

Privacy Policy

We at Novi Digital Entertainment Private Limited, Starhouse, Urmi Estate, 95 Ganpatrao Kadam Marg, Lower Parel (West), Mumbai 400013, India ("we", "us", "our", "Novi") are committed to protecting your Personal Information. Please read the following terms of the Privacy Notice carefully to understand our practices regarding your Personal Information and how we process it.

1. Objective and Scope

This Privacy Policy ("Privacy Notice") applies to the use of Disney+ Hotstar Marketing Platform available on the website ads.hotstar.com and adsmanager.hotstar.com ("Site") and any other websites, applications, or services provided by Novi in connection with the Site (collectively, the "Services") and explains how we process your Personal Information when you use our Services.

Please also note that the Site 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 Site and to read the privacy policies of other sites that may collect your Personal Information.

We encourage you to read the applicable Terms of Service ("Terms") available at [here](#) to understand the terms related to the use of the Services. Please note that unless specifically defined in this Privacy Notice, capitalised terms shall have the same meaning ascribed to them in our Terms. By using all or a part of the Services, you agree and consent to the collection, use, storage, and disclosure of your Personal Information in accordance with this Privacy Notice.

2. Collection of Personal Information

Where we refer to 'Personal Information' we mean any information related to a particular individual which, either directly or indirectly, in combination with other information available or likely to be available with us, is capable of identifying such individual. This includes direct identifiers such as your name, postal address, email address, and mobile number, and also includes all other information which is linked to that information such as, billing information, CIN, PAN.

If you represent a company and/or legal entity, you will be required to provide your entity's full billing information, including name, address, relevant contact person, CIN, PAN and GST number of the entity.

2.1 Information provided by You

We may collect Personal Information directly from you. For example, we will collect contact details when you create and set-up a business account ("Business Account") and provide an acceptable username and password to set-up the Business Account. By providing such information, you represent and warrant that you are authorised by the entity to provide such information on behalf of such entity and create the Business Account on behalf of the entity. If you register as an individual, you will be required to submit Personal Information such as your email address, mobile phone number, your address, billing information, PAN, GST number..

When providing your Personal Information, you must provide accurate and complete information. You are solely responsible for the Personal Information and/or other information, data, images etc. that you submit through the Site. Novi takes no responsibility in the event that Novi is unable to contact you or otherwise provide Services to you, due to any inaccuracy or incompleteness in the information provided by you.

Your Personal Information may be shared with an affiliate of Novi or a third party in relation to the provision of the Services. By providing the aforementioned information and/or signing up with Novi, you acknowledge that you have the authority and consent to provide such information and give us permission to contact you by phone and/or any other communication media. You acknowledge, consent and agree that Novi may access, preserve, transfer and disclose the Personal Information, if

required to do so by law to co-operate with mandated government and law enforcement agencies or to any private parties by an order under law for the time being in force to enforce and comply with the law including to various tax authorities upon any demand or request by them or in a good faith belief that such access, preservation, transfer or disclosure is reasonably necessary to: (a) comply with legal process and/or any applicable law in the territory; (b) enforce this Agreement; (c) respond to your requests for customer service; or (d) protect the rights, property or personal safety of Novi, affiliates, its users and the public.

2.2 Information we collect automatically

We and certain third parties on our behalf may collect information about you and your use of our Site, your interactions with us, as well as information regarding your computer or other device used to access our Services. The information may be collected using tracking technologies such as cookies, Flash cookies, pixels, tags, software development kits, application program interfaces, and Web beacons and may include:

- Your activity on the Site such as pages/titles viewed, load times, , transactions initiated and/or completed, search queries and Site features used.
- Your interactions with our emails, communications, messages,
- Your interactions with our customer support such as the date, time and reason for contacting us, transcripts of any chat conversations, and if you call us, your phone number and call recordings;
- We capture information related to the performance of the Site, such as crash logs, build analytics and other performance statistics generated when you use the Site;

2.3 Inferred Information through usage and log data

We may track certain information about your visit to our Site. This information may include the platform that you just visited (whether this platform is for Services or not), which platform you next visit, your computer browser information, your mobile phone OS version.

2.4. Information we collect through third party sources

We may obtain your Personal Information from other sources.

We may also receive information about you from third parties but will only do so where we have assurances that you have given your permission. For example, we may obtain data related to you and your interests from i) publicly available sources such as public or open government databases or ii) online and offline data providers (including advertising networks and analytics providers).

3. Payment Card and Billing Information

When you make payment on the Site using one or more of our payment gateway service providers, or any other online or mobile payment services provider we may use (including through any app stores), the following payment information will be collected: your credit/debit card details (number, card expiry date, CVC code) or other bank account details along with the date, time and amount of the transaction payment. This payment information is stored by our payment processors and associated with a merchant name/ID and location which our payment processor gives to us, together with a unique customer ID which we share with them but this payment information is never stored or processed by us. Our payment processors use this payment information to process and facilitate payments in order that we may provide you with the Services. To ensure payments have been made , our payment processors will send us a unique transaction ID which we associate with your unique customer ID and which we keep for internal accounting purposes because we have a **legal obligation** to do so.

Our payment processors may use third party fraud detection software or providers which analyse your payment information in order to make automated decisions as to whether or not payment from you will be accepted. You have the right to contest any fraud decision made about you and to be given more information about why any such decision was made by contacting us.

Where our payment processors are providing payment processing services to us we put in place appropriate contracts to protect your Personal Information. Our payment processors have their own privacy policies in place and we recommend you read those policies before you provide your payment information.

In order to process any of your customer support queries related to payment processing, our payment processors may give us access to the first 6 digits and last 4 digits of your credit/debit card (including any updates), and you consent to such access of your payment information by us in order to (a) **perform the contract** with you and; (b) to provide you with a quick resolution of your queries. You also consent to the processing and use of the first 6 digits of your credit/debit card so that we can analyse the most popular card types and issuing banks of our customer base to ensure that we are able to improve our user experience and provide you better service. Our payment processors will also pass us your expiry date after each payment transaction is completed and you consent to such transfer. We will use this to send you an email reminder to update your payment information before your card expires to make sure your access to our Services is not interrupted. However, at no point in time do we have access to or store the full credit/debit card number in our systems.

4. Purposes of processing

We collect and process your Personal Information in accordance with applicable law, for a variety of purposes. These may include, but are not limited to:

Providing advertising Services: Our primary purpose in collecting your information, including Personal Information from you is to deliver the Services . Please note that should you choose to not provide us consent to collect your information, including Personal Information, we may not be able to provide advertising Services to you.

We use your information where we need the Personal Information so as to:

- Register you on our Site and create a Business Account.
- Verify your details in order to provide Services to you
- Process your payment card details (as described in Section 3 above),
 - Provide you with customer or technical support including addressing support queries related to, but not limited to, payment processing, or to diagnose any problems with our servers etc.
- Send you transactional emails or to provide you with information regarding our Service, your Campaign etc.,
- Research, analyze and understand our audience and what advertising they may view, watch or otherwise engage with, in order to improve our Services (including our user interface experiences and security features); to perform analytics and conduct customer research, including general market research or surveying our customers' needs and opinions on specific issues, generating sales and traffic patterns, and to analyze advertising effectiveness, both on an anonymous basis (e.g., by aggregating data) or on an individual basis (if legally permissible), in combination with other information collected from tracking technologies and aggregate it with information collected from other users using our Site, to attempt to provide you with the Services.
- Our affiliate and group companies (collectively referred to as “The Walt Disney Family of

Companies”) may access and use your information where they perform services on our behalf and, unless prohibited under applicable law, for use on their own behalf to market Disney+Hotstar services, our other services, and the services and products generally offered by The Walt Disney Family of Companies.

Or otherwise whenever the law requires us to get your permission or where we have stated we may seek your permission in this Privacy Notice. In some contexts, we use your Personal Information where we have a legal obligation to do so or to protect **your vital interests or those of another person:**

- Prevent, detect and investigate potentially prohibited or illegal activities, including fraud, and enforcing our terms);
- Confirming your identity if you are exercising legal rights;
- Notify you about changes in the Terms of Service or in this Privacy Notice;
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us.

When you access or use the Services or send any data, query, request or communication to us via our Support email, you understand that you are communicating with us electronically, and that we may respond via electronic means to you, such as by email.

5. Disclosure

5.1 SERVICE PROVIDERS

At times we may make your Personal Information available to our service providers (such as but not limited to: marketing, analytics, research, communication, advertisements, infrastructure and IT services, technology or software providers, payment processing and other service providers) that work with us or assist us to provide Services to you or license us software which we include in our Site. You authorise us to share your Personal Information with our service providers to provide or improve the Services and to enable us to analyse our marketing efforts. We do not authorize our service providers to use or disclose your Personal Information except in connection with providing their services..

5.2 Business Transfers

We provide your Personal Information to our affiliates and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Notice and any other appropriate confidentiality and security measures.

5.3 Legal

In the event of any requirement by court order, government or quasi-government agency to disclose your Personal Information, we will disclose information as may be legally required. We may also disclose your Personal Information if we, in the good faith believe that such disclosure is reasonably necessary to respond to subpoenas, court orders, or other legal process

In the event Novi is merged with or acquired by another company or in case of re-organization or restructuring of business, we and our affiliates may share your Personal Information wholly or in part, with another business entity.

6. Your Controls and Choices

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

6.1 Managing Your Information

You can access some of your Personal Information through User Details section of the Site (under Business Settings) after a successful login. You are responsible for providing us with your accurate Personal Information and keeping your Personal Information up-to-date.

6.2 Rectification of Inaccurate or Incomplete Information

You can ask us to correct inaccurate or incomplete Personal Information concerning you by sending us an email to our grievance officer.

6.3 Data Retention

We retain your Personal Information as long as necessary for providing you the Services and to comply with our legal obligations. In particular, when determining how long we retain personal data, we take into account how long we need it to:

- Maintain business records for analysis and/or audit purposes;
- Comply with record retention requirements under the law;
- Defend or bring any existing or potential legal claims; and
- Deal with any complaints regarding the Site/any services provided on the Site.

At the end of the retention period after your Business Account is deleted your personal data will be anonymised. For the avoidance of doubt, anonymised data cannot be used to identify an individual, and does not fall within the scope of Personal Information.

7. Data transfer, storage & processing globally

We operate globally and may transfer your Personal Information to Novi affiliated companies or service providers or third-party recipients to whom we provide technology and hosting services, in locations around the world for the purposes described in this Privacy Notice. Accordingly, by consenting to this Privacy Notice, you also provide consent to Novi to transfer your Personal Information to Novi affiliated companies or service providers or such third-party recipients in locations around the world. Wherever your Personal is transferred, stored or processed by us or our affiliates or service providers, we will take reasonable steps to safeguard the privacy of your Personal Information, as the case may be.

8. Security

We have implemented administrative, technical, and physical security measures to help protect your Personal Information against unauthorized access, loss, destruction, or alteration in compliance with applicable law. Some of the safeguards we use to protect your Personal Information are firewalls and data encryption, and information access controls. These measures are designed to provide a level of security appropriate to the risks of processing your Personal Information. If you know or have reason to believe that your account credentials have been lost, stolen, altered, or otherwise compromised or in case of any actual or suspected unauthorized use of your account, please report such an incident immediately. (please see Contact Information below).

We use commercially reasonable security practices and procedures industry practices and procedures designed to help keep your Personal Information safe and secure. Unfortunately, the transmission of

information over the Internet is not completely secure. Although we strive to protect your Personal Information, we cannot guarantee the security of your data while it is being transmitted to our Services; any transmission is at your own risk. We will also ensure, on a commercially reasonable efforts basis, that any agent or third party that we employ complies with the same security standards as we do for the protection of your Personal Information.

Your information may be transferred to or may be maintained on computers, computer systems and computer resources located outside of your state or country where the privacy laws may be different (but no less stringent than the restrictions imposed by Indian law) as those where you live. If you are located outside India and choose to provide information to us, please be aware that the Site is hosted in India and that the Site keeps or transfers information to and from India for storage and processing.

9. Cookies

A cookie is a small text file that can be stored on and accessed from your device when you visit our Site, to the extent you agree. The other tracking technologies work similarly to cookies and place small data files on your devices or monitor your website activity to enable us to collect information about how you use our sites. The information provided below about cookies also applies to these other tracking technologies.

We and our service providers may use cookies and other technologies to store information in your web browser or on your mobile phone, tablet, computer, or other devices (collectively "devices") that allow us to store and receive certain pieces of information whenever you use or interact with our Site. Such cookies and other technologies help us to identify and learn more about our users and their likely interests, and to deliver and tailor marketing or advertising. We also use cookies and other tracking technologies to control access to certain content on our sites, protect the sites, and to process any requests that you make to us.

If you do not want cookies to be dropped on your device, you can adjust the setting of your Internet browser to reject all or some cookies. For further information about how to do so, please refer to your browser 'help' / 'tool' or 'edit' section for cookie settings.

Please note that if your browser setting is already setup to block all cookies then some of this site's features may not operate as intended.

If you want to remove previously-stored cookies, you can manually delete the cookies at any time through your browser settings. However, this will not prevent the Site from placing further cookies on your device unless and until you adjust your internet browser setting as described above.

10. Change in Privacy Notice

This Privacy Notice is subject to change from time to time. We reserve the right, at our sole discretion, to modify the terms of this Privacy Notice from time to time in order to ensure compliance with applicable laws or in response to changing regulatory or operational requirements). Any updates to this Privacy Notice shall be effective immediately (unless we state otherwise) and shall supersede the terms of this Privacy Notice. We will notify you of any changes to this Privacy Notice if the changes significantly affect your rights or as may be required by law. Your continued use of the Services after any updates will mean you have accepted those changes.

11. Contact us

If You have any questions about this Privacy Notice, you can contact us at adsmanager.support@hotstar.com or you can write and send a letter to us at the below address :-

Novi Digital Entertainment Private Limited

Urmi Estate, Ganapatrao Kadam Marg,

Railway Colony,

Lower Parel, Mumbai,
Maharashtra 400013

Please do not share any private information at the above stated email id
adsmanager.support@hotstar.com