Last updated 05/11/ 2018

#### **WHO WE ARE**

This privacy policy explains the data protection practices of Sony Music Entertainment Middle East FZ-LLC. Sony Music Entertainment Middle East FZ-LLC is a company registered in United Arab Emirates (the "**Territory**") whose registered address is P. O. Box 502812, Office 211-212, Building 6, Dubai Media City, Dubai, United Arab Emirates. Where we refer to "SME", "us" or "we", we mean Sony Music Entertainment Middle East FZ-LLC (or any Sony Music Entertainment entity using your data in accordance with this policy).

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. If you are a data subject protected by the GDPR you may have rights to restrict or object to this processing, however please note that this may adversely affect, inter alia, (i) our ability to personalise our service, offers and communications you receive, (ii) the products and services we offer, (iii) our ability to provide you with effective customer support, (iv) use of our products and services, and (v) business opportunities that may be pursued.

Please read the text carefully to understand our views and practices regarding your personal data and how we will treat it.

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

YOU MUST BE 13 YEARS OF AGE OR OLDER TO REGISTER WITH OUR SITE. PLEASE DO NOT REGISTER IF YOU ARE UNDER 13 YEARS OF AGE.

We are committed to complying with the Children's Online Privacy Protection Act (COPPA). Our site and services are not directed to children under the age of 13. We do not knowingly collect personal information from children under the age of 13. If a user identifies him or herself as a child under the age of 13, we will not collect, store or use any personal information. If we receive personal information that we discover was provided by a child under the age of 13, we will promptly destroy such information.

# A SPECIAL NOTE TO PARENTS AND SCHOOLS

While we prohibit registration by children under the age of [13], parents and schools should supervise their children's online activities and consider using parental and school 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 information without parental and school permission. The term "parents" also includes legal guardians.

## **HOW WE COLLECT YOUR DATA**

# (a) From you

We may collect and process personal data relating to you by you providing such personal data by filling in forms on our site 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) our site, subscribing to any services (e.g. newsletters, alerts, special invitations), promotions, purchasing downloads, posting material or requesting further services.

When you participate in a promotional offer, we may ask for your name, home or work address, telephone number and e-mail address so we can administer the promotion. We may share this information with business partners of ours participating in or supporting the promotion.

### (b) By using cookies

In addition, we may use 'cookies' to collect data relating to your general internet usage. This data may include IP-addresses, browser version, number of visits and similar such data relating to your navigation of the internet and our site. A 'cookie' is a small text file that is placed on your computer's hard drive. Cookies help us to improve our site 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 our site.

You may refuse to accept cookies by activating settings on your internet browser. However, please note that if you select such settings you may be unable to access certain parts of our site.

#### TRANSMISSION OF YOUR DATA VIA THE INTERNET

Unfortunately, the transmission of information via the internet is not completely secure. Any transmission is therefore at your own risk.

Once we have received your data, we will use strict procedures and security features to try to prevent unauthorised access. However, we cannot guarantee that any information you submit to us will be free from unauthorized third party intrusion.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share the password with anyone.

#### WHERE YOUR DATA IS KEPT OR TRANSFERRED

The data that we collect may be transferred to, and stored at, a destination outside the Territory, for instance if any of our servers from time to time are located outside the Territory or if one of our service providers or suppliers is located in a country outside the Territory or if we share your data (in accordance with the 'With whom we share your data' section below).

Where any of those destinations are countries that do not have data protection laws as stringent as those to which we are subject, we will take all steps necessary to ensure that your data is only transferred lawfully out of the Territory, and used in accordance with this privacy policy.

You expressly consent to the transfer of your personal information to, and the collection and processing of such personal information in a destination outside the Territory where we or our vendors operate. In giving this consent, you acknowledge that you understand that the laws on holding, processing, using and transferring personal information in those territories may vary and be less protective of your privacy than laws of your state or country.

### **HOW WE USE YOUR DATA**

We use the data collected from our site in the following ways:

- to establish your identity
- to ensure that content from our site is presented in the most effective manner for you and for your computer and tailors out site to your needs information on our web site use may be used to compile aggregate statistics and carry out analysis in order to help us create web site content and navigation that is most relevant and user-friendly to you.
- to provide you with information, products or services that you have requested from us (or third parties, where appropriate) or which, based on your musical preferences or use, we feel may interest you.
- to carry out our obligations arising from any contracts entered into between you and us.
- to allow you to participate in interactive features of our service, when you choose to do so.
- to enable credit checks such as analysing, verifying and/or checking your credit, payment and/or status in relation to your ability to use any e-commerce-related services (if any) on our website.
- to notify you about changes to our service.

- We may create from information we collect from you anonymous demographic information that
  is not unique to you, such as your ZIP code, domicile, age, gender, preferences and interests.
  We may use or permit use of this information with affiliates, advertisers, business partners or
  unaffiliated third parties for our or their business purposes
- We may transfer information we have about you in connection with a reorganization or combination of our firm with another firm. We reserve the right to disclose personal information to regulatory authorities, law enforcement agencies or as required by applicable law.

#### WITH WHOM WE SHARE YOUR DATA

Subject to the other terms of this policy, we may share your personal data with the following:

## (a) Group companies and third party service providers

We may share your personal data with our affiliated or group companies worldwide and third party service providers\*\*.

# (b) Artists

We may share your personal data with those artists (and their management companies) that you have expressed an interest in, who may then use your data, in accordance with this policy, to keep you updated with information about them.

# (c) Other third parties\*\*

We may transfer, sell or assign any data, including personally identifiable data, to third parties, only in connection with the sale, merger, consolidation, change in control, transfer of substantial assets, reorganization or liquidation of SME, or any part of it.

We may share with others, 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 identifiable from such statistics.

### (d) In special circumstances

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 those described above in paragraph (a) or (b). We may also disclose your personal data when we believe in good faith that the law requires us to do so.

\*\*Note: Your personal data will not be disclosed by us to third parties without your consent for marketing or promotional purposes, save for to our affiliated and/or group companies of Sony Corporation.

# **PERIOD OF RETENTION**

Your personal data which we collect will be retained for a period necessary to attain the specified purposes.

## YOUR RIGHT TO OBTAIN, CHANGE OR REMOVE YOUR DATA

You can opt out of receiving any further messages from SME or anyone with whom we share your data (as described above) at any time by following the unsubscribe instructions in any message sent to you. If you wish to unsubscribe from messages we send you, you can also send an email to partner.relations@sonymusic.com

You have a right to access or correct the personal data we hold about you. To obtain a copy of the personal information we hold about you, please write to us at our registered address provided at the beginning of this privacy policy.

#### **OTHER WEBSITES**

Whilst we endeavour to adhere to our strictest guidelines and select only reputable partners in providing the service, our privacy protection does not cover any personal data that you provide directly to third parties (including but not limited to online merchants sites and other hyperlinked websites). We advise you to consult with the relevant parties before providing any such data.

Our website may contain links to other websites which 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 which is different to how we do so.

These third-party sites may send their own cookies to users to collect data or solicit personal information. These other sites are not subject to our Privacy Policy and we are not responsible for the privacy policies of these third-party sites, or for the use of any information that these sites may collect.

#### **CHANGES TO OUR PRIVACY POLICY**

By using this Site, you consent to the collection and use of your personal information as described above. We are sensitive to users' privacy issues and recognize the need to update this policy as new features and business services are offered by us. Accordingly, 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. We encourage you to review this policy from time to time. Any information collected under our old Privacy Policy will be subject to the terms of our new Privacy Policy.

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