

PRIVACY POLICY

1. APPLICABILITY OF THIS PRIVACY POLICY

This Privacy Policy is applicable to personally identifiable information (hereinafter referred to as “**Personal Data**” and detailed below) collected, processed, stored and used by Culver Max Entertainment Private Limited (formerly known as Sony Pictures Networks India Private Limited) having its registered office at Interface Building 7, Floor 4, Malad (West), Mumbai - 400064, India (“**the Company**”) either through its owned, controlled and operated website located at <https://www.sonypicturesnetworks.com/storyteller/> (collectively and individually referred to as “**Storyteller**”), in connection with individual Users’ (“**User**”, “**You**”, or “**Your**”) access to Storyteller for submitting Your “**Concept**” to the Company (“**Submission**”).

2. ACCEPTANCE OF THE TERMS OF THIS POLICY

- 2.1. This Privacy Policy should be read in conjunction with the Terms of Use.
- 2.2. By using Storyteller, You agree to the Company’s terms of processing Your Personal Data which You provide to the Company in accordance with this Privacy Policy.
- 2.3. Please also note that Storyteller may contain links to third-party websites, platforms or applications not owned, operated, or controlled by the Company. The Company is not responsible for the privacy practices of or for the Personal Data processed by such third-party websites, platforms or applications that You may visit.
- 2.4. The Personal Data that such third-party websites, platforms or applications collect directly from You (for example, payment processing) is subject to such third-party website, platform or application’s privacy practices. Privacy choices You may make on the third-party websites, platforms or applications will not apply to the Company or the Company’s processing of the Personal Data as per this Privacy Policy applications.
- 2.5. The Company encourages You to be aware of the privacy practices of such other websites, platforms or applications that You may choose to access from Storyteller and that may collect Your Personal Data.

3. ACCESS TO STORYTELLER

The access to Storyteller portal is only available to Users who are above the age of 18 years.

4. DEFINITION OF PERSONAL DATA

“**Personal Data**” means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. When anonymous information is directly or indirectly associated with personal data, the resulting information also is treated as personal data.

To access Storyteller, the Company requires You to provide Your Personal Data since the Company cannot identify You by a pseudonym or through anonymous data. The Company may collect anonymized data from You based on certain activity You perform on Storyteller for analytics and statistical purposes. Such anonymized data will not be associated with Your Personal Data and will not be applicable under this Privacy Policy.

5. COLLECTION OF PERSONAL DATA

The Company may collect the following Personal Data from You:

5.1. *Information You Provide to the Company*

A. **At the time of Registration and Sign Up**

To use Storyteller and make submission of Concepts, Users must provide the following Personal Data associated with the User, including but not limited to:

- i. First name
- ii. Last name
- iii. Mobile number (with Country Code)
- iv. E-mail address
- v. Location (IP Address)

- vi. Nationality
- vii. City

5.2. *Additional Personal Data provided by You Voluntarily*

If You send any correspondences, such as emails or letters including data subject requests to the Company, or if other users or third parties send Personal Data about Your activities or postings on Storyteller to the Company, then the Company may collect and store such Personal Data. The Company may collect additional Personal Data at other times, including but not limited to, when You provide feedback etc. This Personal Data includes the information You may share with the Company during such correspondence like Your name, e-mail id, mobile number, city, country, etc.

The additional Personal Data mentioned above is collected solely for the purpose of communicating with the User with respect to submission of their Concepts, processing the feedback received, and conducting surveys to implement suggestions, processing and implementing change requests, data subject requests and enriching the overall user experience. Users will be asked to provide their consent in case the above-mentioned Personal Data is processed for any purpose other than those detailed above.

5.3. *Personal Data automatically collected while browsing or navigating through Storyteller*

The Company may collect Your IP address from Your computer, mobile or any other device on which You access Storyteller. An “IP address” is an identifying number for network hardware connected to a network. It helps to recognize the location of the User.

The Company uses IP address for the following purposes:

- i. Determining Your geographic location
- ii. To enable processing of “Concepts”; and
- iii. To detect and monitor any fraudulent activity.

6. **PURPOSE OF COLLECTION OF YOUR PERSONAL DATA**

The Company may use the Personal Data collected for the following purposes:

- i. process Your submission of “Concept” on Storyteller;
- ii. contact You about Your submission of “Concept” and in connection with any services or feedback through Storyteller;
- iii. increasing security measures to keep Your data safe by preventing, detecting and investigating potentially prohibited or illegal activities;
- iv. other purposes specifically disclosed to You prior to the collection of Your Personal Data or otherwise with Your consent.

If the Company wishes to collect and process Your Personal Data for purposes other than those mentioned above, the Company shall seek a specific consent from You prior to collecting and processing Your Personal Data for such additional purposes unless this falls within legitimate business interest for processing as explained in paragraph 7 below.

7. **PROCESSING OF PERSONAL DATA COLLECTED**

The Company processes Your Personal Data for the purposes detailed hereunder, basis the following lawful basis under GDPR: (i) obtaining explicit consent from You for processing Your Personal Data; (ii) where it is necessary for the Company to undertake its legal obligations or (iii) processing of Personal Data for legitimate interests where processing is not necessary to meet contractual obligations, but is necessary to provide You with services of Storyteller.

8. **SHARING AND DISCLOSURE OF PERSONAL DATA**

The Company may share Personal Data with the following parties:

8.1. **Service providers providing services on the Company’s behalf**

The Company may, from time to time, employ third-party service providers to perform certain functions on the Company’s behalf, such as hosting or operation of Storyteller, hosting the Personal Data, e-mails, messages or other communications, and providing data analysis services etc. within or outside Your country. Wherever Your Personal Data is transferred, stored or processed, the Company will take reasonable steps to safeguard the privacy of Your Personal Data. Any Personal Data shall be disclosed to such third-party service providers only after ensuring contractual protection of Your Personal Data, including that such third-party service providers implement adequate

technical measures to safeguard Your Personal Data. These third-party service providers are prohibited from using Your Personal Data for purposes other than those specified in Paragraph 6 above or required by law.

8.2. **Affiliates of the Company and Business Transfers**

The Company operates globally and it may transfer Your Personal Data to the Company's affiliated companies primarily for business and operational purposes.

the Company or any of its businesses, including Storyteller, may be acquired or merged or de-merged or spun-off or may be subject to any other transactions wherein the Company may no longer remain the controller or processor of Your Personal Data. In such cases, where any such transaction takes place which covers Your Personal Data, Your Personal Data shall be transferred as part of such transaction. Such transfer of Your Personal Data will without any further notice to the Users and by using Storyteller, You hereby acknowledge and agree that this Privacy Policy will serve as notice enough for any such transfer.

8.3. **Disclosures required under laws and regulations**

The Company may transfer and disclose Your Personal Data to:

- i. comply with a requirement or an obligation under a law or regulation when the Company in good faith believes that such disclosure is required under such law or regulation;
- ii. to government and regulatory authorities at their request or order;
- iii. to verify or enforce Storyteller's Privacy Policy, Terms of Use or other applicable policies;
- iv. to protect the rights, property, safety, or security of third parties, users or the public or in response to a similar emergency.

The aforesaid disclosures may be carried out by the Company without notice to You.

9. **YOUR CONTROLS AND CHOICES**

9.1. **Accessing and rectifying your Personal Data**

When You use Storyteller, the Company makes reasonable efforts to provide You with Your right to access Your Personal Data and further upholding the accuracy of the Personal Data by providing You with a fairly simple functionality within Storyteller for rectifying Your Personal Data You may have provided.

9.2. **Data Portability**

You may request copies, in a structured, commonly used, and machine-readable format, of the Personal Data that You provided to the Company, wherever feasible. Alternatively, You may request for Your Personal Data to be transmitted to another service provider (where technically feasible) directly by the Company.

9.3. **Data Retention and Erasure**

the Company retains Your Personal Data for legitimate business interests and until the Company requires such Personal Data for the purposes for which the same has been collected as specified in Paragraphs 6 and 7. The Company may also need to retain Your Personal Data for the Company to comply with legal obligations as specified in Paragraph 8. If You no longer want the Company to use Your Personal Data, then You can request that the Company erases Your Personal Data. Do note that if You request for the erasure of Your Personal Data, the Company may retain some of the Personal Data as may be required for the following purposes:

- i. a unique identifier used for registration purposes such as e-mail or mobile number to detect for any fraudulent activity;
- ii. retention and use of Your Personal Data as necessary for the Company's legitimate business interests, such as fraud detection and prevention and enhancing safety;
- iii. retention and use of Your Personal Data to the extent necessary to comply with the Company's legal obligations (specified above). For example, the Company may keep some of Your Personal Data for tax, legal reporting and auditing obligations;
- iv. Personal Data You share with the Company (e.g. comments, complaints, feedback etc.) maybe retained for legitimate purposes, even after Your submitted "Concept" is rejected or withdrawn; and
- v. Because of the way the Company maintains certain services, after You delete Your Personal Data, residual copies of such Personal Data, it may take some time before these are deleted from the Company's active servers and may remain in the Company's backup systems.

You should be aware that it may not be possible to completely remove or delete all Your Personal Data from the Company's databases to effect any opt-out preferences You have made due to technical concerns with data backup and contingency support.

Your request for deletion, or modification of Your Personal Data shall be subject to the following:

- i. where You have shared Your Personal Data, that You wish to request for deletion or modification, directly with a third-party vendor, You shall request such third-party vendor for deletion or modification of Your Personal Data. The Company shall not be responsible for the deletion or modification of such Personal Data as a data controller; and
- ii. in case the Personal Data that You request for deletion or modification has been collected and used only by the Company and the Company's appointed and contracted processors and contractors, the Company shall be responsible for the deletion or modification of the Personal Data requested subject to the data retention conditions stipulated in this Privacy Policy.

Do note that if You have made multiple submissions with Storyteller, then You will have to raise separate requests for deletion or modification of Your Personal Data for each of "Concept" submitted, along with the associated email IDs or phone numbers.

9.4. Objection and Restriction of Processing

Where there is a lawful basis for processing Your Personal Data and such processing falls within the Company's legitimate interest like, without limitation, IP Address, geo-location, or where You have reasons to believe that the Personal Data being processed by the Company is inaccurate, unlawful or is no longer required to be processed by the Company under any lawful basis, You may, at any time, ask the Company to restrict or object the processing of Your Personal Data.

- 9.5. To send a request for any of the above-mentioned purposes, kindly send an e-mail to the Company's DPO at dpo@setindia.com. The Company may take up to 30 (thirty) days from the date of receipt of request to complete Your requests. However, if the nature of Your request requires significant effort or is time consuming in terms of locating the date or in terms of quantity of data that it relates to, then the Company may ask for an extension of a further 60 (sixty) days by giving a prior notice to You with the reason for the extension.
- 9.6. The Company shall not charge You for fulfilling any of the above requests. However, if the fulfilment of any such request leads to certain costs being incurred by the Company, then the Company will notify You prior to processing such request.
- 9.7. The Company advises the Users to identify themselves in their requests to the DPO for exercising any of their rights with respect to their Personal Data. The Company may not be able to process any requests made in the event the User fails to identify themselves or if the Company is unable to authenticate such a User. The Company may also decline to process requests that are unreasonably repetitive or systematic, requiring disproportionate effort, jeopardizing the privacy of others, or would be extremely impractical or for which access is not otherwise required.
- 9.8. Please be aware that if You do not allow the Company to collect Personal Data from You, the Company may not be able to accept the submission of "Concept" from You. If collection of Personal Data is mandatory, the Company shall inform You at the point of collection so that You can make an informed decision whether You wish to allow the processing of such Personal Data.

10. COMPANY'S COMMITMENT TO PRIVACY AND CHOICES

- 10.1. The Company respects Your privacy and is committed to protecting the Personal Data You provide when You use or access Storyteller services. The Company takes commercially reasonable and appropriate precautions to protect Your Personal Data from unauthorized disclosure and security breaches.
- 10.2. It is important to let You know that electronic data can be intercepted, corrupted, lost or destroyed. The Company cannot guarantee or warrant the security of any data and consequently Your use of Storyteller is at Your own risk. The Company is however continuously implementing and updating administrative, technical, and physical security measures to help protect Your Personal Data against unauthorized access, loss, destruction, corruption, or alteration.

11. NOTIFICATION OF CHANGES AND YOUR ACCEPTANCE OF THE PRIVACY POLICY

The Company will update this Privacy Policy from time to time in response to changing legal, regulatory, business, or operational requirements or when there is a change or update in the services offered on Storyteller. The Company will provide notice of any such changes to the Privacy Policy, including when such changes will take effect, in accordance with the applicable law. Your continued use of Storyteller after any such updates to the Privacy Policy will constitute acknowledgement and acceptance of those changes. If You do not wish to acknowledge or accept any updates to this Privacy Policy, You may suspend your use of Storyteller.

12. CONTACT INFORMATION

The Company welcomes questions, comments, and concerns about its Privacy Policy and privacy practices. You can contact the Company's Data Protection Officer (DPO), Mr. Ashok Nambissan, by email at dpo@setindia.com (via Your email id provided at the time of submitting the "Concept") in relation to concerns or comments for any of the following:

- Processing, usage, and storage of Personal Data
- This Privacy Policy
- Exercise of Your rights as a data subject as provided under the applicable law
- Grievances with respect to processing, usage, and storage of Your Personal Data
- General enquiry/ clarification in relation to the Personal Data
- Suggestions/ feedback related to Privacy Policy and privacy practices

If You contact the Company with a privacy complaint, it will be assessed with the aim of resolving the issue in a timely and effective manner. Please note that if You contact the Company to assist You in this regard, for Your safety and Storyteller's, the Company may need to authenticate Your identity before fulfilling Your request.

In case You require technical support, You may write to the Company at prioritysupport@sonyliv.com.

The Company will only use Your email id for customer interaction and communication. After your query is resolved, the Company will not share with You information about its services including the Storyteller, either through mailers or any other form of communication for which You don't provide consent to the Company.

You may also reach out to the Company's EU Representative, Shalin Patel at Shalin_Patel@spe.sony.com, if You have questions or concerns regarding the Company's privacy practices.