

Business Information Privacy Policy

This Privacy Policy explains how Studio Distribution Services (“we” or “us”) collect, use, disclose and otherwise process Information about you, if you work for an organization we do business with, and how you can access and update your Information and make certain choices about how your Information is used; in other words, it governs our ‘B2B’ relationships (including our relationships with journalists) and the associated processing of Information. However, this Privacy Policy does not apply to our processing of information about our consumers or contractors (whether directly or indirectly contracted), agency workers, freelancers or consultants.

This Privacy Policy covers both our online (e.g. websites, mobile apps, and online services (collectively, our “Sites”) and our offline data processing activities, including Information that we collect through our business interactions, websites, screenings and events.

If you have any questions about this Privacy Policy, you can contact us at [\[redacted\]](#) and include your country or region and from which Site you are viewing this Privacy Policy.

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1. The way that we use your Information

A. What Information do we collect?

We collect and combine different types of information together, and collectively refer to all of this information in this Privacy Policy as “Information”. For instance:

- If you contact us to request information or register on our Sites, we may collect your name, contact details, and information about the/organization you work for and your role within such organization.
- If you are a journalist, we may collect details of press or screening events that you attend, or content that you are given access to.
- If you are a business partner, we may collect information about your services, and Information relating to your organization’s staff.

We may occasionally ask you to disclose relevant sensitive Information, such as Information relating to your religion or health where such information is needed for the purposes outlined in this Policy (e.g. to host corporate events where food may be served, or to ensure appropriate health and safety measures in our offices or events). If you disclose sensitive Information to us, we will only process it where you have given us your explicit consent to do so, or where we have another lawful basis to do so.

Additionally, if you visit any of our Sites, we may collect the following Information:

- account and login information, technical information about the way that you use our web or mobile services, including the IP address, browser type and device information;
- information about your visit to our Sites and our other websites (such as how and when you came to visit our Site, how you interacted with the Site and what content has been read, viewed or otherwise opened).

To help us personalize your experience on our Sites, we may also collect information about your interests, preferences and demographics (such as age and gender), and location information related to the device that you use to visit our Sites.

B. How do we collect Information?

We may collect Information in a variety of ways, including:

- **Directly from you:**
- For example, when you register as a user of one of our Sites, express interest in our products, approach us to solicit interest in one of yours, or send us an enquiry.
- **From other sources:**
- We work closely with third parties providing services to us, and we may also receive Information about you from them.
- From other business contacts, for example by a referral or if you are invited to participate in activities on our Sites or to attend events.
- From publicly available sources.

We may combine Information that we collect about you from other sources with the Information that you give to us directly. We may use this combined Information as described in this Privacy Policy.

- **Through your browser or device or through our servers:**

If you visit our Sites or use our apps, certain Information is collected by most browsers or automatically through your device, and we also collect your IP address (this enables us to recognize your computer or device when you use our Sites) via our server log files.

- **Third party links, sponsors and advertisers.**

Our products and services may contain links to third party websites or services that are not covered by this Privacy Policy. If you click on any of the links on our Sites, you should consult the privacy policies on such third party websites or services before submitting any Information, as we are not responsible for and have no control over the manner in which such websites or services collect, use, disclose, or otherwise process your Information.

C. How do we use Information, and what is our justification for doing so?

We use your Information for a variety of purposes related to the products and services that we provide to you or procure from you. From a legal perspective, there are various reasons for doing so. We have set out an explanation of this below.

- **For purposes related to our business relationship:**
- to establish, manage and maintain commercial and legal relationships with you, or the organization you work for or collaborate with, including in connection with a tendering process, contract negotiation, day to day business correspondence, invoices and payments, and completing due diligence activities;
- to provide you with the information and services that you request or purchase from us or that you provide to us, to communicate with you regarding those services, and to respond to your questions and comments;
- to host corporate events.

We use your Information in this way either because we have a contract with you (or are considering entering into a contract with you), or because it is in our legitimate interests for the conduct of our business activities (for example, to manage the contact, or to be able to communicate with certain groups of people in a 'business to business' capacity in order to promote our products and services).

- **For PR, advertising and marketing purposes, including to measure how effective our marketing communication is:**
- to contact you and let you know about services we offer that we believe you might want to hear about (e.g. to send you marketing materials that we believe will be of interest to you or your organization);
- to invite you to view our pre-release or premiere content, and to send you related information, such as press releases and newsletters;
- to measure the effectiveness of our marketing campaigns and our advertising (i.e. so that we can tell what interests people and what doesn't);
- to conduct surveys or obtain your feedback;
- to develop a more direct relationship with you for the purposes described in this Privacy Policy (such as inviting you to events you may be interested in).

We will rely on our legitimate interests to market and promote our business, in order to process your Information for these purposes. However, where required by applicable law, we will obtain your consent to us contacting you.

- **For administrative and internal business purposes:**
- to tailor our Sites' experience and content, to administer, monitor and improve our Sites, and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- for our internal business purposes, such as analyzing and managing our businesses, audits and developing new products or services.

It is in our legitimate interests as a business to use your Information in this way. For example, we have a clear interest in ensuring that our Site works properly and that our products and services are high quality and efficient.

- **For security and legal and compliance purposes:**
- as part of our efforts to keep our Sites safe and secure;
- to detect or prevent fraud or other illegal activity;
- as we believe to be necessary or appropriate in each case in order to comply with laws or legal processes (including laws or legal processes in other countries);
- to protect our rights or property (or the rights or property of others), and to enforce or defend our rights and pursue available remedies.

In some cases, we will need to use your Information to fulfil a legal obligation (for example, if we receive a legitimate request from a law enforcement agency), and in other cases (such as the detection of fraud or ensuring the security of the Site) we will rely on our legitimate interests as a business to use your Information in this way.

D. How do we share your Information?

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(i) Sharing Information within our group:

We are a joint venture owned by groups within NBCUniversal and Warner Media that share various operations and business processes. Accordingly, we may need to share your Information with our owners as part of our business relationship with you, or because it is in our legitimate interests to do so.

(ii) Sharing with organizations providing services to us:

We engage various third parties to provide services to us, and this will often mean that we need to share your Information with them for the purposes outlined in this Policy, such as content hosting providers, event organizers and newsletter platforms.

We may also from time to time work with online advertisers, social media platforms and advertising networks to deliver, tailor and measure advertising to you and others both on our Sites and elsewhere on the internet (including on social media platforms).

(iii) Sharing in connection with changes to our group structure or the ownership of our business:

We may need to disclose your Information in the event of a business transaction, such as if we or one of our business units or our relevant assets are acquired by, sold to, or merged with another company or as part of a bankruptcy proceeding or a business reorganization.

(iv) Sharing to comply with laws or protect our legal interests:

There may be scenarios where we are subject to a legal obligation to disclose or share your Information, such as: (i) in connection with fraud prevention activities, (ii) where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, (iii) in situations that can involve violations of our terms of use or other rules, (iv) to protect our rights and the rights and safety of others, and (v) as otherwise required by law.

(v) With your consent:

On some occasion, we may ask for your consent to disclose Information with third parties.

International transfers

We operate internationally, and some of the processes involved in our use of your Information will require your Information to be stored or processed in countries outside the country where you are located, including countries where the level of legal protection for your Information may be different and where you may have fewer legal rights in relation to it. In particular, your Information may be transferred to, and processed in the United States, where some of our systems are located.

Whenever we transfer your Information outside of a country or region, such as the European Economic Area, we will make sure that we take steps necessary to comply with applicable legal requirements. Therefore, where required, we will ensure that appropriate safeguards are in place by using appropriate contractual mechanisms, or by relying upon the service providers participating in an approved international data transfer mechanism, including the adoption of Binding Corporate Rules. For further information about the documents we use to protect your Information when it is transferred outside of your country or region, please submit a request to SDSB2B@sds.media

2. Cookies

When you visit our Sites, we, and our affiliates, third party service providers, and partners may use "cookies" or similar technologies, such as pixels and SDKs to: (i) provide, develop, maintain, personalize, protect, and improve our Sites, apps, products, and services, (ii) perform analytics, including to analyze and report on usage and performance of our content and marketing

materials, (iii) protect against, identify, and prevent fraud and other unlawful activity, (iv) create aggregate data about groups or categories of our users, and (v) for us and our affiliates, and partners to target, offer, market, or advertise products, apps, or services. Cookies and other technologies also facilitate, manage, and measure the performance of advertisements displayed on or delivered by or through us.

Managing cookies and other technologies. In order to set your cookie preferences, please click on the Privacy Settings/Cookie Preferences button on our site, or use your app/browser settings.

Required Cookies

These cookies are required to enable core site functionality.

- **Strictly necessary cookies or similar technologies:**

They are essential in order to enable you to move around our Sites or apps and use its features, such as accessing secure areas. If you disable these cookies, some or all of the Site features may not work.

YOUR CHOICES

Marketing communications. We provide you with an opportunity to express your preferences with respect to receiving certain marketing communications from us. If you would like to update these preferences, you can (i), where the feature is available, log in to an account you may have created with us to adjust your settings, or (ii) otherwise submit a request through . You can also follow the "unsubscribe" instructions provided in any marketing email you receive.

3. Retention of your Information

In broad terms, we will only retain your Information for as long as is necessary for the purposes described in this Privacy Policy. This means that the retention periods will vary according to the type of Information and the reason that we have the personal data in the first place. For example, some Information related to the provision of services to you or by you will be kept for a number of years in order to comply with various finance and tax related legal obligations, while other Information may be kept for a different period because it is in our legitimate interests to do so in order to provide or receive appropriate follow up service.

4. Your rights and How to Contact Us

Subject to applicable data protection laws (such as those in the EU) you may have the right to access the Information we hold about you, to request it to be updated, restricted and/or erased, to ask us for a copy of your Information, to request us to transmit it to another controller in a machine readable format and the right to object to the processing of your Information. These rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation and the other laws and regulations to which we are subject.

If the processing of your Information relies on your consent, you also have the right to withdraw your consent at any time.

If you would like to exercise your rights or if you have any queries or concerns about the way that we use your Information (or any questions about this Privacy Policy), please submit a request at [\[redacted\]](#) and include your country or region and from which Site you are viewing this Privacy Policy.

You also have the right to lodge a complaint with your local data protection authority.

5. Changes to this Privacy Policy

From time to time, we can update this Privacy Policy. We will take reasonable measures to communicate any substantial changes we may make to the Privacy Policy in the future, for example by posting an update on our Sites or sending you an updated version of the Privacy Policy.

6. How to Contact Us

If you have any questions about this Privacy Policy you may contact us at: SDSB2B@sds.media