

KONAMI DIGITAL ENTERTAINMENT, INC. PRIVACY POLICY

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This Privacy Policy is incorporated into and subject to the terms of the Konami Terms of Use. By using this website, and voluntarily providing your personally identifiable information to Konami, you consent to the collection and use of such personally identifiable information as set forth in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not provide us with any information and do not use this website.

Konami Digital Entertainment, Inc. ("Konami") respects the privacy rights of our online visitors and is committed to protecting the information collected from you. To further this commitment, we have adopted an online Privacy Policy that describes how we collect, use, safeguard and disclose the information you provide to Konami via this website. This policy may be revised from time to time, so please revisit this page often to remain fully informed of our policies.

This Privacy Policy and the certification seal located on this page confirms that Konami is a valid licensee and participating member in the Entertainment Software Rating Board's Privacy Online Program: ESRB Privacy Online. To protect your privacy, we have voluntarily undertaken this privacy initiative and all of our websites have been reviewed and certified by ESRB Privacy Online to meet established online information collection and use practices. As part of this privacy program, we are subject to frequent audits of our websites and other enforcement and accountability mechanisms administered independently by the ESRB.

ESRB Privacy Online is a third-party seal provider whose mission is to protect consumers' online privacy and make the Internet a secure, reliable, and private place to share information and conduct business. ESRB Privacy Online promotes and enforces established principles and guidelines for fair information practices that include requirements of full disclosure, notice, and informed consent.

Whenever you visit a website that displays the ESRB Privacy Online certification seal, you can expect to be notified of the following:

- The websites and information covered by the Privacy Policy;
- Exactly what information may be collected and how it will be used;
- The consequences, if any, resulting from your refusal to provide personally identifiable information;
- Whether a company uses cookies, tracks IP addresses, or uses other passive means to collect technical information;

- Who, if anyone, is collecting your personally identifiable information;
- With whom, if anyone, is your personally identifiable information shared;
- What a company's policy is regarding links to third party sites;
- What choices you have with regard to the use of your personally identifiable information;
- How you can access, and if necessary, change the personally identifiable information a company collects and maintains;
- How a company ensures data security, quality, and integrity; and
- Where and how to ask questions or file complaints.

The websites and information covered by this Privacy Policy:

This Privacy Policy currently applies to the following websites operated by Konami:

www.konami.com, and all related Konami-controlled websites, including, but not limited to, www.konami-play.com, www.gm.konami.com, www.konami.com/arcade/, www.konami.com/mobile/, and www.konami.com/card/

In addition, Konami may own several other domain names that point to the website listed above. From time to time, we may add new websites and will take reasonable steps to update the above list.

This privacy policy also applies to information collected from users in countries outside of the United States, including, and limited to, Argentina, Brazil, and Mexico. Konami is in compliance with the applicable laws of these countries.

Please note that this Privacy Policy applies only to information submitted and collected online through the website(s) listed above, and does not apply to information that may be collected by Konami offline. In addition, this Privacy Policy applies only to websites maintained by Konami and not to websites maintained by third party companies or organizations to which we link. Konami is therefore not responsible for the content or activities provided on such sites, and we recommend that you independently review the privacy policies posted on such sites.

What types of information does Konami collect and how will it be used?

In order to give you the best experience on our website, Konami may collect information about you, but only if you voluntarily provide it to us. Typically, when we ask a user to submit personally identifiable and/or demographic information, and it will usually be as part of either: (1) "community" registration (e.g. registration for online games or tournaments, to participate in forums or chat rooms, to receive ongoing marketing or other information, etc.); (2) product registration; (3) email correspondence with product support/customer service; (4) polls or surveys; (5) E-Cards or "Send-to-a-Friend" emails; and/or (6) information submitted in a business capacity (e.g., resumes). The types of information that may be requested for each activity and the way the information may be used are detailed below.

§ Community Registration

If you choose to register on our website, you will be required to provide your first and last name, city, state, zip code, country of residence, email address, date of birth, age, occupation and a user name and password. In addition, you may be asked to provide other information, such as your phone number, the provision of which is optional. The information that you submit during registration will: (a) make up your profile; (b) allow you to use our message board and participate in other activities on our website (e.g., contests and sweepstakes, or game-specific events); and (3) allow us to send you, via email, news about products, features and enhancements, special offers, upgrade opportunities, and contents and events of interest.

Please note that the information (e.g., email address, username, occupation, and interests) contained in your profile (i.e., that you provide when registering) may be viewable to other users of Konami's message

board. We cannot and do not guarantee that this information will be kept confidential or private. If you choose, you may omit from your profile certain information that you do not want the public to see by leaving such information blank at the time of registration, or choosing to make your email address not accessible via such message boards.

§ Product Registration

To register a Konami product on our website, you will be required to submit your first and last name, city, state, zip code, country of residence, email address, date of birth, age and occupation. You may also be asked to provide your phone number and answer demographic questions relating to your age, information about the product you purchased, the type of console you own, and the types of games you enjoy playing. The information that you submit during product registration will entitle you to limited warranty protection and technical support. **Unless you opt out at the time of registration, we may also use your registration information to send you, via email, news about products, features and enhancements, special offers, upgrade opportunities, and contents and events of interest.**

§ Email Correspondence

Konami may collect and temporarily store personally identifiable information that you voluntarily submit to us via email when contacting Konami customer service or support. For example, we provide on our website a link through which an online visitor can send e-mail to customer service addressing any issue a user encounters with a Konami product. Your email address and any personally identifiable information you choose to provide in the body of such email is used by Konami for the sole purpose of responding to your question. Although most e-mail messages are deleted immediately after they are responded to, in certain cases, hard copies or data from certain e-mail correspondence may be kept on file for security purposes, and even deleted emails may remain archived or in system backups. Any such copy or data will be stored in a secure location, and information from these messages will not be used for marketing purposes. Any email addresses collected from you during the use of the E-Cards or "Send-to-a-Friend" email feature on any Konami website are not retained by Konami, and are only used to send a one-time email notification on your behalf.

§ Polls/Surveys

From time to time, we may ask you for your opinion about certain matters in the form of online polls or surveys, including your opinion with respect to our games or other products and services. Your responses to these polls help us provide products and services of interest to you. While we may ask for certain demographic or other information in connection with such polls or surveys to allow us to better interpret the results, we do not request personally identifiable information, such as your name, in connection with these polls or surveys.

§ Resumes

Konami provides on its website an email address that visitors can use to send us their resumes. In the future we may expand functionality on our site for other similar business uses. Personally identifiable information collected from resumes will be used for the purpose of accepting and evaluating candidate submissions for job postings and may therefore be shared within our company. Other than as explained above, this Privacy Policy does not apply to personally identifiable information gathered through resumes.

§ Passive Collection

As noted below, (see "Does Konami use cookie, track IP addresses or use other passive means to collect information?"), we use certain passive means to collect information regarding visitors to our website, website traffic patterns and website usage. Unless noted otherwise, we may share in aggregate, statistical form, such non-personal information with our partners, affiliates or advertisers.

§ Other Uses of Personally Identifiable Information

We may also use your personally identifiable and demographic information for our internal marketing and demographic studies, so we can constantly improve the products and services we provide you and to better meet your needs. From time to time, we are approached by third-party companies and organizations that provide products or services that we believe may be of interest to you. To extend these products or services to you, we may use your personally identifiable information to send out notices on

their behalf. We strive to limit the notices and communications to those that we think you would appreciate receiving.

No matter what method we use to collect information and no matter how we use that information, we will only collect the information deemed reasonably necessary to fulfill your online requests and our legitimate business objectives.

What happens if I refuse to provide my personal information to Konami?

If you choose not to submit personally identifiable information when requested, you may not be able to participate in certain activities on our website which may considerably limit the services we can provide you. For example, if you refuse to provide your email address when registering, you will not be able to use our message boards. When you browse our website, however, you do so anonymously; no personally identifiable information is collected.

Does Konami use cookies, track IP addresses or use other passive means to collect information?

Cookies

Konami may collect information through cookies to improve the use of our website. A "cookie" is a small string of text sent by our website to your browser and then stored by your browser on your computer's hard drive. Storage of cookies on your system provides an easy and convenient method for us to personalize and enhance your experience on our website, and to help us diagnose problems with our servers and to administer the website. For example, cookies allow us to remember your screen name and date of birth, tell us that you have visited our website before, track your usage of the site, and may contain information that will make your next visit to our website more enjoyable. In addition, Konami will not use cookies to retrieve information from your computer that was not originally sent in a cookie. Most web browsers automatically accept cookies, but you can always disable cookies or set your browser to alert you when cookies are being sent to your computer. However, rejecting cookies may prevent you from taking advantage of certain portions of this website.

Third Party Cookies

We currently contract with several online partners to help manage and optimize our Internet business and communications. We use the services of a marketing company to help us measure the effectiveness of our advertising and how visitors use our website. To do this, we use Web beacons and cookies provided by our marketing company on this website. We may collect the following types of information through such third party cookies: the activity of the website visitor's browser when the visitor is viewing the website; the website path of visitors; the time visitors come to the website; and product codes and pricing information for merchandise that visitors purchase via this website. By supplementing our records, this information helps us learn things like what pages are most attractive to our visitors, which of our products most interest our customers, and what kinds of offers our customers like to see. Although our marketing company logs the information coming from our website on our behalf, we control how that data may and may not be used. If you do not want to help us learn how to improve our website, products, offers and marketing strategy, you can "opt-out" of our ability to analyze such data by clicking here.

IP Addresses

While you are browsing our website, Konami automatically collects your IP address and your activity while using the website for safety and security purposes. An IP address is a number that is used by computers on the network to identify your computer every time you log on to the Internet.

Log Files

The only other information collected passively by Konami is in the form of logs files that record website activity, including how many "hits" a particular web page is getting (a.k.a. "click-through data"). For example, log file entries are generated every time a visitor clicks an image on our website. These entries

are generated anonymously, and enable Konami to assess overall site activity, track interest in particular portions of our website, troubleshoot technical concerns, and identify the type of browser you are using. We may also use the log file entries for our internal marketing and demographic studies, so we can constantly improve the products and services we provide you. Log files are used internally only, and are not associated with any particular user or with any personally identifiable information.

Who is collecting my personal information?

The information that you disclose while visiting any of our websites is collected by Konami, or one of its vendors on Konami's behalf, and is used in the manner specified above.

With whom does Konami share my personal information?

Konami does not sell or rent your personally identifiable information to third parties. Konami may share your personally identifiable information with our parent, subsidiary, or affiliate companies for purposes of internal marketing and demographic studies, which help us improve and tailor the products and services we provide you.

From time to time, Konami may employ and share your personally identifiable information with entities who use it solely to provide support for the internal operations of Konami's website(s) (e.g., message board operation and product registration storage).

Your personally identifiable information may also be shared with third party businesses involved in the entertainment, food, clothing, media, or Internet industries, in order to assist us in notifying you about special promotions or co-sponsor a promotion being offered on our website. We require all such third parties to agree to maintain the confidentiality, security, and integrity of the personally identifiable information they obtain from us. **If you do not want us to share your information with such third party businesses, please opt-out from such sharing at the time your information is collected.**

We may disclose the information we maintain, including personally identifiable information, when required to do so by law, or may disclose such information in response to a request from a law enforcement agency or authority; or to protect the rights, property, or safety of Konami, our customers, website users or others.

In addition, Konami may, in the future, sell or otherwise transfer some or all of its assets to a third party. Your personally identifiable information and/or technical information we obtain from you via this website may be disclosed to any potential or actual third party purchasers of such assets and/or may be among those assets transferred.

What is Konami's policy regarding children?

In compliance with the Children's Online Privacy Protection Act, 15 U.S.C. §§ 6501-06 and 16 C.F.R. §§ 312.1-312.12, with the exception of the Konami Card site, Konami does not permit children under 13 years of age to become registered users, and we do not collect information from children. By using any portion of our website(s) other than the Konami Card site, you represent that you are not under 13 years of age. You can review the Privacy Policy and information collection practices concerning the Konami Card site by clicking [here](#).

What is Konami's policy regarding links to third party sites?

You should be aware that while you are on our website, Konami may reference or provide links to third party sites. Konami does not control, nor are we responsible for, the privacy policies or information practices of such third parties or their websites. Because we cannot guarantee that the privacy policies of

such third party websites meet our high standards and the requirements of the ESRB Privacy Online Program, we recommend that you read the privacy policies posted on these sites before you submit any personal information via such third party sites.

Can I choose how my personal information is used?

If you do not want Konami or any third party to send you product updates and other company information, and/or if you prefer not to have Konami share your personally identifiable information with third parties, please opt-out from these services at the time of registration or information collection on the Konami website. If you have opted-in and, at a later time, you wish to opt-out, please contact us, at any time, via e-mail at webinfo@konami.com. Alternatively, we will be happy to honor any such opt-out requests made by regular mail to:

Konami Digital Entertainment, Inc.
Attention: Website Administrator
2381 Rosecrans Ave. Suite #200
El Segundo, CA 90245

How can I access my personal information?

We strive to maintain the accuracy of any personally identifiable information that may be collected from you on this website, and will use our commercially reasonable efforts to respond promptly to update our database when you tell us the information in our database is not accurate. It is your responsibility to ensure that such information is accurate, complete and up-to-date. If you have registered to use the message board on our website and wish to update your profile, you may do so online by visiting the "profile" section found at each game forum on our website. You may be required to submit your login name and password before you can access your profile information.

If you wish to review, update, or delete any other personally identifiable information that we may have collected about you, please contact us via e-mail at KDEonline@konami.com, or by regular mail at:

Konami Digital Entertainment, Inc.
Attention: Website Administrator
2381 Rosecrans Ave. Suite #200
El Segundo, CA 90245

Your California Privacy Rights

Since 2005, California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of personally identifiable information to third parties for direct marketing purposes. For inquiries regarding our disclosure policy, please write us:

Konami Digital Entertainment, Inc.
Attention: Website Administrator
2381 Rosecrans Ave. Suite #200
El Segundo, CA 90245
webinfo@konami.com

What safeguards does Konami use to protect my personal information?

Konami maintains appropriate safeguards that ensure the security, integrity and privacy of the personally identifiable information we collect from our users. Personally identifiable information collected by Konami

is stored in secure operating environments that are not available to the public and is only accessible by authorized employees. We also have security measures in place to protect the loss, misuse and alteration of the information under our control (i.e., maintain data quality). Before we allow website users to access their personally identifiable information, for example, we verify their identity by prompting them to submit information such as their login name and password.

In addition, we take reasonable steps to ensure that third parties to whom we disclose personally identifiable information (as described above) provide sufficient protection of such personally identifiable information.

Nonetheless, please be aware that Internet data transmission is not always secure and we cannot warrant or guarantee that information you transmit utilizing our website is secure. Because security is important to both Konami and you, we will always make reasonable efforts to ensure the security of our systems.

How do I ask a question or file a complaint?

If you have any questions, complaints or comments regarding our Privacy Policy Statement or practices, please contact us via email at webinfo@konami.com or by regular mail at:

Konami Digital Entertainment, Inc.

Attention: Website Administrator
2381 Rosecrans Ave. Suite #200
El Segundo, CA 90245

You can also contact ESRB Privacy Online directly at www.esrb.org/privacy/contact.jsp or at:

ESRB

Attn: Director, Privacy Online
317 Madison Avenue, 22nd Floor
New York, NY 10017
privacy@esrb.org

Effectiveness of this Privacy Policy

This Privacy Policy is effective as of August 19, 2010. We reserve the right, at any time, to modify, alter, update or make changes to this policy and any such modifications, alterations, updates or changes will be effective upon posting. Please check back from time to time to ensure you are aware of these changes. In the event we modify this Privacy Policy, your continued use of this website will signify your acceptance of the modified Privacy Policy.