

# KURA SUSHI - PRIVACY POLICY

Privacy Policy Effective Date: December 9, 2025.

## PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THE KURA SUSHI USA, INC. SERVICE.

Kura Sushi USA, Inc. and its parents, subsidiaries, and affiliates (collectively, "Kura Sushi," "Kura," "Kura Revolving Sushi Bar," "Us") is very sensitive to your privacy concerns.

This Privacy Policy outlines the types of Personal Information or data (as defined by applicable U.S. law, "Personal Information") that you may provide to us and explains how we handle such Personal Information.

**Part I** of this Privacy Policy, [Pre-collection Notice](#), addresses our Personal Information practices on an enterprise-wide level, including Consumers who are visitors to and users of its website, Kura Sushi Restaurants, Kura Sushi Rewards mobile application ("App"), rewards programs, customer service call centers, Communication Services (e.g., e-mails, text messages, and chatbots), and other online programs that post a link to this Privacy Policy (collectively the "Kura Service" or "Service"), (collectively, "you", "your", or "Users"), but does not apply to our current employees, former employees, our job applicants or independent contractors ("Personnel"). It is designed to comply with State Consumer Privacy Laws (defined below).

**Part II** of this Privacy Policy, [Online Privacy Notice](#), applies to all users of, and visitors to our online services (including, website, App, and Communication Services) that post a link to this notice ("Online Services") and it supplements Part I.

**Part III** of this Privacy Policy, [Consumer Privacy Rights](#), describes the privacy rights Consumers have under State Consumer Privacy Laws that apply to us and how a Consumer may exercise those rights. Our application of the rights in this section to residents of other jurisdictions is discretionary.

**Part IV** of this Privacy Policy contains general notices for all Users.

Collectively, Parts I-IV are our "Privacy Policy." Sometimes additional or different privacy policies or practices may apply, in which case we will provide you with notice at the time of collection. Where applicable, those additional policies or practices supplement this Privacy Policy.

Please see the [Consumer Health Data Privacy Notice](#) for additional information about how we may process Personal Information or personal data that could be considered consumer health data.

To see and print our full Privacy Policy, click [here](#). You can also request a copy, including in Braille, or otherwise obtain disability access assistance by contacting us through the methods outlined in [Contact Us](#).

In addition, please review our Kura Sushi [Terms & Conditions](#) ("Terms") which govern your use of the Kura Service. By using the Kura Service, you acknowledge this Privacy Policy and our collection, use, and disclosure of Personal Information.

## I. PRE-COLLECTION NOTICE

This Pre-collection Notice applies to "Consumers" as defined under state U.S. state consumer privacy laws, such as the California Consumer Privacy Act, including as amended by the California Privacy Rights Act (together, the "CCPA"), as well the consumer privacy laws enacted in Colorado, Indiana, Kentucky, Maryland, Minnesota, New Jersey, Oregon, Texas, Utah, and Virginia, subsequently enacted laws in other U.S. jurisdictions, and all laws implementing, supplementing or amending the foregoing, including regulations promulgated thereunder, as of their respective effective dates (collectively, "State Consumer Privacy Laws") and serves as our pre-collection notice under the CCPA. However, we may provide additional notices at the point of collection which will supplement this notice. Capitalized terms used by not defined in this Pre-collection Notice shall have the meanings given to them under the State Consumer Privacy Laws.

**Consumers and Business-to-Business Contacts (only California).** This Pre-collection Notice applies to Consumers that interact with us as traditional customers of the Kura Service. Both the [Personal Information Collection, Use, and Disclosures, According to Categories of Personal Information](#) and [Consumer Privacy Rights](#) sections of this Pre-collection Notice apply to Consumers about whom we collect Personal Information. The [Consumer Privacy Rights](#) section of this Pre-collection Notice also applies to Consumers residing in California who interact with us in a business-to business context, such as if you are an employee of one of our Vendors or suppliers.

**Personnel and Job Applicants.** . This Part I does not apply to our Personnel. Our California Personnel can learn about our data practices as it relates to them by contacting our Human Resources Department at [hr@kurausa.com](mailto:hr@kurausa.com) or by visiting our [Personnel Privacy Notice](#) and can learn how to exercise their California privacy rights in Section III.

### 1) Notice of Personal Information Practices

We are providing you with notice of our Personal Information practices over the 12 months prior to the Effective Date specified above. However, this Pre-collection Notice also applies to our current data practices which under California's law is referred to as a "notice at collection," which is a notice regarding the Personal Information we collect online and offline, and the purposes for which we process Personal Information. For any new or substantially different processing activities that are not described in this Pre-collection Notice, we will notify you as legally required.

The [Personal Information Collection, Use, and Disclosures, According to Categories of Personal Information](#) section covers our collection, use, and disclosure of Consumers' Personal Information. The [Consumer Privacy Rights](#) section describes your rights under State Consumer Privacy Laws and explains how to exercise those rights.

Notably, this Pre-collection Notice does not apply to data that is not treated as Personal Information under the State Consumer Privacy Laws or to the extent the data is subject to an exemption under applicable laws. This Pre-collection Notice also does not apply to information collected by Third-Party Services (as defined and discussed below in our [Additional Notices for Users of Our Online Services](#)).

## 2) Processing Purposes

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

- Processing and fulfilling orders and transactions
- Verifying customer information
- Processing payments
- Auditing related to counting ad impressions to unique visitors
- Verifying positioning and quality of ad impressions
- Providing Advertising and Marketing
- Accommodation requests
- IT systems and security
- Identifying and repairing errors that impair the functionality of our Service
- Security (including electronic and on premises)
- Auditing, investigations, and compliance
- Studying customer buying patterns and other trend analyses

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

- Disclosing it to our Service Providers, Contractors, or Processors that perform services for us (e.g., data analytics providers, payment processors, ordering and delivery platforms, app and website providers, and marketing services providers) (“Vendors”);
- Disclosing it to you or to other parties at your direction or through your action (e.g., some software platform operators);
- 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 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; and
- To assignees as part of an acquisition, merger, 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 State Consumer Privacy Laws, our Vendors may also use your Personal Information for Business Purposes and Additional Business Purposes, and may engage their own vendors to enable them to perform services for us.

### 3) Personal Information Collection, Use, and Disclosures, According to Categories of Personal Information

Generally, we collect, retain, use, and disclose your Personal Information to provide you our products and services and as otherwise related to the operation of our business, including for the business and commercial purposes listed in the [Use of Online Services Personal Information](#) and [Disclosure of Personal Information](#) sections of our [Online Privacy Notice](#) in Section II and in the chart below ("Processing Purposes"). These Processing Purposes include the following categories of Business Purposes: performing services, managing interactions and transactions, security, debugging, advertising & marketing, quality assurance, processing interactions and transactions, and research and development. We may also use Personal Information for other Business Purposes in a context that is not a Sale or Share under State Consumer Privacy Laws, such as disclosing it to our Vendors, to the Consumer or to other parties at the Consumer's direction or through the Consumer's action; 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 to comply with law or legal process or protect or enforce legal rights or obligations or prevent harm; and to assignees as part of an acquisition, merger, asset sale, or other transaction where another party assumes control over all or part of our business ("Corporate Transaction") (each an "Additional Business Purpose"). Subject to restrictions and obligations under State Consumer Privacy Laws, our Vendors may also use your Personal Information for Business Purposes and Additional Business Purposes, and may engage their own vendors to enable them to perform services for us.

Some of the Processing Purposes, as we discuss in the [Processing Purposes Implicating Sale, Sharing, Targeted Advertising](#) section below, may implicate "Selling," "Sharing," and/or "Targeted Advertising" by Kura Sushi. For more details on the meaning of Selling, Sharing, and Targeted Advertising, and how to opt-out of them, please visit the [Do Not Sell/Share/Target Opt-out](#) section below. Please note that the Processing Purposes as shown in the table are categorical descriptions, to aid in readability and clarity.

The table below describes the categories of Personal Information we collect as well as examples of types of data that fit within such categories, in the left column. The middle column lists Processing Purposes applicable to each category of Personal Information. The right column states the categories of recipients that receive those specific categories of Personal Information and Sensitive Personal Information as part of disclosures of business purposes, as well as types of recipients of disclosures which may be considered a Sale or Sharing under State Consumer Privacy Laws.

Category of Personal Information	Processing Purposes	Categories of Recipients
1. <b>Identifiers and Contact Information</b> (such as name, phone number, address, email address, mobile identification number, IP address, cookie ID)	<ul style="list-style-type: none"><li>• Providing our products and services</li><li>• Operating our business</li><li>• Customer service and communications</li><li>• Administering accounts and loyalty programs</li><li>• Research, development, and analytics</li><li>• Sweepstakes, contests, and other promotions</li><li>• Customizing your experience, offers, and</li></ul>	<b>Disclosures for Business Purposes</b> <ul style="list-style-type: none"><li>• Operational Vendors (e.g., data processors, IT service providers, storage vendors, marketing service providers, security providers, and professional advisors)</li><li>• Third-Party Promotional Partners</li><li>• Affiliates and Related Entities</li></ul>

Category of Personal Information	Processing Purposes	Categories of Recipients
	<ul style="list-style-type: none"> <li>content</li> <li>Targeting advertisements to you or your device</li> <li>Ad measurement, attribution, and other ad administration.</li> <li>Market research and customer satisfaction</li> <li>Security and safety</li> <li>Compliance with legal obligations</li> <li>Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>For purposes disclosed at the time of collecting your Personal Information</li> <li>For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</li> </ul>	<ul style="list-style-type: none"> <li>Other parties within the limits of Additional Business Purposes</li> </ul> <p><b>Sale/Sharing:</b></p> <ul style="list-style-type: none"> <li>Third-Party Digital Businesses</li> </ul>
<p>2. <b>Personal Records</b> (this includes information from other categories of Personal Information, including Identifiers and Contact Information, and Financial Payment and Information)</p>	<ul style="list-style-type: none"> <li>Providing our products and services</li> <li>Operating our business</li> <li>Customer service and communications</li> <li>Administering accounts and loyalty programs</li> <li>Research, development, and analytics</li> <li>Sweepstakes, contests, and other promotions</li> <li>Customizing your experience, offers, and content</li> <li>Targeting advertisements to you or your device</li> <li>Ad measurement, attribution, and other ad administration.</li> <li>Market research and</li> </ul>	<p><b>Disclosures for Business Purposes</b></p> <ul style="list-style-type: none"> <li>Operational Vendors</li> <li>Third-Party Promotional Partners</li> <li>Affiliates and Related Entities</li> <li>Other parties within the limits of Additional Business Purposes</li> </ul> <p><b>Sale/Sharing:</b></p> <ul style="list-style-type: none"> <li>Third-Party Digital Businesses</li> </ul>

Category of Personal Information	Processing Purposes	Categories of Recipients
	<p>customer satisfaction</p> <ul style="list-style-type: none"> <li>• Security and safety</li> <li>• Compliance with legal obligations</li> <li>• Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>• For purposes disclosed at the time of collecting your Personal Information</li> <li>• For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</li> </ul>	
<p>3. <b>Personal Characteristics and Traits</b> (this includes age and gender)</p>	<ul style="list-style-type: none"> <li>• Providing our products and services</li> <li>• Operating our business</li> <li>• Customer service and communications</li> <li>• Administering accounts and loyalty programs</li> <li>• Research, development, and analytics</li> <li>• Sweepstakes, contests, and other promotions</li> <li>• Customizing your experience, offers, and content</li> <li>• Targeting advertisements to you or your device</li> <li>• Ad measurement, attribution, and other ad administration.</li> <li>• Market research and customer satisfaction</li> <li>• Security and safety</li> <li>• Compliance with legal obligations</li> <li>• Prevention, detection, investigation, and mitigation of illegal</li> </ul>	<p><b>Disclosures for Business Purposes</b></p> <ul style="list-style-type: none"> <li>• Operational Vendors</li> <li>• Affiliates and Related Entities</li> <li>• Other parties within the limits of Additional Business Purposes</li> </ul> <p><b>Sale/Sharing:</b></p> <ul style="list-style-type: none"> <li>• Third-Party Digital Businesses</li> </ul>

Category of Personal Information	Processing Purposes	Categories of Recipients
	<p>activities, fraud, injury to others or violation of our terms and policies</p> <ul style="list-style-type: none"> <li>• For purposes disclosed at the time of collecting your Personal Information</li> <li>• For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</li> </ul>	
<p>4. <b>Account Details and Commercial Information</b> (such as your purchase history)</p>	<ul style="list-style-type: none"> <li>• Providing our products and services</li> <li>• Operating our business</li> <li>• Customer service and communications</li> <li>• Administering accounts and loyalty programs</li> <li>• Research, development, and analytics</li> <li>• Sweepstakes, contests, and other promotions</li> <li>• Customizing your experience, offers, and content</li> <li>• Targeting advertisements to you or your device</li> <li>• Ad measurement, attribution, and other ad administration.</li> <li>• Market research and customer satisfaction</li> <li>• Security and safety</li> <li>• Compliance with legal obligations</li> <li>• Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>• For purposes disclosed at the time of collecting your Personal Information</li> <li>• For our legitimate business</li> </ul>	<p><b>Disclosures for Business Purposes</b></p> <ul style="list-style-type: none"> <li>• Operational Vendors</li> <li>• Third-Party Promotional Partners</li> <li>• Affiliates and Related Entities</li> <li>• Other parties within the limits of Additional Business Purposes</li> </ul> <p><b>Sale/Sharing:</b></p> <ul style="list-style-type: none"> <li>• Third-Party Digital Businesses</li> </ul>

Category of Personal Information	Processing Purposes	Categories of Recipients
	<p>purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</p>	
<p>5. <b>Service Usage Information</b> (such as search or browsing history on the Service)</p>	<ul style="list-style-type: none"> <li>• Providing our products and services</li> <li>• Operating our business</li> <li>• Customer service and communications</li> <li>• Administering accounts and loyalty programs</li> <li>• Research, development, and analytics</li> <li>• Sweepstakes, contests, and other promotions</li> <li>• Customizing your experience, offers, and content</li> <li>• Targeting advertisements to you or your device</li> <li>• Ad measurement, attribution, and other ad administration.</li> <li>• Market research and customer satisfaction</li> <li>• Security and safety</li> <li>• Compliance with legal obligations</li> <li>• Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>• For purposes disclosed at the time of collecting your Personal Information</li> <li>• For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</li> </ul>	<p><b>Disclosures for Business Purposes</b></p> <ul style="list-style-type: none"> <li>• Operational Vendors</li> <li>• Affiliates and Related Entities</li> <li>• Other parties within the limits of Additional Business Purposes</li> </ul> <p><b>Sale/Sharing:</b></p> <ul style="list-style-type: none"> <li>• Not Sold or Shared</li> </ul>
<p>6. <b>Location Data</b> (such as when</p>	<ul style="list-style-type: none"> <li>• Providing our products</li> </ul>	<p><b>Disclosures for Business</b></p>



Category of Personal Information	Processing Purposes	Categories of Recipients
<p>you enable location-based features on your Device)</p>	<p>and services</p> <ul style="list-style-type: none"> <li>• Operating our business</li> <li>• Customer service and communications</li> <li>• Research, development, and analytics</li> <li>• Customizing your experience, offers, and content</li> <li>• Security and safety</li> <li>• Compliance with legal obligations</li> <li>• Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>• For purposes disclosed at the time of collecting your Personal Information</li> <li>• For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</li> </ul>	<p><b>Purposes</b></p> <ul style="list-style-type: none"> <li>• Operational Vendors</li> <li>• Affiliates and Related Entities</li> <li>• Other parties within the limits of Additional Business Purposes</li> </ul> <p><b>Sale/Sharing:</b></p> <ul style="list-style-type: none"> <li>• Not Sold or Shared</li> </ul>
<p><b>7. Audiovisual and Similar Information</b> (such as security camera footage, customer service call recordings)</p>	<ul style="list-style-type: none"> <li>• Operating our business</li> <li>• Customer service and communications</li> <li>• Research, development, and analytics</li> <li>• Security and safety</li> <li>• Compliance with legal obligations</li> <li>• Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>• For purposes disclosed at the time of collecting your Personal Information</li> <li>• For our legitimate business purposes that are</li> </ul>	<p><b>Disclosures for Business Purposes</b></p> <ul style="list-style-type: none"> <li>• Operational Vendors</li> <li>• Affiliates and Related Entities</li> <li>• Other parties within the limits of Additional Business Purposes</li> </ul> <p><b>Sale/Sharing:</b></p> <ul style="list-style-type: none"> <li>• Not Sold or Shared</li> </ul>

Category of Personal Information	Processing Purposes	Categories of Recipients
	compatible with the purpose of collecting your Personal Information and that are not prohibited by law	
<b>8. Professional or Employment Information</b> (e.g., vendors may provide us this information on their own employees)	<ul style="list-style-type: none"> <li>• Providing our products and services</li> <li>• Operating our business</li> <li>• Research, development, and analytics</li> <li>• Security and safety</li> <li>• Compliance with legal obligations</li> <li>• Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>• For purposes disclosed at the time of collecting your Personal Information</li> <li>• For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</li> </ul>	<b>Disclosures for Business Purposes</b> <ul style="list-style-type: none"> <li>• Operational Vendors</li> <li>• Affiliates and Related Entities</li> <li>• Other parties within the limits of Additional Business Purposes</li> </ul> <b>Sale/Sharing:</b> <ul style="list-style-type: none"> <li>• Not Sold or Shared</li> </ul>
<b>9. Inferences from Personal Information Collected</b> (such as based on your order history in order to provide you with that are most relevant to your interests)	<ul style="list-style-type: none"> <li>• Providing our products and services</li> <li>• Operating our business</li> <li>• Customer service and communications</li> <li>• Administering accounts and loyalty programs</li> <li>• Research, development, and analytics</li> <li>• Sweepstakes, contests, and other promotions</li> <li>• Customizing your experience, offers, and content</li> <li>• Targeting advertisements to you or your device</li> <li>• Ad measurement, attribution, and other ad</li> </ul>	<b>Disclosures for Business Purposes</b> <ul style="list-style-type: none"> <li>• Operational Vendors</li> <li>• Affiliates and Related Entities</li> <li>• Other parties within the limits of Additional Business Purposes</li> </ul> <b>Sale/Sharing:</b> <ul style="list-style-type: none"> <li>• Third-Party Digital Businesses</li> </ul>

Category of Personal Information	Processing Purposes	Categories of Recipients
	<p>administration.</p> <ul style="list-style-type: none"> <li>• Market research and customer satisfaction</li> <li>• Security and safety</li> <li>• Compliance with legal obligations</li> <li>• Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>• For purposes disclosed at the time of collecting your Personal Information</li> <li>• For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</li> </ul>	
<b>10. Sensitive Personal Information</b>		
<p><b>Government IDs</b> (e.g., we may collect your driver's license or other government-issued ID to verify you are of legal age to purchase alcoholic beverages)</p>	<ul style="list-style-type: none"> <li>• Providing our products and services</li> <li>• Operating our business</li> <li>• Research, development, and analytics</li> <li>• Security and safety</li> <li>• Compliance with legal obligations</li> <li>• Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>• For purposes disclosed at the time of collecting your Personal Information</li> <li>• For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</li> </ul>	<p><b>Disclosures for Business Purposes</b></p> <ul style="list-style-type: none"> <li>• Operational Vendors</li> <li>• Affiliates and Related Entities</li> <li>• Other parties within the limits of Additional Business Purposes</li> </ul> <p><b>Sale/Sharing:</b></p> <ul style="list-style-type: none"> <li>• Not Sold or Shared</li> </ul>

Category of Personal Information	Processing Purposes	Categories of Recipients
<b>Account Information and Password</b> (we may store your account log-in in combination with a password in our systems)	<ul style="list-style-type: none"> <li>• Providing our products and services</li> <li>• Operating our business</li> <li>• Customer service and communications</li> <li>• Administering accounts and loyalty programs</li> <li>• Research, development, and analytics</li> <li>• Security and safety</li> <li>• Compliance with legal obligations</li> <li>• Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>• For purposes disclosed at the time of collecting your Personal Information</li> <li>• For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</li> </ul>	<b>Disclosures for Business Purposes</b> <ul style="list-style-type: none"> <li>• Operational Vendors</li> <li>• Affiliates and Related Entities</li> <li>• Other parties within the limits of Additional Business Purposes</li> </ul> <b>Sale/Sharing:</b> <ul style="list-style-type: none"> <li>• Not Sold or Shared.</li> </ul>
<b>Precise Location</b> (such as when you enable location-based features on your device or enter your full address for delivery purposes)	<ul style="list-style-type: none"> <li>• Providing our products and services</li> <li>• Operating our business</li> <li>• Research, development, and analytics</li> <li>• Customizing your experience, offers, and content</li> <li>• Security and safety</li> <li>• Compliance with legal obligations</li> <li>• Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>• For purposes disclosed at the time of collecting your</li> </ul>	<b>Disclosures for Business Purposes</b> <ul style="list-style-type: none"> <li>• Operational Vendors</li> <li>• Affiliates and Related Entities</li> <li>• Other parties within the limits of Additional Business Purposes</li> </ul> <b>Sale/Sharing:</b> <ul style="list-style-type: none"> <li>• Not Sold or Shared.</li> </ul>

Category of Personal Information	Processing Purposes	Categories of Recipients
	Personal Information <ul style="list-style-type: none"> <li>For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</li> </ul>	
<b>Personal Information Collected and Analyzed Concerning a Consumer's Health</b> (for example, we may provide you the option to submit information that may be considered health-related, such as disability access requests)	<ul style="list-style-type: none"> <li>Providing our products and services</li> <li>Operating our business</li> <li>Research, development, and analytics</li> <li>Security and safety</li> <li>Compliance with legal obligations</li> <li>Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury to others or violation of our terms and policies</li> <li>For purposes disclosed at the time of collecting your Personal Information</li> <li>For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law</li> </ul>	<b>Disclosures for Business Purposes</b> <ul style="list-style-type: none"> <li>Operational Vendors</li> <li>Affiliates and Related Entities</li> <li>Other parties within the limits of Additional Business Purposes</li> </ul> <b>Sale/Sharing:</b> <ul style="list-style-type: none"> <li>Not Sold or Shared.</li> </ul>

There may be additional information we Collect that meets the definition of Personal Information under applicable State Consumer Privacy Laws 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.

As permitted by applicable law, we do not treat de-identified data or aggregate consumer information as Personal Information and we reserve the right to convert, or permit others to convert, your Personal Information into de-identified 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.

#### **a) Processing Purposes Implicating Sale, Sharing, Targeted Advertising**

When you provide us Personal Information for the following Processing Purposes, we may use certain information, such as your email address, that you provide for such purposes to advertise to you. This may include making available your Personal Information to certain third parties, such as Third-Party digital

businesses, including social media platforms and other tech companies that offer digital advertising services ("Third-Party Digital Businesses"), in ways that may constitute Selling and/or sharing, as well as processing your Personal Information for purposes of Targeted Advertising.

- Providing our products and services
- Administering accounts and loyalty programs
- Sweepstakes, contests, and other promotions
- For purposes disclosed at the time you provide your information
- Targeting advertisements to you or your device
- Ad measurement, attribution, and other ad administration
- Sweepstakes, contests, and other promotions
- For purposes disclosed at the time you provide your information

For more information on the meaning of Selling, Sharing, and Targeted Advertising and how to adjust your preferences with respect to such processing, please refer to the [Do Not Sell/Share/Target Opt-out](#) subsection of the State Privacy Rights Section.

### **b) Sources of Personal Information**

We may collect Personal Information directly from you (e.g., when you register for an account or make a purchase); your Devices; Third-Party Services; Vendors; our affiliates and related entities; public sources of data (where not exempt); other individuals (e.g., your friends and others that use the Service and submit content) and other businesses.

### **c) Data Retention**

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. For instance, we may maintain business records for so long as relevant to our business and may have a legal obligation to hold Personal Information for so long as potentially relevant to prospective or actual litigation or government investigation. We apply the same criteria for determining if we have a legitimate purpose for retaining your Personal Information that you ask us to delete. If you make a deletion request, we will conduct a review of your Personal Information to confirm if legitimate ongoing retention purposes exist, will limit the retention to such purposes for so long as the purpose continues, and will respond to you with information on any retention purposes on which we rely for not deleting your Personal Information. For more information on deletion requests, please refer to the [Right to Delete](#) section.

## **II. ONLINE PRIVACY NOTICE**

In this Part II, we provide additional notices to all users of our Online Services, regardless of if you are a resident of a state with State Consumer Privacy Laws. This section is a supplement to our other privacy policies and notices and is part of our main Privacy Policy. In the event of a conflict between any other Kura Sushi policy, statement, or notice and this section, this section will prevail as to data collected by our Online Services, except where additional notices are posted at collection that are said to modify or supplement this notice.

This section applies to "Online Services Personal Information," which is Personal Information that is collected through the Kura Service. To the extent we combine your Online Services Personal Information with data we

receive outside of the Online Services or with deidentified data, we will treat the combined data as Online Services Personal Information and apply this Part II to such combined data, unless we have disclosed otherwise. As permitted by applicable law, we do not treat Online Services Personal Information that has been deidentified or aggregated as Personal Information and we reserve the right to convert, and permit others to convert, your Online Services Personal Information into deidentified or aggregate data. We will not attempt to reidentify data that we maintain as deidentified.

## 1) Collection of Online Services Personal Information

### a) Types of Information Collected

We collect Online Services Personal Information in relation to the operation of our business and, most importantly, to run our restaurants, serve you sushi, and operate our [Kura Sushi Rewards Program](#). Some of the data categories listed below may not apply to you, depending on how you interact with us. For example, our App may process the Personal Information data categories outlined below, except for Audiovisual or Similar Information. The Online Services may collect the following categories of Online Services Personal Information:

- **Identifiers**, including your name and account names, as well as date of birth, if you provide it to us on the App. It also includes online identifiers such as mobile advertising ID, IP address, and cookie ID that we may use in relation to our advertising activities.
- **Contact Information** such as your email address, phone number, and address.
- **Personal Characteristics and Traits**, such as where we provide you the option to submit information regarding whether you are visually impaired or have any reach limitations, in order to assist with fulfilling your order. In addition, we may collect certain demographic information, such as age and gender.
- **Account Details and Commercial Information** such as your purchase history and amounts, favorite menu items and communications preferences.
- **Financial and Payment Information**, such as your payment card information (we do not handle full payment card info directly but rather rely on Business-related Recipients for doing so).
- **Service Usage Information**. This includes information collected by Tracking Technologies (defined below), which includes information such as:
  - your device functionality (browser, operating system, hardware, mobile network information);
  - the URL that referred you to our Kura Service;
  - the areas within our Kura Service that you visit and your activities there (including emails we send, such as whether you open them or click on links within);
  - your device location (if you have enabled such features on your device);
  - your device characteristics; and
  - device data and the time of day.
- **Location Data** if you enable features on your device to provide us with your location (which may include your precise location).

- **Audiovisual and Similar Information** such as CCTV recordings in our retail locations and customer service call recordings.
- **Professional and Employment Information** such as if you contact us via the Online Services in your capacity as an employee of one of our Business-related Recipients or suppliers.
- **Inferences** including information derived from other information that we have collected. For example, we may make inferences about you based on your order history or other information about you in order to provide you with offers or advertisements that are most relevant to your interests.
- **User Content** as described in our [Terms & Conditions](#).

## **b) How We Collect Personal Information**

Below are some examples of how we may collect your Online Services Personal Information. In some instances, our agents, service providers, and vendors ("Business-related Recipients") may collect it on our behalf.

### **i. Directly From You on the Online Services**

E-mail addresses and other Online Services Personal Information of visitors, such as a first and last name, home or other physical address, date of birth or telephone number, are known to Kura only when voluntarily submitted, for example, via purchases made through the Kura Service, registration for sweepstakes or contests, content submissions, suggestions or participation in online interactive activities. For example, you may submit your name, postal address, e-mail address, and/or other information in order to receive information about various subjects, register for programs, contact customer service, or respond to surveys.

### **ii. Information From Your Kura Revolving Sushi Bar Visits**

We may collect data using technology in our stores and premises. This technology is used for operational purposes and to provide you with your orders and other assistance you request while visiting Kura Revolving Sushi Bar. For example, we may also collect Personal Information directly from you when you visit a Kura Revolving Sushi Bar, such as when you interact with the tablet at your table to order sushi or drinks and checkout in person, or when you checkout using the App.

### **iii. Automatically From You or Your Device When You Visit the Online Services**

We use cookies and other tracking technologies ("Tracking Technologies"), as discussed in further detail below, to collect information about your device and your use of the Online Services.

We may use a variety of technologies that store or collect certain information whenever you visit or interact with the Online Services. This information may be stored or accessed using a variety of technologies that may be downloaded to your personal computer, browser, laptop, tablet, mobile phone or other device whenever you visit or interact with our Online Services.



In addition, we may collect certain information by automated means. The information we collect may include your Internet Protocol (IP) address, computer/mobile device operating system and browser type, type of mobile device, the unique device identifier (UDID) or mobile equipment identifier (MEID) for your mobile device, and others ("Device Identifiers"). We may use such Device Identifiers to associate information you have provided on different devices, or during separate interactions with us on the Online Services on the same device. For example, if you login to your account on your mobile phone, then later login to your account on your tablet or laptop, we may collect those Device Identifiers and associate those two devices and their Device Identifiers with other information we have about you. By way of another example, if you use the Online Services (for example, to order sushi) while logged into your account during one interaction but later use the Online Services on the same device, but not logged into your account, we may use Device Identifiers and other information to associate these separate interactions with the Online Services with your single device. We may also collect the address of a referring web site (if any), the pages you visit on our Online Services, and other information. We may use this information to operate, maintain, and manage our Online Services and to provide services such as technical support.

We may use various Tracking Technologies to collect information on the Online Services, including the types of information described in the [Types of Information Collected](#) section, above. Tracking Technologies include:

- **Cookies.** A cookie is a data file placed on a device when it is used to visit the Online Services.
- **Software Development Kits ("SDK").** A set of platform-specific third-party building tools for developers. The SDKs are integrated into our App to facilitate the use and functionality of our Online Services.
- **Web Beacons.** Small graphic images or other web programming code called web beacons (also known as "1x1 GIFs" or "clear GIFs") may be included in our Online Services' pages and messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a page or e-mail can act as a web beacon. Web beacons or similar technologies can be used to count visitors to the Online Services, to monitor how Users navigate the Online Services, to count how many e-mails that were sent were actually opened or to count how many links were actually viewed.
- **Embedded Scripts.** An embedded script is programming code that is designed to collect information about the links you click on and your interactions with the Online Services. The code is temporarily downloaded onto your device from our web server or a third-party service provider, is active only while you are connected to the Online Services and is deactivated or deleted thereafter.
- **Location-Identifying Technologies.** Our Online Services may provide you the ability to enable location-identifying technologies, including "location services" on our App, to find the nearest Kura Revolving Sushi Bar. Some location-identifying technologies rely on Bluetooth technology, which you also have to enable with respect to the App in order for our App to interact with such technology. For example, some retail locations may install Bluetooth, Wi-Fi, radio transmitters, or other devices, which have the ability to communicate with your App or collect information about your device when you are in or near a retail location. In order to stop utilizing, or to change the

settings with respect to, location-identifying technologies on our App, you can change your device settings.

There may be other Tracking Technologies now and later devised and used by us in connection with the Online Services. See [Your Choices](#) section, below, for more information on your choices regarding Interest-based Advertising, and our [U.S. State Privacy Notice](#) for information on rights of residents of certain U.S. states with respect to Tracking Technologies.

**iv. From Our Affiliates and Related Entities**

We may receive Online Services Personal Information from our affiliates and related entities that are part of the Kura Sushi, Inc. family.

**v. From Others**

We may receive Online Services Personal Information about you from third parties, including your friends and others (when they submit content to us or post or interact with the Online Services) and Third-Party Services. Additionally, we may, from time to time, supplement the information we collect with information from third parties.

**vi. Information You Provide About Others**

The Online Services (or a Third-Party Service) may allow you to submit the Personal Information of someone else, for example, if you want to send them an invitation or other communication about Kura Revolving Sushi Bar. If so, the Online Services Personal Information you provide is used to facilitate the communication or transaction and is not used by us for any other marketing purpose unless we obtain consent from that person or we explicitly say otherwise. Please see our [Terms & Conditions](#) for our expectations and your obligations as to information that you submit. Please be aware that when you use any send-to-a-friend functionality, your information, including contact information, name or username and message, may be included in the communication sent to your addressee(s), and the communication will indicate it was sent at your request and/or on your behalf.

## **1) Use of Online Services Personal Information**

Generally, we use and otherwise process Online Services Personal Information to provide you with sushi and other products and services you purchase or request, personalize our offerings, services, and marketing, and to otherwise support our business. Below are more specific examples of various purposes for which we use Online Services Personal Information:

- Providing our products and services, including to provide you with information, goods, or services, or process transactions that you have requested or agreed to receive, to enable you to participate in a variety of the Online Services' features, including ordering sushi and finding a nearby Kura Revolving Sushi Bar; to process your registration with the Online Services, including verifying your Personal Information is active and valid; and to facilitate a purchase, including facilitating payment for your purchase.
- Operating our business.

- Customer service and communications, including responding to any questions, comments, or requests that you have for us or for other customer service purposes; sending you communications and notifications about your use of the Online Services or your other interactions with us, and changes to the Online Services, policies, or other aspects of our business operations.
- Administering accounts and loyalty programs, such as the Kura Sushi Rewards Program.
- Research, development, and analytics, including to better understand how Users access and use our websites, Apps, and other Online Services, both on an aggregated and individualized basis, in order to improve our Online Services and respond to User desires and preferences, and for other research, development, and analytical purposes relating to the Online Services, our retail locations, and the operation of our business.
- Promotions and marketing, including sweepstakes, contests, and other promotions that you sign up for (which may include co-promotions with third parties), and to provide you with special offers or promotional materials on behalf of us or third parties.
- Customizing your experience, offers, and content, including to customize your experience on the Online Services, or to serve you specific content and offers that are relevant to or customized for you (including, without limitation, pricing and discounts based on your profile, location, or history).
- Targeting advertisements to you or your device to assist us in determining relevant advertising.
- Ad measurement, attribution, and other ad administration, including to determine the success of our advertising campaigns and to help us determine where to place our ads, including ads placed on other websites and services.
- Market research and customer satisfaction, including administering surveys and questionnaires, such as for market research or customer satisfaction purposes.
- For security and safety purposes, including to detect and respond to threats, to both our in-store and online operations, protect the health and safety of our customers, team members, and the public, and to prevent, investigate and prosecute criminal activities.
- To maintain business records and to comply with legal obligations, including as part of our general business operations, for other business administration purposes, or as otherwise required or compelled.
- Prevention, detection, investigation, and mitigation of illegal activities, fraud, injury, or violation of our terms or policies, such as where we believe we need to do so 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 of our [Terms & Conditions](#) or this Privacy Policy.
- For purposes disclosed at the time you provide your Online Services Personal Information.
- For our legitimate business purposes that are compatible with the purpose of collecting your Personal Information and that are not prohibited by law.

## 2) Kura Sushi Rewards Program

We operate a loyalty program, the [Kura Sushi Rewards Program](#), to thank you for visiting our restaurants and eating our sushi. The Online Services Personal Information collected from the Kura Sushi Rewards Program is used to administer the loyalty program.

## 3) Disclosure of Personal Information

We disclose or otherwise make available Online Services Personal Information as described in this Privacy Policy, including for the processing purposes described in the [Use of Online Services Personal Information](#) section above, and as follows:

- **Affiliated and Related Entities.** We may share Online Services Personal Information with certain of our affiliated and related entities in accordance with this Privacy Policy.
- **Business-related Recipients.** We may provide or otherwise make available Online Services Personal Information with Vendors and other "Business-related Recipients" who assist us with carrying out many of the purposes described above in Use of Online Services Personal Information section and otherwise in this Privacy Policy.
- **Third-Party Services.** Our Online Service may contain links to third-party content, web sites, applications, platform, code (e.g., plug-ins, application programming interfaces ("API"), and software development kits ("SDKs")), Third-Party Digital Businesses and other Tracking Technologies, (collectively, "Third-Party Services"). These Third-Party Services may collect your Online Services Personal Information independently via the Online Services, or we may directly provide them with Online Services Personal Information that we have collected on the Online Services, including in relation to Interest-Based Advertising and other purposes. The data practices of these third parties are subject to their own privacy policies and terms.
- **With notice or your consent.** We may disclose your Online Services Personal Information to third parties with notice to you, as directed by you, or, where legally required, upon your consent or authorization.
- **For safety, security, legal, and similar/related reasons.** We may disclose your Online Services Personal Information to other persons, organizations, or governmental authorities if we believe in good faith that doing so is necessary or appropriate: (i) to protect or defend the rights, safety or property of Kura, its affiliated or related entities, or third parties; (ii) to investigate, prevent, or take action regarding illegal activities, or suspected fraud; (iii) to enforce, investigate, or take action regarding this Privacy Policy, our Terms, and other applicable agreements and policies; (iv) in litigation or other proceedings in which we, our affiliated or related entities may be involved; and (v) to comply with legal and regulatory obligations and, to the extent not prohibited by applicable law, requests from law enforcement and other public authorities. We will exercise our discretion in electing to make or not make such disclosures, and to contest or not contest requests for such disclosures, all without notice to you, subject to applicable law or other legal requirements.
- **Corporate Transactions.** We may disclose and transfer your Online Services Personal Information: (i) to a subsequent owner, co-owner, or operator of the Online Services or applicable database; or (ii) in

connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other corporate change, or a financing, and during the course of any due diligence process.

- **Deidentified and/or Aggregate Data.** We may share data that we de-identify or aggregate such that it is no longer Online Services Personal Information or other information for which we have an obligation to you based on this Privacy Policy (or a statement made elsewhere on the Online Services) or applicable law. We do not authorize recipients of information we have de-identified to re-identify the data.

Your Online Services Personal Information may be stored and processed by Business-related Recipients and other third parties implicated above in the United States or other locations where they maintain facilities.

## 4) User Content

If the Online Services permits you to submit content ("User Content"), we or others may store, display, reproduce, publish, distribute, or otherwise use User Content online or offline in any media or format (currently existing or hereafter developed) and may or may not attribute it to you. You choose what User Content you submit. You may be able to submit User Content including ideas, photographs, personal profiles, writings, music, video, audio recordings, computer graphics, pictures, data, questions, comments, suggestions, and Personal Information, or to public areas of the Online Services such as blogs and message boards. Others may have access to this User Content and may have the ability to share it with third parties. Please think carefully before deciding what information you share, in connection with your User Content. Please note that Kura does not control who will have access to the information that you choose to make public and cannot ensure that parties who have access to such publicly available information will respect your privacy or keep it secure. We are not responsible for the accuracy, use or misuse of any User Content that you disclose or receive from third parties through the Online Services.

User Content that you submit in public areas of the Online Services is not subject to our usage or sharing limitations, or other obligations under this Privacy Policy or otherwise, and may be used and shared by us and third parties, except as prohibited by law. Any California residents under the age of eighteen (18) who have registered to use the Online Services, and who have posted content or information on the Online Services, can request that such information be removed from the Online Services by following the instructions in [Other California Notices](#). We encourage you to exercise caution when making decisions about what you disclose in such public areas. To the fullest extent permitted by applicable law, we are not responsible for User Content you submit to Third-Party Services via our Online Services.

## 5) Third-Party Content, Links, and Services

### a) Generally

The Service has functionality that allows certain kinds of interactions between the Online Services and Third-Party Services.

For example, you may have an option to use your Facebook, Google or other account provided by a Third-Party Service to interact with the Service, including by logging into the service or posting information from the Online Services on the Third-Party Service (or vice versa) ("Social Features"). If we offer and you choose to use Social Features, the Third-Party Service may send Personal Information about you to us. If so, we will then treat it as Online Services Personal Information under this Privacy Policy since we are collecting it as a result of your accessing of and interaction on our

Online Services. If you use Social Features, and potentially other Third-Party Services, information you post or provide access to may be publicly displayed on the Online Services (as described in the [User Content](#) section, above) and/or by the Third-Party Service that you use, depending on your privacy settings on each. Similarly, if you post information on a Third-Party Service that references the Online Services (e.g., by using a hashtag associated with us in a tweet or status update), your post may be used on or in connection with the Online Services or otherwise by us. Also, both we and the third party may have access to certain information about you and your use of the Online Services and any Third-Party Service.

Third-Party Services may use their own cookies, web beacons, and other Tracking Technologies to independently, collect information about you, including Third-Party Services to which you are directed from the Online Services, including where you click a link and leave the Online Services entirely. There are certain websites and other Third-Party Services to which we may link from the Online Services, which are third party websites using our name under license but with their own terms and policies (except where we have explicitly linked to this Privacy Policy).

We are not responsible for the policies or business practices of Third-Party Services, including how they collect, use, or share your information, including through Tracking Technologies that collect information regarding your visit to the Online Services as well as after your visit is over. These Third-Party Services may have their own terms of service, privacy policies or other policies, for which they may request your agreement. Be sure to review any available policies before submitting any personally identifiable information to or otherwise interacting with any Third-Party Services.

## **b) Analytics**

We may use Google Analytics, Adobe Analytics, or other Business-related Recipients for analytics services. These analytics services may use cookies and other Tracking Technologies to help us analyze Users and how they use the Online Services. Information generated by these analytics services (e.g., your IP address and other Usage Information) may be transmitted to and stored by these Business-related Recipients on servers in the U.S. (or elsewhere) and these Business-related Recipients and/or Third-Party Services may use this information for purposes such as evaluating your use of the Online Services, compiling statistic reports on the Online Services' activity, and providing other services relating to Online Services activity and other Internet usage. See [Your Choices](#) and [Consumer Privacy Rights](#) for more information on your choices regarding certain analytics Tracking Technologies.

## **c) Interest-Based Advertising**

We may engage and work with Business-related Recipients and Third-Party Services to serve advertisements on the Online Services and/or on other online services. Some of these ads may be tailored to your interest based on your browsing across time on the Online Services and elsewhere online (other websites and services), which may include use of precise location and/or cross-device data, sometimes referred to as "interest-based advertising" ("Interest-based Advertising"). See [Your Choices](#) for more information on your choices regarding Interest-based Advertising, and [Consumer Privacy Rights](#) for information on your choices with respect to Interest-based Advertising that qualifies as "Targeted Advertising" and/or "Cross-Context Behavioral Advertising."

## 6) Your Choices

### a) Marketing/Promotional Communications

You may unsubscribe from email and other electronic marketing communications you receive from us as follows: (i) for promotional emails, following the instructions provided in e-mails to click on the unsubscribe link, or if available by changing your communication preferences by logging onto your account; (ii) for text messages, following the instructions provided in text messages from us to text the word, "STOP" (or as otherwise instructed); and (iii) for app push notifications, turn off push notifications on the settings in your mobile device.

Opting out of certain communications will not affect subsequent subscriptions and, if your opt-out is limited to certain types of electronic communications, the opt-out will be so limited. Subsequent or different subscriptions will be unaffected. Please note that we reserve the right to send you certain communications relating to your account or use of our Online Services and administrative and service announcements. These transactional messages will be unaffected if you choose to opt-out of marketing communications.

### b) App Features and Functionality

The App may process Identifiers, Contact Information, Personal Characteristics and Traits, Financial and Payment Information, Service Usage Information, and Location Data. The App's features and functionality, and its related data collection, can be terminated by uninstalling the App. You may also delete your account within the App. The deletion of your account will delete, subject to certain exceptions, the Personal Information processed through the App including information obtained via Meta Platform tools (e.g., the Facebook Login API). You can also [Contact Us](#) to request deletion of your account. You can use the App's or your device's settings to set and change some settings and control some functions, such as enabling or disabling certain features (e.g., "tracking," Bluetooth, location-based services, push notifications, etc.).

### c) Tracking Technologies and Interest-based Advertising

#### i. Consent Management Platform and Device/Browser Settings

We offer a Tracking Technologies management platform (also called a "consent management platform" or "CMP") that allows you to exercise choice with respect to certain Tracking Technologies on the Online Services.

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options, so you may need to set them separately. Also, tools from commercial browsers may not be effective with regard to certain Tracking Technologies.

Some App-related Tracking Technologies in connection with non-browser usage (e.g., most functionality of a mobile app) can only be disabled by uninstalling the app. To uninstall an app, follow the instructions from your operating system or device manufacturer. Apple and Google mobile device settings have settings to limit ad tracking, and other tracking, but these may not be completely effective.



Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no consensus among industry participants as to what “Do Not Track” means in this context. Like many online services, we currently do not alter our practices when we receive a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” you can visit <http://www.allaboutdnt.com>, but we are not responsible for the completeness or accuracy of this third-party information. Your browser settings or browser extensions may allow you to automatically transmit Global Privacy Control (“GPC”) signals, which are separate and distinct from Do Not Track signals. We apply GPC signals as an opt-out of Sale and Sharing as to cookie Personal Information to the extent required by State Consumer Privacy Laws. For more information about how we handle GPC signals, click [here](#).

Some third parties, however, may offer you choices regarding their Tracking Technologies.

## **ii. Interest-Based Advertising Industry Opt-Out Programs**

There are two advertising industry organizations – the Network Advertising Alliance (NAI) and Digital Advertising Alliance (DAA) that offer opt-out programs. You can visit the following links to submit opt-out requests to companies participating in each program. The NAI’s opt-out page provides detailed information regarding the opt out of Interest-based Advertising and its limitations. For similar information from the DAA regarding its opt-out program, click [here](#) (web-based program) and [here](#) (app-based program).

To visit the NAI’s opt-out page, click [here](#).

To visit the DAA’s opt-out page, click [here](#).

Please be aware that, even if you are able to opt out of certain kinds of Interest-based Ads, you will continue to receive non-targeted ads. Further, if you selectively opt out of one or more of the above opt-out programs, you may receive Interest-based Advertising from other participants. You may also receive Interest-based Advertising from parties that do not participate in the NAI or DAA’s programs. However, Kura supports the ad industry’s Self-regulatory Principles for Online Behavioral Advertising and expect that ad networks Kura directly engages to serve you Interest-based Ads will do so as well, though Kura cannot guarantee their compliance.

## **iii. Company-specific Opt-Outs**

We may also use Microsoft Advertising Services. To learn about the data Microsoft collects and how your data is used by it and to opt-out of certain Microsoft browser Interest-based Advertising, please visit [here](#).

We may also use Google Ad Services. To learn more about the data Google collects and how your data is used by it and to optout of certain Google browser Interest-Based Advertising, please visit [here](#).

For Google Analytics, please visit [here](#). For Adobe Analytics, please visit [here](#).

## **iv. Important Notice Regarding Opt-Outs**

We are not responsible for the effectiveness of, or compliance with, any third parties’ opt-out options or programs or the accuracy of their statements regarding their programs. You will need



to exercise the above choices on each browser or device that you use. Please be aware that if you disable or remove certain Tracking Technologies, some parts of the Service may not work or will function with more limited capabilities. In addition, please note that your choices sometimes rely on Tracking Technologies, such that when you clear or disable them, your choices are reset.

**v. Limit the Amount of Information You Share**

You may also proactively limit the amount and type of actively transmitted Online Services Personal Information that Kura receives about you by choosing not to enter any Personal Information into forms or data fields on the Online Services. However, some services can only be provided to you if you provide appropriate Online Services Personal Information. Other parts of the Online Services may ask whether you wish to opt out or opt in to contact lists for offers, promotions and additional services that may be of interest to you.

### **III. CONSUMER PRIVACY RIGHTS**

Subject to meeting the requirements for a Verifiable Consumer Request (defined below) and limitations permitted by State Consumer Privacy Laws, Kura Sushi provides Consumers residing in states with applicable State Consumer Privacy Laws to which we are subject the privacy rights described in this section. As described in further detail below, we provide Consumers – which are, for clarity, residents of states with State Consumer Privacy Laws – the privacy rights described in this section. This section also applies to Consumers residing in California who interact with us in a business-to business context, our California Personnel, and California job applicants, but the other states do not treat individuals in such capacity as Consumers.

#### **1) Consumer Rights Requests Process**

We provide rights to Consumers as required by State Consumer Privacy Laws. For residents of states without Consumer privacy rights, or for residents of states that have State Consumer Privacy Laws but we do not meet the thresholds for applicability, we will consider requests but will apply our discretion in how we process such requests. For states that have passed State Consumer Privacy Laws but are not yet in effect as of the Effective Date, we will also consider applying state law rights prior to the effective date of such laws but will do so in our discretion.

#### **2) Making a Request and Scope of Requests**

As permitted by the State Consumer Privacy Laws, certain requests you submit to us are subject to an identity verification process ("Verifiable Consumer Request") as described in the [Verifying Your Request](#) section below. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify you are the Consumer about whom we collected Personal Information.

To make a privacy rights request, or to submit a request as an authorized agent, please complete this [Consumer Rights Request Form](#) and follow the instructions or by phone at 657-333-4047, and respond to any follow-up inquiries we make.

Some information we maintain about Consumers that is technically considered Personal Information may, nonetheless, not be sufficiently associated with information that you provide when making your request. For example, if you provide your name, email address, and phone number when making a request, we may be unable to associate that with certain data collected on the Service, such as clickstream data tied only to a

pseudonymous browser ID. Where we are unable to associate such information with the information you provide, we do not include such information in response to those requests. If we cannot comply with a request, we will explain the reasons in our response. We will use Personal Information provided in a Verifiable Consumer Request only to verify your identity or authority to make the request and to track and document request responses unless you also gave it to us for another purpose.

We will make commercially reasonable efforts to identify Personal Information that we collect, process, store, disclose, and otherwise use and to respond to your privacy requests. We will typically not charge a fee to fully respond to your requests; provided, however, that we may charge a reasonable fee, or refuse to act upon a request, if your request is excessive, repetitive, unfounded, or overly burdensome. If we determine that the request warrants a fee, or that we may refuse it, we will give you notice explaining why we made that decision. You will be provided a cost estimate and the opportunity to accept such fees before we will charge you for responding to your request.

We endeavor to respond to Verifiable Consumer Requests within the time required by State Consumer Privacy Laws. If we require more time, and it is permitted by State Consumer Privacy Laws, we will inform you of the reason and extension period in writing.

### **3) Verifying Your Request**

When you make a request, we will verify that you are the person you say you are, or, if you are seeking information on behalf of another person, that you are authorized to make the request on their behalf (see our [Authorizing an Agent](#) section below). In addition, we will compare the information you have provided to ensure that we maintain Personal Information about you in our systems. As an initial matter, we ask that you provide us with, at a minimum, your full name and phone number or email, and the nature in which you have transacted or interacted with us (e.g., customer at one of our locations business-to-business communications). Depending on the nature of the request and whether we have the phone number or email address you have provided in our systems, we may request further information from you to verify that you are, in fact, the Consumer making the request. We will review the information provided as part of your request and may ask you to provide additional information via email or other means to complete the verification process. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify you are the Consumer that is the subject of the request. The same verification process does not apply to opt-outs of Sale or Sharing, or limitation of Sensitive Personal Information requests, but we may apply authentication measures if we suspect fraud (such as verifying access to the email address or phone number provided when making the request).

### **4) Authorizing an Agent**

Subject to the limitations and requirements of State Consumer Privacy Laws, you may designate an authorized agent to submit a request on your behalf using the submission methods described above. If you are an authorized agent who would like to make a request, the State Consumer Privacy Laws require that we ensure that a request made by an agent is a Verifiable Consumer Request (except Do Not Sell/Share requests) and allows us to request further information to ensure that the Consumer has authorized you as their agent to make the request on their behalf. Generally, we will request that an agent provide proof that the Consumer gave the agent signed written permission to submit the request, and, as permitted under the State Consumer Privacy Laws, we also may require the Consumer to either verify their own identity or directly confirm with us that they provided the agent permission to submit the request.

## 5) Your Consumer Privacy Rights

The Consumer privacy rights we will consider are as follows:

### **a) Right to Limit Sensitive Personal Information Processing**

Certain Personal Information qualifies as sensitive data or sensitive Personal Information under the State Consumer Privacy Laws, which we refer to in this Section as "Sensitive Personal Information." Certain State Consumer Privacy Laws require you to consent to or have a right to limit certain types of use and disclosure of Sensitive Personal Information. When you provide us with Sensitive Personal Information for a particular purpose (e.g., you enable location awareness on the App and do not disable it) you authorize its connection and use for that purpose. Based on the way we Process Sensitive Personal Information in the non-HR context, we do not do so in a manner that would make a limitation right applicable.

### **b) Right to Know / Access**

Consumers have the right under State Consumer Privacy Laws to request access to Personal Information maintained by Kura. This right may be limited in some circumstances by law.

#### **i. Categories**

California residents have a right to submit a request for any of the following for the period that is 12-months prior to the request date:

- The categories of Personal Information we have collected about you.
- The categories of sources from which we collected your Personal Information.
- The Business Purposes or Commercial Purposes for our collecting or Selling your Personal Information.
- The categories of third parties to whom we have shared your Personal Information.
- A list of the categories of your Personal Information disclosed for a Business Purpose and, for each, the categories of recipients, or that no disclosure occurred.
- A list of the categories of your Personal Information sold and, for each, the categories of recipients, or that no sale occurred.

#### **ii. Specific Pieces / Access / Transportable Copies**

You have the right to request a transportable copy of the specific pieces of Personal Information we collected and are maintaining about you. Please note that Personal Information is retained by us for various time periods, so there may be certain information that we have collected about you that we do not even retain (and thus, it would not be able to be included in our response to you).

#### **iii. Right to Confirm Processing**

You have the right to confirm we are processing your Personal Information, which we will process as a Categories request but not provide the level of detail we provide to California Consumers.

#### **iv. Right to Obtain Information Regarding Third-Party Disclosures**

Residents of Oregon, Maryland, and Minnesota can request additional information regarding certain third-party disclosures of your Personal Information. Please feel free to reach out to us via our [Contact Us](#) section below.

### **c) Right to Delete**

You may request that we delete your Personal Information. After we confirm that your deletion request is a Verifiable Consumer Request, subject to permitted retention exceptions, we will carry out one or more of the following as permitted by applicable law: (i) permanently erase your Personal Information on our existing systems with the exception of archived or back-up systems; (ii) deidentify your Personal Information; or (iii) aggregate your Personal Information with other Consumer's information. Where legal exceptions will apply to your request for deletion, we will tell you which one(s) and will limit retention to the permitted purpose(s).

### **d) Right to Correct**

You have the right to request that we correct inaccuracies that you find in your Personal Information maintained by us. Your request to correct is subject to our verification (discussed above) and the response standards in the applicable State Consumer Privacy Laws.

### **e) Do Not Sell/Share/Target Opt-out**

Under the State Consumer Privacy Laws, Consumers have the right to opt-out of certain processing activities. California and certain other states have opt-outs specific to Targeted Advertising activities, which involve the use of Personal Information from different businesses or services to target advertisements to you. California's law refers to these activities as "cross-context behavioral advertising" while other state laws refer to these activities simply as Targeted Advertising. California provides Consumers the right to opt-out of Sharing, which includes providing or making available Personal Information to third parties for such Targeted Advertising activities, while other states provide Consumers the right to opt-out from processing Personal Information for Targeted Advertising more broadly. There are broad and differing concepts of the Sale of Personal Information under the State Consumer Privacy Laws, all of which at a minimum require providing or otherwise making available Personal Information to a third party.

When you opt-out pursuant to the instructions below, it will have the effect of opting you out of Sale, Sharing, and Targeted Advertising, such that our opt-out process is intended to combine all these state opt-outs into a single opt-out. Instructions for opting out are below.

Third-Party Digital Businesses, including social media platforms and other tech companies that offer digital advertising services, may process Personal Information that we make available about you, including some of the categories of Personal Information in the table in Section I above. Giving access to Personal Information on our Online Services, or otherwise, to Third-Party Digital Businesses could be deemed a Sale and/or Sharing and could implicate Targeted Advertising under some state laws, unless the other company has committed contractually to limit their Processing to what would qualify them as our Vendor. Certain Personal Information which we make available to Third-Party Digital Businesses is information that we have previously collected directly from you or otherwise about you, such as your email address (which we refer to as "non-cookie Personal Information").

We do not believe we "sell" "covered information" of Nevada "consumers" as those terms are defined by Chapter 603A of the Nevada Revised Statutes. Though we do not believe we sell covered information,

Nevada's law requires us to provide a method for Nevada consumers to make requests to opt out of sale, which you can do by e-mail at [customerservice@kurausa.com](mailto:customerservice@kurausa.com).

### **i. Opt-out for Non-Cookie Personal Information**

If you would like to submit a request to opt-out of our processing of your non-cookie Personal Information (e.g., your email address) for Targeted Advertising, or opt-out of the Selling or Sharing of such data, you may submit an opt-out request through our [Consumer Rights Request Form](#) or call us at 657-333-4047.

### **ii. Opt-out for Cookie Personal Information**

We do not Sell or Share your cookie-related Personal Information or Process your cookie-related Personal Information for Targeted Advertising.

We may disclose your Personal Information for the following purposes, which are not a Sale or Share: (i) if you direct us to disclose Personal Information; (ii) to comply with a Consumer rights request you submit to us; (iii) disclosures amongst the entities that are affiliates (in accordance with State Consumer Privacy Laws) or as part of a Corporate Transaction; and (iv) as otherwise required or permitted by applicable law.

We do not knowingly Sell or Share the Personal Information of Consumers under 16.

For more information on how to limit Interest-based Advertising using your browser settings, mobile device settings, or ad industry tools, please see the [Tracking Technologies and Interest-based Advertising](#) section of our Privacy Policy above. Please note, clearing cookies or changing settings may affect your choices and you have to opt-out separately via each browser and other device you use. Cookie-enabled opt-out signals may no longer be effective if you delete, block or clear cookies. We are not responsible for the completeness, accuracy or effectiveness of any third-party notices, tools, or choices.

### **iii. Global Privacy Control**

Some of the State Consumer Privacy Laws require businesses to process Global Privacy Control (or "GPC") signals, which are referred to in some states as opt-out preference signals or universal opt-out mechanisms. GPC signals are signals sent by a platform, technology, or mechanism, enabled by individuals on their devices or browsers, that communicate the individual's choice to opt-out of Sale, Sharing and/or Targeted Advertising, such that the GPC signal effectively automatically communicates such requests. To use GPC, you can download an internet browser or a plugin to use on your current internet browser and follow the settings to enable GPC. To our knowledge, we have configured the settings of our consent management platform to receive and process GPC signals on our websites.

Although we only enable non-essential (i.e., not strictly necessary) cookies if you opt-in to them, we have also configured the settings of our cookie consent management platform to receive and process GPC signals on our website. To make a Do Not Sell/Share/Target request as to non-cookie Personal Information, please visit the [Do Not Sell/Share/Target Opt-out](#) section above.

We do not (1) charge a fee for use of our websites if you have enabled GPC; (2) change your experience with our websites if you use GPC; or (3) display a notification, pop-up, text, graphic,

animation, sound, video, or any interstitial in response to the GPC, except that we may display a notification confirming the GPC.

**a) Automated Decision Making and Profiling**

We do not engage in Automated Decision Making or Profiling.

**b) Right to Non-Discrimination, Non-Retaliation; Incentive/Loyalty Programs**

You have the right not to receive discriminatory treatment, in a manner prohibited by the State Consumer Privacy Laws, for the exercise of your privacy rights. The Personal Information collected from the Kura Sushi Rewards Program is used to administer the loyalty program. We do not give you rewards or a discount in exchange for your Personal Information. The material aspects of the Kura Sushi Rewards Program are described in the program terms, available [here](#). Please note that participating in Kura Sushi Rewards Program is entirely optional, you will have to affirmatively opt-in to the program and you can opt-out of each program (i.e., terminate participation and forgo the ongoing incentives) prospectively by following the instructions in the applicable program description and terms. We deem the value of the Personal Information to be reasonably related to the value of the incentive, and by subscribing to the Kura Sushi Rewards Program, you indicate you agree. If you do not, please do not subscribe to the Kura Sushi Rewards Program. If you subsequently wish to withdraw from the Kura Sushi Rewards Program, please contact us at [rewards@kurasushi.com](mailto:rewards@kurasushi.com). We do not limit participation in our financial incentive programs to Consumers who do not exercise their rights under the State Consumer Privacy Laws. However, a deletion request will not delete Kura Sushi Rewards Program Personal Information because the information is necessary to maintain your participation in the program. If you desire to delete Kura Sushi Rewards Program Personal Information, terminate your participation in the program before making a CCPA deletion request. We may add or change incentive/loyalty programs and/or their terms by posting notices on the program descriptions and terms linked to above, so please check them regularly.

**c) Appeal Rights**

Consumers have the right to appeal our decision regarding a request by following the instructions in our response to your request.

## **IV. GENERAL NOTICES**

### **1) Other California Notices**

We disclose our tracking and “do not track” practices in the [Tracking Technologies and Interest-based Advertising](#) section above. Any California residents under the age of eighteen (18) who have registered to use the Service, and who have posted content or information on the Service, can request that such information be removed from the Service by contacting us at Postal Mail: 17461 Derian Ave, #200, Irvine, CA 92614, Attn: General Counsel; or by e-mail at [customerservice@kurausa.com](mailto:customerservice@kurausa.com), stating that they personally posted such content or information and detailing where the content or information is posted. We will make reasonably good faith efforts to remove the post from prospective public view or anonymize it so the minor cannot be individually identified. This removal process cannot ensure complete or comprehensive removal. For instance, third parties may have republished the post and archived copies of it may be stored by search engines and others that we do not control. California Civil Code Section 1798.83 (the “Shine the Light” law) permits California residents, who have certain types of an existing business relationship with us, to request

certain information regarding our disclosure of Personal Information to third parties (including, in some cases, our affiliates) for those third parties' own direct marketing purposes. If you are a California resident, you may request information about our compliance with the Shine the Light law by contacting us in the following ways: Postal Mail: 17461 Derian Ave, #200, Irvine, CA 92614, Attn: STL Request; or by e-mail at [customerservice@kurausa.com](mailto:customerservice@kurausa.com). You must put the statement "Shine the Light Request" in the correspondence. In your request, please attest to the fact that you are a California resident and provide a current California address for your response. Please note that the CCPA and Shine the Light are different laws offering different rights and requests must be made separately.

## **2) Security of Personal Information**

Kura endeavors to incorporate commercially reasonable safeguards to help protect and secure your Personal Information on the Kura Service. However, the confidentiality and security of Personal Information transmitted over the Internet cannot be guaranteed. We urge you to exercise caution when transmitting Personal Information over the Internet. Please note that we cannot ensure the security of any Personal Information you transmit to us, and you use our Kura Service and otherwise provide us with your information at your own risk.

## **3) Notices for Users Outside of the U.S.**

We are based in the U.S. and the information we and our Vendors collect via the Kura Service is governed by U.S. law. We do not target individuals outside of the U.S. If you are accessing our Service from outside of the U.S., please be aware that information collected through the Service may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Kura Service, or provision of any information, constitutes your acknowledgement of the transfer to and from, processing, usage, sharing, and storage of your information, including Personal Information, in the U.S. (and potentially other territories worldwide) as set forth in this Privacy Policy.

## **4) Children's Privacy Notice**

We do not use the Online Services to knowingly collect Online Services Personal Information from (i) minors. If you think we may have unknowingly collected such Personal Information of / from a minor, please [Contact Us](#).

In the event that we become aware that we have collected Personal Information from any child, we will dispose of that information in accordance with the Children's Online Privacy Protection Act ("COPPA") and other applicable laws and regulations. If you are a parent or guardian and believe we may have collected such information without parental or guardian consent or other than in a manner authorized by law, please [Contact Us](#).

Please refer to the [Other California Notices](#) section for more information regarding requests pertaining to California residents under the age of eighteen (18) who have registered to use the Service.

## **5) Changes**

We reserve the right to change this Privacy Policy at any time without other form of notice apart from posting an updated copy on our Online Service. However, at our discretion, we may also notify you by email, pop-up, or otherwise, when appropriate. Additional or different practices may be disclosed at the point of



collection, without changing the main Privacy Policy. Any modifications will be effective immediately upon the posting of the revised Privacy Policy and your use of the Kura Service indicates your acknowledgment to the privacy policy and notices posted at the time of use. However, we will not use your previously collected Personal Information in a manner materially different than represented at the time it was collected without your consent. Please check our Online Services frequently to see any updates or changes to this Privacy Policy. To the extent any provision of this Privacy Policy is found by a court of competent jurisdiction, such provision shall be severed to the extent necessary for the remainder to be valid and enforceable.

## **6) Contact Us**

All notices to Kura Sushi can be sent via email to [customerservice@kurausa.com](mailto:customerservice@kurausa.com) or mailed to Kura Sushi USA, Inc., ATTN: Customer Service Department, 17461 Derian Ave, Suite 200, Irvine, CA 92614.