

# PRIVACY AND COOKIES POLICY

This Privacy and Cookies Policy applies to the Sony Pictures Entertainment (a division of Sony Corporation) websites, apps, and online features (“**Content**”) that link to this Privacy and Cookies Policy (“**Policy**”). In this Policy, we use “**SPE,**” or “**we,**” “**us,**” and “**our**” to collectively refer to the Sony Pictures Entertainment entities. Together with Sony Pictures Entertainment Inc., the SPE entity responsible for a particular site or app (the data controller) can be located by clicking here. **Sony Pictures Entertainment Inc.**’s corporate offices are located at 10202 West Washington Boulevard, Culver City, California 90232 USA. You can also learn more about cookies and similar technology which we use in this Policy by reviewing the terms below.

## **KEY POINTS**

- We use personal data to allow you to use the features in the Content, to process your registration, and to provide you with requested Content related to our movies and other offerings. [Click here to learn more.](#)
- If you give us your permission or consent, we will send you news and promotional material about SPE. You can change your mind at any time and ask us not to process your personal data for direct marketing purposes, including profiling related to direct marketing. You can ask us to stop processing this data.
- We provide interactive features that engage with social media sites, such as Facebook and Twitter. If you use these features, these sites will send us personal data about you. [Click here to learn more.](#)
- We use cookies and other tracking technologies to personalise Content and advertising and to make our Content function better. To learn about our use of tracking technologies [click here.](#)
- Most of our Content is not designed for children. We may ask for your age before you can sign up to receive newsletters or to use our Content. [Click here to learn more.](#)
- When you make a purchase from one of our sites or apps, we will use your personal data to fulfil your order. We will disclose your personal data to our third-party partners to process your payment and perform some of the other fulfilment on our behalf. [Click here to learn more.](#)
- We disclose your personal data publicly when you post user-generated content via our sites or apps. We disclose personal data when you agree that we can share data with our business partners or other Sony Group Corporation affiliates. We also share data with third parties we engage to process data on our behalf or when such sharing is required by law, or in certain other situations. [Click here to learn more.](#) We take steps to ensure that such affiliated entities and third parties adopt and maintain appropriate security measures to protect such data from unauthorized access or processing.
- We may transfer your personal data to the United Kingdom, European Union and/or the United States. We use European Commission approved standard contractual clauses to protect your personal data. [Click here to learn more.](#) We apply the highest standard of protection towards ensuring the safety of the data collected. By signing or proceeding with the service, the user consents to the transfer and other terms in the policy and terms of use.

1.

## **1. HOW WE USE YOUR INFORMATION**

We use personal data collected via our Content:

- **(1) To fulfil a contract, or take steps linked to a contract;**
  - a. To process your registration on a site or app, or entry into a competition, prize draw or contest
  - b. To send you information about changes to our terms or policies
  - c. To process your payment and fulfil your purchased order
- **(2) Where this is necessary for the following purposes:**

- a. To provide you with access to Content and features in the sites and apps
- b. To send you information you have requested
- c. To ensure the security of our sites and apps, by trying to prevent unauthorised or malicious activities
- d. To enforce compliance with our Terms of Use and other policies and to help other organisations (such as copyright owners) to enforce their rights
- e. To tailor Content, advertisements and offers for you.
- (3) **Where you give us consent:**
  - a. Where you ask us to send marketing information to you via a medium where we need your consent (for example, email marketing)
  - b. Where you give us consent to place cookies and to use similar technologies
  - c. On other occasions where we ask you for consent, for a purpose which we explain at that time.
- (4) **For purposes which are required by law:**
  - a. Where we need parental consent to provide online services to children under 18. Most of our sites and apps are not designed for children under 18.
  - b. In response to requests by government or law enforcement authorities conducting an investigation.

We retain personal data for so long as we think is reasonably necessary for the purposes described above.

We may collect sensitive personal data about you. This includes your property details with respect to your location and your sex.

## **2. INFORMATION WE RECEIVE FROM THIRD PARTIES**

Sometimes, we receive information about you from third parties. For example, if you login to a site or app using Facebook Connect you will be asked if you wish to share information from your Facebook account with us. If you participate in a game or other feature where your score is posted on a social media content, or if you use a "like" or a "share" button for a feature on our sites or apps, then the third party will share information with us.

If you participate in activities on non-SPE sites or apps - such as participating in a Facebook application - you may allow us to have access to personal data held by Facebook, or other site or app owners.

We will also receive personal data about you if individuals give us access to their profiles, or similar features, on non-SPE sites or apps, and you are one of their "connections".

Some of our Content has 'send to a friend' features. The 'send to a friend' feature is when users can ask us to send features to their friends. If a friend asks us to send you a feature, then we will process your contact details (i.e. email address). The contact details are only used to send you the feature and we do not retain the contact detail. If you want to use this feature, you should only provide your friend's contact details to us when you know they would like to hear from us. Your friend will know that you provided their contact details to us. If we provide online services to a child where we need parental consent for this, we may ask for a parent's email address, in order to obtain the consent.

## **3. COOKIES AND SIMILAR TRACKING TECHNOLOGY**

Cookies and similar tracking technologies allow us to recognise you when you visit a site, or app, or open an email - they do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving your experience.

We use tracking technologies for three purposes:

- **A. To provide you with the service you have requested:** for example, keeping you logged in during your visit and ensuring security of the Content.
- **B. To show adverts that are more relevant to your interests:** for example, with your consent, we use tracking technologies to remember Content that has interested you and then use this to help us serve more relevant ads to you, including when you are on another site. Tracking technologies also help limit the number of times that you see an ad, measure the effectiveness of advertising campaigns and help us and others track

whether ads have been properly displayed so we can pay for this. We also allow other organisations to use tracking technologies for these advertising purposes too.

- **C. To analyse and improve your experience:** to analyse which Content is most popular and gets viewed the most and which gets viewed the least on our websites and in our emails (where you have chosen to receive emails from us), and to provide us with general information about users of the Content (such as age, gender and interest areas). We also check for bugs and glitches in the Content and remember the choices you have made, such as your language or region, to enhance and personalise your experience. We use analytics services provided by Adobe and Google to help us do this. If you don't want us to use information about your visits in this way, click [here](#) for Adobe and [here](#) for Google, to opt-out of their services.

### ***How to manage tracking technologies***

If you are using our Content via a browser you can change your cookie preferences and withdraw your consent at any time using the [Cookie Consent Tool](#).

In addition:

- the Help menu on the menu bar of most browsers tells you how to prevent your browser from accepting new cookies, how to delete old cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether
- you can opt-out of analytics as described above.

We use Flash cookies to provide some Content such as video clips or animation. Flash cookies are managed through the Flash Player Settings Manager, which is a different interface than the one provided by your web browser. This Settings Manager lets you manage global privacy settings, storage settings, security settings, and automatic notification settings. Beginning with Flash Player 10.3, the Flash Player Settings Manager can be accessed locally on your computer: in the Control Panel on Windows and in System Preferences on Mac. Users of other operating systems and earlier versions of the Flash Player should manage their global privacy settings using the Flash Player Settings Manager are provided online from Adobe by clicking [here](#).

### **PS4, Apple iOS and Android Devices**

By accessing certain applications from these devices, you consent to cookies being stored to your device for the following purposes: keeping you logged in, managing parental control PINs, analytics and advertising. These cookies are essential to the operation of the application. It is not currently possible to opt out or remove these cookies from the devices without deleting the application.

### **4. HOW WE SHARE YOUR PERSONAL DATA**

If we ask you for consent to share your personal data with third parties for their own marketing purposes, and if you give consent, we will share personal data with these third parties. We do not share your personal data with third parties for their own marketing unless you agree to this.

If you register for a promotion, such as a competition, prize draw or contest, which is administered by a third party, your personal data will be disclosed to the organiser for them to administer the promotion. This may also mean that your personal data will be included on a winners list.

If you submit user-generated content to a site or app this will be disclosed publicly. We share data with third parties who perform functions on our behalf, such as hosting or operating our site and apps, sending e-mails, and carrying out data analysis. Where you make a purchase on one of our sites or apps, we will share your personal data with third parties to process your card payment and deliver your order.

We share your personal data with other SPE entities, which are involved when we process data for the purposes listed at section 1 above. Where you give permission via the

registration process or cookie consent tool, we will also share your personal data with other Sony Group Corporation affiliates for them to use for direct marketing purposes.

SPE or any of its assets, including the Content, may be sold, or other transactions may occur in which your personal data may be considered one of the business assets of the transaction. In this case, your personal data may be transferred, either as part of the transaction or during any due diligence process.

We share information with government and law enforcement authorities and with other parties involved in, or contemplating, legal proceedings to comply with a legal obligation, when we believe in good faith that the law requires it, or where this is necessary for us or for third parties to protect our or their rights, property, safety, or security.

## **5. TRANSFER**

Our sites and apps are hosted and operated in the United States. Your personal data will be transferred to and processed in the United States, and may be also transferred to and processed in the United Kingdom and European Union where the privacy laws may not provide an equivalent level of protection to those in your home country. We use Standard Contract Clauses approved by the European Commission to protect your personal data. We are aware that the Nigerian Data Protection Regulation requires that transfer of personal data should be carried out under the supervision of the Honourable Attorney General of the Federal Republic of Nigeria (HAGF) who will assess the location where the data is to be transferred to and determine whether such jurisdiction provides adequate protection. We confirm that we have not obtained the adequacy decision of the HAGF but also confirm that we apply the highest standard of protection towards ensuring the safety of the data collected. By signing or proceeding with the service, the user consents to the transfer without the aforementioned adequacy decision. If you would like a copy of those or have other queries, please contact us.

## **6. AMENDING OR REMOVING YOUR PERSONAL DATA, CONTROLLING MARKETING COMMUNICATIONS, OTHER PRIVACY QUESTIONS AND RIGHTS**

You have the right to access your personal data and, if necessary, have it amended, corrected or deleted in instances where it is false or misleading, or restricted. You may also ask us to provide some types of personal data to you, or another organisation nominated by you, in a structured and machine-readable format. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.

Where we need to collect personal data under law or under the terms of any contract we have with you and you fail to provide the personal data when requested, we may not be able to perform the contract we have entered into or are trying to enter into with you for the provision of our offerings or online services. In such a case, we may have to cancel or refrain from providing the offerings or online services to you. We will however notify you of this at such time.

You can also ask us not to send marketing communications and not to use your personal data when we carry out profiling for direct marketing purposes. You can opt-out of receiving email newsletters and other marketing communications by following the opt-out instructions provided to you in those emails. If you sign up to receive SMS or MMS messages, you can unsubscribe from those messages received by replying "STOP." Transactional account messages will be unaffected if you opt-out from marketing communications.

This Privacy and Cookies Policy applies to a number of Sony Pictures Entertainment companies. Together with Sony Pictures Entertainment Inc. (10202 W. Washington

Boulevard, Los Angeles, California, 90232 USA), the company which is responsible for a particular site or app (the data controller) is listed below:

**SONY PICTURES ENTERTAINMENT GROUP  
DATA CONTROLLERS**

***References to the Sony Pictures Entertainment entities or SPE entities shall include (without limitation) the following:***

<b>Country</b>	<b>Sony Pictures Entertainment entity</b>	<b>Address</b>
Austria and Germany	Sony Pictures Entertainment Deutschland GmbH	Art Deco Palais-000, Munich, Germany  Company Number: HRB 128797  VAT Number: DE 114 212 328
Belgium and the Netherlands	Sony Pictures Entertainment Benelux BV	Bergweg 62, 1217 SC Hilversum, Netherlands  Company Number: 34296878  VAT Number: NL819149287B02
Bulgaria, Czech Republic, Hungary, Ireland, Romania, Slovakia, Slovenia, Norway, Finland, Sweden, Greece and Denmark	Columbia Pictures Corporation Limited	The Brunel Building, 2 Canalside Walk, London W2 1DG, United Kingdom  Company Number: 242372  VAT Number: 3543031 85
Estonia, Latvia, Lithuania and Romania	SPTI Networks Eastern Europe (UK) Limited	The Brunel Building, 2 Canalside Walk, London W2 1DG, United Kingdom  Company Number: 06342613  VAT Number: GB919 6372 91
France	Sony Pictures Entertainment France SAS	3, rue La Boetie, Paris, 75008, France  Company Number: 390 293 835 00075  VAT Number: FR 46 390 293 835

Italy	Sony Pictures Entertainment Italia S.r.l.	Via Leone XIII 95 - 00165 Roma, Italy  Company Number: 00393640586  VAT Number: IT00877721001
Poland	Columbia Pictures Corporation Limited	The Brunel Building, 2 Canalside Walk, London W2 1DG, United Kingdom  Company Number: 242372  VAT Number: 3543031 85
Portugal and Spain	Sony Pictures Entertainment Iberia SLU	Pedro de Valdivia, 10, Madrid 28006, Spain  Company Number: B82011743  VAT Number: ESB82011743
United Kingdom (excluding Silvergate)	Columbia Pictures Corporation Limited	The Brunel Building, 2 Canalside Walk, London W2 1DG, United Kingdom  Company Number: 242372  VAT Number: 3543031 85
United Kingdom (Silvergate)	Silvergate Media Holdings Limited	York House 4 <sup>th</sup> Floor 23 Kingsway London WC2B 6UJ  Company Number: 07767497  VAT Number: 115 1499 28

The websites and mobile apps operated by the following businesses target more than one country:

<b>Business name</b>	<b>Sony Pictures Entertainment entity</b>	<b>Address</b>
Funimation	Funimation Global Group, LLC	1200 Lakeside Parkway, Building 1, Flower Mound, Texas 75028, USA

Sony One app	Columbia Pictures Corporation Limited	The Brunel Building, 2 Canalside Walk, London W2 1DG, United Kingdom Company Number: 242372 VAT Number: 3543031 85
Games	Sony Pictures Entertainment Inc.	10202 West Washington Boulevard, Culver City, California 90232 USA
Manga	Manga Entertainment Limited	The Brunel Building, 2 Canalside Walk, London W2 1DG, United Kingdom Company Number: 02202664 VAT Number: 239771961

For more details or any privacy questions please contact us by email at [SPE\\_EU\\_Privacy\\_Contact@spe.sony.com](mailto:SPE_EU_Privacy_Contact@spe.sony.com) or write to us at the relevant address of the entity listed here. You also have a right to submit a complaint to a supervisory authority for data protection in the country where you live, where you work, or where you consider that a breach of data protection has occurred – although we hope that we can assist with any queries or concerns you may have about our use of your personal data.

## **7. CHANGES TO THIS POLICY**

We reserve the right to change the terms of this Privacy and Cookies Policy at any time, by prominently posting notice of the amendment on the site or app. To the extent permitted by law, these changes will apply from the time they are posted.

Effective Date: This Privacy and Cookies Policy is effective as of XX, 2020.

