### PRIVACY AND COOKIE POLICY

Last updated: March 21st, 2024



Under 18? Try one of these versions instead.

We encourage you to read the entire policy. Please click on any of the links below to review that particular section:

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## 1. WHO WE ARE

This privacy and cookie policy ("Privacy Policy") explains the practices of **Sony Music Entertainment UK Limited** ("Sony Music UK") in relation to the collection, use and disclosure of personal data on our websites, online and offline services, landing pages, apps, online stores, podcasts, email correspondence, and any other site dedicated to the release of Sony Music Entertainment products or services ("Site" or "Sites"), together with any entity of Sony Music Entertainment using your data in accordance with this Privacy Policy (collectively, "Sony Music," "we," "us," "our"). Sony Music UK is a company registered in England & Wales under company number 01471066 with its registered office at 2 Canal Reach, London, N1C 4DB.

We are committed to protecting and respecting your privacy and the following sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed. Please read the text carefully to understand our views and practices regarding your personal data and how we will treat it.

# 2. KEY POINTS

As explained in greater detail further below:

- We use personal data to allow you to use the features in our website content, to process your registration, and to provide you with requested content related to our music, podcasts, live events, and other offerings.
- Our Sites may provide interactive features that engage with social media sites, such as Facebook and X (formerly Twitter), as well as with content streaming services such as Spotify and YouTube. If you use these features, or complete one of our forms by using your social

media or streaming service account credentials, these third-party sites will send us personal data about you and information on how you use their platforms.

- Most of our content is not designed for children. We do not knowingly collect personal data
  of children under the age of 13, and we may ask for your age before you can sign up to
  newsletters, participate in a contest or use our content.
- If you give us permission, we will send you news and promotional material about Sony Music, including our artists, podcasts, live events, products, and other offerings. You can change your mind about this at any time and ask us not to process your personal data for direct marketing purposes.
- This Privacy Policy also explains when we process personal data for our legitimate interests, such as to provide you with more relevant and personalised advertising and marketing by creating a profile with the information provided by you and gathered by monitoring your behavior during your navigation on our Sites, stores and newsletters and on the aforementioned social media and streaming platforms (should you participate or register using your account credentials from a third-party platform). You can ask us to stop processing this data. <a href="Click here">Click here</a> to learn more about your wider data protection rights and how you can exercise them.
- Your personal data may be publicly visible when you post content via our Sites. We may also
  disclose your personal data to our business partners, other affiliates and subsidiaries of Sony
  group companies, artists and their management companies, third parties we engage to
  process data on our behalf, and with other parties when such sharing is required by law or by
  competent authorities, or in certain other situations, such as at your request.
- We may transfer certain personal data to the United States and to other countries outside the EEA ("European Economic Area"), UK, or Switzerland in accordance with applicable legal requirements.
- 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.

## 3. A SPECIAL NOTE TO CHILDREN UNDER 13 YEARS OF AGE

YOU MUST BE 13 YEARS OF AGE OR OLDER TO REGISTER WITH OUR SITES AND SERVICES. PLEASE DO NOT REGISTER OR SHARE YOUR PERSONAL DATA WITH US IF YOU ARE UNDER 13 YEARS OF AGE.

If you're under 13, some of our music and videos might not be right for you. Ask your parent or guardian to check the Site or content first, and then explore it together if they say it's okay.

You can read our privacy notice for younger Sony Music fans <a href="here">here</a>.

## 4. A SPECIAL NOTE TO PARENTS & LEGAL GUARDIANS

While we do not knowingly allow registration on our Sites or services by children under the age of 13, parents and legal guardians should supervise their children's online activities and, where appropriate, consider using parental control tools available from online services and software manufacturers that help provide a child-friendly online environment. These tools can also prevent children from disclosing online their name, address, and other personal data without parental permission.

We want to encourage younger users to understand their data privacy rights and develop confidence in their online choices. Our Sites and services allow the user to set their own privacy and cookie preferences (subject to the browser's parental controls, if applicable). This Privacy Policy and our

cookie preference centre explain what will happen with a user's personal data if they change our default high privacy settings, but we also encourage younger users to speak to a responsible adult first before changing those default settings.

### 5. HOW WE COLLECT YOUR DATA & WHAT INFORMATION WE COLLECT

We may collect the following categories of personal data from you:

- Contact information, including name, email address, street or mailing address, and telephone or mobile phone number;
- Billing information, including billing address, order details and other commercial information;
- Demographic information, including age, date of birth, gender, interests, country, and post code:
- Unique online identifiers, including username and password, and your device's Internet Protocol ("IP") address;
- Preferences and other information, including product wish lists, order history and marketing
   & listening preferences;
- Geolocation information, including your actual or approximate location (for example, from the IP address of your device or computer);
- Photos, videos, and other content that you submit on our Sites, which may include metadata
  which can reveal further information about the content, including but not limited to where
  and when images were taken;
- Audio, video or audio-visual recordings or photos (in as far as they may feature you) taken at
  events hosted by or on behalf of Sony Music, or on set at one of our podcast recordings or
  content shoots;
- Internet and other electronic network activity; and
- Other information you provide to us in connection with a request (including without limitation information about your health relating to access or special requirements at events or productions hosted by or on behalf of Sony Music).

If you are an independent artist or label client (for example, a label distributing their music through a Sony Music-owned distribution platform) engaging with Sony Music's client-facing Site(s), services, or tools, in certain cases we may collect the following additional categories of personal data:

- Your trading or company name, and company number (if applicable);
- Contact information of authorized representatives and employees, including name, email address, street or mailing address and telephone or mobile phone number;
- Accounts payable information, which may include bank account details and applicable tax forms;
- Limited identification documents, such as passport or driving licence, and proof of address such as utility bills or credit card statements;
- Information provided on identification documents, such as nationality, gender, date of birth, place of birth.

We may collect personal data from the following sources:

### From the user:

We may collect and process personal data that you provide to us by filling in forms on our Sites, or by you contacting us. This includes, but is not limited to, information provided at the time of registering to use (or become a member of) any of our or our artists' Sites, subscribing to any of our services (such as newsletters, podcasts or voice activated content), purchasing downloads or other products, posting material, participating in a contest or opportunity, or requesting further services.

If you contact us by email, you'll be sharing with us your email address, name, and any other personal data you might include in your message.

If you enter a Sony Music contest on social media by commenting on a post, or posting to your profile using the contest hashtag, we will collect your username, and sometimes your name, in order to randomly select the winners and contact you via direct message if you are a winner.

# From third parties with the user's consent:

We may collect your personal data when you access our services, participate in a Sony Music campaign or contest, or otherwise contact Sony Music, by using your account credentials from your social media accounts (such as Facebook, Google, or X) or content streaming services (such as Spotify or YouTube), or by clicking 'like' or 'share' on such third-party platforms. For example, you might use your Spotify credentials to participate in an artist's pre-save contest or a campaign that generates a personalised playlist, or you might submit a form using your Facebook credentials to sign up to receive an artist's newsletter.

Depending on the platform, Sony Music may receive general information and contact information (such as, name, username, profile picture, email address, age, date of birth, gender, country), technical or financial information (such as type of computer, or type of service or chosen subscription model), and/or information about your actions and behaviours on the applicable platform (which may include frequency of use, activity, followers, date of registration, artists and songs most listened to and artists or pages followed or liked).

This information will only be collected by Sony Music should you subscribe or engage with Sony Music or its artists or content by using the log-in credentials of your social media or streaming platform account, and only after you have been informed about the sharing of such information by way of this Privacy Policy and the privacy notice served to you by the applicable platform setting out the permissions to be granted to Sony Music and how your data shall be processed in these cases.

In addition to fulfilling the purpose(s) of your registration (such as pre-saving an artist's release, signing up to an artist newsletter, or entering a contest), Sony Music may file, organise, consult, store, use for profiling, and cross-compare such personal and behavioural information with the personal data provided by you as described above so that we may enhance your online experience, measure our audience, and provide you with tailored marketing and advertising content, which might include sending you information about other artists, events, content, products or services based on your listening preferences or use that may be of interest you,.

At any time, you can remove Sony Music's access permissions on your account, and stop the applicable platform from sharing with us further personal data relating to your account, either by emailing Sony Music UK at <a href="mailto:musicinfo@sonymusic.com">musicinfo@sonymusic.com</a> and/or changing the data privacy settings on your account page on the applicable platform.

You don't need to share such platform account information to enjoy Sony Music content, sign up to an artist's newsletter, enter a contest, or join in with most Sony Music campaigns. For example, you could fill in the form yourself, or pre-save the album next time you're on your streaming account. However, without account information and permissions from such platforms, we won't be able to generate certain personalised content (for example, a playlist based on your favourite songs, but you'll still be able to enjoy the artist's official playlist on your streaming service).

We've set out below the information and access each platform may share with us, subject to your agreement and/or depending on the configuration of your settings when using the platform:

# Spotify

By clicking the 'Spotify Connect' button on a Sony Music Site, and then clicking 'Agree' on the permissions pop-up, you agree to Spotify sharing the following personal and account information with Sony Music and letting us take certain actions on your account (until you remove those permissions and stop Spotify sharing your information with us):

- Sony Music will be able to view your Spotify account data, as follows:
  - o your email address;
  - o the type of Spotify subscription you have;
  - your account country;
  - your settings for explicit content filtering;
  - o your name and username;
  - o your profile picture, if applicable; and
  - o how many followers you have on Spotify, and your public playlists.
- Sony Music will be able to view your activity on Spotify (limited to the 50 most recent records, unless otherwise stated), as follows:
  - o content you've recently played;
  - what you've saved in your library;
  - the artists and content you listen to most (limited to the 10 most recently played artists and tracks each week);
  - who you follow on Spotify;
  - playlists you've made and your collaborative playlists (limited to the 10 most recent playlists);
  - o collections you've made;
  - o playlists you follow; and
  - o your podcast subscriptions.
- Sony Music will be able to take the following actions on Spotify on your behalf (solely for the
  purpose of following the relevant artist and saving or pre-saving the relevant playlist or
  release, or generating your personalised playlist, as applicable depending on the purpose of
  your interaction):
  - upload images to personalise your profile or playlist cover;
  - o add and remove items in your library;
  - o create, edit, and follow private playlists;
  - o create, edit, and follow playlists; and
  - o manage who you follow on Spotify.

### **Apple Music**

By clicking the 'Apple Music' button on a Sony Music Site, and providing your email address (the email you use for your Apple Music account) on the pop-up form, you agree to Apple Music sharing the following personal and account information with Sony Music and letting us take certain actions on your account (for 60 days or until you remove those permissions and stop Apple Music sharing your information with us, if sooner):

- Sony Music will collect your email address (and first name if applicable) as provided by you on the Apple Music permissions form.
- Sony Music will be able to view your activity on Apple Music (limited to the 50 most recent records), as follows:
  - o the artists to which you've recently listened;
  - o the albums or tracks you've recently added to your library; and
  - the artists you listen to most.
- Sony Music will be able to take the following actions on Apple Music on your behalf (solely for the purpose of saving or pre-saving the relevant release to your Apple Music library, or generating your personalised playlist, as applicable depending on the purpose of your interaction):
  - o upload images to personalise your profile or playlist cover;
  - add and remove items in your library;

- o create, edit, and follow private playlists;
- o create, edit, and follow playlists; and
- o manage who you follow on Apple Music.

#### **Facebook**

By clicking the 'Facebook' button on a Sony Music Site, and clicking 'Continue as... [your Facebook username]' on the permissions pop-up, you agree to Facebook sharing the following personal and account information with Sony Music (for 60 days or until you remove those permissions and stop Facebook sharing your information with us, if sooner):

- Sony Music will collect and/or be able to view your Facebook account data, as follows:
  - your email address;
  - o your name;
  - o your profile picture, if applicable;
  - o your username if available;
  - your website, if applicable;
  - your birthday;
  - o your gender; and
  - o your city.
- Sony Music will be able to view your activity on Facebook (limited to your 25 most recent statuses unless otherwise stated), as follows:
  - the pages you 'like' (limited to your 25 most recently liked pages);
  - if you 'like' a Sony Music artist's page;
  - o if you've mentioned a Sony Music artist in a post or on your profile;
  - o if you've posted on a Sony Music artist's page;
  - o if you've shared on your profile a photo from a Sony Music artist's page;
  - o if you've shared on your profile a status from a Sony Music artist's page; and
  - o if you've tagged a post or photo with a Sony Music campaign hashtag.

### Google

By submitting your details on a Sony Music form by clicking the 'Google' button, and clicking 'Next' on the permissions pop-up, you agree to Google sharing the following personal data and user preferences with Sony Music:

- Sony Music will collect and be able to view your Google account data, as follows:
  - your email address;
  - your name;
  - o your language preferences;
  - o your profile picture, if applicable;
  - o your username;
  - your bio, if applicable;
  - your gender;
  - o your city; and
  - o your country.

## X (formerly Twitter)

By clicking the 'X' or 'Twitter' button on a Sony Music Site, and clicking 'Authorize app' on the permissions pop-up, you agree to X sharing the following personal and account information with Sony Music (until you remove those permissions and stop X sharing your information with us):

- Sony Music will collect and/or be able to view your X account data, as follows:
  - your email address;
  - your name;
  - o your profile picture, if applicable;

- o your username;
- o your website, if applicable;
- o your bio; and
- o your city or country.
- Sony Music will be able to view your activity on X (limited to your 60 most recent posts unless otherwise stated), as follows:
  - the accounts you follow, mute, and block (limited to 5,000);
  - o your posts;
  - o if you've mentioned a Sony Music artist in a post on your account;
  - o if you've retweeted a Sony Music artist's post;
  - o if you've shared on your X account a Sony Music artist's TikTok video;
  - o if you've shared on your X account a Sony Music artist's Discord server; and
  - if you've posted on X using a Sony Music campaign hashtag.

#### YouTube

By clicking the 'YouTube' button on a Sony Music Site, and clicking 'Next' on the permissions popup, you agree to YouTube sharing the following personal and account information with Sony Music and letting us take certain actions on your account (until you remove those permissions and stop YouTube sharing your information with us):

- Sony Music will be able to view your YouTube account data, as follows:
  - your email address;
  - your name and username;
  - o your gender; and
  - o your profile picture, if applicable.
- Sony Music will be able to view your activity on YouTube (limited to the 50 most recent records), as follows:
  - videos you've liked;
  - o videos you've marked as a favourite; and
  - o your channel subscriptions.
- Sony Music will be able to take the following actions on YouTube on your behalf (solely for the purpose of subscribing to the applicable artist's or label's channel if that is the purpose of your interaction):
  - manage your channel subscriptions.

# Deezer

By clicking the 'Deezer' button on a Sony Music Site, and clicking 'Accept' on the permissions popup, you agree to Deezer sharing the following personal and account information with Sony Music and letting us take certain actions on your account (until you remove those permissions and stop Deezer sharing your information with us):

- Sony Music will be able to view your Deezer account data, as follows:
  - o your email address;
  - o your name and username;
  - your birthday;
  - your gender;
  - o your country; and
  - o your profile picture, if applicable.

- Sony Music will be able to view your activity on Deezer (limited to the 25 most recent records unless otherwise stated), as follows:
  - content you've recently played;
  - o artists you've added as a favourite;
  - o tracks you've added as a favourite (limited to the most recent 50);
  - o albums you've added to your library or a collection;
  - o playlists you follow; and
  - o your top content (limited to your 25 most played tracks since opening your account).
- Sony Music will be able to take the following actions on Deezer on your behalf (solely for the purpose of following the applicable artist on Deezer and saving or pre-saving the applicable playlist or release, or generating your personalised playlist, as applicable depending on the purpose of your interaction):
  - o upload images to personalise your profile or playlist cover;
  - o add and remove items in your library;
  - o create, edit, and follow private playlists;
  - o create, edit, and follow playlists; and
  - manage who you follow on Deezer.

# From purchase & subscription transactions:

You may purchase music and other content, subscribe to paid podcast content, or purchase merchandise from our Sites, in which case you will be directed to an externally hosted web page or site to complete your transaction. These third-party sites will be clearly identified and link to their own privacy policies, so you know which company is collecting your personal data. You should refer to those policies for any privacy-related questions or concerns regarding your purchase or subscription.

When you make a purchase from a Sony Music artist's official store, your personal data (such as email, name, and country, as provided by you at checkout or when registering an account with the store) may be shared with Sony Music. The store may also share certain transactional data (such as what you purchased, how much you spent and your billing city, but never your payment details) and/or information about your actions and behaviours on the store, which we will use for the purpose of internal analytics so that we may measure our audience, improve our product range, and enhance the Sony Music user experience. We also need to keep certain transactional data for reporting and accounting purposes.

Where you already receive marketing updates from Sony Music, or you opt-in to receive marketing when checking out on the store or at a later date, we may combine certain transactional and behavioural data (such as previous purchases and most recent billing city) with the personal data you provided when registering for marketing updates. We use this information to send you the marketing updates you've requested and to personalise that marketing content, which might include sending you information about other artists, products or services based on your listening preferences or use that may be of interest you. For example, we might let you know about new releases you may like, or relevant artists' shows in your city.

# By using cookies and other tracking technologies:

In addition, we use technology on our Sites, services, and content to collect information that helps us to enhance your online experience, measure our audience and provide you with tailored advertising based on your behaviour on our Sites, and interactions with our content, and, if applicable, your behaviour on the aforementioned social media platforms and streaming services.

We refer to this technology as "cookies" throughout this Privacy Policy, but this is intended to cover all similar technologies including web beacons, log files, pixel tags, gifs. We use our own and third-party cookies to collect the information we require. For more information see "Cookies and other tracking technologies" below.

Sometimes we receive information about you from third parties in other circumstances. For example, if you use a 'like' or a 'share' button for a feature on our Sites then the third-party platform will share information with us. If you participate in activities on other third-party 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 as applicable.

If, at some point, we provide online services to a child under 13 years old, where we need parental consent for this, we may ask for a parent's or legal guardian's email address in order to ask for consent.

# **Other sources of information:**

We may receive information about you from other sources, including:

- Artists and their representatives: such as marketing data from a new or partnering artist, which
  is integrated with information we already have about you to create a more tailored fan
  experience;
- Business partners: such as contest providers and other promotional partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers and others who enable sign-on functionality and social network integration;
- Publicly available databases;
- Other applications: such as streaming sites and social media platforms not specifically referenced above, which may share similar account information and permissions;
- Information you disclose publicly: our Sites and our artist, label, podcast and product pages on third-party platforms may offer message boards, chat rooms, 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 (collectively, "User Submissions");

### • Your contacts:

- As part of a Sony Music campaign, one of your contacts may provide us with personal data relating to you. Participants in such campaigns are encouraged to seek the person's consent before referencing or nominating someone else in a contest entry or content submission. We will only use this information for the specific purpose for which it is provided. If you believe that one of your contacts has provided us with your personal data without your consent, and you would like to request that it be removed from our systems, please contact <a href="mailto:musicinfo@sonymusic.com">musicinfo@sonymusic.com</a>.
- At your direction, your authorised representative(s) (for example, a manager, lawyer, or accountant) may share your personal data with us.
- Collection societies: if you are an independent artist or label client registered with Kollective Neighbouring Rights, collection societies around the world may share your personal data with us if you have directed them to do so.

The above information may be combined with personal data we already have about you, which helps us to update, expand and analyse our records, identify new customers, and provide content and services that may be of interest to you.

### 6. HOW WE USE YOUR DATA

We may use personal data collected via our content, Sites, and services in accordance with this Privacy Policy for the following purposes:

## (a) To fulfil a contract, or take steps linked to a contract;

- i. to process your registration on one of our Sites in accordance with the applicable terms of service or terms of use;
- ii. to fulfil our obligations and enforce our rights and remedies under a contract;
- iii. to process your entry to any contest or user-generated-content opportunity we run, and to record your agreement to the corresponding contest rules and, if applicable, the accompanying disclaimer / release form; or
- iv. to send you information about changes to our terms or policies or other relevant updates.
- (b) Where this is necessary for purposes which are in our or third parties' legitimate interests. These interests are (without limitation):
  - i. to provide you with access to content and features on our Sites and artists' sites;
  - ii. to send you information you have requested from us or our artists;
  - iii. to ensure the security of our Sites and apps by trying to prevent unauthorised or malicious activities; identify fraudulent activities and transactions; prevent abuse of and investigate and/or seek prosecution for any potential threats to or misuse of our Sites or services; ensure compliance with the applicable terms of service and this Privacy Policy; investigate violations of or enforce these agreements; and otherwise to protect the rights and property of Sony Music, its partners and customers.;
  - iv. to investigate violations of or enforce compliance with our terms of use, this Privacy Policy and other applicable policies; and to help other organisations (such as copyright owners) to enforce their rights;
  - v. to personalise content, advertising, marketing and offers for you, which may include providing information about artists, podcasts, live events, products, or services based on your listening preferences or use that may be of interest you;
  - vi. to invite you to submit your content for potential inclusion in an artist's campaign or podcast episode; and
  - vii. for internal analysis to measure our audience, improve our product range and enhance the Sony Music user experience.

When you submit your details to receive marketing from Sony Music, we may undertake limited profiling activities to personalise such marketing, whereby we combine the personal data and any other information provided by you with additional information lawfully collected by Sony Music, such as your navigation of Sony Music's Sites, and how you interact with Sony Music communications you may have received by any means authorised by you.

When you access our services, participate in a campaign, or otherwise interact with Sony Music by using your social media or content streaming service account credentials, Sony Music may also take into account your behavior on the applicable platform based on the data shared with

Sony Music by such platform with your consent. Such information may be used for internal analysis so as to measure our audience and enhance the Sony Music user experience, and to identify and create audiences for the Sony Music artists, products or services, and where possible to send you more personalised information about the artist, label, podcast or live event for which you have requested to receive updates, or about other artists, content, live events, products or services that may be of interest to you based on your listening preferences or use.

# (c) Where you give us consent:

- i. Where you ask us to send marketing information to you via a medium where we ask for your consent (for example, email or SMS marketing), and you tick the box on the sign-up form giving us your permission to collect and process your data to send you updates about an artist, label, podcast, live event or product, and information about special offers and other artists, podcasts, live events, products or services based on your listening preferences or use.
- ii. Where you allow us to share your data with parties from whom you have agreed to receive marketing, such as artists and their management, or event promoters.
- iii. Where you agree to participate in market research studies (such as a survey or focus group) conducted by Sony Music or third-party companies on Sony Music's behalf, about Sony's artists, content and products or the entertainment sector generally.
- iv. Where you give us consent to place cookies and to use similar tracking technologies.
- v. On other occasions where we ask you for consent, for a purpose which we explain at that time.

# (d) For purposes which are required by law:

- i. Where we need parental consent to provide online services to children under 13, or the relevant age below which parental consent is required. However, our Sites are not generally designed for children under 13.
- ii. In response to requests by government or law enforcement authorities conducting an investigation.

# 7. HOW WE SHARE YOUR DATA

We may share your personal data with the following categories of recipients:

- (a) Other Sony Music entities and Sony Group companies We may share your personal data with other affiliated Sony Music entities, as well as with Sony Group companies worldwide, for the purposes listed <a href="mailto:above">above</a>.
- (b) Artists & artists' representatives We may share your personal data with artists (and their management companies) about whom you have requested to receive updates, who may then use your personal data to keep you updated with information about them.
- (c) **Suppliers and vendors** We share personal data with suppliers and vendors who perform functions on our behalf, such as hosting or operating our Sites, sending e-mails, and carrying out data analysis.

- (d) **Other third parties** We may transfer or assign personal data to third parties in connection with the sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation of Sony Music, or any part of it.
  - We may share with other third parties, at our discretion, certain aggregate statistical data about purchases and the use of our content, which data may include demographic data such as the age range and/or geographic location of groups of users. No personal data (such as names or email addresses) will be directly identifiable from such statistics.
- (e) To enforce legal rights and comply with applicable laws We may disclose personal data in special cases when we have reason to believe that disclosing this data is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference (either intentionally or unintentionally) with the rights or property of Sony Group companies or artists, or to otherwise comply with applicable law. Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or court order, or if required for the legal protection of our legitimate interests in compliance with applicable laws.
- (f) At your instruction or direction We may disclose personal data when instructed or directed by you to do so, including when you decide to participate in certain types of activities that necessitate your personal data being shared. For example, your personal data may be shared with:
  - i. **Podcasts** If you consent to receive direct marketing about a particular podcast, or submit content for consideration in a podcast, or participate in a podcast call-to-action, we may share your personal data with the podcast operator, who may then use your personal data to keep you updated about the podcast, or contact you about your participation or User Submission, as applicable.
  - ii. **Independent artist or label clients** Some of our marketing and pre-save campaign tools are used by independent artist and label clients to promote their content directly to their audience. When you request to join their mailing list via our Sites or services, we may share your personal data with the applicable independent label or artist (or their management company), who may use your personal data to keep you updated with information about them, subject to their own privacy policy.
  - iii. **Event promoters** Where you have asked to receive updates from an event promoter, by ticking their newsletter opt-in on a Sony Music form, we will share your name and email address as requested by you. The promoter will have their own privacy policy, which we encourage you to read before you choose to receive marketing from them.
  - iv. **Co-promoters and prize providers** Where a Sony Music related contest is managed or co-promoted by a third party, or the prize is provided and/or fulfilled (in part or in full) by a third party, we will share each winner's basic contact information for the purpose of managing the contest and fulfilling the prizes. Where a prize includes attending an event, each winner's full name will also be shared with the venue or event promoter, and they may request to see the winner's ID before allowing entry to the event. Each winner's surname and city may also be included on a winners' list if another contest entrant asks who won.
  - v. **Collection Societies** If you are an independent artist or label client registered with Kollective Neighbouring Rights, we will share your personal data with applicable collection societies if you direct us to do so.

If you post content directly to a Sony Music Site, or to an artist's social media account, anyone may be able to see it. Particularly if you are under 18, we encourage you to set your social media accounts to 'private' so that only people you know can see your posts and personal data.

When you upload your content via a Sony Music form as part of a "user-generated-content" opportunity, if we include your content in the final product then anyone will be able to see it. For example, we may publish an online gallery, or make a video for social media featuring contest winner's videos, along with first name and city. Users aged under 18 will need parental permission before sharing such content with us.

### 8. INTERNATIONAL TRANSFERS

The personal data that we collect or receive about you may be transferred to, processed in, and stored in a country other than where you reside, including within the United States or some other country outside the UK, the European Economic Area ("EEA"), or Switzerland. For instance, if any of our servers, or any of our UK-, EEA-, or Switzerland-based service providers' servers, from time to time are located outside the UK, EEA, or Switzerland; or if one of our service providers or suppliers is themselves located in a country outside the UK, EEA, or Switzerland; or if we share your data with other Sony Music or Sony Group entities or external parties (in accordance with the "How we share your data" section above), then personal data may be transferred abroad.

Where personal data is transferred outside the EEA, UK, or Switzerland to a party in a country that is not subject to an adequacy decision by the EU Commission, UK government, Swiss government, or other relevant governmental authority, as applicable, then Sony Music takes steps to ensure that such data is adequately protected in accordance with applicable data protection laws, including by EU Commission-approved standard contractual clauses (including the UK and Swiss addenda to such clauses), a vendor's Processor Binding Corporate Rules, certification under another approved framework, or pursuant to some other lawful transfer mechanism or applicable derogation permitted by law. Where Sony Music relies on standard contractual clauses, you may request a copy.

### 9. COOKIES AND OTHER TRACKING TECHNOLOGIES

### What is a cookie?

Cookies are text files containing small amounts of coded information that are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

Cookies help us to improve our Sites and to deliver a better and more personalised service, for instance by storing information about your preferences and allowing us to recognise you when you return to a Site. You may refuse to accept cookies by activating settings on your internet browser, however, please note that if you select such settings certain parts of the Site may not work properly.

The information we collect may include IP addresses, browser version, number of visits, which pages you access and your viewing preferences.

We use the following categories of cookies on our Sites, marketing content, advertising, and services:

## **Category 1: Strictly Necessary Cookies**

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies, services you have asked for, like any shopping basket items cannot be provided. We don't use these cookies to gather information about you that could be used for marketing or remembering where you've been on the internet.

# **Category 2: Performance Cookies**

These cookies collect information on how visitors use our Site. For example, which pages visitors go to most often, and if you get error messages from web pages. These cookies don't collect information that identifies you as a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

# **Category 3: Functionality Cookies**

These cookies remember choices you make, such as the country you visit a Site from, the language or the region you are in. These can then be used to provide you with an experience more appropriate to your selections and to make your subsequent visits easier and more tailored to your preferences. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

# **Category 4: Targeting cookies or advertising cookies**

These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advert as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third-party advertising networks with the website operator's permission. They remember the websites you visit, and this information is shared with other parties, such as advertisers. This is why you might have seen adverts on your social media feed about something you've just been looking at on another website. Quite often, targeting or advertising cookies will be linked to site functionality provided by the other organisation.

# **Category 5: Social Media Cookies**

These cookies allow you to share what you've been doing on our Sites on social media such as Pinterest, Facebook, Instagram, or X (formerly Twitter). These cookies are not within our control. This information may be linked to targeting or advertising activities. Please review the applicable social media platform's privacy and cookie policies to understand how their cookies work.

### **Use of Web Beacons**

Some of our web pages may contain electronic images known as web beacons, among other things, that allow us to count users who have visited these pages. Web beacons (also known as image tags, pixel tags, GIFS, or web bugs) are small pieces of code used to collect limited information such as a cookie number, time and date of a page view, and a description of the page on which the web page resides. This information may be used for various purposes, including, without limitation, to count visitors to our Sites, to monitor how users navigate our Sites and services, to count how many sent emails were actually opened, or to determine whether content sent was actually viewed. We may also carry web beacons placed by third-party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of a particular campaign.

## **Consent to Cookies**

In order to place cookies on your device, we may require your consent, subject to applicable law. You'll see a cookies banner at the bottom of all our Sony Music UK Sites. You can either 'Accept All' cookies, 'Reject All' cookies, or click 'Manage Cookies' for more information and options. Unless you change the settings, we will only collect what are referred to as "Strictly Necessary Cookies", which we need so you can move around the Site and access its content.

If you don't want to receive cookies at all, you can modify your browser so that it notifies you when cookies are sent to it, or you can refuse cookies altogether. If you're under 18, speak to your parent or guardian if you're not sure how to change those settings.

Please note that if you continue to browse a Site, you will be considered to have agreed to our use of Strictly Necessary Cookies.

You can withdraw your consent to our use of cookies at any time. If you wish to restrict or block web browser cookies that have been set on your device, then you can do this through your browser settings (it's often found under 'clear history' or 'clear cookie cache'); the Help function within your browser should tell you how. You can also use your browser settings to delete cookies that have already been set.

Alternatively, you may wish to visit <a href="www.aboutcookies.org">www.aboutcookies.org</a>, which contains comprehensive information on how to do this on a wide variety of desktop browsers. However, please note that if you select such settings, you may be unable to access certain parts of our Sites, or certain content or functionality may not be available.

If you'd like to opt out of other third-party cookies relating to behavioural advertising, please go to <a href="https://www.youronlinechoices.eu">www.youronlinechoices.eu</a>. Opting out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

Some web browsers offer a "Do Not Track" feature that signals to websites you visit that you do not want to have your online activity tracked. When you choose to turn on the Do Not Track settings in your browser, your browser will send a signal to websites, analytics providers, advertisement networks, plug-in providers, and other web service providers you encounter while browsing to stop tracking your activity. To find out more about Do Not Track, please visit <a href="https://www.allaboutdnt.com">www.allaboutdnt.com</a>.

Global Privacy Control ("GPC") is a technical specification in your browser settings that you can use to automatically inform websites of your privacy preferences with regard to third-party online tracking. To find out more about and to set up GPC, please visit <a href="https://globalprivacycontrol.org/#about">https://globalprivacycontrol.org/#about</a>.

Opting out of tracking or targeted advertising cookies doesn't mean you won't receive online advertising, just that the advertisements you see won't be based on the website pages you've visited.

# 10. SOCIAL NETWORKS / ONLINE COMMUNITIES

We enable you to create a profile for accessing blogs or online communities for sharing User Submissions. Separate terms & conditions may apply to User Submissions on our Sites and third-party platforms, which you should read prior to submitting content. 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 email address or the real name of another person when selecting a username (or screen name or member name). Please note that we cannot control the actions of others with whom you may choose to share your pages and information. Anything you post to a Community Forum is public, and others will have access to your User Submission(s), and may view, collect, and use that information or share it with third parties. If you choose to voluntarily disclose User Submissions, the protections of this Privacy Policy will not cover such disclosure of information. We encourage you to think carefully before you post, and to use caution before disclosing any personal data in Community Forums and other online communities.

We may also enable you to post content from some of our Sites to your profile on social networks. You can access these services from our Sites using Facebook Connect, Instagram, X (formerly Twitter), or other Open ID providers. These services will authenticate your identity and allow you to post and share certain personal data or other information with that site. Please be aware that the privacy policy of that third-party site or service will apply to any content you provide them in these instances. We do not allow these services to provide any personal data or content back to our Sites or your profile with us unless you agree to participate in such Community Forums. To request removal of your personal data from our blog or Community Forum, contact <a href="mailto:musicinfo@sonymusic.com">musicinfo@sonymusic.com</a>. If we are unable to remove your personal data, we will respond to your request with the applicable reasons.

Widgets and Social Media Plug-Ins: Our Sites may include interactive mini programs that provide specific services from another company (e.g., displaying digital news feeds, playing music, 'liking' or sharing content, etc.), often referred to as "widgets" or "plug-ins". You may have the opportunity to submit personal data, such as your email address, for collection through a widget. A widget may also use browser or Flash cookies and/or collect clickstream and usage data. Information collected by a widget is governed by the privacy policy of the company that created it.

# 11. SECURITY

We follow generally accepted industry standards to protect the personal data submitted to us, both during transmission and after receipt. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure and we cannot guarantee its absolute security. If you have any questions about the security of your personal data, you can contact us by emailing musicinfo@sonymusic.com.

### 12. YOUR DATA PROTECTION RIGHTS

If you live in the UK or European Economic Area, you are entitled to exercise, the following data protection rights (as applicable, and subject to applicable exemptions or exceptions under the law):

- (a) to access and ask us for a copy of your personal data;
- (b) to modify or correct the personal data Sony Music may hold about you if you believe the information is inaccurate or incomplete. You can do this by emailing <a href="musicinfo@sonymusic.com">musicinfo@sonymusic.com</a> or by updating your information in the Sony Music preference centre (a link to which can be found in the footer of any marketing email we send you);
- (c) to request deletion of your personal data processed by Sony Music;
- (d) to limit or restrict the processing of your personal data;
- (e) to request the portability of your personal data and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine-readable format. This right includes the possibility of requesting the transfer of your data to another data controller, provided that this would not negatively affect the rights of third parties;
- (f) to object to the processing of your personal data in some circumstances; and
- (g) where we rely on your consent, you may withdraw that consent at any time.
  - You can do this by emailing Sony Music UK at <a href="musicinfo@sonymusic.com">music.com</a>, or clicking the unsubscribe link in the footer of any marketing email we send you, or by updating your subscriptions in the Sony Music preference centre (a link to which can also be found in the footer of any marketing email we send you).
  - Where you have previously used your account credentials to register with Sony Music and consented to certain data being shared with us, to stop your social media or streaming accounts sharing any more information with us, you will need to change your data-sharing preferences in the account section of each relevant platform.
  - Withdrawal of consent will not affect the legitimacy of the data processing based on consent given prior to the withdrawal.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, where it would infringe the rights of a third party (including our rights), or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the UK GDPR (UK General Data Protection Regulation) and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, you can contact us by emailing <a href="mailto:musicinfo@sonymusic.com">musicinfo@sonymusic.com</a>. If you have unresolved concerns, you have the right to complain to the data protection authority where you live, work, or where you believe a breach of your data protection rights may have occurred. In the UK, the relevant authority is the Information Commissioner's Office (<a href="https://ico.org.uk">https://ico.org.uk</a>).

Data that is mandatory in order to carry out your request is indicated on relevant forms that you may complete. Where provision of data is mandatory, if relevant data is not provided then we will not be able to fulfil your requests to receive newsletter updates, enter a contest or opportunity, or otherwise engage with Sony Music or its artists. All other provision of your information is optional.

### 13. HOW DO I GET IN TOUCH?

If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch by emailing: <a href="mailto:musicinfo@sonymusic.com">musicinfo@sonymusic.com</a>.

Alternatively, you can write to us at: Data Privacy Office, Sony Music Entertainment UK Limited, 2 Canal Reach, London N1C 4DB.

### 14. HOW LONG IS MY DATA STORED?

Where we process your data in connection with your use of our Sites or services, we do this for as long as you remain an active user of our Sites, and as needed to provide the services.

Where we process personal data for marketing or other purposes with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or continue to process your data so that we can respect such request in future.

Where we process personal data in connection with performing a contract or administering a contest, we keep the data for as long as required under relevant country laws pertaining to the type of data and instance that the data has been collected.

Where we process your personal data collected from Sony Music e-commerce stores, we shall retain this information for as long as is legally required for the purposes of reporting and accounting.

We will use and retain your information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

# 15. OTHER WEBSITES

Our Sites may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect and process information from you in a way that is different to how we do so. We encourage you to review such other websites' privacy and cookie policies.

## 16. CHANGES TO OUR PRIVACY AND COOKIE POLICY

We may modify, alter, or otherwise update this Privacy Policy at any time. We will indicate any changes by updating the date at the top of the policy and contacting you as appropriate. We encourage you to review this policy from time to time.