

PRIVACY AND COOKIES POLICY

This Privacy and Cookies Policy applies to the Sony Pictures Entertainment (a division of Sony Corporation) websites 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 [Sony Pictures Entertainment entities](#). You can also learn more about cookies and similar technology which we use in this Policy.

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 permission, 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. This Policy also explains when we process personal data, for our legitimate interests. You can ask us to stop processing this data. [Click here](#) to learn more about our legitimate interests, your rights and how you can exercise them.
- 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 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 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 transfer your personal data to the United States. We use standard contractual clauses approved by the European Commission to protect your personal data. [Click here to learn more.](#)

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 purchase order
- **(2) Where this is necessary for purposes which are in our or third parties' legitimate interests.** These interests are:
 - 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 companies (such as copyright owners) to enforce their rights
 - e. To tailor Content, advertising and offers to 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 (e.g. 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 16, or the [relevant age below which parental consent is required](#).
 - 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.

2. INFORMATION WE RECEIVE FROM THIRD PARTIES

Sometimes we receive information about you from third parties. For example, if you log in 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 lets users 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 details. If you want to use this feature, you should only provide your friend’s contact details to us if you are sure 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 that require us to obtain parental consent, 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 many different jobs, such as letting you navigate efficiently between pages, remembering your preferences and generally making your internet experience more enjoyable.

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 the 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, even when you are on another site. Tracking technologies also help limit the number of times that you see a particular 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 on our sites and in our emails (where you have opted to receive email from us), and which Content gets viewed the least, 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 with the browser. 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, which is provided online by Adobe here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager06.html

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, for 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 list of winners.

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 emails, 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 Corporation affiliates](#) for them to use it 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, where the privacy laws may not provide an equivalent level of protection to those in your home country. We use standard contractual clauses which have been approved by the European Commission to protect your personal data. If you would like a copy of these clauses or have any other queries, [please contact us](#). Also, if you register with us, we will ask for your consent to transfer your information to the United States.

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 or deleted or restricted. You may ask us to provide some types of personal data to you, or another organisation nominated by you, in a structured and machine-readable format.

You may also ask us not to send promotional 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 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 receiving these messages by replying "STOP". Transactional account messages will be unaffected if you opt out from marketing communications.

This Privacy and Cookies Statement 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 responsible for specific sites or apps (the data controller) is listed below:

Games

Sony Pictures Entertainment Inc. If you would like more detailed information or have any questions about data protection, please contact your local SPE office, the address of which is given below.

Websites and mobile apps

Country	Sony Pictures Entertainment Company	Address
Germany, Austria and Switzerland	Sony Pictures Entertainment Deutschland GmbH	Kemperplatz 1, 10785, Berlin, Germany
Belgium and the Netherlands	Sony Pictures Entertainment Benelux BV	Bergweg 62, 1217 SC Hilversum, The Netherlands
Bulgaria, Czech Republic, Hungary, Romania, Slovakia and Slovenia	Columbia Pictures Corporation Limited	Sony Pictures Europe House, 25 Golden Square, London W1F 9LU, United Kingdom
Estonia, Latvia, Lithuania and Romania	SPTI Networks Eastern Europe (UK) Limited	Sony Pictures Europe House, 25 Golden Square, London W1F 9LU, United Kingdom
France (excl. TV shows)	Sony Pictures Entertainment France SAS	3, rue La Boetie, Paris, 75008, France
France (TV shows)	Sony Pictures Television Production France (SAS)	3, rue La Boetie, Paris, 75008, France
Italy	Sony Pictures Entertainment Italia SRL	Via Enrico Tazzoli, 6, 00195 Roma, Italy
Poland	Columbia Pictures Corporation Limited	Sony Pictures Europe House, 25 Golden Square, London W1F 9LU, United Kingdom
Portugal and Spain	Sony Pictures Entertainment Iberia SLU	Pedro de Valdivia, 10, Madrid 28006, Spain
United Kingdom	Columbia Pictures Corporation Limited	Sony Pictures Europe House, 25 Golden Square, London W1F 9LU, United Kingdom

Funimation

Funimation Productions, LLC, 1200 Lakeside Parkway, Building 1, Flower Mound, Texas 75028, USA

For more details or any privacy questions, please contact us by email at SPE_EU_Privacy_Contact@spe.sony.com or write to us at the relevant address of the entity listed above. 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 apply as soon as they are posted.

Effective date: This Privacy and Cookies Policy was updated on 25 May 2018 and became effective on the same date.

8. ABOUT US

The entity responsible for the processing of personal data on these internet pages is

Sony Pictures Entertainment Deutschland GmbH

Kemperplatz 1
10785 Berlin

Tel: +49 30 40369 5800

info@sonypictures.de

You can contact our data protection officer as follows:

spe.sony.com@extdsb.org

Tel.: 089 / 51 30 569-7, Fax: -8