

## **PRIVACY POLICY**

### **Sony Pictures Networks India Private Limited**

#### **Privacy Policy**

This Privacy Policy applies to the Sony Pictures Networks India Private Limited (“SPN”) web sites and online features that link to this Privacy Policy (each a “Site”). The Sites are offered by Sony Pictures Networks India Private Limited, Interface Building no.7, 4th Floor, Malad Link Road, Malad West, Mumbai 400064 and its subsidiaries or affiliated companies. (collectively, “SPN,” or “we,” “us,” and “our”).

Please read this Privacy Policy carefully as your use of this Site constitutes your consent to the processing of your Personal Data as described in the Policy. If you are younger than 18 years old of age, and you wish to provide us with your Personal Data to participate in a promotion or contest, you must read this Privacy Policy with your parent or guardian.

***“This document is published in accordance with the provisions of Rule 3 (1) of the Information Technology (Intermediaries Guidelines) Rules, 2011 that require publishing the rules and regulations, privacy policy and user agreement for access or usage of [www.sonyleplex.com](http://www.sonyleplex.com) (“Website”). “***

#### **SUMMARY OF KEY POINTS**

- We use Personal Data to allow you to participate in the features on the Site, to process your registration, and to provide you with other requested content related to our content and other offerings. [Click here to learn more](#)
- We provide interactive features that engage with third party social media sites, such as Facebook and Twitter. Any data that we obtain about your use of such features is subject to this Privacy Policy. Any data that the social media sites gather about you is subject to your terms with them. [Click here to learn more](#)
- We use cookies and other technologies to track the use of our Site. We allow third parties to place such technologies on our Site to allow them to display advertising and for other purposes. To learn about opportunities to choose not to allow cookies, [Click here to learn more](#)
- If you are under 18 years old, you must obtain the permission of your parent or guardian before participating in a contest or engaging in other activities. The only exceptions are if you simply sign up for a newsletter or request certain basic content. [Click here to learn more](#)
- We disclose your Personal Data publicly when you post User-Generated Content on the Site. We also disclose Personal Data when you request or agree to such sharing with business partners or other third parties, when we engage a third party to process data on our behalf, when such sharing is required by law, or in certain other situations. [Click here to learn more](#)

- This Site may be hosted on web servers in the other jurisdiction. Your use of the Site constitutes your consent to the transfer of Personal Data to any other jurisdiction that may not provide the same level of data protection as your home country. [Click here to learn more](#)

## **1. INFORMATION COVERED BY THIS PRIVACY POLICY**

### ***Information You Provide***

We may collect personal data, including your name, email or street address, date of birth, telephone number, your preferences and interests, or other information you provide to us or grant us access to ("**Personal Data/Information**") when you register for newsletters, communicate with us, or take part in interactive games, features or competitions. We may also collect any photographs, video images or other user-generated content that you may upload to the Site ("**User-Generated Content**" or "**UGC**"). The Sites may also ask you to provide other information about yourself, such as demographic information (gender, zip code, age, etc.) or certain information about your preferences and interests. If we combine demographic or other information we collect about you with Personal Information about you, we will treat the combined information as Personal Information. Please note that information submitted to the Sites via a "contact us" or other similar function may not receive a response. We will not use the information provided to contact you for marketing purposes unrelated to your request unless you agree otherwise.

### ***Information We Collect Automatically As You Access and Use the Sites***

Whenever you visit or interact with the Sites or SPN content, SPN, as well as any third-party advertisers, content providers and/or service providers, may use a variety of technologies that automatically or passively collect information about how the Sites are accessed and used ("**Usage Information**"). Usage Information may include, in part, browser type, operating system, the page served, the time, and the preceding page & video views. Usage Information is generally non-identifying, but if SPN associates it with you as a specific and identifiable person, SPN treats it as Personal Information.

SPN also automatically collects your IP address or other unique identifier ("**Device Identifier**") for the computer, mobile device, technology or other device (collectively, "**Device**") you use to access the Sites. A Device Identifier is a number that is automatically assigned to your Device when you access a web site or its servers, and our computers identify your Device by its Device Identifier. Some mobile service providers may also provide us or our third-party service providers with information regarding the physical location of the Device used to access the Sites.

The technologies used on the Sites to collect Usage Information, including Device Identifiers, include:

### ***Cookies and Other Tracking Technologies***

By using the Site, you consent to our cookies.

**Cookie:** A cookie is a data file placed on a Device when it is used to visit the Sites. A Flash cookie is a data file placed on a Device via the Adobe Flash plug-in that may be built-into or downloaded by you to your Device. Cookies and Flash Cookies may be used for many purposes, including, without limitation,

remembering you and your preferences and tracking your visits to our web pages. If you choose to disable cookies or Flash cookies on your Device, some features of the Sites may not function properly. The use of cookies on the Site allows you to enjoy more seamless visits and more accurately measures your behaviour on the Site. There are two types of cookies that we may use: session and persistent. Session cookies exist only during an online session. They disappear from your Device when you close the browser software. Persistent cookies remain on your Device after the browser has been closed. The cookies used on the Site do not identify you personally. They merely recognize your browser, unless you choose to identify yourself voluntarily. You may choose to identify yourself for any one of the following reasons: by asking the browser to remember your username and password, by responding to a promotional offer, or by personalizing a web page or requesting more information on a product or service.

**Web beacons:** (also known as clear gifs) are used in combination with cookies to help Site operators understand how you interact with their websites. A web beacon is typically a transparent graphic image (usually 1 pixel x 1 pixel) that is placed on a site or in an email. The use of a clear gif allows the Site to measure your actions in opening the page that contains the clear gif.

**Embedded Scripts:** An embedded script is programming code that is designed to collect information about your interactions with the Sites, such as the links you click on. The code is temporarily downloaded onto your Device from our server or a third party service provider, is active only while you are connected to the Sites, and is deactivated or deleted thereafter.

**Log File Information:** Our web servers automatically collect limited information about your computer's connection to the Internet, including your IP address, when you visit our site. Your IP address is a number that lets computers attached to the Internet know where to send you data -- such as the web pages you view. Your IP address does not identify you personally.

***How We Use Cookies and Web Beacons:***

SPN may use Cookies and Web Beacons for a number of purposes, including to:

- Provide general internal and customer analytics.
- Study traffic patterns in order to improve website performance, to customize the user experience, and to better match the users' interests and preferences. For example, SPN keeps track of the domains from which people visit, and also measures visitor activity on SPN websites. However, these tracking records are performed and maintained in ways that keep the data non-identifiable.
- Keep track of preferences you specify while you are using SPN products or services.
- Support security measures, such as requiring re-login into a SPN product or service after a certain amount of time has elapsed.

- If you login to our products through the Site, cookies can also be used to save the username so that we can process the saved login information and quickly log you into the product.
- Assist in identifying possible fraudulent activities.
- Tell if an email has been opened and acted upon.

***Controlling Our Use of Cookies:***

- You may configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences.
- The Adobe Flash Player is an application and web tool that allows rapid development of dynamic content. Flash (and similar applications) use technology to remember settings, preferences and usage similar to browser cookies. SPN employs Adobe Flash cookies in certain situations where we use Flash to provide some content such as video clips or animation. SPN does not use Flash cookies to serve interest-based advertising. 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 provided online from Adobe: *Put the new URL:* This Site may also use Google Analytics, a web analysis service of Google Inc. (“Google”). Google Analytics uses cookies, text files that are stored on your Device and allow an analysis of your use of the Site. If Google Analytics is used, the information generated by the cookie about your use of the Site (including the IP address) will be transferred to and stored on a server of Google in the US. Google will use such information to analyze your use of the Site, to create reports about the Site activities for SPN and to provide further services associated with the use of the Site and the internet. Furthermore, Google may transfer such information to third parties, to the extent legally required or if such third parties process the data on behalf of Google. In no event will Google associate your IP address with other information of Google. By using this Site, you consent to the processing of your information collected by Google as described above and for the purposes described above. Google Analytics can be disabled through this link: <http://tools.google.com/dlpage/gaoptout>.
- For further information about cookies you can visit [www.allaboutcookies.org](http://www.allaboutcookies.org). If you choose to decline cookies, you may not be able to login or use other interactive features of our Sites and features that depend on cookies.

## **2. MINOR'S PERSONAL DATA**

Certain Sites may attract individuals younger than 18 years old of age ("**Minor**" or "**Minors**"). On those Sites, SPN may collect the e-mail address and age of Minors in order to send them newsletters and engage in other limited activities. If you are a Minor, and you wish to provide us with your Personal Data for any other purposes, such as to participate in a promotion or contest, you must read this Privacy Policy with your parent or guardian and may not provide your Personal Data without obtaining first your parent's or guardian's prior consent. If we are notified or otherwise learn that a Minor has submitted Personal Data to us through any of our Sites other than under the conditions set forth above, we will delete that Minor's Personal Data. Children younger than 14 years of age may only surf the Site and play with features, but SPN does not knowingly collect data of users younger than 14 years of age.

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

We will use Personal Data collected through the Sites to: (1) allow you to participate in the features we offer on the Site; (2) process your registration and/or upload your UGC; (3) provide you with information that you request or agree to receive; (4) improve the Site and for internal business purposes; (5) contact you with regard to your use of the Site, and any changes to our policies; (6) tailor content, advertisements and offers we serve you; and (7) fulfil other purposes disclosed at the time you provide your Personal Data or otherwise with your consent.

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

We may share Personal Data with the following parties:

### ***When You Agree To Have Your Personal Information Shared***

While on our Site, you may have the opportunity to opt-in to receive information and/or marketing offers from someone else or to otherwise consent to the sharing of your Personal Data with a third party. If you agree to have your Personal Data shared, your Personal Data will be disclosed to the third party and the Personal Data you disclose will be subject to the privacy policy and business practices of that third party. You also may SPN specifically request, sometimes through your use of an interactive feature, a widget or an application, that we share your Personal Data with a third party and we will typically do so under those circumstances. In addition, if you choose to register for a promotion, such as a competition, prize draw or contest, your Personal Data may be disclosed to third parties for purposes of the administration of such promotion.

### ***Sweepstakes, Contests and Promotions.***

The Sites may offer sweepstakes, contests, and other promotions (each, a "**Promotion**") that may require registration. If you choose to enter a Promotion, your Personal Information may be disclosed to

third parties in connection with the administration of such Promotion, such as in connection with winner selection, prize fulfillment, and as required by law, such as on a winners list. By entering a Promotion, you are agreeing to the official rules that govern that Promotion, which may contain specific requirements of you, including, except where prohibited by law, allowing the sponsor and/or other parties to use your name, voice and/or likeness in advertising or marketing materials.

#### ***Personal Data That You Disclose Publicly on the Site***

You may submit UGC to the Site. Any such UGC will be disclosed publicly. This Privacy Policy does not apply to third party uses of any UGC after it is displayed on the Site.

#### ***Third Parties Providing Services on Our Behalf***

We may engage third parties to perform functions on our behalf, such as hosting or operating our Site, sending e-mail communications, and data analysis. We may share Personal Data with third parties in order for them to provide content or otherwise perform services for us, and we will require such parties to maintain appropriate security to protect such data from unauthorized access or processing.

#### ***Affiliate Sharing and Business Transfers***

We may share your Personal Data with other entities affiliated with us for internal reasons, primarily for business and operational purposes. SPN or any of its assets, including the Site, may be sold, or other transactions may occur in which your Personal Data is one of the business assets of the transaction. In such case, your Personal Data may be transferred. Hence, SPN reserves the right to disclose and transfer user information, including Personal Information in connection with a corporate merger, consolidation, restructuring, the sale of certain of SPN's assets, or other corporate change including, without limitation, during the course of any due diligence process.

#### ***Legal Protections and Other Disclosures***

We may transfer and disclose information, including your Personal Data, Usage Information and Device Identifier (including IP address), to third parties: to comply with a legal obligation; when we believe in good faith that the law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce the Site's Terms of Use or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to this Site or the public. Pursuant to valid requests by law enforcement agencies, we may also use Device Identifiers to identify users, and may do so in cooperation with copyright owners, Internet service providers, wireless service providers or law enforcement agencies, in our discretion. Such disclosures may be carried out without notice to you.

### **5. LINKS TO OTHER WEB SITES AND SERVICES, AND SPN CONTENT FOUND ON OTHER WEB SITES**

The Site may contain links that will direct you to other web sites or services that are operated and controlled by third parties. This includes links from advertisers, sponsors and partners that may use our

logo(s) as part of a co-branding agreement. We have no control over these third parties, and your use of their websites and features are subject to their privacy policies. SPN is not responsible for the privacy practices or business practices of any third party web site. In addition, SPN may place our widgets or other features on certain third party web sites. When we do so, any Personal Data that we obtain about you will be subject to this Privacy Policy.

## **6. INFORMATION YOU DISCLOSE PUBLICLY ON OUR SITES**

Our Sites may offer message boards, chat rooms, alternative reality games, multi-player games and other public areas (collectively, "**Community Forums**") where you can engage in social networking, interact with others, as well as have the opportunity to submit photographs, writings, music, video, audio recordings, computer graphics, pictures, data, questions, comments, suggestions or other content, including Personal Information (collectively, "**User Submissions**"). To participate in certain Community Forums, you may be asked to select a username, screen name or member name and password. Please do not use your real name or the real name of another person when selecting a username (or screen name or member name).

***Note that anything you post to a Community Forum is public*** -- others will have access to your User Submissions and may use it or share it with third parties. Information you choose to post or make available in the Community Forums may be viewed, collected and used by others. If you choose to voluntarily disclose User Submissions, the protections of this Privacy Policy will not cover such disclosure of information. Think carefully before you post and use caution before disclosing any Personal Information.

Also, functionality on the Sites may permit interactions between the Sites and a third party web site or service, such as enabling you to "like" a product on our Site or "share" content to other web sites or services. If you choose to "like" or "share" content on the Site or to otherwise post information from or via the Site to a third party's web site, service, feature or application, that information will become public and the third party may have access to information about you and your use of our Site.

User Submissions may be published online or offline in any media or format (currently existing or hereafter developed). We may also publish your name, voice, likeness and other Personal Information with your User Submissions, and SPN may use the content, or any portion of the content, for advertising, marketing, publicity and promotional activities. For full terms and conditions regarding User Submissions you submit to the Sites, please review our Terms of Use.

***"You shall not create, Submit, host, display, upload, modify, publish, transmit, update or share any information/ User Submission on the Site that—***

***(a) belongs to another person and to which the user does not have any right to;***

***(b) is grossly harmful, harassing, blasphemous defamatory, obscene, pornographic, pedophilic, libelous, invasive of another's privacy, hateful, or racially, ethnically objectionable, disparaging,***

***relating or encouraging money laundering or gambling, or otherwise unlawful in any manner whatever;***

***(c) harm minors in any way;***

***(d) infringes any patent, trademark, copyright or other proprietary rights;***

***(e) violates any law for the time being in force;***

***(f) deceives or misleads the addressee about the origin of such messages or communicates any information which is grossly offensive or menacing in nature;***

***(g) impersonate another person;***

***(h) contains software viruses or any other computer code, files or programs designed to interrupt, destroy or limit the functionality of any computer resource;***

***(i) threatens the unity, integrity, defense, security or sovereignty of India, friendly relations with foreign states, or public order or causes incitement to the commission of any cognizable offence or prevents investigation of any offence or is insulting any other nation”***

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

SPN may receive information about you from third parties. For example, if you are on another web site and you opt-in to receive information from SPE, that web site will forward to us your e-mail address and other information about you so that we may contact you as requested. You may also choose to participate in a third party application or feature on our Sites (such as logging in through Facebook Connect or otherwise linking the Sites with another web site or interactive service) or on a third party web site or service (such as one of our Facebook applications or a similar application or feature on a third party web site or service) through which you allow us to collect (or the third party to share) information about you, including Personal Information. When you choose to participate, you may be opting to link your activity on our Sites with that third party web site or service, which may then collect information about your visits to our Sites and may publish that activity as you request to your "profile" or similar feature with that third party (such as if you choose to share content you find on one of our Sites with your "connections" on the third party's web site or service). The information we collect is subject to this Privacy Policy. However, the information collected and stored by the third party remains subject to the third party's privacy practices, including whether the third party continues to share information with us or with other third parties, the types of information shared, and your choices with regard to what is visible to others on that third party's web site or service. The third party may allow you to remove the application or feature, in which case we will no longer collect information about you through the application or feature, but we may retain the information previously collected. In addition, we may receive information about you if other users of a third party web site or service give us access to their profiles and you are one of their "connections" or information about you is otherwise accessible

through your "connections" web page, profile page, or similar page on a social networking or other third party web site or interactive service.

We may also supplement the information we collect about you through the Sites with outside records from third parties in order to enhance our ability to serve you, to tailor our content to you and to offer you opportunities to purchase products or services that we believe may be of interest to you. We may combine the information we receive from these third parties with information we collect through the Sites. In those cases, we will apply this Privacy Policy to any Personal Information received, unless we have disclosed otherwise.

#### **8. AD SERVING AND TRAFFIC MEASUREMENT SERVICES WE MAY USE; HOW TO "OPT OUT" OF RECEIVING ADVERTISING RELEVANT TO YOU**

SPN licenses technology to serve advertisements on its own sites and within its videos and other content as that content is served across the Internet. In addition, SPN may use third party network advertisers to serve advertisements and third party analytics service providers to evaluate and provide us with information about the use of the Sites and viewing of our content. We do not share Personal Information with these third parties, but ad network providers, the advertisers, the sponsors, and/or analytics service providers may set and access their own **cookies**, **web beacons** and **embedded scripts** on your Device and they may otherwise collect or have access to information about you, including Usage Information. With regard to advertisements, we and our network advertisers may target advertisements for products and services in which you might be interested based on your visits to both the Sites and other web sites. **Cookies** and **web beacons**, including those set by third party network advertisers, may be used to, among other things, target advertisements, prevent you from seeing the same advertisements too many times, or to conduct research regarding the usefulness of certain advertisements to you. We may share Usage Information about visitors to the Sites with third party advertising companies for the same purposes. We may use a variety of companies to serve advertisements.

#### **9. UPDATING YOUR INFORMATION AND OPTING OUT FROM EMAIL, SMS AND MMS COMMUNICATIONS**

SPN may provide web pages or other mechanisms through which you can correct or update some of the Personal Information you have provided to us, including, without limitation, through registration with the Sites. You may opt out of receiving e-mail newsletters by following the opt-out instructions provided to you in those e-mails. If you sign up to receive SMS or MMS messages that may be offered on the Sites, you may unsubscribe from any SMS or MMS messages received by replying "STOP". Please note that we reserve the right to send you certain communications relating to your account or use of the Sites and these transactional account messages may be unaffected if you choose to opt-out from marketing communications. In accordance with our routine record keeping, we may delete certain records that contain Personal Information you have submitted through the Sites. We are under no obligation to store such Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Personal Information. In addition, you should be aware that it is not

always possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons.

## **10. SECURITY**

We incorporate commercially reasonable safeguards to help protect and secure your Personal Information. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us, and you use the Sites and provide us with your information at your own risk.

## **11. THIRD PARTY CONTENT, LINKS TO OTHER WEB SITES AND SERVICES, AND SPN CONTENT FOUND ON OTHER WEB SITES**

Certain content on the Sites may be hosted and served by third parties, which may include third party widgets (such as those that allow you to "like" or "share" content with third party web sites and interactive services, or third party "get tickets and showtimes" widgets). In addition, when you are on the Sites you may be directed to other web sites or services that are operated and controlled by third parties. This includes links from advertisers, sponsors and partners that may use our logo(s) as part of a co-branding agreement. In addition, SPN Site widgets or other SPN content may be included on web pages, web sites and/or services that are not associated with SPN. We have no control over these third parties. These third parties may send their own cookies to your Device, they may independently collect data or solicit Personal Information and may or may not have their own published privacy policies. SPN is not responsible for the privacy practices or business practices of any third party web site.

## **12. CONSENT TO TRANSFER**

The Site is hosted and operated in India. Your Personal Data will therefore be transferred to and processed in the India where the privacy laws may not provide an equivalent level of protection to those in your home country. By using the Site, and providing us with any information, you consent to the transfer of your information to, and its processing in, the India

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

You have the right to access your Personal Data held by us and, if necessary, have it amended or deleted. You can also request not to receive email, SMS, and MMS marketing communications from us. You may 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 may unsubscribe from any SMS or MMS messages received by replying "STOP." Please note that we may still need to send you certain communications relating to your account or use of the Sites and these transactional account messages may be unaffected if you choose to opt-out from marketing communications.

For more details or any privacy questions please contact us by email at [privacyqueries@setindia.com](mailto:privacyqueries@setindia.com) or write to us at:

Legal Department  
Sony Pictures Networks India Private Limited,  
Interface Building no.7, 4th Floor,  
Malad Link Road,  
Malad West,  
Mumbai 400064  
India

We request you to please provide the following information in your complaint:-

- Identification of the information provided by you
- Clear statement as to whether the information is personal information or sensitive personal information
- Your address, telephone number or e-mail address.
- A statement that you have a good-faith belief that the information has been processed incorrectly or disclosed without authorization, as the case may be
- A statement, under penalty of perjury, that the information in the notice is accurate, and that the information being complained about belongs to you.

You may also contact us in case you have any questions / suggestions about the Privacy Policy using the contact information mentioned above.

#### **14. NOTIFICATION OF CHANGES AND YOUR ACCEPTANCE OF THE PRIVACY POLICY**

We reserve the right to change the terms of this Privacy Policy at any time, by prominently posting notice of the amendment on this Site. To the extent permitted by applicable law, such changes will be applicable from the time they are posted. However, SPN will use your Personal Information in a manner consistent with the Privacy Policy in effect at the time you submitted the information, unless you consent to the new or revised policy.

**Effective Date:** This Privacy Policy was updated December, 2012 and is effective as of that date