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 we have to offer on the platforms and devices our guests prefer.

Our privacy policy is designed to provide transparency into our privacy practices and principles, in a format that our guests can navigate, read and understand. We are dedicated to treating your personal information with care and respect.

Privacy Policy



Last Modified: December 30, 2013

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.

1. Types of Information We Collect

We collect two basic types of information – <u>personal information</u> and <u>anonymous information</u> – and we may use personal and anonymous information to create a third type of information, <u>aggregate information</u>. 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 <u>public forums</u> on our sites and <u>applications</u>
- 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 thirdparty sites or platforms such as social networking sites, or link your profile on a third-party 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 <u>IP address</u>, 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 <u>public forums</u> or other activities on our sites and <u>applications</u>, 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 <u>Online Tracking and Advertising</u> for further information, including Do Not Track and 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.

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

A <u>member</u> of <u>The Walt Disney Family of Companies</u>, which includes many different brands, will be the data controller for your information. The relevant data controller(s) can be determined <u>here</u>. 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 <u>data processor</u>) 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 <u>applications</u> 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
- 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 <u>personal information</u> outside <u>The Walt Disney Family of Companies</u> 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

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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 <u>personal information</u> 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 <u>Communication Choices</u>, contacting <u>Guest Services</u>, 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 <u>Guest Services</u>.

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6. Children's Privacy

We recognize the need to provide further privacy protections with respect to <u>personal information</u> we may collect from <u>children</u> on our sites and <u>applications</u>. Some of the features on our sites and applications are age-gated 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 <u>parents</u> 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.

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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 <u>personal information</u> to individual companies of <u>The Walt Disney Family of Companies</u> 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.

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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 <u>notice</u> to you if these changes are material and, where required by applicable law, we will obtain your consent.

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10. Comments and Questions

If you have a comment or question about this privacy policy, please contact <u>Guest Services</u>. Our sites and <u>applications</u> 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 <u>personal</u> 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
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.

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Definitions

Aggregate Information. Aggregate information means information about groups or categories of quests, which does not identify and cannot reasonably be used to identify an individual quest.

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

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Application. 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.

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Children. 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.

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Data Controller. The data controller is the subsidiary or affiliated entity of The Walt Disney Company that is responsible for the personal information collected from sites and applications, as follows:

Sites and Applications	Company	Contact Information
Disney Club Penguin ("Club Penguin")	Disney Canada Inc. (formerly known as Disney Online Studios Canada Inc.)	Club Penguin c/o Disney Online Studios Canada Inc. 1628 Dickson Avenue, Suite 500 Kelowna, British Columbia V1Y 9X1 CANADA support@clubpenguin.com
Disney Movies Online	Disney Online, Buena Vista Home Entertainment, Inc.	Disney Interactive 500 South Buena Vista Street

		Mail Code 7667 Burbank, CA 91521-7667 United States of America Guest Services
Disney Studio All Access Disney Movie Rewards	Disney Online, Buena Vista Home Entertainment, Inc., Walt Disney Studios Motion Pictures	Disney Interactive 500 South Buena Vista Street Mail Code 7667 Burbank, CA 91521-7667 United States of America Guest Services
All other sites and applications	Disney Online	Disney Interactive 500 South Buena Vista Street Mail Code 7667 Burbank, CA 91521-7667 United States of America Guest Services

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Data Processor. 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).

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IP Address. 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.

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

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Notice. 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.

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Personal information. 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.

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Public Forums. 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 <u>Guest Services</u>.

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The Walt Disney Family of Companies. 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
- Babble
- Baby Einstein
- BabyZone
- Club Penguin
- Disney
- Disney Pixar
- ESPN
- Hollywood Records
- Indiana Jones
- Lucasfilm
- Marvel
- Muppets
- Playdom
- Spoonful
- Star Wars
- Tapulous
- Touchstone

Guest Services Contact Information

United States of America:

Guest Services
Disney Interactive
500 South Buena Vista Street
Mail Code 7667
Burbank, CA 91521-7667
United States of America

Guest Services

For questions related to children's privacy, you may also telephone Guest Services at (877) 466–6669.

Disney Interactive has received the TRUSTe Privacy Seal in the United States, signifying that this privacy policy and our privacy practices have been reviewed for compliance with the TRUSTe program listed on the validation page available when you click on the TRUSTe Privacy Seal. The TRUSTe program covers only those properties identified on the validation page. If you believe that Disney Interactive 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.