

# Delete Requests and User Subject Rights Requests under CCPA

For Publishers

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(CCPA Effective Date: January 1, 2020)

## What is required under CCPA?

CCPA provides consumers with the right to opt out of sale, the right to request access to their data, and the right to request deletion. Users frequently request access to data or request data deletion after a transaction has occurred, and the request applies to their historical data, so these requests occur outside of the signals framework used for opting out of sale. Publishers may send requests for data access or data deletion to Rakuten Advertising; requests with the necessary information provided will be honored within the required deadline of 45 days.

## What Personal Information does the company capture?

Rakuten Advertising does not capture any personal information (PI) from Publishers at any point in our process. The company also does not capture directly identifiable information such as username, email address, mailing address, or phone number.

When a click on an Affiliate link occurs, or when a Programmatic ad serves an impression, we create our own user ID, the RMUID, which is associated with that user and is considered PI under CCPA.

**Publishers or Advertisers may pass Rakuten the following information that may be considered PI under CCPA when linked to an RMUID:**

- RMUID (Rakuten Advertising-generated)
- U1 – unique click ID (from Publisher)
- Order ID (from Advertiser)

## How do I submit a User Subject Rights or Delete Request to Rakuten Advertising?

Please send validated subject rights request and delete requests to:

[rm-subjectrequests@mail.rakuten.com](mailto:rm-subjectrequests@mail.rakuten.com)

Delete requests must contain the user's U1 or click ID or RMUID. Without one of these identifiers, we will be unable to locate and delete records associated with that user. We ask that our Publishers please not transmit any other user personal information (such as name, address, e-mail address, or phone number) to Rakuten Advertising in order to protect user privacy.