

## **JaCER Engagement and Remedy Platform CCPA Privacy Policy**

Japan Center for Engagement and Remedy on Business and Human Rights (JaCER) has formulated this privacy policy in order to comply with the California Consumer Privacy Act of 2018 and the California Privacy Rights Act of 2020, as amended (hereinafter collectively referred to as "CCPA") and other equivalent privacy laws and regulations in the operation of our grievance mechanism platform "Engagement & Remedy Platform". This privacy policy will explain how JaCER uses the personal information which JaCER collects from you when you submit grievance through JaCER and you use JaCER's website. This privacy policy also describes the types, sources, and purposes of use of the personal information collected by JaCER in the preceding 12 months.

### **Scope of application**

This privacy policy applies to JaCER's processing of any personal information of residents in the State of California in the United States (hereinafter "California Residents").

### **What personal information does JaCER collect?**

Through the operation of the Engagement and Remedy Platform, JaCER collects any personal information in grievance reports and any other communications including but not limited to: names, addresses (as necessary), telephone numbers, nationalities, occupations, companies/organizations of affiliation, e-mail addresses, content of the grievance, and circumstances and history pertaining to processing of the grievance, etc.

### **How does JaCER collect your personal information?**

You directly provide JaCER with most of the personal information which JaCER collects. JaCER collects and processes your personal information when you submit a grievance report to JaCER.

JaCER may also receive your personal information indirectly from the following source:

- JaCER's member companies when you submit a grievance report to them; and
- Any third parties who submit a grievance report involving you to JaCER

Please note that the provision of your personal information is neither a statutory or contractual requirement, nor a requirement necessary to enter into a contract and that you are not obliged to provide personal information. Nonetheless, if you do not provide your personal information, there is a risk that we may not be able to appropriately investigate and

address the contents of your grievance.

**Why and How will JaCER collect and use your personal information?**

JaCER will process your personal information contained in your grievance report only for the purpose of implementing appropriate measures depending on the results of the investigation and not for any other purpose.

However, in order to appropriately process your grievance, personal information contained in your grievance report may be provided to the parties concerned.

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**Parties Concerned** Use of Personal information

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**Company Concerned** JaCER provides all of the personal information in regard to your grievance to the department in charge of processing grievances in the company concerned. The company concerned processes the grievance received from you.

**Suppliers and other business partners of the company concerned** JaCER provides all of the personal information in regard to your grievance to the department in charge of processing grievances in the company concerned. The company concerned processes the grievance received from you.

**Advisory and Mediation Panel and Investigation Panel** An Advisory and Mediation Panel and an Investigation Panel may be set up in the company concerned to appropriately investigate and process your grievance. The Advisory and Mediation Panel and the Investigation Panel have duties to maintain secrecy with respect to the company concerned. The personal information contained in your grievance may be provided to the Advisory and Mediation Panel and the Investigation Panel.

**No “Sale” and “Sharing” of your personal information**

JaCER neither sells nor shares your personal information collected through the Engagement and Remedy Platform. Likewise, JaCER neither sells nor shares any personal information of consumers under 16 years of age. JaCER uses the term "sale" and "sharing" as defined by the CCPA in this privacy policy.

#### **How do we store your personal information?**

JaCER securely stores your personal information at the cloud server in Japan where security measures are taken.

JaCER keeps your personal information for necessary to achieve the above purposes.

#### **What are your rights regarding personal information?**

JaCER would like to make sure you are fully aware of all of your rights regarding your personal information. You, as a California resident, is entitled to the following:

- The right to know what personal information the business has collected about the consumer, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about the consumer.
- The right to delete personal information that the business has collected from the consumer, subject to certain exceptions.
- The right to correct inaccurate personal information that a business maintains about a consumer.
- If the business sells or shares personal information, the right to opt-out of the sale or sharing of their personal information by the business. Please note that JaCER neither sells nor shares your personal information collected through the Engagement and Remedy Platform as described above.
- If the business uses or discloses sensitive personal information for reasons other than those set forth in section 7027, subsection (m) of the CCPA regulations, the right to limit the use or disclosure of sensitive personal information by the business.
- The right not to receive discriminatory treatment by the business for the exercise of privacy rights conferred by the CCPA, including an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of their CCPA rights.

If you make a request, JaCER has one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: [info@jacer-bhr.org](mailto:info@jacer-bhr.org)

In addition, you also have a right to lodge a complaint with a supervisory authority.

### **Data Transfer to Third Countries**

JaCER and the company concerned may provide your data in your grievance report to the parties concerned who reside in countries other than Japan in order to appropriately process your grievance.

### **Cookies and Web Beacons**

JaCER's website may use cookies and Web beacons for enhanced provision of services to persons accessing JaCER's website. Cookies enable provision of data that is more personally relevant to persons who have accessed JaCER's website and are revisiting the site.

Cookies are small packets of data sent to the user's browser so that the Web server can identify the user's computer but cannot identify specific individuals unless you input personal information. Some browsers allow the user to disable cookies by changing the browser's settings. However, as a result, you may not be able to use part or all of the services offered by JaCER's website.

Web beacons are used to count the number of times JaCER's website page is visited for preparation of statistical data. Web beacons do not have a function that enables identification of specific individuals.

### **Access Log**

Personal information on persons who access JaCER's website is recorded in the access log.

Access logs are records of user personal information that include IP addresses, types of browsers, and access dates and times. This personal information is utilized for website maintenance and management, statistical analysis of how users interact with JaCER's website, and site enhancement. JaCER uses the personal information obtained from access logs only within the scope of established purposes for use of personal information.

JaCER also uses Google's Google Analytics to collect, record, and analyze browsing history on our website. Google Analytics uses cookies to collect personal information that does not include personal information that can identify a specific individual. The disable setting for Google Analytics can be downloaded from Google's Opt-out Browser Add-on download page. Download and install "Google Analytics Opt-out Browser Add-on." You can disable Google Analytics by changing the browser's Add-on setting. Personal information collected by Google is managed in conformance with Google's Privacy Policy as follows.

[Google Analytics Terms of Service](#)

[Google Privacy Policy](#)

[Google Analytics Opt-out Browser Add-on](#)

### **Automated decision-making**

JaCER does not carry out any automated decision-making, including profiling, based on the personal information which you provide.

### **Privacy policies of other websites**

JaCER's website contains links to other websites. JaCER's privacy policy applies only to JaCER's website, so if you click on a link to another website, you should read their privacy policy.

### **Changes to JaCER's Privacy Policy**

JaCER keeps its privacy policy under regular review and places any updates on this web page.

### **How to contact us (Contact Point)**

If you have any questions about JaCER's privacy policy, the personal information that JaCER holds on you, or you would like to exercise one of your rights regarding personal information, please do not hesitate to contact us.

Japan Center for Engagement and Remedy on Business and Human Rights (JaCER)

Address Otemachi Center Bldg., 1-1-3, Otemachi, Chiyoda Ward, Tokyo 100-0004

Representative Sakon Kuramoto, Daisuke Takahashi, and Hidemi Tomita

Contact Point [info@jacer-bhr.org](mailto:info@jacer-bhr.org)