



Privacy Policy

SEGA of AMERICA'S ONLINE PRIVACY POLICY

Sega of America, Inc. (collectively, "Sega" or "we") respect the privacy rights of our online visitors and are committed to protecting the personal information collected about you. To further this commitment, we have adopted this Online Privacy Policy ("Privacy Policy") to guide how we collect, store, and use the information you provide us.

This Privacy Policy Statement and the certification seal located on this page confirms that Sega 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 sites and other enforcement and accountability mechanisms administered independently by the ESRB.

Because the website you have come from displays the ESRB Privacy Online certification seal, this Privacy Policy will tell you:

- * The scope of this Privacy Policy;
- * Exactly what information Sega may collect from you online;
- * How Sega will use the information it collects;
- * What are the consequences if you refuse to provide your personal information to Sega when requested;
- * Whether Sega uses cookies, tracks IP addresses, or uses other passive means to collect information about your visit our websites;
- * Who collects the information that you disclose on a Sega website;
- * Sega's policy regarding links to websites operated by other companies;
- * How you can view, and if necessary, update or delete the personal information Sega has already collected and stored about you;
- * The steps Sega takes to ensure the security, quality, and integrity of the personal information it collects from online visitors;
- * The information you need to ask a question or file a complaint regarding this Privacy Policy or Sega's online information practices; and,
- * Sega's policy regarding the collection of information from children under 13.

The scope of this Privacy Policy:

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

www.sega.com
www.segamobile.com

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

Please note that this Privacy Policy applies only to information submitted and collected by Sega online through the websites listed above, and does not apply to information



that may be collected by Sega offline. In addition, this Privacy Policy applies to Sega only, and not to websites maintained by our international affiliates or by other companies or organizations to which we link. When you link to these websites or to any other sites from a website operated by Sega (as listed above), this Privacy Policy no longer applies. Sega is therefore not responsible for the content or activities provided on such sites.

By using and submitting personal information to any of our websites, you signify your assent to Sega's Online Privacy Policy. If you do not agree to this Privacy Policy, please do not use our websites. We reserve the right to make changes to this Privacy Policy. If we make a material change to this Privacy Policy, we will notify you by posting the change on our websites or in this Privacy Policy and, if necessary, give you additional choices regarding such change. Please check back from time to time to ensure that you are aware of these changes. Your continued use of our websites will signify your acceptance of these changes.

What types of information does Sega collect?

In order to give you the best experience on our websites, Sega may collect information about you, but only if you voluntarily provide it to us. Typically, we may ask you to submit personal and/or demographic information if you decide to:

- * Register on one of our websites;
- * Subscribe to a Sega newsletter (e.g., Sega NewsBlast);
- * Access and participate in message boards;
- * Participate in an online contest, tournament, or other event;
- * Email a question to our customer service desk;
- * Register a product online; and/or,
- * Purchase a product or service online (e.g., Phantasy Star Online subscription).

Please note that before you can use some of the activities above, you may be required to register. The ability to access certain areas and features of our websites by simply logging in is only available to those web users that have already created a username and password during an earlier visit to one of our websites.

The types of personal information collected in conjunction with the activities listed above will vary depending on the activity. The requested information may include: (i) your name, (ii) mailing address, (iii) telephone number, (iv) email address, and, for those purchasing products or services online, (v) credit card and billing information.

For some activities, we may also ask you to create a username and password and to provide other non-personal information such as: (i) your age or date of birth; (ii) your gender; (iii) your game and platform preferences; (iv) information about the hardware you may own and/or the game you may have recently purchased; (v) your favorite quotes, websites, and fan pages; and, (vi) other game-related information (collectively referred to as "demographic information"). If demographic information is collected for an activity that also requires personal information, we may combine your demographic information with your personal information.



How does Sega use the information it collects?

Generally, information that we collect for a particular purpose is used for that purpose only. For example, if you email us a question using our online Customer Service form, your personal information will only be used to provide a response to your inquiry. Similarly, information collected from those who register on one of our websites account is used to provide registrants the benefits that come along with registration, which often include a subscription to our newsletter, access to the latest game news and special offers, contests, and other features. In some instances, however, you may also be given the option to have your information used for an activity or service different from the activity or service that you are requesting (e.g., have your email address added to our newsletter mailing list when entering a contest). If you choose to receive these additional services, we will use your information to provide them to you. If you choose to opt-in to receive e-mails from one of our partner companies (during registration for or participation in one of these events), we encourage you to visit such partner's website and read their policy before agreeing to provide your information to them.

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 personal 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.

We may use your email address to send you service announcements that tell you about updates to our Privacy Policy, changes in pricing, changes to our online service or customer service policies, and other related service changes.

In addition, personal and/or demographic information collected through one of the activities set forth above may be used for our internal marketing and demographic studies, so we can constantly improve the online products and services we provide you and better meet your needs. Additionally, we may use information that we collect to ensure that someone who is cheating is excluded, and to enforce our rights under our Terms of Service.

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.

Please be advised that information submitted by individuals acting solely in a business capacity (e.g., resume from job applicant) is not subject to this Privacy Policy. However, we want to assure you that information obtained from your resume will be used solely for the purpose of accepting and evaluating your submission for a job opening.

A Special Note about our Message Boards

Please note that whenever you give out personal information in public areas such as on our message board, that information can be collected and used by people you don't know. While we strive to protect those who wish to participate in these activities, we cannot guarantee the security and privacy of any information that you post in these areas.



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

If you choose not to submit personal information when requested, you may not be able to use many of the features offered on our websites. For example, if you were to refuse to disclose your name or email address, you would not be able to register a product online or submit a question to customer service. However, to simply browse and view certain content on our websites, you do not need to give us any personal information.

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

Cookies

We may use cookies on our websites. A "cookie" is a small bit of record-keeping information that sites often store on a user's computer. Cookies are typically used to quickly identify a user's computer and to "remember" things about the user's visit. For example, Sega uses cookies to keep track of your preferences and your username and password. Information contained in a cookie may be linked to your personal information for this purpose. You can disable cookies or set your browser to alert you when cookies are being sent to your computer, although this may affect your ability to use many of the features on our websites.

IP Addresses

An Internet Protocol (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. Although we do not generally collect IP addresses, we may collect and use your IP address when we feel it is necessary to protect our service, websites, customers, or others.

MAC Addresses

If you play a Sega video game online, we may collect your MAC address, which is a unique number associated with a computer's identity on a network.

Log Files

The only other information that may be passively collected by Sega is in the form of logs - files that record website activity, including how many "hits" a particular web page is getting (a.k.a. "navigational data"). These entries are generated anonymously, and enable Sega to gather statistics about users' browsing habits, assess overall website activity, track interest in advertised sales, and maintain website security. We also use the log file entries for our internal marketing and demographic studies, so we can constantly improve the online services we provide you. Log files are used internally only, and may be combined with data collected via cookies to help us aggregate behavior patterns of registered users.

Who is collecting my personal information and is it shared with anyone?

Generally, the information that you disclose on a Sega website is collected by Sega or by a vendor on Sega's behalf, and is used in accordance with the practices set forth above. Vendors (or agents) are entities that provide support for the internal operations of our websites and who only use the information we share with them for the purpose



of carrying out the service you've requested (e.g., newsletter delivery and fulfillment of online purchases and contest entries).

From time to time, we may run contests, tournaments, or other events or activities ("events") on our websites. Information collected for these events may include personal information such as your email address and may be collected by or shared with a third party sponsor or co-sponsor or shared with other reputable third party (that provides products or services that may be of interest to you). While we have no control over the third party's use of such information, we will attempt to ensure that they agree to protect the confidentiality, security, and integrity of any personal information collected through our website. If you do not want your information to be collected by or shared with a third party, you can choose not to participate in these events at the time the information is collected.

We may disclose personal information in the good faith belief that we are required to do so by law, including but not limited to disclosure to law enforcement or other government officials in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose you or us to legal liability.

In addition, in the event of a merger, acquisition, reorganization, bankruptcy, or other similar event, Sega's customer information may be transferred to its successor or assign, if permitted by and done in accordance with applicable law.

Sega may also share aggregate information about our visitors within the Sega family such as with ESPNVideogames. For example, we may say a particular game title's audience is X% female and Y% male. This data is used to customize the content and advertising of Sega's websites to deliver better experience for our visitors. It can also help tailor Sega's products and services to meet the needs of our customers.

Sega sends to your web browser most of the advertisements you see when you visit our websites. However, Sega may allow other companies, called third party ad servers, to serve advertisements within our web pages. This Privacy Policy does not apply to, and cannot control the activities of, these other companies. If you want to prevent a third party ad server from sending or reading cookies on your computer, you must visit each of the company's websites individually and opt-out.

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

You should be aware that while you are browsing one of our websites, you may be directed to other sites that are beyond our control and for which we are not responsible. Because we cannot guarantee that the privacy policies of such sites meet our high standards and the requirements of the ESRB Privacy Online Program, we recommend that you read the privacy policy of the website to which you link before you submit any personal information. Can I choose how my personal information is used?

If you do not want to receive our newsletters (such as the Sega NewsBlast) or other email communications from Sega, please opt-out from these services at the time of registration or information collection. If you have opted-in and, at a later time, wish to opt-out, please use one of the following two methods to opt-out:

1. To opt-out of receiving emails, simply go to the site (either Sega.com or



ESPNVideogames.com) and follow the instructions on that particular site.

2. Click the "unsubscribe" link at the bottom of your most current email from Sega. You will either be presented with an email to send us your unsubscribe request, or be taken to a web page on which you can confirm your unsubscribe request. On the web page, click the appropriate link to unsubscribe from the Sega email list. Either of these methods will unsubscribe you from the Sega email list. If you are experiencing problems with opting out, please contact Sega at privacy@segaamerica.com.

How can I access my personal information?

If you wish to view, correct, or delete the personal information collected about you, or you wish to subscribe or cancel your subscription to our promotional emails and newsletters, you can easily do so online. To modify your Phantasy Star Online account info, please go to the Phantasy Star Online website, log in using your current username and password, select the areas you wish to change, and edit or delete your information. The information you delete online will be immediately removed from our database. If you are experiencing problems with changing your information online, you may contact us at privacy@segaamerica.com.

What safeguards does Sega use to protect my personal information?

Sega maintains appropriate safeguards that ensure the security, integrity, and privacy of the personal information we collect and store about you. These safeguards include, among other things, limiting access to such data to those employees performing a legitimate business function; technical security measures, such as encryption or passwords, to prevent unauthorized access; and the storage of data on secure servers or computers inaccessible by modem.

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 web users to access their personal information, for example, we verify their identity by requesting that they submit information such as their username and password. We also take reasonable steps to ensure that third parties to whom we transfer personal information provide sufficient protection of such data.

How do I ask a question or file a complaint? (Contact Information)

If you have any questions, complaints, or comments regarding this Privacy Policy or our information collection practices, please contact our Privacy Policy Administrator at (800) 872-7342, via email at privacy@segaamerica.com, or by writing to:

Sega
Customer Service Department
650 Townsend Street, Suite 650
San Francisco, CA 94103-4908



Sega is a licensee of the ESRB's Privacy Online Program. If you believe that we have not responded to your inquiry or your inquiry has not been satisfactorily addressed, please contact ESRB at http://www.esrb.org/privacy_wc_hotline.asp.

ESRB
Attn: Privacy Online Program
317 Madison Avenue, 22nd Floor
New York, NY 10017
212-759-0700
privacyinfo@esrb.org

Sega's policy regarding children under 13:

We do not knowingly collect personal information such as name and email address from children 12 years old and under. From time to time, certain portions of our websites (e.g., a contest entry form) may allow all users (including children under 13) to disclose a limited amount of personal information without first telling us their age or parental permission. Such portions of our sites operate activities or provide services in a way that does not require prior parental consent.

We recognize the importance of safeguarding the privacy of children and encourage parents to check and monitor their children's use of online activities regularly.