

Sony Pictures Entertainment Talent Privacy Policy

This Sony Pictures Entertainment Talent Privacy Policy (“**Privacy Policy**”) describes the privacy practices of Sony Pictures Entertainment Inc. (a subsidiary of Sony Group Corporation) and/or certain of its affiliates and business divisions (collectively, “**SPE**,” “**Company**,” “**we**,” “**our**,” or “**us**”), who are the “Controllers” of Personal Data collected in connection with our talent engagement process (“**Your Job Candidacy**”). The SPE entity responsible for the processing of your Personal Data is normally the company you are engaging with. To find the local SPE entity responsible please click [here](#). This Privacy Policy provides the talent (“**you**”) with information about how we collect, use, process, disclose, and transfer certain Personal Data about you.

As used in this Privacy Policy, the term “**Personal Data**” means information relating to an identified or identifiable natural person.

It is important that you read this notice, together with any other privacy documents we may provide on specific occasions when we are processing Personal Data about you, so that you are aware of how and why we are using such information.

PERSONAL DATA WE COLLECT

We may collect the Personal Data listed below.

- **Personal Details:** name and contact information (home address, email address, phone number and emergency contact information), gender, date of birth, government identification numbers, driver’s license number, tax identification number, national insurance number, citizenship/residency, photograph, and other data collection permitted or required by local law;
- **Professional or employment-related information,** including skills, qualifications, role (whether within SPE or outside of SPE), work experience, nominations, recent credits and awards, and information about previous productions you have worked on contained in any publicly-available webpages (for example, IMDB), publicly-available social media sites, or that you otherwise choose to share with us; SPE sponsored development programs (the “**Programs**”) you attended; and information relating to your agent, including agent’s name, email and phone number.
- **Background information:** educational, training, and employment background, references from previous employers or engagements, conflict of interest certification statement, and other background information commonly used for security screenings, in accordance with applicable law.

You are not required to provide all Personal Data identified in this Privacy Policy in connection with Your Job Candidacy, but if you do not provide Personal Data we inform you is necessary when we request it, then we may not be able to proceed with consideration for your candidacy.

In addition, if you have previously attended one of our Programs or worked on our productions or if you have applied for a position at SPE or currently hold a role within SPE, Personal Data we have previously collected about you in connection with those opportunities may also be combined with or evaluated in conjunction with the Personal Data described above.

In addition, where permitted by applicable law, SPE collects, processes and uses the following categories of Personal Data about you from you or from authorized third parties (e.g., your supervisor, public authorities or public resources) in connection with Your Job Candidacy, which may be considered special categories of Personal Data under certain data protection laws (collectively, "**Sensitive Personal Data**"):

- **Diversity information** such as data relating to race or ethnicity, sexual orientation, gender identity and pronoun preference to enable us to have a diverse talent pool of candidates in our productions as well to support efforts within the entertainment industry for diverse workforce by providing equal opportunities.
- **Health information** for purposes such as managing risks and taking actions to protect our workforce and facilities during a pandemic (such as COVID-19).
- **Disability information** for purposes of administering the workforce (e.g., accommodating the workplace) and compliance with applicable laws and engagement-related requirements.

SOURCES FROM WHICH WE COLLECT PERSONAL DATA

The Personal Data (including Sensitive Personal Data) will be collected either directly from you or your activities in the course of their employment or engagement, or from third party sources (including references, talent agents or agencies, or our Program managers and/or producers on our productions as provided by you to them), subject to the requirements of applicable law.

We may also obtain your Personal Data (including Sensitive Personal Data) from publicly-available sources such as websites, social media, or any other publicly accessible sources commonly used for connecting individuals and production/studio companies to explore potential business and engagement opportunities.

PURPOSE AND LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We will only use your Personal Data when permitted to do so in accordance with data protection laws, which means that we will only process your Personal Data where we have a lawful basis for doing so.

When we process your Personal Data, we rely on the following legal bases for the purposes indicated below:

Legal basis	Purpose(s)
Legal obligation. We process your Personal Data for the purpose(s) listed opposite to the extent that the processing is necessary for	<ul style="list-style-type: none"> • To comply with a legal obligation, including responding to requests by government, regulators, judicial or law enforcement

<p>compliance with a legal obligation to which we are subject.</p>	<p>authorities.</p> <ul style="list-style-type: none"> To comply with tax or accounting rules or other legal obligations under applicable law.
<p>Legitimate interests. We process your Personal Data for the purpose(s) listed opposite to the extent that the processing is necessary for the purposes of our (or a third party's) legitimate interests and not overridden by your interests or fundamental rights and freedoms. We rely on legitimate interests only where we do not have your consent and are not relying on any of the other lawful bases set out in this table.</p>	<ul style="list-style-type: none"> To manage the security of SPE premises and systems. To detect and prevent fraud against you and/or us. To manage our corporate diversity and inclusion initiatives. To ensure safe working conditions for staff, talent, and others on set. To establish, exercise or defend legal claims that may arise against us or against you.
<p>Vital interests. We process your Personal Data for the purpose(s) listed opposite to the extent that the processing is necessary to protect your, or another person's, vital interests.</p>	<ul style="list-style-type: none"> For emergency contact or medical treatment purposes, if an urgent healthcare issue arises.
<p>Public interest. We process your Personal Data for the purpose(s) listed opposite to the extent that the processing is necessary for the performance of a task carried out in the public interest.</p>	<ul style="list-style-type: none"> To increase the pool of candidates and have a diverse talent pool of candidates in our productions, as well to support efforts within the entertainment industry for diverse workforce by providing equal opportunities.
<p>Consent. Where none of the above legal bases apply, we process your Personal Data for the purpose(s) listed opposite where we have your consent to do so.</p>	<ul style="list-style-type: none"> To communicate with you. To assess your eligibility for a job in a production, as permitted by local data protection law. To onboard and enroll you for a job in a production. To comply with applicable laws and regulations.

In addition, when we process your Sensitive Personal Data, we rely on the following legal bases for the purposes indicated below:

Legal basis	Purpose(s)
<p>Employment, social security and social protection law obligations and rights. We</p>	<ul style="list-style-type: none"> To comply with applicable employment, social security and social protection laws

<p>process your Sensitive Personal Data for the purpose(s) listed opposite to the extent that the processing is necessary for the purposes of carrying out obligations and exercising specific rights of us or you under employment and social security and social protection law.</p>	<p>and regulations.</p> <ul style="list-style-type: none"> • To assess your working capacity as required by applicable employment, social security and social protection laws and regulations • To increase the pool of candidates and have a diverse talent pool of candidates in our productions, as required by applicable employment, social security and social protection laws and regulations. • To manage risks and taking actions to protect our workforce and facilities during a pandemic (such as COVID-19), and making reasonable workplace adjustments for talent with disabilities, as required by applicable employment, social security and social protection laws and regulations.
<p>Sensitive Personal Data made manifestly public by you. We process your Sensitive Personal Data for the purpose(s) listed opposite to the extent that the processing relates to Sensitive Personal Data manifestly made public by you (and where we are not already required by employment, social security and social protection law to process this information).</p>	<ul style="list-style-type: none"> • To manage our corporate diversity and inclusion initiatives, including increasing the diversity of the talent pool.
<p>Establishing, exercising, or defending legal claims. We process your Sensitive Personal Data for the purpose(s) listed opposite to the extent that the processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.</p>	<ul style="list-style-type: none"> • To establish, exercise or defend legal claims that may arise against us or against you.
<p>Substantial Public Interest. We process your Sensitive Personal Data for the purpose(s) listed opposite to the extent that the processing is necessary for the performance of a task carried out in the public interest and as permitted by the applicable law.</p>	<ul style="list-style-type: none"> • To increase the pool of candidates and have a diverse talent pool of candidates in our productions, as well to support efforts within the entertainment industry for diverse workforce by providing equal opportunities.
<p>Assessing your working capacity. We process your Sensitive Personal Data for the purpose(s) listed opposite to the extent the processing is necessary for the purposes of assessing your working capacity.</p>	<ul style="list-style-type: none"> • To assess your working capacity as permitted by applicable data protection law.

<p>Explicit Consent. Where none of the above legal bases apply, we process your Sensitive Personal Data for the purpose(s) listed opposite where we have your explicit consent to do so.</p>	<ul style="list-style-type: none"> • To manage our corporate diversity and inclusion programming where voluntarily provided by you in accordance with other notices
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If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Data, please contact us using the contact details provided below.

DISCLOSURE OF YOUR PERSONAL DATA

We may share your Personal Data with the following categories of recipients:

With certain third parties

Existing or potential business partners, independent external advisors (e.g., auditors), banks, insurance carriers, benefits providers, and other third parties may also receive your Personal Data as necessary in connection with our business operations and for consideration of Your Job Candidacy, in particular to carry out our contractual relationships with such third parties, to administer the Programs in connection with productions, communicate with you and third parties, comply with corporate financial responsibilities, and respond to and comply with requests and legal demands. Lastly, for the purpose of booking interviews or other related travel arrangements in connection with Your Job Candidacy, Personal Data may also be made available to a third-party travel agent, that, in turn, may transfer Personal Data to the Company, its subsidiaries and/or affiliates.

Affiliate Sharing

We may share your Personal Data with SPE production companies and/or non-SPE production companies and entities who are affiliated with us for operational purposes or in connection with open roles we or they have as permitted under applicable law.

Business Transfers

SPE or any of its assets, may be sold, or other transactions may occur in which your Personal Data is considered one of the business assets of the transaction. In such cases, your Personal Data may be transferred to third parties in the context of these transactions.

Regulatory and/or Law Enforcement Agencies

We may also transfer and disclose any category of Personal Data we collect to third parties such as to local labour authorities, courts and tribunals, regulatory bodies and/or law enforcement agencies 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 applicable policies to Your Job Candidacy; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of SPE, third parties, visitors to any website or the public.

Such disclosures may be carried out without additional notice to you.

INTERNATIONAL TRANSFER

In some cases, recipients of your Personal Data identified in this Privacy Policy may be located in a jurisdiction where data protection and privacy regulations do not offer the same level of protection as that offered in the EU/EEA and/or UK (such as group companies in the United States of America). In these cases, we implement appropriate safeguards, in line with applicable data protection laws, such as standard data protection clauses adopted by the competent EU or UK authorities. You can request a copy of the appropriate safeguards by contacting us.

DATA RETENTION

Your Personal Data is stored by SPE to the extent necessary for the performance of our obligations and for the time necessary to achieve the purposes for which the data are collected, in accordance with applicable data privacy laws and our Records Retention Schedules.

When we no longer need to use your Personal Data, we will remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires, or shorter, if you withdraw your consent.

For more information about our retention policies, please contact us using the contact details below.

SECURITY

SPE maintains reasonable technical and organizational security measures as prescribed by applicable law that are designed to protect your Personal Data from unauthorized access, use, misuse, modification, disclosure and destruction. Nevertheless, transmission via the internet and online digital storage are not completely secure and SPE cannot guarantee the security of your information collected online.

YOUR RIGHTS

Under certain circumstances, by law you have the right to:

- Right of access: You may have the right to obtain from us confirmation as to whether or not Personal Data concerning you is processed, and, where that is the case, to request access to the Personal Data.
- Right to rectification: You may have the right to obtain from us the rectification of inaccurate

Personal Data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

- Right to erasure (right to be forgotten): Under certain circumstances, you may have the right to obtain from us the erasure of Personal Data concerning you and we may be obliged to erase such Personal Data.
- Right to restriction of processing: Under certain circumstances, you may have the right to obtain from us restriction of processing your Personal Data. In this case, the respective data will be marked and may only be processed by us for certain purposes.
- Right to data portability: Under certain circumstances, you may have the right to receive the Personal Data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another entity without hindrance from us.
- Right to object: Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Data by us and we can be required to no longer process your Personal Data.

If you want to exercise any of your rights, please contact us in writing at the email as detailed below.

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights) unless such request is clearly unfounded or excessive; in such circumstances we may charge a reasonable fee, or refuse to comply with the request in such circumstances.

Please be aware that the rights above are not absolute and there may be circumstances where we are unable to comply with your request (either wholly or in part). In such cases we will explain why we cannot comply with the request.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

You also have the right to complain to your competent data protection authority about our processing of your Personal Data. However, although you are not obligated to do so, we ask that you contact us first so that we can try to resolve any concerns you have.

RIGHT TO WITHDRAW CONSENT

When you provide your consent to the collection, processing and transfer of your Personal Data for the specific purpose mentioned above, you have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose you originally agreed to and, subject to our retention policy, we will

dispose of your Personal Data securely, unless we have another lawful basis for doing so, which we will inform you of when responding to you.

CHANGES TO THE PRIVACY POLICY

Except where prior notice or consent is required by law, SPE reserves the right to vary, update or modify this Privacy Policy at any time and without prior notice.

CONTACT US

If you have any questions, comments or concerns about the use of this Privacy Policy, please contact us by sending an email to Privacy_EMEA@spe.sony.com

You may also contact SPE's Data Privacy Officer at SPE_Privacy@spe.sony.com or contact your local data protection authorities with any questions.

Effective Date: February 26, 2024

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