability: This Notice does not apply to our consumer facing website(s) or our other data practices outside of the HR context, which are addressed in our general privacy notice available [here](#) , except when you submit a job application to us.

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1. NOTICE OF DATA PRACTICES

The description of our data practices in this Notice covers the twelve (12) months prior to the Effective Date above and will be updated at least annually if there are any material changes. We will notify you of any material changes by updating this Notice and may also choose to notify you, in our discretion, in another reasonable and appropriate manner. Our data practices may differ between updates, however, and if materially different from this Notice, we will provide supplemental pre-collection notice of the current practices, which may include references to other privacy policies, notices, or statements. Otherwise, this Notice serves as our notice at collection.

(a) Personal Information Sources and Use

We may collect your Personal Information directly from you, such as when you apply for a position or become employed or engaged by us (e.g., identification/identity data, contact details, educational and employment data), others through interactions in the course of employment or engagement, from third parties (e.g., background check vendors and references), or from public sources of data.

Generally, we use Personal Information for HR Business Purposes and as otherwise related to the operation of our business, including for: Performing Services; Managing Interactions and Transactions; Security; Debugging; Quality Assurance; Processing Interactions and Transactions; and Research and Development. For example, we use Personal Information for the following purposes:

- Recruiting for positions with Kura Sushi
- Running background checks
- Employee intake/ onboarding/ off-boarding
- Maintaining personnel records
- Payroll, reimbursements, and timekeeping
- Processing leaves of absence
- Processing workers' compensation claims
- Booking travel
- Benefits administration
- Personnel activation initiatives and communications
- Facilitating diversity and inclusion programs
- Administering training and education programs
- Operating HR and IT systems
- Personnel and performance management
- Health & safety/occupational health
- Security (including electronic and of premises)

We may also use Personal Information for “**Additional Business Purposes**” in a context that is not a Sale or Share under the CCPA, such as:

- Disclosing it to our Service Providers, Contractors, or Processors that perform services for us (“**Vendors**”);
- Disclosing it to you or to other parties at your direction or through your action (e.g., payroll processors, benefits providers, software platform operators, etc.);

- For the additional purposes explained at the time of collection (such as in the applicable privacy policy or notice);
- As required or permitted by applicable law;
- To the government or private parties, and their respective representatives, to comply with law or legal process or protect or enforce legal rights or obligations or prevent harm;
- To identify our Personnel and business contact and similar information of Personnel to others where appropriate;
- Where we believe we need to in order to investigate, prevent or take action if we think someone might be using information for illegal activities, fraud, or in ways that may threaten someone's safety or violate our policies or legal obligations, including disclosures to law enforcement and others; and
- To assignees and their agents as part of an acquisition, merger, bankruptcy, asset sale, or other transaction where another party assumes control over all or part of our business ("**Corporate Transaction**").

Subject to restrictions and obligations under the CCPA, our Vendors may also use your Personal Information for Business Purposes, including Additional Business Purposes, and may engage their own vendors to enable them to perform services for us. When you interact with third parties such as those that provide payroll or benefits, you are directing us to make your Personal Information available to them for such purposes.

(b) Personal Information Collection, Disclosure, and Retention - By Category of Personal Information

We collect, disclose, and retain Personal Information as follows:

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
1. Identifiers	Real name, alias, postal address, telephone number, unique personal identifiers, online identifier, Internet Protocol address, e-mail address, date of birth, Social Security number, state identification number, passport number (I-9 purposes), device identifier, network address, account name, and similar contact information and identifiers.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business Vendors • HR system Vendors • Non-software HR Vendors • Payroll and benefits Vendors and providers • Insurance providers and brokers • Facility management • Security Vendors • Other members of our corporate group • Governmental entities (for example, in relation to our obligations to determine employment eligibility and responding to requests pursuant to legal or regulatory process) • Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
2. Personal Records	Name, signature, description, Social Security number, address, telephone number, driver's license or state identification number, education, employment, employment history, bank account number, other financial information, medical information, and health insurance information. <i>Some Personal Information included in this category may overlap with other categories.</i>	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business Vendors • HR system Vendors • Non-software HR Vendors • Payroll and benefits Vendors and providers • Insurance providers and brokers • Facility management • Security Vendors • Other members of our corporate group • Governmental entities (for example, in relation to our obligations to determine employment eligibility and responding to requests pursuant to legal or regulatory process) • Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>
3. Personal Characteristics or Traits	In some circumstances, we may collect Personal Information that is considered protected under U.S. law, such as age, gender, nationality, race or information related to medical conditions, but only when that information is relevant for our Business Purposes. We abide by the legal requirements imposed under applicable law in regards to such information.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business Vendors • HR system Vendors • Non-software HR Vendors • Payroll and benefits Vendors and providers • Insurance providers and brokers • Facility management • Security Vendors • Other members of our corporate group • Governmental entities (for example, in relation to our obligations to determine employment eligibility and responding to requests pursuant to legal or regulatory process) • Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>
4. Commercial Information	Records of products or services purchased or obtained in the HR context, such as benefits you have signed up for.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business Vendors • HR system Vendors • Non-software HR Vendors

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
		<ul style="list-style-type: none"> Payroll and benefits Vendors and providers Insurance providers and brokers Other members of our corporate group Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>
5. Internet Usage Information	When you use our online systems or otherwise interact with us online, we may collect browsing history, search history, computer type, operating system, and other information regarding your interaction with our systems or other sites, applications, or content.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> General IT, software, and other business Vendors HR system Vendors Other members of our corporate group Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>
6. Geolocation Data	If you use our systems or interact with us online, we may gain access to the approximate, and sometimes precise, location of the device or equipment you are using, or the location from which you are accessing our systems. We may also track the location of Kura Sushi-owned equipment.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> General IT, software, and other business Vendors HR system Vendors Security Vendors Other members of our corporate group Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>
7. Sensory Data	We may collect audio, video, electronic, or similar information, for example, CCTV security, HR hotlines, audio/video conferencing services, and photo identification.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> General IT, software, and other business Vendors HR system Vendors Non-software HR Vendors Facility management Security Vendors Insurance providers and brokers Other members of our corporate group Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>
8. Professional or Employment Information	Professional, educational, or employment-related information, such as compensation information, work history, and prior employment.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> General IT, software, and other business Vendors HR system Vendors Non-software HR Vendors

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
		<ul style="list-style-type: none"> Payroll and benefits Vendors and providers Other members of our corporate group Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>
9. Non-public Education Records	Education records directly maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, schedules, identification codes, financial information, or disciplinary records.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> General IT, software, and other business Vendors HR system Vendors Non-software HR Vendors Other members of our corporate group Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>
10. Inferences from Personal Information Collected	We may draw inferences from other information we collect about you. For example, based on your performance or other information we may recommend skills training that may benefit you.	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> General IT, software, and other business Vendors HR system Vendors Non-software HR Vendors Other members of our corporate group Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>
11. Sensitive Personal Information	Government Issued ID Numbers (Social Security, driver's license, state ID card, or passport number)	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> General IT, software, and other business Vendors Fraud detection and prevention Vendors HR system Vendors Non-software HR Vendors Payroll and benefits Vendors and providers Insurance providers and brokers Other members of our corporate group Governmental entities (for example, in relation to our obligations to determine employment eligibility and responding to requests pursuant to legal or regulatory process) Other parties within the limits of Additional Business Purposes

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
		Sale/Share: None
	Account Log-In (e.g., username and password to online account with Kura Sushi)	Disclosures for Business Purposes: <ul style="list-style-type: none"> General IT, software, and other business Vendors Other members of our corporate group Other parties within the limits of Additional Business Purposes Sale/Share: None
	Precise Geolocation (any data that is derived from a device and that is used or intended to be used to locate an individual w/in a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet)	Disclosures for Business Purposes: <ul style="list-style-type: none"> General IT, software, and other business Vendors HR system Vendors Security Vendors Other members of our corporate group Other parties within the limits of Additional Business Purposes Sale/Share: None
	Personal Characteristics, if you provide such information to us (racial or ethnic origin, religious or philosophical beliefs, or union membership)	Disclosures for Business Purposes: <ul style="list-style-type: none"> General IT, software, and other business Vendors HR system Vendors Non-software HR Vendors Facility management Other members of our corporate group Other parties within the limits of Additional Business Purposes Sale/Share: None
	Communication Content (contents of mail, email, and text messages, other than where Kura Sushi is the intended recipient of the communication)	Disclosures for Business Purposes: <ul style="list-style-type: none"> General IT, software, and other business Vendors Other members of our corporate group Governmental entities (for example, in relation to our obligations to respond to requests pursuant to legal or regulatory process) Other parties within the limits of Additional Business Purposes Sale/Share: None
	Health Information (Personal Information collected and analyzed concerning an	Disclosures for Business Purposes:

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
	individual's health, such as disability-related information)	<ul style="list-style-type: none"> • General IT, software, and other business Vendors • Facility management • Other members of our corporate group • Governmental entities (for example, in relation to our legal obligation to provide information on injuries or illnesses) • Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>
	Sex Life/ Sexual Orientation, if you provide such information to us (Personal Information collected and analyzed concerning an individual's sex life or sexual orientation)	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business Vendors • Other members of our corporate group • Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>
	Biometric Information to establish individual identity (fingerprints for the purposes of keeping restaurant employee timecards)	<p>Disclosures for Business Purposes:</p> <ul style="list-style-type: none"> • General IT, software, and other business Vendors • Other members of our corporate group • Other parties within the limits of Additional Business Purposes <p>Sale/Share: None</p>

There may be additional information we collect that meets the definition of Personal Information under the CCPA but is not reflected by a category above, in which case we will treat it as Personal Information as required, but will not include it when we describe our practices by Personal Information category.

Because there are so many different types of Personal Information in certain categories, and so many purposes and use cases for different data, we are unable to provide retention ranges based on categories of Personal Information in a way that would be meaningful and transparent to you. Actual retention periods for all Personal Information will depend upon how long we have a legitimate purpose for the retention — consistent with the collection purposes and applicable law.

2. CALIFORNIA PERSONNEL RIGHTS AND HOW TO EXERCISE THEM

California Personnel have the same rights to know/access, delete, correct, limit, and opt-out as traditional Consumers, although Kura Sushi does not Sell or Share your Personal Information. You may exercise your rights at any time by contacting us via email at customerservice@kurausa.com, by calling us at 657-333-4047, by sending us mail to 17461 Derian Ave, #200, Irvine, CA 92614 (Attn: CCPA Rights Request), or by completing a request [here](#).

a) Your Privacy Rights

- **Right to Know (Categories):** You have a right to submit a request for any of the following:
 - The categories of Personal Information we collect from or about you or otherwise process.
 - The categories of sources from which your Personal Information was collected.
 - Our purposes for collecting and (if applicable) disclosing your Personal Information.
 - The categories of third parties to which Kura Sushi disclosed your Personal Information.
 - The categories of Personal Information sold or disclosed and the categories of recipients.
- **Right to Know (Specific Pieces):** You may request to confirm if we are processing your Personal Information and to obtain a transportable copy of your Personal Information that we have collected and are maintaining.
- **Right to Delete:** You may request that Kura Sushi delete Personal Information about you which we have collected from you, unless we have a basis for retaining it under applicable law.
- **Right to Correct:** You have the right to request that we correct inaccuracies in your Personal information that we maintain.
- **Opt Out of Sale/Sharing:** Kura Sushi does not Sell or Share your Personal Information, as defined in the CCPA.
- **Limit Sensitive Personal Information Processing:** If you elect to provide us with Sensitive Personal Information, you can request to limit our use and disclosure of such Sensitive Personal Information.

b) Your Request Must be a Verifiable Consumer Request

Only you, or someone legally authorized to act on your behalf (your authorized agent), may make a Verifiable Consumer Request related to your Personal Information or the information of your minor child.

As permitted or required by the CCPA, any request you submit to us must be a “Verifiable Consumer Request,” meaning when you make a request, we may ask you to provide verifying information, such as your name, email, phone number, account and/or transaction information. We will review the information you provided and may request additional information via email or by other means to ensure we are interacting with the correct individual. We will not fulfill your Right to Know (Categories), Right to Know (Specific Pieces), Right to Delete, or Right to Correct request(s) unless you have provided sufficient information for us to reasonably verify you are the Person about whom we collected Personal Information.

We verify each request as follows:

- **Right to Know (Categories):** We verify your request to a reasonable degree of certainty, which may include matching at least two data points provided by you with data points maintained by us, which we have determined to be reliable for the purpose of verifying you. If we cannot do so, we will refer you to this Notice for a general description of our data practices.
- **Right to Know (Specific Pieces):** We verify your request to a reasonably high degree of certainty, which may include matching at least three data points provided by you with data points maintained by us, which we have determined to be reliable for the purpose of verifying you together with a signed declaration under penalty of perjury that you are the Person whose Personal Information is the subject of the request. If you fail to provide requested information,

we will be unable to verify you sufficiently to honor your request, but we will then treat it as a Right to Know (Categories) request.

- **Right to Delete:** We verify your request to a reasonable degree of certainty, which may include matching at least two data points provided by you with data points maintained by us, or to a reasonably high degree of certainty, which may include matching at least three data points provided by you with data points maintained by us, depending on the sensitivity of the Personal Information and the risk of harm posed by unauthorized deletion.
- **Right to Correct:** We verify your request to a reasonable degree of certainty, which may include matching at least two data points provided by you with data points maintained by us, or to a reasonably high degree of certainty, which may include matching at least three data points provided by you with data points maintained by us, depending on the sensitivity of the Personal Information and the risk of harm posed by unauthorized correction.

To protect Personnel, if we are unable to verify you sufficiently, we will be unable to honor your request. We will use Personal Information provided in a Verifiable Consumer Request only to verify your identity and authority to make the request and to track and document request responses unless you also gave it to us for another purpose.

c) Authorized Agent Request

Only you, or someone legally authorized to act on your behalf, subject to our verification of the agent, the agent's authority to submit requests on your behalf, and of you, in accordance with the Your Request Must Be a Verifiable Consumer Request section above, may make a Verifiable Consumer Request related to your Personal 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. Once your agent's authority is confirmed, they may exercise rights on your behalf subject to the agency requirements of applicable laws.

3. NON-DISCRIMINATION / NO RETALIATION

We will not discriminate or retaliate against you in a manner prohibited by the CCPA for your exercise of your California privacy rights.

4. OUR RIGHTS AND THE RIGHTS OF OTHERS

Notwithstanding anything to the contrary, we may collect, use and disclose your Personal Information as required or permitted by applicable law and this may override your rights under the CCPA. In addition, we are not required to honor your requests to the extent that doing so would infringe upon our or another person's or party's rights or conflict with applicable law.

5. CONTACT US

If you have any questions, comments, or concerns about our HR privacy practices, please contact us by e-mail at customerservice@kurausa.com or call us at 657-333-4047. You can also send us mail to 17461 Derian Ave, #200, Irvine, CA 92614. Please note that e-mail communications will not necessarily be secure; accordingly, you should not include sensitive information in your e-mail correspondence with us.