

WARNER MUSIC GROUP PRIVACY POLICY

Last updated: 13.9.2022

The **Warner Music Group** takes your privacy seriously where we deal with your personal data. This means information that identifies you personally such as your name, contact details, order history, credit/debit card details, marketing preferences or data that can be linked with such information in order to identify you directly or indirectly ("**Personal Information**"). References to "we" "our" or "us" in this Privacy Policy are to the Warner Music Group entities listed as Controllers in the "Controllers of your Personal Information" section below.

This Privacy Policy describes our practices in connection with Personal Information that we collect from you in person and through certain of our owned or controlled websites, online stores, web properties (e.g., widgets and applications) and mobile applications ("**Mobile Apps**") in each case, that link to this Privacy Policy (each, a "**Platform**" or collectively our "**Platforms**").

This Privacy Policy applies to the Warner Music Group as a whole and where there are local variations or additions concerning how we use your Personal Information collected from your home country, these are set out clearly in the Country Specific Schedules section of this Privacy Policy. Please treat these schedules as a part of this Privacy Policy. If you are a California resident, please note that we have a separate California Privacy Policy which applies to the collection and use of your Personal Information along with this Privacy Policy and also addresses your privacy rights. Please see our California Privacy Policy here.

Please note that our Platforms are not directed to individuals under the age of sixteen (16), and we request that such individuals do not provide Personal Information through the Platforms.

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1. CONTROLLERS OF YOUR PERSONAL INFORMATION

1.1 The **Warner Music Group** companies listed below will be responsible as Controllers of the Personal Information we collect on our Platforms:

1.1.1 **Warner Music Finland Oy**, a company incorporated and registered in Finland whose registered office is at Olavinkatu 1 B, 7. kerros, 00100 Helsinki, Finland;

1.1.2 **Warner Music International Services Limited**, a company incorporated and registered in England and Wales whose registered office is at 78 Cannon Street, London, England, EC4N 6AF, UK;

1.1.3 **Warner-Elektra-Atlantic Corporation**, a Delaware Corporation with its principal place of business at 1633 Broadway New York, New York 10019, USA;

1.1.4 **Warner Music Inc.**, a Delaware corporation with its principal place of business at 1633 Broadway New York, New York 10019, USA;

Please note that the exact Controller relationship that will apply to your Personal Information is determined by the activities that apply to you in the “How we use your Personal Information” section, and depending on the relevant activities identified, the companies listed above may either be Sole Controllers (so one company listed above is solely responsible) or Joint-Controllers (so two or more companies listed above are jointly responsible) of your Personal Information. We have included a table here setting out the Controller relationship for each activity that may apply to you and where there is a Joint-Controller relationship we have included a summary of the arrangements in place (basically who is responsible for complying with the law with regards to your privacy) here.

1.2 We have tried to make it as clear as possible in the links provided above, however, if you have any questions about which of the above companies is the Controller of your Personal Information or would like to contact any of the companies listed above, please email us at privacypolicy@wmg.com. If more convenient, you can also write to us at Warner Music UK Limited, Legal Department, The Warner Building, 27 Wrights Lane, London, W8 5SW, UK.

2. HOW WE USE YOUR PERSONAL INFORMATION

We receive Personal Information about you, either directly from you, from a third-party source (a source other than you, for example, when you make an album purchase on Ticketmaster) or by automated collection when you use any of our Platforms.

We use your Personal Information for various purposes (reasons) and our lawful bases (justifications) for using your Personal Information is either “to provide a requested service or carry out a contract with you”; “where we have a legal obligation”; where you have given us your consent”; or “where it is necessary for our legitimate interests” (this means that we have a business or commercial interests in using your Personal Information).

The tables below set out clearly how we collect and use your Personal Information and the lawful bases (reason) we rely on for using your Personal Information. Where we have said that using or keeping your information is “necessary for our legitimate interests”, we have carried out an assessment to ensure this is not unfair to you. Please note that each heading in the “How we use

your information and our lawful bases” column of the table below refers to the different lawful basis we rely on for using your Personal Information.

Please bear in mind that if you choose not to provide information requested by us, or if you object to our use of your Personal Information where we have made it clear that this information is mandatory, we may not be able to provide you with the services you have requested or otherwise fulfil the purpose(s) for which we have asked for your Personal Information.

2.1 Online Accounts and Purchases

| Information we collect | How we use your information and our lawful bases |
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| <p><i>User Account</i></p> <p>You give us Personal Information about you when you register for an online account on any of our Platforms (e.g. our e-commerce stores online). This is generally information including your name, and email address.</p> <p>When you complete your account information after registration and use your account, you give us additional information about you. This is generally Personal Information including your address details (shipping address and billing address), contents of your shopping cart, order history, preferred payment details (e.g. credit/debit card/PayPal) and marketing preferences.</p> | <p><i>Provide a requested service / carry out a contract with you</i></p> <ul style="list-style-type: none"> To register your account and provide you with account functionality on our Platforms, such as arranging access to your account, maintaining your account and providing you with related customer service. To send you administrative information, including information regarding our Platforms and changes to our terms, conditions and policies. To allow you to send messages (for example, music clips or artist information) to a friend through our Platforms. By using such functionality, you are telling us that you are entitled to use and provide us with your friend's name and email address. |
| <p><i>Purchases/Orders</i></p> <p>You give us Personal Information about you when you place an order on any of our Platforms. This is generally information including the contents of your shopping cart, your name, email address, telephone number, shipping address, delivery preferences and payment details (e.g. credit/debit card/PayPal)</p> | <p><i>Provide a requested service / carry out a contract with you</i></p> <ul style="list-style-type: none"> To complete and fulfil your purchases on our Platforms, including processing your payments, sending you an order confirmation, sending you updates on your order and having your order delivered to you. To send you administrative information, including information regarding our Platforms and changes to our terms, conditions and policies. <p><i>Comply with a legal obligation</i></p> |

| Information we collect | How we use your information and our lawful bases |
|---|--|
| | To comply with any relevant consumer laws in relation to purchases you make, including regarding giving you certain information and issuing replacements, credits or refunds (if applicable). |
| <p><i>Purchases from Third Parties</i></p> <p>We collect Personal Information about you when you purchase any of our offerings from a third-party (e.g. when you make an album purchase on Ticketmaster). This is generally information including your name, telephone number, order details, shipping address and delivery preferences.</p> | <p><i>Provide a requested service / carry out a contract with you</i></p> <p>To complete and fulfil your purchases from our third-party partners, including sending you an order confirmation, sending you updates on your order and having your order delivered to you.</p> |
| <p><i>Customer Service Support</i></p> <p>You give us Personal Information about you when you contact us in relation to an order or support request you have made on any of our Platforms. This is generally information including your name, email address, payment details, order details (including shipping and delivery preferences) and details of your enquiry or query.</p> | <p><i>Provide a requested service / carry out a contract with you</i></p> <p>To communicate with you regarding purchases you have made on our Platforms and provide you with related customer service.</p> |

2.2 Marketing Campaigns and Direct Marketing

| Information we collect | How we use your information |
|---|--|
| <p><i>Competitions, Sweepstakes and Similar Promotions</i></p> <p>You give us Personal Information about you when you participate in any of our competitions, sweepstakes, or similar promotions. This is generally information including your name, gender, telephone number, email address, date of birth, post code, country, city, details of the competition or sweepstake you have participated in and your entry.</p> <p>Please bear in mind that the types of Personal Information collected above may vary (we may only request for you to provide some of the Personal Information above) depending</p> | <p><i>With your consent</i></p> <p>To allow you to participate in our competitions, sweepstakes or similar promotions, and to administer these activities.</p> <p>Some of these activities have additional rules, which could contain additional information about how we use and disclose your Personal Information. If there are any additional rules, these will be provided to you prior to your participation - please read these rules carefully before providing us with your Personal Information.</p> |

| Information we collect | How we use your information |
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| <p>on the promotion you agree to participate in. We will tell you what information is required prior to you entering any of our promotions.</p> | |
| <p><i>Direct Marketing</i></p> <p>You give us Personal Information about you when you sign up/agree to receive marketing communications from us.</p> <p>This is generally information including your name, email address, telephone number and marketing preferences. Depending on the marketing campaign, this may also include your country, city, date of birth, and gender where you provide us with these additional details.</p> <p>There are several ways you can sign up to receive marketing from us including:</p> <ul style="list-style-type: none"> • Postal. Signing up to receive marketing from us by post. • Newsletters. Signing up to receive any of our newsletters on any of our web pages. • Artist/Label/Brand Lists. Signing up to receive Artist/Label/Brand specific marketing communications and updates. • Campaigns. Signing up to receive marketing communications when you participate in any of our marketing campaigns (including offline campaigns, concerts, competitions, sweepstakes and similar promotions). • Account Registration. Signing up to receive marketing when you register for an account on our Platforms. • Purchase. Signing up to receive marketing communications from us when you make a purchase through our online stores. • Marketing Partners. Signing up to receive marketing communications from us on a third-party partner's website or | <p><i>With your consent</i></p> <ul style="list-style-type: none"> • To send you marketing communications via email or SMS where you have agreed to receive these communications. We will only do this in line with your marketing preferences and you can opt-out of receiving these communications at any time by selecting the unsubscribe link in any email we send, following the instructions in any SMS we send or by emailing us at privacypolicy@wmg.com. • To segment you for the purposes of determining what content is best suited to send to you. We do this, for example, by analysing factors about you such as how you have signed up to receive marketing communications from us (e.g. on our website or through a competition), your location, and the marketing preferences you have communicated to us (e.g. the Artist you have said you are interested in). Please note that we will cease to do any segmentation where you opt-out of receiving marketing communications at any time by selecting the unsubscribe link in any email we send, texting back "STOP" or by emailing us at privacypolicy@wmg.com. • To share your contact details and marketing preferences with our affiliates, our artists and any other third party for the purposes of them sending you marketing communications via email or SMS where you have agreed to us sharing your Personal Information for these purposes. We will only do this in line with your marketing preferences and you can ask us to stop sharing your Personal Information for these purposes |

| Information we collect | How we use your information |
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| <p>online platform (any website or online platform that is not under our control e.g. ticketing platforms or music streaming services).</p> | <p>at any time by emailing us at privacypolicy@wmg.com.</p> <p>Please note that, if you do opt-out from receiving marketing-related messages from us, we will continue to send administrative and service messages to you as necessary. These messages will not contain any marketing content.</p> |
| <p><i>Social Media Audience Advertising</i></p> <p>You give us Personal Information about you when you sign up or agree to receive marketing communications from us including social media advertising. This is generally information including your name, email address, social media username or handle, telephone number and marketing preferences.</p> <p>Where we have a social media pixel on any of our Platforms, you give us Personal Information about you when you consent to this pixel interacting with and collecting data from your device when you access our Platforms. This is generally information on the fact that you have visited our Platforms and have an account on our partner social media platforms (e.g. Facebook or Google).</p> <p><i>Please see our Cookie policy for further information on social media pixels and how they work. You can find it at the bottom of our website pages, next to our Term of Use.</i></p> | <p><i>With your consent</i></p> <ul style="list-style-type: none"> To send you our custom adverts on your social media account using audience targeting technology, where our social media partners match your email address or information collected from our social media pixels with your user account on their platform (if you have one), and include you on a group of individuals to whom we can send custom adverts. This “Custom Audience” group is created and stored only on your social media platform and although we can send custom adverts to you, we can’t tell if you have been included on the Custom Audience group and do not have access to any information held on your social media account. To segment you for the purposes of determining what content is best suited to send to you and what custom audience group you are best suited to. We do this, for example, by analysing factors about you such as how you have signed up to receive marketing communications from us (e.g. on our website or through a competition), your location, the marketing preferences you have communicated to us (e.g. the Artist you have said you are interested in) and even by analysing your interactions with our Platforms and your listening behaviour where you have given us consent to do so (see “Listening Behaviour on Streaming Platforms” section below). Please note that we will cease to do any |

| Information we collect | How we use your information |
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| | <p>segmentation where you opt-out of receiving marketing communications at any time by selecting the unsubscribe link in any email we send, following the instructions in any SMS we send or by emailing us at privacypolicy@wmg.com.</p> <ul style="list-style-type: none"> To create a separate group of social media users with similar characteristics as those who have been included on our Custom Audience groups. This “Lookalike Audience” group is created and stored only on the platforms of our social media partners. Although we can send custom adverts to individuals on this Lookalike Audience group, we can’t identify any individuals included in this group and do not have access to any information held by the social media platform on these individuals. |

2.3 Social Media, Streaming Services and Third-Party Accounts

| Information we collect | How we use your information |
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| <p><i>Digital Service Providers Direct Marketing</i></p> <p>We partner with digital service providers. If you have an account with a digital service provider (e.g. Spotify) and agree to receive marketing communications from their partners through using their online tools, your digital service provider shares your Personal Information with us for this purpose. This information includes your name, date of birth, gender, email address and post code.</p> | <p><i>With your consent</i></p> <p>To send you themed marketing communications by email and in line with your marketing preferences. See also the “Listening Behaviour on Streaming Platforms” section below which discusses other ways we interact with streaming platforms to send you content that is relevant to you where you have consented to this.</p> <p>Please note that you can opt-out of receiving these communications at any time by selecting the unsubscribe link in any email we send, by emailing us at privacypolicy@wmg.com or by opting out through your digital service provider’s platform.</p> |
| <p><i>Entering Competitions, Sweepstakes and Similar Promotions with a Social Media Account.</i></p> | <p><i>With your consent</i></p> |

| Information we collect | How we use your information |
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| <p>If you use your social media account (e.g. Facebook), streaming platform account (e.g. Spotify) or any other third party user account to enter our competition, sweepstakes or promotions or via an invitation to sign into such account on our Platforms, you will share certain Personal Information from your third party account with us which may include, for example, your name, gender, email address, city, country, listening history, favourite tracks, details of the promotion you have participated in, your entry and any other Personal Information that you make accessible to us.</p> | <p>To allow you to participate in our competitions, sweepstakes or similar promotions, and to administer these activities.</p> <p>Some of these activities have additional rules, which could contain additional information about how we use and disclose your Personal Information - please read these rules carefully prior to providing us with your Personal Information.</p> |
| <p><i>Listening Behaviour on Streaming Platforms</i></p> <p>If you give us permission to, we collect Personal Information from streaming platforms you use (e.g. Spotify) on your listening behaviour on their platform. This includes information on tracks, playlists and albums listened to, along with your top genres and artists.</p> | <p><i>With your consent</i></p> <ul style="list-style-type: none"> • To analyse your listening behaviour (on both an aggregated and personally identifiable bases) for the purposes of determining what marketing content may be more suitable to send to you, if you have consented (on the streaming platform) to receiving direct marketing communications from us and in line with your marketing preferences. For example, if we identify one artist as a top artist based on your listening behaviour, we may recommend a similar artist who we think you may like but you haven't yet listened to. Please note that you can withdraw your consent to us using your listening behaviour through your streaming platform or by contacting us at privacypolicy@wmg.com. • To monitor the performance of our content on streaming platforms by analysing users' listening behaviour. |
| <p><i>Pre-save/Pre-add</i></p> <p>If you pre-save or pre-add any of our unreleased content on a streaming platform, the streaming platform may share your Personal Information with us. This may include information on the pre-save/pre-added content you have selected, along with your name, email address, city, country and (if</p> | <p><i>With your consent</i></p> <ul style="list-style-type: none"> • To add requested content to your streaming platform library when this content is officially released and to send you an email informing you of its official release. |

| Information we collect | How we use your information |
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| applicable) your marketing preferences where you have opted into receiving marketing communications from us. | <ul style="list-style-type: none"> To send you marketing communications by email where you have agreed to receive these communications. We will only do this in line with your marketing preferences and you can opt-out of receiving these communications at any time by selecting the unsubscribe link in any email we send or by emailing us at privacypolicy@wmg.com. |

2.4 General Enquiries and Engagement

| Information we collect | How we use your information |
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| <p><i>General Enquiries</i></p> <p>You give us Personal Information about you when you contact us or otherwise interact with us generally, including via email, SMS, social media, online contact form, telephone call, SMS post or otherwise. This is generally information including your name, contact information, and details of your communication.</p> | <p><i>Necessary for our legitimate interests</i></p> <p>To respond to your inquiries and fulfil your requests, for example, when you send us questions, suggestions, compliments or complaints, or when you request information about our Platforms. We may also take such into account when improving our Platforms, products and services.</p> |
| <p><i>Surveys</i></p> <p>You give us Personal Information about you when you participate in and complete any of our surveys. This is generally information including your name, contact information, and your survey responses.</p> | <p><i>With your consent</i></p> <p>To register you for our surveys and to analyse the responses you have provided to our survey questions.</p> |

2.5 Automatically Collected Information

| Information we collect | How we use your information |
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| <p><i>Email Deliverability</i></p> <p>We collect certain Personal Information by automated means when we send you marketing emails in line with your marketing preferences. This is generally information including whether you have opened the email and what you have clicked on within the email.</p> | <p><i>With your consent</i></p> <ul style="list-style-type: none"> To monitor the performance of the marketing emails we send to you. To tailor future marketing emails, we send to you based on your interactions with our previous emails. |

| Information we collect | How we use your information |
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| <p><i>Please see our Cookies Policy for information on what Cookies (and other similar technologies) are and how we use them. You can find it at the bottom of our website pages, next to our Terms of Use.</i></p> | |
| <p><i>Accessing our online Platform</i></p> <p>We collect certain Personal Information by automated means when you visit or interact with any of our online Platforms. This is generally information including:</p> <ul style="list-style-type: none"> • Browser and Device Details: Certain information is collected by most browsers, such as your Media Access Control (MAC) address, device type (Windows or Mac), screen resolution, operating system version, Internet browser type and version of our Platform that you are using. • Mobile App Details: When you download and use any of our Mobile Apps, we may track and collect Mobile App usage data, such as the date and time the Mobile App on your device accesses our servers and what information and files have been downloaded to the Mobile App based on your device number. • IP Address: An Internet Protocol (IP) address is a number that is automatically assigned to your device from which you are accessing a Platform by your Internet Service Provider (ISP), and is identified and logged automatically in our server log files whenever you visit the Platform, along with the time of the visit and the activity on the Platform. | <p><i>It is necessary for our legitimate interests</i></p> <ul style="list-style-type: none"> • To calculate our Platform usage levels. • To help diagnose server problems. • To administer our Platforms. • To determine your location at a country level. |
| <p><i>Cookies (and Similar Technologies)</i></p> <p>When you visit any of our online Platforms, we collect Personal Information about you through cookies and similar technologies placed on your device. The information collected may include a user ID assigned to you, your IP address, the content you have</p> | <p><i>Necessary for our legitimate interests</i></p> <ul style="list-style-type: none"> • To ensure our Platforms work as intended on your device and as necessary to provide the content or services you request on our Platforms. <p><i>Necessary to comply with a legal obligation</i></p> |

| Information we collect | How we use your information |
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| <p>interacted with on our Platforms, duration of each visit to our Platforms, error messages encountered when using our Platforms and your interactions with social plug-ins (e.g. Facebook like or share button) on our Platforms.</p> <p><i>Please see our Cookies Policy for information on what Cookies (and other similar technologies) are and how we use them. You can find it at the bottom of our website pages, next to our Terms of Use.</i></p> | <ul style="list-style-type: none"> • To ensure your use of our Platforms and any activities you carry out on our Platform is secure. • To comply with applicable legislation with regards to Cookies and information collected from Cookies – for example, to remember your cookies settings. <p><i>With your consent</i></p> <ul style="list-style-type: none"> • To target you with customised advertising online and on social media based on your online activity and use of our Platforms. • To share your information with third party partners for the purposes of them sending you customised advertising content online and on social media. • To share your information with third party social media platform partners where you interact with social plug-ins (e.g. Facebook like or share button) on our Platforms. • To recognise you when you return to any of our Platforms and to customise your experience based on your previous visits. • To carry out web analytics on our Platforms (e.g. to monitor the number of your visits to our Platforms and the actions you take on our Platforms for analytical purposes). |

2.6 Internal Business Processes

| Information we collect | How we use your information |
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| <p><i>Aggregating Personal Information</i></p> <p>Our aggregating of Personal Information may apply to any of the above Personal Information we collect about you.</p> | <p><i>Necessary for our legitimate interests</i></p> <p>To aggregate any Personal Information we collect so that in its final aggregated form, it will no longer directly identify you or any other individual. For example, by using Personal Information collected from website visits to calculate the percentage of our users who like a particular Artist. We use the</p> |

| Information we collect | How we use your information |
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| | <p>aggregated data generated for multiple purposes including:</p> <ul style="list-style-type: none"> • To develop new products and services. • To enhance, improve, or modify our current products and services. • To determine the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users. • To operate and expand our business activities, for example, understanding which parts of our Platforms are of most interest to our users so we can focus resources and development efforts effectively. |
| <p><i>Audits (Internal and External) and Compliance</i></p> <p>Our audit and compliance process may apply to any of the above Personal Information we collect about you.</p> | <p><i>Necessary for our legitimate interests</i></p> <p>To verify that our internal processes function as intended.</p> <p><i>Necessary to comply with a legal obligation</i></p> <p>To verify that our internal processes are compliant with legal, regulatory or contractual requirements.</p> |
| <p><i>Fraud and Security</i></p> <p>Our fraud and security monitoring process may apply to any of the above Personal Information we collect about you.</p> | <p><i>Necessary for our legitimate interests</i></p> <p>To carry out fraud and security monitoring within our business, for example, to detect and prevent cyberattacks or attempts to commit identity theft.</p> |
| <p><i>Administration</i></p> <p>Our administrative processes may apply to any of the above Personal Information we collect about you.</p> | <p><i>Necessary for our legitimate interests</i></p> <p>To operate efficiently within our business model and corporate structure, in a way that effectively services our customers, including by using a range of centralised and localised business functions.</p> |
| <p><i>Legal claims</i></p> <p>Our legal claims process may apply to any of the above Personal Information we collect about you.</p> | <p><i>Necessary to comply with a legal obligation / Legitimate interests (depending on the situation)</i></p> <p>To effectively defend or bring claims to protect our legal rights and interests, and to</p> |

| Information we collect | How we use your information |
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| | respond to investigations from regulators or law enforcement. |

3. HOW WE SHARE YOUR PERSONAL INFORMATION

We share your Personal Information for the following purposes:

- We share your Personal Information with affiliates for the purposes described in this Privacy Policy. You can consult the list and location of our affiliates here <https://wminewmedia.com/affiliates/>.
- We share your Personal Information with companies who perform services on our behalf (and in some cases, our affiliates), to enable them to support the services we provide to you including those listed below. These can include consultants, providers of professional advisory services (such as lawyers and accountants), digital marketing agencies, service providers involved in hosting (cloud providers such as AWS and Microsoft Azure), marketing technology (such as for email campaign creation, email automation, managing opt-outs etc), data analysis (such as website traffic analytics), payment processing (such as PayPal), order fulfilment (such as shipping/delivery of customer orders), infrastructure provision (such as website and application development), auditing (external auditors such as KPMG and PWC), IT services, customer service, email delivery, credit card processing, and other similar services.
- We share your Personal Information with third parties (including our partners and artists) to permit them to send you marketing communications, consistent with your marketing preferences. For example, when you register to receive an artist's newsletter.
- We share your Personal Information with our social media partners for the purposes of carrying out Social Media Audience Advertising and when we use social media plug-ins on our Platforms.
- We share your Personal Information with third parties that sponsor contests, sweepstakes and similar promotions so that they can offer and administer such contests, sweepstakes and promotions.
- Any Personal Information that you post or disclose on or through public areas of our Platforms (e.g. through message boards, chat, profile pages and blogs) will become public information, and may be available to visitors to our Platforms and to the general public, and may be redistributed through the Internet and other media channels where they will reach an even broader audience.
- We share your Personal Information if we are under a duty to do so, in order to comply with (and/or where we reasonably believe we are under a duty to comply with) any legal or regulatory obligation, such as pursuant to court orders, enforcement action from regulators or law enforcement; or in order to enforce any agreement we have in place with you; or to protect the rights, property, safety, or security of the Warner Music Group, our affiliates, our artists, you, others third parties, users of our Platforms or the general public.
- We share your Personal Information in connection with a sale or business transaction. We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock

(including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

- We share your Personal Information to enforce our terms and conditions or any other contracts we have with you and to allow us to pursue available remedies or limit the damages that we may sustain in any action, such as pursuant to court orders and engaging debt collection agencies.

4. DO WE TRANSFER YOUR PERSONAL INFORMATION?

Please note that as a result of the global nature of the Warner Music Group, your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using our Platforms you understand that your Personal Information may be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country.

In particular, our consumer databases and global marketing teams are based in the United States and the United Kingdom, so the Personal Information you provide to us while interacting with us for e-commerce purposes, for marketing purposes and for purposes relating to competitions (including sweepstakes and other similar promotions) will be stored and processed in the United States and the United Kingdom for these purposes.

Please see the “Do we transfer your personal information” section in the [Country Specific Schedules](#) of this Privacy Policy for information on how we protect your Personal Information when it is transferred from your country of residence to a location outside your country of residence.

5. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will retain your Personal Information for as long as needed or permitted considering the purpose(s) for which it was obtained and consistent with applicable law.

The criteria we use to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide our Platforms to you (for example, for as long as you have an account with us or keep using the Platforms);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period before we can delete them);
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations); and
- Any guidelines issued by relevant legal and data protection authorities.

6. SENSITIVE PERSONAL INFORMATION

We ask that you not send us, and you not disclose to us, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, sexual orientation or sex life, political opinions, religion or philosophical beliefs, health related information, criminal background or trade union membership) on or through our Platforms or otherwise unless we expressly request this information for specified purposes.

7. YOUR PRIVACY RIGHTS

If you would like to exercise your rights in relation to your Personal Information (such as to access, review, correct, update, suppress, restrict or delete Personal Information), you may contact us at: privacypolicy@wmg.com. We will respond to your request consistent with applicable law.

When contacting us, please make clear what right(s) you wish to exercise, what actions you would like us to take concerning your Personal Information and any specifics on the Personal Information your request relates to. This will allow us deal with your request more efficiently.

For your protection, we may only implement requests with respect to the Personal Information associated with the email address that you use to send us your request or we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and within any legally required time limits.

Please see the “Your Privacy Rights” section in the [Country Specific Schedules](#) this Privacy Policy or the California Privacy Policy for information on specific data protection rights provided by your jurisdiction.

8. UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy at any time. We will notify you of any significant changes where we have a relationship with you and otherwise post updated versions on our website from time to time. Please take a look at the “LAST UPDATED” legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we make the revised Privacy Policy available on or through our online Platforms.

9. CONTACTING US

If you have any questions or concerns about this Privacy Policy or our data processing practices, please contact us by email at reception.finland@warnermusic.com

We are located at the following address:

Warner Music Finland Oy

Olavinkatu 1 B, 7. kerros,

00100 Helsinki

Finland;

Attn: **Business Affaris and Managing Director**

Please note that email communications are not always secure, so please do not include credit card information or other sensitive information in your email messages to us. You can also contact us by email at privacypolicy@wmg.com or write to us at Warner Music UK Limited, Legal Department, The Warner Building, 27 Wrights Lane, London W8 5SW, for the attention of The Privacy Team.

10. COUNTRY SPECIFIC SCHEDULES

10.1 European Union and European Economic Area

DO WE TRANSFER YOUR PERSONAL INFORMATION?

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is

available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission (including the United States), we have put in place standard contractual clauses adopted by the European Commission regarding Personal Information transfers as a safeguard for the transfer of your information. You may obtain a copy of this safeguard by contacting privacypolicy@wmg.com or consult the standard terms by following this [link](#).

YOUR PRIVACY RIGHTS?

Privacy Rights if you are located in the EEA or your Personal Information is held by a Warner Music Company in the EEA:

By law, you have a number of rights (subject to certain conditions and exceptions) when it comes to your information. You can exercise any of these rights by contacting us at privacypolicy@wmg.com or through our details in the contact section below.

You have the right to object to us using your Personal Information where we rely on “legitimate interests” as a lawful basis for processing your Personal Information or where we use your Personal Information for direct marketing purposes (.e. if you no longer want to receive direct marketing newsletters, updates and other marketing communications from us).

| Rights | What does this mean? |
|----------------------------------|---|
| The right to be informed | You have the right to be provided with clear, transparent and easily understandable information about how we use your Personal Information and your rights. This is why we are providing you with the information in this Privacy Policy. |
| The right of access | You have the right to obtain access to your Personal Information (if we are processing it), and certain other information (like the information provided in this Privacy Policy). This is so you are aware and can check that we are using your Personal Information in accordance with data protection law. |
| The right to rectification | You are entitled to have your Personal Information corrected if it is inaccurate or incomplete. |
| The right to erasure | This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your Personal Information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions. |
| The right to restrict processing | You have rights to ‘block’ or suppress further use of your Personal Information. When processing is restricted, we can still store your Personal Information, but may not use it further. We keep lists of people who have asked for further use of their Personal Information to be ‘blocked’ to make sure the restriction is respected in future. |

| Rights | What does this mean? |
|---|---|
| The right to data portability | You have the right to receive your Personal Information in a structured, commonly used and machine-readable format and to request that this data is transmitted to another controller where this is technically feasible. This right only applies to Personal Information you have provided to us yourself (not any other information), that we process by automated means based on your consent or for the performance of a contract with you. |
| The right to object | You have the right to object to the use of your Personal Information in some circumstances, such as where we don't have to process your Personal Information to meet a contractual or other legal obligation. For example, you may object to the use of your Personal Information for direct marketing purposes. We can still store your Personal Information, but we can no longer use it in the way that you have asked us not to. |
| The right not to be subject to a decision based solely on automated processing, including profiling | You have the right not to have your Personal Information used to make solely automated decisions about you that you impact you. For example, you have the right not to have your Personal Information used to create a profile of you that automated decisions are later based on without there being any human involvement in that processing. |
| The right to lodge a complaint | You have the right to lodge a complaint about the way we handle or process your Personal Information with your relevant national data protection regulator. See details of the EEA data protection regulators here . |
| The right to withdraw consent | If you have given your consent to anything we do with your Personal Information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your Personal Information with your consent up to that point is unlawful). This includes the right to withdraw consent to us using your Personal Information for marketing purposes. |

10.2 United Kingdom (UK)

DO WE TRANSFER YOUR PERSONAL INFORMATION?

EEA countries are recognised by the UK as providing an adequate level of data protection and as such transfers of your Personal Information from the UK to an EEA country are currently permitted under UK law. In addition, transfers of your Personal Information to some non-EEA countries are currently permitted by the UK provided these countries have been certified by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)).

For transfers from the UK to countries not considered adequate by the European Commission (including the United States), the standard contractual clauses adopted by the European Commission regarding Personal Information transfers are currently certified by the UK as a valid safeguard for the transfer of your information and we have put these standard contractual clauses in place where we transfer your Personal Information to countries not considered by the UK as providing an adequate level of data protection. You may obtain a copy of this safeguard by contacting privacypolicy@wmg.com or consult the standard terms by following this [link](#).

YOUR PRIVACY RIGHTS?

Privacy Rights if you are located in the UK or your Personal Information is held by a Warner Music Company in the UK:

By law, you have a number of rights (subject to certain conditions and exceptions) when it comes to your Personal Information. You can exercise any of these rights by contacting us at privacypolicy@wmg.com or through our details in the contact section below.

You have the right to object to us using your Personal Information where we rely on “legitimate interests” as a lawful basis for processing your Personal Information or where we use your Personal Information for direct marketing purposes (.e. if you no longer want to receive direct marketing newsletters, updates and other marketing communications from us).

| Rights | What does this mean? |
|----------------------------------|---|
| The right to be informed | You have the right to be provided with clear, transparent and easily understandable information about how we use your Personal Information and your rights. This is why we are providing you with the information in this Privacy Policy. |
| The right of access | You have the right to obtain access to your Personal Information (if we are processing it), and certain other information (like the information provided in this Privacy Policy). This is so you are aware and can check that we are using your Personal Information in accordance with data protection law. |
| The right to rectification | You are entitled to have your Personal Information corrected if it is inaccurate or incomplete. |
| The right to erasure | This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your Personal Information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions. |
| The right to restrict processing | You have rights to ‘block’ or suppress further use of your Personal Information. When processing is restricted, we can still store your Personal Information, but may not use it further. We keep lists of people who have asked for further use of their |

| Rights | What does this mean? |
|---|---|
| | Personal Information to be 'blocked' to make sure the restriction is respected in future. |
| The right to data portability | You have the right to receive your Personal Information in a structured, commonly used and machine-readable format and to request that this data is transmitted to another controller where this is technically feasible. This right only applies to Personal Information you have provided to us yourself (not any other information), that we process by automated means based on your consent or for the performance of a contract with you. |
| The right to object | You have the right to object to the use of your Personal Information in some circumstances, such as where we don't have to process your Personal Information to meet a contractual or other legal obligation. For example, you may object to the use of your Personal Information for direct marketing purposes. We can still store your Personal Information, but we can no longer use it in the way that you have asked us not to. |
| The right not to be subject to a decision based solely on automated processing, including profiling | You have the right not to have your Personal Information used to make solely automated decisions about you that you impact you. For example, you have the right not to have your Personal Information used to create a profile of you that automated decisions are later based on without there being any human involvement in that processing. |
| The right to lodge a complaint | <p>You have the right to lodge a complaint about the way we handle or process your Personal Information with the UK data protection regulator (ICO). Please see contact details for the ICO below:</p> <p>Address: <u>Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.</u></p> <p>Phone number: <u>0303 123 1113.</u></p> <p>Website: <u>https://ico.org.uk/make-a-complaint/</u></p> |
| The right to withdraw consent | If you have given your consent to anything we do with your Personal Information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your Personal Information with your consent up to that point is unlawful). This includes the right to withdraw consent to us using your Personal Information for marketing purposes. |

11. CALIFORNIA PRIVACY POLICY

Pursuant to the California Consumer Privacy Act of 2018 (“**CCPA**”), this California Privacy Policy provides California residents with a description of our practices regarding the collection, use, sale, and disclosure of their Personal Information. Under the CCPA, “**Personal Information**” is information that identifies, relates to, describes, or could reasonably be associated or linked with a particular California resident or household. This California Privacy Policy also addresses other provisions of California law. We are providing this California Privacy Policy in addition to the information contained in our general Privacy Policy, above. As noted above, this California Privacy Policy describes our practices in connection with Personal Information that we collect from you in person and through certain of our owned or controlled Platforms. This California Privacy Policy does not apply to our job applicants, employees, contractors, owners, directors, or officers where the Personal Information we collect about those individuals relates to their current, former, or potential role with us.

11.1 Collection of Personal Information

We plan to collect, and have collected within the preceding 12 months, the following categories of Personal Information, as listed in the CCPA:

- A. **Identifiers.** Identifiers, such as name, contact information (address, email address, telephone number), an IP address that can reasonably be linked or associated with a particular consumer or household, Social Security number, social media username or handle, and online identifiers;
- B. **Customer Records Information.** Personal information as defined in the California customer records law, such as name, contact information, and financial account information;
- C. **Protected Class Information.** Characteristics of protected classifications under California or federal law, such as gender and age;
- D. **Transaction Information.** Commercial information, such as order history, contents of shopping cart, payment details, order delivery preferences, and listening history and preferences;
- E. **Online Use Information.** Internet or network activity information, such as browsing history, search history, and interactions with our online properties or ads;
- F. **Geolocation Information.** Geolocation information, such as device location and approximate location derived from IP address;
- G. **Audio/Video Information.** Audio, electronic, visual, and similar information, such as call and video recordings;
- H. **Inferences.** Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics.

11.2 Sources of Personal Information

We collect Personal Information from you and from other sources, such as third parties with which we have relationships, ad networks, publicly available databases, joint marketing partners, social media platforms, and our third-party service providers.

11.3 Our Use of Personal Information

We use Personal Information as set forth in our general Privacy Policy, above, to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, including, for example, to: develop, improve, and maintain our products and services; personalize, advertise, and market our products and services; conduct research and data analysis; maintain our facilities and infrastructure; undertake quality and safety assurance measures; conduct risk and security control and monitoring; detect and prevent fraud; perform identity verification; perform accounting, audit,

investigations, and other internal functions; comply with law, legal process, and internal policies; maintain records; and exercise and defend legal claims.

11.4 Our Disclosure and Sale of Personal Information

As set forth in our general Privacy Policy, above, we share Personal Information with the following categories of third parties:

- **Affiliates.** We share with our affiliates for the purposes described in this Privacy Policy.
- **Service Providers.** We share with our service providers, to facilitate the services they provide to us, such as website hosting, marketing services, data analysis, payment processing, order fulfillment, infrastructure provision, auditing, IT services, customer service, and email delivery.
- **Business Partners.** We share with third parties (including our partners and artists) to permit them to send you marketing communications, consistent with your marketing preferences.
- **Ad Networks.** We share with ad networks and online advertising partners to permit them to send you marketing communications.
- **Social Media Platforms.** We share with our social media partners for the purposes of carrying out Social Media Audience Advertising and when we use social media plug-ins on our Platforms.
- **Promotion Sponsors.** We share with third parties that sponsor contests, sweepstakes and similar promotions so that they can offer and administer such promotions.
- **Legal Authorities.** We share with public and government authorities, including regulators and law enforcement, to respond to requests, as well as to protect and defend legal rights.
- **Other Parties in Legal Proceedings.** We share Personal Information in the context of litigation discovery and in response to subpoenas and court orders.

Under the CCPA, a “sale” is broadly defined as the disclosure of Personal Information for monetary or other valuable consideration and may include certain of our business practices, including those related to certain types of online advertising. In the preceding 12 months, we disclosed for our operational business purposes or sold the following categories of Personal Information to the following categories of third parties:

| Categories of Personal Information | Disclosed to Which Categories of Third Parties for Operational Business Purposes | Sold to Which Categories of Third Parties |
|---|---|--|
| Identifiers | Affiliates; Service Providers; Business Partners; Promotion Sponsors; Ad Networks | Ad Networks |
| Customer Records Information | Affiliates; Service Providers; Business Partners; Promotion Sponsors; Ad Networks | Ad Networks |
| Protected Class Information | Affiliates; Service Providers; Ad Networks | Ad Networks |
| Transaction Information | Affiliates; Service Providers; Business Partners; Promotion Sponsors; Ad Networks | Ad Networks |
| Online Use Information | Affiliates; Service Providers; Ad Networks | Ad Networks |

| | | |
|-------------------------|--|-------------|
| Geolocation Information | Affiliates; Service Providers; Promotion Sponsors; Ad Networks | Ad Networks |
| Audio/Video Information | Affiliates; Service Providers | None |
| Inferences | Affiliates; Service Providers; Ad Networks | Ad Networks |

We do not knowingly sell the Personal Information of minors under 16 years of age.

11.5 Your CCPA Rights

Requests to Know and Delete

You may request that we disclose to you the following information covering the 12 months preceding your request:

- The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
- The specific pieces of Personal Information we collected about you;
- The business or commercial purpose for collecting or selling Personal Information about you;
- The categories of Personal Information about you that we sold and, for each, the categories of third parties to whom we sold such Personal Information; and
- The categories of Personal Information about you that we otherwise shared and, for each, the categories of third parties with whom we shared such Personal Information.

You may request that we delete Personal Information we collected from you.

To make a Request to Know or a Request to Delete, please contact us at 833-596-2637. We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may need to request additional Personal Information from you, such as your email address, phone number, recent transactions with us, or last several digits of your credit or debit card if you have purchased from us, in order to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your Personal Information. If you make a Request to Delete, we may ask you to confirm your request before we delete your Personal Information.

If you are the authorized agent of a consumer, making a Request to Know or a Request to Delete on behalf of the consumer, we will ask you for:

- Proof of your registration with the California Secretary of State to conduct business in California; and
- Proof that the consumer has authorized you to make a Request to Know or a Request to Delete on the consumer's behalf. This must be a permission signed by the consumer. "Signed" means that the permission has either been physically signed or provided electronically in accordance with the Uniform Electronic Transactions Act, Civil Code 1633.7 *et seq.*

If an authorized agent has not provided us with a power of attorney from the consumer pursuant to Probate Code sections 4000-4465, we may also:

- Require the consumer to provide you with a written permission signed by the consumer to make the request on the consumer's behalf;
- Verify the identity of the consumer as we would if the consumer were making the request personal; and

- Obtain verification from the consumer that they provided you permission to make the request.

Request to Opt Out of a Sale

You may request to opt out of any future sale of Personal Information about you by contacting us at 833-596-2637.

If you are the authorized agent of a consumer, making a Request to Opt Out on behalf of the consumer, we will ask you for:

- Proof of your registration with the California Secretary of State to conduct business in California; and
- Proof that the consumer has authorized you to make a Request to Know or a Request to Delete on the consumer's behalf. This must be a permission signed by the consumer. "Signed" means that the permission has either been physically signed or provided electronically in accordance with the Uniform Electronic Transactions Act, Civil Code 1633.7 *et seq.*

Right to Non-Discrimination

You have the right to be free from unlawful discriminatory treatment for exercising your rights under the CCPA.

11.6 Do Not Track Signals

We do not currently respond to browser do-not-track signals.

11.7 Your California Privacy Rights

If you are a California resident, you may request certain information once per year about our disclosure of certain categories of Personal Information during the preceding calendar year to third parties for such third parties' own direct marketing purposes. Please send your request by email to privacypolicy@wmg.com, or by postal mail to Warner Music Group, Attn: Privacy Coordinator, 1633 Broadway, New York, NY 10019. We reserve our right not to respond to requests submitted other than to the email or mailing addresses specified in this section.