The Walt Disney Company has a rich tradition of bringing great stories, characters and experiences to our guests around the world, and our sites and applications are created to entertain and connect guests with the best that Disney has to offer on the platforms and devices they prefer.

We have updated our privacy policy. Our updated policy is designed to provide greater transparency into our privacy practices and principles, in a new format that is easier to navigate, read and understand. We continue to treat your personal information with care and respect.

# **Privacy Policy**

Effective Date: May 25th, 2012

This privacy policy describes the treatment of information provided or collected on the sites where this privacy policy is posted. It also explains the treatment of information provided or collected on applications we make available on third-party sites or platforms if disclosed to you in connection with use of the application. We follow this privacy policy in accordance with local law in the places where we operate.

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## 1. Types of Information We Collect

We collect two basic types of information – **personal information** and **anonymous information** – and we may use personal and anonymous information to create a third type of information, **aggregate information**. We collect the following categories of information:

- Registration information you provide when you create an account, including your first name and surname, country of residence, gender, date of birth, email address, username and password
- Transaction information you provide when you request information or purchase a product or service from us, whether on our sites or through our applications, including your postal address, telephone number and payment information
- Information you provide in public forums on our sites and applications
- Information sent either one-to-one or within a limited group using our message, chat, post or similar functionality, where we are permitted by law to collect this information
- Information you provide to us when you use our sites and applications, our applications on third-party sites or platforms such as social networking sites, or link your profile on a thirdparty site or platform with your registration account.
- Location information when you visit our sites or use our applications, including location
  information either provided by a mobile device interacting with one of our sites or applications,
  or associated with your IP address, where we are permitted by law to process this information
- Usage, viewing and technical data, including your device identifier or IP address, when you
  visit our sites, use our applications on third-party sites or platforms or open emails we send

#### 2. How We Collect Your Information

- We collect information you provide to us when you request products, services or information from us, register with us, participate in **public forums** or other activities on our sites and **applications**, respond to customer surveys, or otherwise interact with us. Please keep in mind that when you provide information to us on a third-party site or platform (for example, via our applications), the information you provide may be separately collected by the third-party site or platform. The information we collect is covered by this privacy policy and the information the third-party site or platform collects is subject to the third-party site or platform's privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our applications.
- We collect information through technology, such as cookies, Flash cookies and Web beacons, including when you visit our sites and applications or use our applications on third-party sites or platforms. Please visit Online Tracking and Advertising for further information, including how to disable cookies.
- We acquire information from other trusted sources to update or supplement the information you
  provided or we collected automatically. Local law may require that you authorize the third
  party to share your information with us before we can acquire it.

## 3. Use of Your Information by The Walt Disney Family of Companies

A member of The Walt Disney Family of Companies, which includes many different brands, will be the data controller for your information. The relevant data controller(s) can be determined here. Other members of The Walt Disney Family of Companies may have access to your information where they perform services on behalf of the data controller(s) (as a data processor) and, unless prohibited under applicable law, for use on their own behalf (as a data controller) for the following purposes:

- Provide you with the products and services you request
- Communicate with you about your account or transactions with us and send you information about features on our sites and **applications** or changes to our policies
- Consistent with local law and choices and controls that may be available to you:
  - Send you offers and promotions for our products and services or third-party products and services
  - o Personalize content and experiences on our sites and applications
  - Provide you with advertising based on your activity on our sites and applications and on third-party sites and applications. To learn more about how we use your information for personalization and tracking, please visit Online Tracking and Advertising.
- Optimize or improve our products, services and operations
- Detect, investigate and prevent activities that may violate our policies or be illegal

## 4. Sharing Your Information with Other Companies

We will not share your **personal information** outside **The Walt Disney Family of Companies** except in limited circumstances, including:

- When you allow us to share your personal information with another company, such as:
  - Electing to share your personal information with carefully selected companies so that they can send you offers and promotions about their products and services
  - Directing us to share your personal information with third-party sites or platforms, such as social networking sites
- Please note that once we share your personal information with another company, the information received by the other company becomes subject to the other company's privacy practices.

- When we cooperate with financial institutions to offer co-branded products or services to you, such as our co-branded Disney Rewards Visa Card; however, we will do so only if permitted by applicable law and, in these cases, the financial institutions are prohibited from using your personal information for purposes other than those related to the co-branded products or services
- When companies perform services on our behalf, like package delivery and customer service; however, these companies are prohibited from using your personal information for purposes other than those requested by us or required by law
- When we share personal information with third parties in connection with the sale of a
  business, to enforce our Terms of Use or rules, to ensure the safety and security of our guests
  and third parties, to protect our rights and property and the rights and property of our guests
  and third parties, to comply with legal process or in other cases if we believe in good faith that
  disclosure is required by law

#### 5. Your Controls and Choices

We provide you the ability to exercise certain controls and choices regarding our collection, use and sharing of your information. In accordance with local law, your controls and choices may include:

- You may correct, update and delete your registration account
- You may change your choices for subscriptions, newsletters and alerts
- You may choose whether to receive from us offers and promotions for our products and services, or products and services that we think may be of interest to you
- You may choose whether we share your **personal information** with other companies so they can send you offers and promotions about their products and services
- You may choose whether to receive targeted advertising from many ad networks, data exchanges, marketing analytics and other service providers **here**
- You may request access to the personal information we hold about you and that we amend or
  delete it and we request third parties with whom we have shared the information do the same

You may exercise your controls and choices, or request access to your personal information, by visiting **Communication Choices**, contacting **Guest Services**, or following instructions provided in communications sent to you. Please be aware that, if you do not allow us to collect personal information from you, we may not be able to deliver certain products and services to you, and some of our services may not be able to take account of your interests and preferences. If you have questions regarding the specific personal information about you that we process or retain, please contact **Guest Services**.

## 6. Children's Privacy

We recognize the need to provide further privacy protections with respect to **personal information** we may collect from **children** on our sites and **applications**. Some of the features on our sites and applications are agegated so that they are not available for use by children, and we do not knowingly collect personal information from children in connection with those features. When we intend to collect personal information from children, we take additional steps to protect children's privacy, including:

- Notifying parents about our information practices with regard to children, including the types of
  personal information we may collect from children, the uses to which we may put that
  information, and whether and with whom we may share that information
- In accordance with applicable law, obtaining consent from parents for the collection of personal information from their children, or for sending information about our products and services directly to their children
- Limiting our collection of personal information from children to no more than is reasonably necessary to participate in an online activity

 Giving parents access or the ability to request access to personal information we have collected from their children and the ability to request that the personal information be changed or deleted

For additional information about our practices in the United States and Latin America regarding children's personal information, please read our **Children's Privacy Policy**.

## 7. Data Security and Integrity

The security, integrity and confidentiality of your information are extremely important to us. We have implemented technical, administrative and physical security measures that are designed to protect guest information from unauthorized access, disclosure, use and modification. From time to time, we review our security procedures to consider appropriate new technology and methods. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable.

## 8. Data Transfers, Storage and Processing Globally

We operate globally and may transfer your **personal information** to individual companies of **The Walt Disney Family of Companies** or third parties in locations around the world for the purposes described in this privacy policy. Wherever your personal information is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information. Additionally, when using or disclosing personal information transferred from the European Union, we abide by the Safe Harbor Principles as set forth by the U.S. Department of Commerce, use standard contract clauses approved by the European Commission, adopt other means under European Union law for ensuring adequate safeguards, or obtain your consent. We also apply the substantive requirements of the Safe Harbor Principles when transferring personal information from Australia.

## 9. Changes to this Privacy Policy

From time to time, we may change this privacy policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We will provide **notice** to you if these changes are material and, where required by applicable law, we will obtain your consent.

#### 10. Comments and Questions

If you have a comment or question about this privacy policy, please contact Guest Services.

Our sites and **applications** may contain links to other sites not owned or controlled by us and we are not responsible for the privacy practices of those sites. We encourage you to be aware when you leave our sites or applications and to read the privacy policies of other sites that may collect your **personal information**.

## Notice to California Residents:

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by certain **members** of The Walt Disney Family of Companies to third parties for the third parties' direct marketing purposes. With respect to these entities, this privacy policy applies only to their activities within the State of California. To make such a request, please send an email to caprivacy.wdig@twdc.com or write us:

CA Privacy Rights
Disney Interactive Media Group
500 South Buena Vista Street

Mail Code 7667 Burbank, CA 91521-7667

In your request, please specify the member of The Walt Disney Family of companies to which your request pertains. If no member is specified, we will treat your request as pertaining to Disney Online.

## **Definitions**

<u>Aggregate Information</u>. Aggregate information means information about groups or categories of guests, which does not identify and cannot reasonably be used to identify an individual guest.

<u>Anonymous Information.</u> Anonymous information means information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual guest.

<u>Application.</u> Application means a program or service operated by us (or on our behalf) that may be displayed on various online, mobile or other platforms and environments, including those operated by third parties, which permits us to interact directly with our guests.

<u>Children.</u> Children means individuals who we have identified are not of legal age to consent to the collection and processing of their personal information. In the United States and Latin America, the term "children" refers to individuals under 13 years of age.

<u>Data Controller.</u> The data controller is the subsidiary or affiliated entity of The Walt Disney Company that is responsible for the personal information collected from the following sites and applications:

Sites and Applications	Company	Contact Information
Disney.co.uk and Disneymovierewards.co.uk, and applications with associated branding	The Walt Disney Company Limited	The Walt Disney Company Limited registered in England & Wales under Company Registration Number 530051 with its registered office at 3 Queen Caroline Street, Hammersmith, London, W6 9PE United Kingdom Send an email to <b>Guest Services</b>
DisneyStore.co.uk, and applications with associated branding	Disney Stores Limited (jointly with The Walt Disney Company Limited)	The Walt Disney Company Limited registered in England & Wales under Company Registration Number 530051 and Disney Stores Limited registered in England & Wales under Company Registration Number 02523767, both with their registered office at 3 Queen Caroline Street, Hammersmith, London, W6 9PE United Kingdom Send an email to <b>Guest Services</b>
Disney ID, Marvel XP and all other sites and applications	Disney Online	Disney Interactive Media Group 500 South Buena Vista Street Mail Code 7667 Burbank, CA 91521-7667 United States of America <b>Guest Services</b>

<u>Data Processor.</u> A data processor is a person or entity that processes personal information on behalf of a data controller (or data controllers) and is permitted to perform data processing only as directed by the data controller(s).

<u>IP address.</u> An IP address is associated with the access point through which you enter the Internet, and is typically controlled by your Internet Service Provider (ISP), your company, or your university. We may use IP addresses to collect information regarding the frequency with which our guests visit various parts of our sites and applications, and we may combine IP addresses with personal information.

Member. Member means a subsidiary or affiliated entity that is part of The Walt Disney Family of Companies.

<u>Notice</u>. Notice may be by email to you at the last email address you provided us, by posting notice of such changes on our sites and applications, or by other means, consistent with applicable law.

Parents. Parents means a parent or legal guardian.

<u>Personal information.</u> Personal information means information that identifies (whether directly or indirectly) a particular individual, such as the individual's name, postal address, email address and telephone number. When anonymous information is directly or indirectly associated with personal information, this anonymous information also is treated as personal information.

<u>Public Forums.</u> Our sites and applications may offer message boards, conversation pages, blogs, chat rooms, social community environments, profile pages, and other forums that do not have a restricted audience. If you provide personal information when you use any of these features, that personal information may be publicly

posted and otherwise disclosed without limitation as to its use by us or by a third party. To request removal of your personal information from a public forum on one of our sites or applications, please contact **Guest Services**.

<u>The Walt Disney Family of Companies.</u> The Walt Disney Family of Companies refers to The Walt Disney Company and its subsidiary and affiliated entities, which offer their products and services under various brand names. These companies engage in a number of businesses, including theme parks and travel, motion pictures and television, publishing, consumer products and interactive services. The Walt Disney Company brands include, among others, the following:

ABC
Baby Einstein
BabyZone
Club Penguin
Disney
ESPN
Hollywood Records
Kaboose
Marvel
Muppets
Pixar
Playdom
Tapulous
Touchstone

## **Guest Services Contact Information**

## Europe:

Guest Services
The Walt Disney Company Limited
London W6 9PE
England
Send an email to Guest Services

### **United States of America:**

Guest Services
Disney Interactive Media Group
500 South Buena Vista Street
Mail Code 7667
Burbank, CA 91521-7667
United States of America
Send an email to Guest Services

For questions related to children's privacy, you may also telephone Guest Services at +1 (877) 466-6669. Disney Interactive Media Group is a licensee of the TRUSTe Privacy Program in the United States. If you believe that Disney Interactive Media Group has not responded to your inquiry or your inquiry has not been satisfactorily addressed, you may contact TRUSTe here or the United States Federal Trade Commission through its online consumer complaint form available here.

## **Communication Choices**

The following information is relevant to most registration accounts with The Walt Disney Family of Companies, including ABC, ESPN, Disney, Family, Kaboose and FamilyFun accounts.

To access and control registration accounts with certain other **members** of The Walt Disney Family of Companies, including Club Penguin, Marvel, Playdom and Tapulous, click **here**.

# 1. Accessing Your Registration Account

You can access and update the contact information you gave us during registration (that is, your postal address, email address, or any other information that would directly enable us to contact you) **here**.

## 2. Accessing Your Child's Registration Account

To request access and update the information your child gave us during registration or to request that we delete your child's registration account, please contact **Guest Services**.

## 3. Exercising Marketing Choices

How to exercise your general marketing choices:

To modify a general marketing permission that you provided when you registered and set up your account (or any later changes to that permission), click **here**.

Following our receipt of your request to cease using your personal information for marketing purposes, we may require a reasonable period of time to update our systems to fully implement your request.

## 4. Choices for Subscriptions, Newsletters and Alerts

In addition to the general marketing choices managed above, you may choose to subscribe or unsubscribe to a number of communications covering a variety of topics from sports scores and family crafts to breaking news. Please click on the links below to learn about many of these communications and set your choices.

- ABC.com
- ABCNews.com
- BabyZone
- Club Penguin
- Disney.co.uk
- Disney.com
- Disneyland Resort
- Disneystore.co.uk
- Disneystore.de
- Disneystore.fr
- DisneyStore.com
- ESPN
- Family.com
- FamilyFun.com
- Hollywood Records
- Kaboose
- Marvel
- MarvelStore.com
- Playdom
- Radio Disney
- SoapNet.com
- Tapulous
- Walt Disney World Resort

# 5. Registration Accounts with Certain Other Members of The Walt Disney Family of Companies

- If you have a Club Penguin registration account, please go here.
- If you have a Marvel registration account, please go here.
- If you have a Playdom registration account, please go here.
- If you have a Tapulous registration account, please go here.

# **Online Tracking and Advertising**

UK Guests Only: Please click here to read our Cookies Policy.

## 1. Online Tracking and Advertising

We and certain service providers operating on our behalf collect information about your activity on our sites and **applications** using tracking technologies such as cookies, Flash cookies and Web beacons. Definitions for the tracking technologies listed, as well as information regarding how to disable them, are available below. This tracking data is used for many purposes including, for example, to:

- Provide useful features to simplify your experience when you return to our sites and applications; for example, remembering your shipping information for future purchases
- Deliver relevant content based on your preferences, usage patterns and location
- Monitor and evaluate the use and operation of our sites and applications
- Analyze traffic on our sites and on the sites of third parties

We may associate this tracking data with your registration account, in which case we will treat it as personal information. Service providers that collect tracking data on our behalf may provide an opportunity for you to choose not to be tracked online.

Advertisers and third parties also may collect information about your activity on our sites and applications and on third-party sites and applications using tracking technologies. Tracking data collected by these advertisers and third parties is used to decide which ads you see both on our sites and applications and on third-party sites and applications, but does not identify you personally and is not associated with your registration account. You may choose not to receive targeted advertising from many ad networks, data exchanges, marketing analytics and other service providers **here**.

## 2. Online Tracking Technologies

Examples of online tracking technologies include:

Cookies. Cookies are pieces of information that a website places on the hard drive of your computer when you visit the website. Cookies may involve the transmission of information from us to you and from you directly to us, to another party on our behalf, or to another party in accordance with its privacy policy. We may use cookies to bring together information we collect about you. You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Each browser is a little different, so look at your browser Help menu to learn the

- correct way to modify your cookies. If you turn cookies off, you won't have access to many features that make your guest experience more efficient and some of our services will not function properly.
- Flash cookies. We may use local shared objects, sometimes known as Flash cookies, to store your preferences or display content based upon what you view on our site to personalize your visit. Our advertisers and third-party service providers also may use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored. Cookie management tools provided by your browser will not remove Flash cookies. To learn how to manage privacy and storage settings for Flash cookies, please click here. If you disable Flash cookies, you won't have access to many features that make your guest experience more efficient and some of our services will not function properly.
- Web beacons. Web beacons are small pieces of data that are embedded in images on the
  pages of sites. Web beacons may involve the transmission of information directly to us, to
  another party on our behalf, or to another party in accordance with its privacy policy. We may
  use web beacons to bring together information we collect about you.

End of **Privacy Policy**