

## Privacy Policy

### 1. Introduction

Please read this Privacy Policy (“Privacy Policy”) carefully, as it applies to the information collected, used and disclosed by 101 Studios or any third parties acting with our authorization or otherwise provided to us by third parties about you, in each instance, with respect to your access to and use of the Services. Where you have provided your personal information to third parties, including marketing companies, advertisers and service providers and have provided sufficient consent, we may obtain such personal information and combine it with your Information (as defined herein) and, if we do so, our use of the resulting combined Information will be subject to this Privacy Policy. Please review our Terms of Use **[EMBED LINK]** which governs your use of the Services. Any capitalized terms that are not defined in this Privacy Policy shall have the meaning ascribed to them in the Terms of Use. This Privacy Policy will remain in full force and effect, even if your use of or participation in the Services or any other particular service, feature, function or promotional activity offered on or in connection with the Services terminates or expires or is suspended or deactivated for any reason. The collection and use of your information as described in this Privacy Policy is based on your voluntary consent or on our contractual obligations to you. If you do not agree with this Privacy Policy, please do not participate in any of the Services. This Privacy Policy applies regardless of the Device you use to access the Services.

### 2. Information We Collect About You

We collect personal information or other information about you when you use our Services. The information and data we may process (*i.e.*, collect, use and store) depends on your interaction with us. The key types of Information that we may process include the following:

- **Location Information:** We may collect information about and from your Device, including GPS-based location information, your IP address, and time zone in order to provide you with more personalized content within the Services. The type of location data we collect depends on a number of factors, including the type of Device you are using (*e.g.*, laptop, smartphone, tablet) and the type of connection enabled on your Device (*e.g.*, WiFi, Bluetooth, broadband cable). If you agree to allow access to your location, you agree that we and our service providers may collect such location-based information from your Device. We may use and share that location-based information with third parties to deliver, market and promote the content, services, features, products and advertising (and/or to verify your rights to receive such content, services, features and/or products) that are available through the Services. If you no longer wish to have this location information collected and used by us, you may “opt-out” by disabling the location and Bluetooth features in the operating system of your Device.
- **Third Party Platform Information:** If you access the Services via your Third Party Platform account, we may collect certain information about you from the Third Party Platform, including your email address, legal name, country of residence, location, date of birth, film and other preferences and usage data. We use this information to further enhance your experience using the Services.
- **Personal Information You Choose to Provide:** We may collect Personal Information that you choose to provide to us when you elect to participate in optional features or Services, as the same may become available. For example, if you sign up to receive newsletters, marketing promotions or other communications regarding the Services, we may collect your name, email address, mailing address, phone number and survey responses in order to provide the additional features or Services. We will make clear what information we may process as a result of your engagement with the optional features or Services, as applicable.

- **Information Collected by Cookies:** As further described in [Section 6](#) of this Privacy Policy, when you use the Services, we automatically collect certain Information, to assist us in authenticating your usage and/or Device, keep track of your preferences, create a more tailored user experience and to provide targeted advertising. In addition, the Services and/or third parties may use “cookies” (which are small data files containing information about you that is stored on your device), “embedded scripts”, and other similar tracking technologies (collectively, “[Tracking Technologies](#)”) to collect Additional Information (as defined below) automatically as you interact with the Services. Information processed by Tracking Technologies will be processed in accordance with our Cookie Policy **[NOTE: EMBED LINK]**.
- **Third Party Advertising:** As part of the Services and in accordance with our Cookie Policy **[NOTE: EMBED LINK]**, we may also use a variety of third parties, including advertising networks, data exchanges, traffic measurement service providers and marketing analytics service providers to, for example, serve advertisements on the Services, populate user-specific advertisements and/or measure and analyze advertising effectiveness and/or traffic on or in connection with the Services (“[Third Party Advertising Providers](#)”). Such Third Party Advertising Providers may enable us to display advertisements based on your use of the Services and other websites, services and platforms you have used or visited. These Third Party Advertising Providers may use their own Tracking Technologies (as described above) to collect similar Information. 101 Studios does not control these Third Party Advertising Providers and/or their use of Tracking Technologies, which is instead governed by the privacy policies of any such Third Party Advertising Provider.

As it is used in this Privacy Policy, the term “[Personal Information](#)” means any information that we collect, receive or access on or in connection with the Services that would allow someone to identify you, such as your name, address, email address, physical address, payment card information, telephone number(s), a unique device identifier assigned to your Device, Third Party Platform anonymous identifiers, your Internet protocol (IP) address (if applicable), and location data (if you enable this feature), all as outlined above in this [Section 2](#). The term “[Additional Information](#)” means any information that we collect about you on or in connection with the Services other than Personal Information that is used in an anonymized and aggregated fashion and detailed in this [Section 2](#) above, such as to improve our Services and determine where our Services are being used geographically (Personal Information and Additional Information shall be collectively referred to as “[Information](#)”).

### **3. How We Use Information**

We may process your Information (depending on your interaction with us) for a variety of reasons that are permitted under data protection laws and in accordance with this Privacy Policy, which may include the below purposes. Note that the legal bases outlined below are required to be included under EU data protection laws, but are not required to be included if you do not reside in the EU:

- To fulfill our contractual obligations under an existing agreement with you or in anticipation of entering into an agreement with you, including:
  - To provide any services or products that you request or purchase in connection with the Services;
  - To enforce your legal rights under an agreement; and
  - To provide you with an estimate for the cost of our products and services, as applicable.
- To meet and fulfill our legitimate business interests, including:
  - To contact you regarding the administration of any features or functions of the Services;
  - To market and promote the Services, including promotions and other initiatives and sending marketing emails and correspondence;
  - To respond to your questions, comments, complaints, requests and other communications;
  - To track your return visits and use of the Services in order to tailor your experience with the Services;
  - To manage our business needs, such as monitoring, analyzing, modifying and improving the Services’ functionality and performance;

- To help us to enhance and improve the existing Services and to develop new Services;
- To accumulate and report aggregate, statistical information in connection with the Services and user activity.
- With your consent, including:
  - To display advertising and marketing information based on your use of the Services and other websites, services and platforms you have used or visited;
  - To provide information and marketing materials about our other products and services and the products and services of unaffiliated businesses; and
  - To provide personalized services offered by us on third-party websites and online services.

You can withdraw your consent at any time by following the steps in [Section 5](#) of this Privacy Policy.

- To comply with our regulatory or legal obligations, to enforce our legal rights or comply with legal processes, including:
  - To detect and prevent fraud or infringement of our or any third party's rights;
  - To meet reporting requirements (*e.g.*, filing tax forms);
  - To retain documents and information related to a legal action;
  - To enforce the Terms of Use; and
  - To report data breaches or unauthorized access to the Services.

#### 4. **Information We Share With Third Parties**

We take your privacy seriously and will not share your Information with others except in the following circumstances:

- **Our Group Entities:** We may disclose your Information to affiliates and/or subsidiaries of 101 Studios in order to provide you with tailored products, services and communications or in accordance with our internal policies or administrative or business practices.
- **Third Party Service Providers:** We may share Information with carefully selected service providers who are working with us in connection with the operation of the Services. These service providers may temporarily store Information on their servers, but may only use your Information in connection with the specific services they are providing. We request that service providers maintain commercially reasonable standards of security and confidentiality and must agree to keep such Information secure and confidential in line with this Privacy Policy. Please note that we are not responsible for the actions of service providers or other third parties, nor are we responsible for any additional information you provide directly to any third parties. We may share aggregated information and non-identifying information with third parties for industry analysis, demographic profiling and other similar purposes.
- **With Your Consent:** We will obtain consent from you prior to enabling your use of any location-based services. If you reside in the European Union, we will obtain consent from you prior to sharing your Personal Information with third parties for their marketing purposes if we are unable to rely on our legitimate interests in doing so.
- **Pursuant to Law, Rule or Regulation:** We may share or disclose your Information when we believe in good faith that we are lawfully authorized or required to do so or that doing so is reasonably necessary or appropriate to comply with the law or legal processes, including to respond to requests from public, governmental, legal and regulatory authorities, to comply with court orders, to obtain legal remedies or limit our damages, to enforce this Privacy Policy or the Terms of Use, to protect against fraud or for risk management purposes, and to protect the rights, safety and/or property of you, our employees or others.

- **Corporate Transactions or Events:** We may disclose your Information in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition, or in any other situation where Information may be disclosed or transferred as one of our business assets.
- **To Fulfill Your Requests:** If you elect to use certain authentication or sharing features available on the Sites or via the Services, we may use your Personal Information to fulfill your request to share content with or provide access to such third parties (e.g., Facebook, LinkedIn or Twitter).

## 5. **Rights and Choices Regarding Information (e.g., Opting Out, Disabling Certain Features)**

At times, you may be presented with the option to “opt-in” to receiving certain push notifications, marketing and promotional communications or other information from us and others that we think will be of interest to you. Recipients of such communications can unsubscribe or “opt-out” by following the specific instructions included in such communications or by adjusting the settings in your Device. At any time you may request that we delete your Information, or opt you out of receiving marketing and promotional emails from us, by emailing us at [●] [\[101studiosent@gmail.com\]](mailto:101studiosent@gmail.com) detailing your request. Please note that such requests may not take effect immediately, but will be processed without undue delay and during which time your Information shall remain subject to the prior privacy settings. We will take steps to delete your Information as soon as is practicable, but some Information may remain in archived/ backup copies pursuant to our legal obligations or as otherwise required by law. We will communicate the erasure to each recipient to whom Information was disclosed, unless this proves impossible or involves disproportionate efforts.

If you continue to use the Services, we may send you emails and announcements that are necessary for the proper functioning and administration of our Services, including for the purposes described in [Section 3](#) of this Privacy Policy in order to keep you informed about the operation of our Services. We may also have features that allow you to submit information, questions or feedback to us. In those instances, we may retain your emails and other information you submit to us for our internal purposes and to help us to serve you better.

The settings in your Device will also present you with the option to disable certain features which allow it to collect and use certain Information from your Device, including location-based information. If you do not wish to have location-based information collected and used by our service providers and us, you may opt out by disabling the location features on your Device.

If you are a citizen of or reside in the European Union, you may have certain additional rights with respect to the Personal Information you provided to us. To the extent permitted by applicable data protection laws, you may:

- Access or modify your Personal Information;
- Object at any time to the processing of your Personal Information if the legal ground we are relying on is our legitimate interest or in the public interest;
- Request that your Personal Information be erased if it is no longer necessary to be retained for the purposes for which it was processed, you have withdrawn consent to, or object to, the processing of such Personal Information and we meet no other legitimate basis for such processing or it has been unlawfully processed;
- Restrict the processing of your Personal Information if you contest its accuracy or the lawfulness of our processing, we no longer need it but you need it for a legal claim or you have objected to its processing and await verification of our legitimate grounds for processing it;
- Under certain circumstances, have your Personal Information transferred to another company;
- Withdraw any consents that you have previously provided to allow us to process your Personal Information; or

- Request to stop receiving our marketing communications. If you opt out of marketing emails you will continue to receive messages from us about your relationship with us where permitted by law.

If you wish to exercise any of these rights please contact us at [•] [101studiosent@gmail.com](mailto:101studiosent@gmail.com) Please note that some requests may require you to verify your identity.

## **6. Opting Out of Use of Certain Information That May be Collected by Tracking Technologies**

When you visit our Sites, use our Services, or visit a third-party website for which we provide online services, we and our business partners and vendors may use Tracking Technologies to recognize you as a repeat visitor and to customize your online experiences, the Services you use, and other online content and advertising, measure the effectiveness of promotions and perform analytics, and to mitigate risk, prevent potential fraud, and promote trust and safety across the Services. Certain aspects and features of our Services are only available through the use of Tracking Technologies, thus, if you choose to disable or decline Tracking Technologies, your use of the Services may be limited or not possible. Please review our Cookie Policy [\[NOTE: EMBED LINK\]](#) to learn more about how we use and how you may adjust and disable Tracking Technologies.

## **7. Retaining Your Personal Information**

We access, retain, store and use Personal Information for the least amount of time necessary pursuant to our relationship with you (e.g., to provide you with or access to our Services), in accordance with our data retention policies and applicable law. We do not collect more Personal Information than is necessary to fulfill our obligations to you or at law or for the purposes stated in this Privacy Policy.

## **8. Security**

We maintain and have implemented security safeguards to protect the Personal Information submitted to and collected, used and stored by us, both during transmission and once we receive it. We cannot guarantee its absolute security. You should take appropriate steps to protect your account and Personal Information.

We are not responsible for protecting any Personal Information that we share with a third-party based on an account connection that you have authorized. 101 Studios is not responsible for any actual or consequential damages that result from a lapse in compliance with this Privacy Policy because of a technical malfunction or a breach in security.

## **9. Our Policy Regarding Children**

Our Services are not directed to children under the age of 13. We do not knowingly collect Information from children under the age of 13. If you are under the age of 13 (if you are located in the United States) or 16 years of age or older (if you are located outside of the United States), you may not use the Services, participate in any sweepstakes, contests, social networking features, or engage in other activities that collect and/or permit you to enter information about yourself. If we obtain actual knowledge that we have collected Personal Information from someone under the age of 13, we will promptly delete it, unless we are legally obligated to retain such data. If you believe that we have mistakenly or unintentionally collected information from someone under the age of 13, please contact us at [•] [101studiosent@gmail.com](mailto:101studiosent@gmail.com).

## **10. International Transfers of Personal Information**

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and some of our servers, vendors and service providers may not be located in your jurisdiction and may also be located outside of the European Union and Switzerland. If you download, interact with and/or otherwise use the Services from a location outside the United States, please be advised that any Information you provide, or that is collected by us from Third Party Platforms, in connection with any such activity may be processed in and/or transferred to the United States and/or other territories and locations, where privacy protections may not be as comprehensive as those in the territory or location where you download, interact with or otherwise use the Services. If you are a citizen of or

reside in the European Union, we will transfer your Personal Information to the United States in accordance with European Union data protection law requirements by using model contractual clauses that have been approved by the European Commission or other appropriate means.

Please note that such transfers may also be necessary in order to perform our obligations under a contract with you, to fulfill a request made by you, to meet a legal or regulatory obligation and/or through obtaining your express consent. If you connect our Service with Third Party Platforms outside the European Union or Switzerland, we are required to transfer your Personal Information with those parties in order to provide the requested Service to you. If you wish to gain more information about such transfers, please contact us at [●] [\[101studiosent@gmail.com\]](mailto:101studiosent@gmail.com).

#### **11. Privacy Policy Changes**

From time to time, we may modify this Privacy Policy to reflect industry initiatives, third party requirements or changes in the law, technology, our information collection and use practices or the features and functionality of the Services, and such modifications shall be effective upon posting. If we materially change our Privacy Policy, we will notify you of such changes by posting them on the Site or by sending you an email or other notification. Your continued use of the Services after we post a revised Privacy Policy (and, where appropriate, notify you of same) signifies your acceptance of the revised Privacy Policy. We may continue to process your Information based on our legitimate interests or in order to fulfill our obligations under a contract and/or may also seek your affirmative consent to the terms of the updated Privacy Policy.

#### **12. Accuracy**

It is your responsibility to give us current, complete, truthful and accurate information, including Personal Information, and to keep such information up to date. We cannot and will not be responsible for any problems or liability that may arise if you do not give us accurate, truthful or complete Information or you fail to update such Information. We may reject or delete any Information or entry for any reason, including if we believe in good faith that the Information is false, fraudulent or inconsistent with this Privacy Policy or our Terms of Use [\[EMBED LINK\]](#).

#### **13. Your California Privacy Rights**

If you are a resident of the State of California, we provide you with information on how to exercise your disclosure choice options such as your right to opt-out (which we may sometimes refer to as “unsubscribe”) with respect to use of your Personal Information by third parties for marketing purposes. Pursuant to the California Civil Code, we are not required to maintain or disclose a list of the third parties that received your Personal Information for marketing purposes during the preceding year. If you are a California resident and wish to request information about how to exercise your third party disclosure choices, please send a request by email to [●] [\[101studiosent@gmail.com\]](mailto:101studiosent@gmail.com), and include your name, street address, city, state, zip code and email address (your street address is optional if you wish to receive a response to your request via email) and indicate your preference on how our response to your request should be sent (email or postal mail). We will not accept requests via the telephone, postal mail or by fax. We are not responsible for notices that do not have complete information.

#### **14. Links to Third Party Platforms and Services**

The Services may be linked to, rely on and/or be integrated with websites, applications, interfaces, services and platforms operated by other companies, including Third Party Platforms. The Services may also feature advertisements from other third parties. We are not responsible for the privacy practices or the content of such third-party services. Any information you provide via those services is subject to the applicable privacy policies of such third-party services and is not covered by this Privacy Policy.

#### **15. Contact**

If you have any questions about our privacy practices or any of the terms or conditions of this Privacy Policy, please contact us via the below means:

Email: [●] [101studiosent@gmail.com]

**OR**

101 Studios, LLC

Attention: [Head of Digital]

Address: [335 N. Maple]

[Suite 350]

[Beverly Hills, CA 90212]