

Sony Pictures Entertainment

Job Applicant Privacy Policy

This Sony Pictures Entertainment Job Applicant 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**,” “**we**,” “**our**,” or “**us**”), as the controller of Personal Information collected as part of the job application process. This Privacy Policy provides you with information about how we collect, use, process, disclose, and transfer certain Personal Information about you on this site and otherwise during your job application process (the “**Site**”). This Privacy Policy applies only to the Site on which there is a direct link to this Privacy Policy.

As used in this Privacy Policy, the term “**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you.

If you are a **California Job Applicant**, please click [here](#).

SUMMARY OF KEY POINTS

- **PERSONAL INFORMATION WE COLLECT** - We collect Personal Information to allow you to learn about jobs with SPE, to seek a job with SPE, to allow SPE to process your job application, and, in some cases, to hire you. Click [here](#) to learn more.
- **DISCLOSURE OF YOUR PERSONAL INFORMATION** - We disclose your Personal Information when you request or agree to such sharing with third parties, when we engage other parties to process data on our behalf, when such sharing is required by law, or in certain other situations. Click [here](#) to learn more.
- **DATA TRANSFERS** - This Site is hosted on web servers in the United States, a jurisdiction that may not provide the same level of data protection as your home country. We take appropriate measures to enable the secure transfer of your Personal Information, including the use of data transfer agreements where applicable. Click [here](#) to learn more.
- **COOKIES AND SIMILAR TRACKING TECHNOLOGY** - We use cookies and other technologies to track the use of our Site. To learn more about the use of such cookies and technologies and about opportunities to choose not to allow cookies, click [here](#).

PERSONAL INFORMATION WE COLLECT

We may collect the Personal Information listed below, which you provide to us or grant us access to, where permitted or required by law or as may be necessary or permitted for a role, when you register on the Site, apply for a job, or otherwise communicate with us via this Site, in person, via email, or during online meetings with our representatives. Some of the Personal Information we collect may be considered Sensitive Personal Information or Special Categories of Data under applicable law. In addition, if you have previously worked at SPE or applied for another position, certain Personal Information about you may also be combined with or evaluated in conjunction with this Personal Information.

- **Identifiers**, including real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, or other similar identifiers. The Identifiers we collect also include social security number, driver's license, state identification card or passport number; as well as account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.
- **Personal records**, including your name, signature, social security number, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history. This category includes the information described in Cal. Civ. Code § 1798.80(e), some of which is duplicative of the other Personal Information listed here.
- **Characteristics of protected classifications**, including age and date of birth, race, ancestry, ethnic origin, nationality, country of birth, sex, gender, gender identity, sexual orientation, medical condition, disability, and military or veteran status. This category includes Personal Information that reveals racial or ethnic origin and union membership; as well as Personal Information concerning sexual orientation; and information concerning health.
- **Internet or other electronic network activity information**, including browsing history, search history, and information regarding your interactions with our websites, applications, or advertisements.
- **Geolocation information** inferred from your IP address and collected with your permission.
- **Audiovisual information**, including closed-circuit images and other information collected about you should you come onto an SPE property; audio and video information collected through phone and video interviews.
- **Professional or employment-related information**, including skills, qualifications, work experience, languages spoken, honors and awards, references, recommendations, and other information included in a resume, CV, application form, or cover letter; salary information; performance data; answers to behavioral or other screening questions in an application or interview; information contained in any personal webpages, social media sites, or documents you choose to share with us; information relating to professional licenses, training, disciplinary actions, and membership in professional organizations; information relating to membership in civic organizations.
- **Inferences** used to create a profile reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We may also request information concerning your criminal and motor vehicle operations history (where permitted by and in accordance with local law).

You are not required to provide all Personal Information identified in this Privacy Policy to use the Site or to interact with us, but if you do not provide certain Personal Information, we may not be able to administer your recruitment or make a hiring decision.

SOURCES FROM WHICH WE COLLECT PERSONAL INFORMATION

Generally, we collect the categories of Personal Information described above from the following categories of sources:

- Directly from you.
- Automatically when you use the Site or our other electronic systems.
- Created by us (e.g., if we create records pertaining to you to facilitate the application process or assess your application).
- From service providers that help us to run our business (such as those that host or support the Site, provide analytic or data storage services, or otherwise perform functions on our behalf as part of the job application process).
- From third parties, which may include background check vendors and individuals who serve as references for you, among others.
- Government records.

PURPOSE AND LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

We may use your Personal Information for the legitimate business purposes outlined below, including to:

- Identify or evaluate candidates for positions.
- Make a decision about whether the individual should be offered a position.
- Maintain appropriate record-keeping; analyze the hiring process and outcomes.
- Conduct employment verification and background investigations where permitted by law.
- Establish your credentials in the Site.
- Deliver appropriate regional website content.
- Verify your access rights.
- Respond to your inquiries.
- Engage in other business activities and comply with other applicable policies.
- Process your registration.
- Provide you with information that you request or agree to receive.
- Improve the Site and for internal business purposes.
- Contact you with regard to your use of the Site and any changes to our policies.
- Tailor content.
- To comply with our rights and obligations under collective bargaining agreements.
- Protect the rights and property of SPE or the public as required or permitted by law and fulfill other purposes disclosed at the time you provide your Personal Information or otherwise with your consent.

We may use your Sensitive Personal Information for the purposes of complying with government reporting requirements and other legal obligations, tracking diversity, and determining reasonable accommodations for a candidate. Health information, such as temperature, may be collected for risk management purposes only and for taking measures to protect our workforce and facilities during the COVID-19 pandemic.

If you are from the European Economic Area or in the United Kingdom, our legal basis for collecting and using your Personal Information described above falls into the following categories

and will depend on the Personal Information concerned as well as the specific context in which we process it.

- **TO FULFIL A CONTRACT, OR TAKE STEPS LINKED TO A CONTRACT**
 - To process your application or employment contract.
 - To send you information about changes to our terms or policies and other transactional messages.

- **WHERE NECESSARY FOR PURPOSES WHICH ARE IN OUR, OR THIRD PARTIES', LEGITIMATE INTERESTS. THESE INTERESTS ARE:**
 - To assess your suitability for a role at SPE.
 - To provide you with access to content, including open positions and job requirements.
 - To send you information you have requested.
 - To ensure the security of our sites and apps, by trying to prevent unauthorized or malicious activities.
 - To enforce compliance with the Terms of Use posted in association with this Privacy Policy and other policies.
 - To determine your approximate location and adapt our content (e.g. language, currency, territory restrictions).
 - To analyze how our site or content is used (including frequency and length of viewings).
 - To improve our services, including analyzing your feedback and comments provided via a survey or event feedback.
 - To provide you with customer support.

- **WHERE YOU GIVE US CONSENT**
 - Where you ask us to send information related to our open roles with you via a medium where we need your consent under applicable law.
 - Where required by applicable law, consent to place cookies and to use similar technologies. For more information please also see the section on Cookies.
 - On other occasions where we ask you for consent, for a purpose which we explain at that time.

- **WHERE THIS IS NECESSARY FOR US TO COMPLY WITH OUR LEGAL OBLIGATIONS**
 - In response to requests by government, regulators, judicial or law enforcement authorities conducting an investigation.
 - To comply with health and safety, tax or accounting rules or other legal obligation under applicable law.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided below.

DISCLOSURE OF YOUR PERSONAL INFORMATION

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

Service Providers

We may engage service providers and contractors to perform functions on our behalf, such as hosting or operating our Site, sending e-mail communications, and data analysis. Generally, we disclose Personal Information with our service providers and contractors as follows:

Category of Personal Information	Purposes for Disclosure
Identifiers Personal records Professional or employment-related information	To communicate with you To open and maintain your application records To assess your eligibility for employment To market and advertise job opportunities with us To comply with applicable laws and regulations To manage corporate information technology To manage the security of SPE premises, systems, and websites
Characteristics of protected classifications	To comply with applicable laws and regulations To manage our corporate diversity and inclusion initiatives To comply with our rights and obligations under collective bargaining agreements
Internet or other electronic network activity information Geolocation data	To facilitate your use of our website To provide you with tailored recommendations, and updates To improve our website, set default options, and provide you with a better application experience To market and advertise job opportunities with us To manage corporate information technology To manage the security of SPE premises, systems, and websites
Audiovisual information	To facilitate the interview process To manage the security of SPE premises, systems, and websites
Inferences	To assess your eligibility for employment To market and advertise job opportunities with us To manage the security of our premises and systems
Social security, driver's license, state identification card, or passport number	To comply with applicable laws and regulations
Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account	To manage the security of SPE premises, systems, and websites
Personal Information that reveals racial or ethnic origin, or union membership	To comply with applicable laws and regulations To manage our corporate diversity and inclusion initiatives To comply with our rights and obligations under collective bargaining agreements
Personal Information concerning sexual orientation	To comply with applicable laws and regulations To manage our corporate diversity and inclusion initiatives

Affiliate Sharing and Business Transfers

We may share your Personal Information with other entities affiliated with us for operational purposes or marketing in connection with other open roles as permitted under applicable law. SPE or any of its assets, including the Site, may be sold, or other transactions may occur in which your Personal Information is considered one of the business assets of the transaction. In such cases, your Personal Information 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 Information we collect to third parties such as to local labor 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 Site's Terms of Use or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of SPE, third parties, visitors to this Site or the public. Pursuant to valid requests by law enforcement agencies, we may also use Device Identifiers to identify users, and may do so in cooperation with copyright owners, Internet service providers, wireless service providers or law enforcement agencies, in our discretion. Such disclosures may be carried out without additional notice to you.

INTERNATIONAL TRANSFER

The Site is hosted and operated in the United States. It will therefore be necessary to transfer and process your Personal Information in the United States, where the privacy laws may not provide an equivalent level of protection to those in your home country.

In addition, some of the recipients of your Personal Information identified in this Privacy Policy may be located outside of your home country, which may have different rules for processing and securing Personal Information. We take appropriate measures to enable the secure transfer of your Personal Information, including the use of data transfer agreements where applicable. With respect to transfers originating from a country or a region such as the United Kingdom or the European Economic Area ("EEA"), and if the transfer is not to a country which is the subject of an adequacy decision or adequacy regulation (or equivalent), we implement appropriate solutions to address cross-border transfers as required by applicable law such as, with relation to the EEA, standard contractual clauses approved by the European Commission; and with the UK, standard contractual clauses approved by the UK government. Under such laws, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed here. Where your consent is required by applicable law for the international transfer of Personal Information, by using our websites or apps or otherwise by engaging with us, and providing us with your Personal Information, you consent to the international transfer of your Personal Information. Further, access to your Personal Information is designed to be restricted to those individuals who have a need to know in order to fulfill their job responsibilities.

DATA RETENTION

Your Personal Information 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. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected;
- The Personal Information is reasonably necessary to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. 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 Information 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

In some jurisdictions, data protection laws provide individuals with certain rights to their Personal Information, including the right to access, correct, port, delete, or to block or object to, or withdraw consent to the processing of certain Personal Information (without affecting the lawfulness of processing based on consent before its withdrawal). You also have the right to make a complaint to your local supervisory authority. If you are based in the UK and believe we mishandled your personal information or failed to comply with UK data protection laws, you can also make a data protection complaint directly to us. You may exercise such privacy rights as applicable to you in the jurisdiction you reside by contacting us as detailed below. Please note that we will retain certain Personal Information as required or permitted by applicable law. You can also opt out of receiving (or withdraw your consent to receive) recruitment communications about other opportunities by contacting us as detailed [here](#).

CALIFORNIA PRIVACY RIGHTS

If you are a California job applicant, please read this section for more information about your privacy rights under the California Consumer Privacy Act (“CCPA”). If you interact with us as a consumer, you can find our California Consumer Privacy Notice [here](#).

To submit a request relating to your Personal Information, please use our webform [here](#) or call us at 1-310-244-7062 between 9:00am – 6:00pm PST. Please note that if you submit a request, you will be asked to log into your account or to provide 2-3 pieces of Personal Information that we will

match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed. An authorized agent may submit a request on your behalf using the webform or toll-free number listed above.

Right to Correct. If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

Right to Delete. You have the right to request that we delete Personal Information we collected from you, subject to certain exceptions. Where we use deidentification to satisfy a deletion request, we commit to maintaining and using the information in deidentified form and will not attempt to reidentify the information.

Right to Know. You have the right to know what Personal Information we have collected about you, which includes:

- (1) The categories of Personal Information we have collected about you, including
 - a. The categories of sources from which the Personal Information was collected
 - b. Our business or commercial purposes for collecting or disclosing Personal Information
 - c. The categories of recipients to which we disclose Personal Information
 - d. The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information

- (2) The specific pieces of Personal Information we have collected about you

Right to Opt Out of Sales and Sharing of Personal Information. We do not sell or share for cross-context behavioral advertising the Personal Information we collect pursuant to your application for employment with us. If you interact with SPE as a consumer, please review our California Consumer Privacy Notice for more information about our practices in that context.

Right to Limit the Use and Disclosure of Sensitive Personal Information. Our use of Sensitive Personal Information is limited to exempt purposes under CCPA, and is therefore not subject to the right to limit use and disclosure under the law.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us.

COOKIES AND OTHER TRACKING TECHNOLOGIES

SPE and/or third-party service providers may use a variety of technologies that collect information about how the Site is accessed and used (“Usage Information”). Usage Information may consist, in part, of your browser type, operating system, the page served, the time, and the preceding page views. Usage Information is generally non-identifying, but if it is associated with other information so that you can be identified, it will be treated as Personal Information.

SPE and/or third-party service providers also collect your IP address or other unique identifier (“Device Identifier”) for the computer, mobile device, technology or other device (collectively,

“Device”) you use to access the Site. Some mobile service providers may also provide us with the physical location of the Device used to access the Site with your permission. While certain of the information described above may be considered non-identifying, if it is associated with other information so that you can be identified, it will be treated as Personal Information.

We use cookies and other technologies on the Site to collect Usage Information, including Device Identifiers. We also use session cookies to help ensure proper functioning of the site and for similar purposes. You may configure your Internet browser to notify you when a cookie is sent (giving you the option to decide whether to accept it or not), and to reject or remove cookies. Certain features of the Site may not be available, however, if cookies are disabled. If you delete your cookies, use a different browser, or use a different computer, you will need to renew your choices.

To find out more about cookies used for personalized ads in the US and Canada, including the choices you may have, please visit the Digital Advertising Alliance-US, Network Advertising Initiative, Digital Advertising Alliance-Canada, and European Interactive Digital Advertising Alliance. For UK visitors, please see our UK Cookie Policy for more information.

Please visit the respective privacy policies and/or review the privacy settings of the social networking services you use to make choices about online advertising on those services. While we and others give you choices described in this Privacy Policy, there are many ways Web browser signals and other similar mechanisms can indicate your choice to disable tracking, and we may not be aware of or honor every mechanism.

We use Hotjar, a service provider, to help us understand and analyze how visitors use our services, and to improve the services. Hotjar may collect the following types of information from users of our websites:

- Device IP Address
- Device screen size
- Device type (unique device identifiers)
- Browser information, geographic location (country only)
- Preferred language used to display our website

Hotjar represents that it stores the above information in a pseudonymized format. Hotjar further represents that it does not use this information to identify individual users, or match or link the information with other information about users. For more information regarding Hotjar's collection and use of information, please visit Hotjar's privacy policy [here](#).

Our Site uses Google Analytics to help us understand and analyze how visitors use our Site. For more information on how Google Analytics uses data, visit www.google.com/policies/privacy/partners/. To opt out of Google Analytics cookies, visit <https://tools.google.com/dlpage/gaoptout/>

Your web browser may provide you with a Do Not Track option that signals a user does not wish to have activity tracked. However, currently there is no universal standard for how to interpret that signal. We currently do not alter our practices when we receive a Do Not Track signal from a user's browser.

CHANGES TO THE PRIVACY POLICY

Except where prior notice or consent is required by law, SPE reserves the right to update or modify this Privacy Policy at any time and without prior notice by posting the revised version of the Privacy Policy on the Site. Please check the Privacy Policy frequently and particularly before you submit additional information via the Site. Your continued use of the Site will constitute your consent to any such changes in the Privacy Policy except where otherwise prohibited by applicable law.

CONTACT US

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

ATTN: People & Organization SONY PICTURES ENTERTAINMENT INC. 10202 W. Washington Blvd., Suite 3900 Culver City, CA 90232.

You may also contact us by email at:

European Union: SPE_EU_Privacy_Contact@spe.sony.com

Brazil: Privacidade Brasil@spe.sony.com

U.S. and other countries: SPE_Privacy@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: January 1, 2023

© 2023 Sony Pictures Entertainment Inc. All rights reserved.