

PRIVACY & COOKIE INFORMATION FOR USERS AGED 13 - 17

Under 13? Try the under 13s' version instead.

18+ or just want more information? Check out the full version.

This policy has been written for teenagers and young adults aged 13 to 17 who use online stores operated by Ceremony of Roses UK Limited.

To help you stay safe online and explore our sites and stores with confidence, this policy explains your data privacy rights and how we collect, use, share and protect information about you.

If you have any questions or you don't understand - that's okay, some of this stuff is complicated! – speak to your parent or guardian (the person who looks after you), or email our support team at support@ceremonyofroses.com.

Here's what this policy explains:

- Who we are
- What age you have to be to use our sites (depending on where you live)
- What your parents need to know (if you're under 18)
- How we collect information about you & what information we collect
- How we use information about you
- How we share information about you
- Cookies and other tracking technologies we use
- Your data protection rights
- How to contact us
- How long we keep your information
- Other websites
- Changes to our privacy policy

1. WHO WE ARE

We are **Ceremony of Roses UK Limited**. We're part of bigger group of companies called Sony Music Entertainment.

We operate online stores worldwide for various singers, musicians and artists.

When you see the word "sites" in this policy, it means all websites and sub-domains owned and operated by Ceremony of Roses UK Limited.

Where you see "Ceremony of Roses", "us" or "we" in this policy, it means Ceremony of Roses UK Limited or any Sony Music Entertainment company using your data as set out below.

2. MINIMUM AGES

OUR SITES ARE NOT INTENDED TO BE USED BY PEOPLE UNDER 13 YEARS OLD, OR THE FOLLOWING AGES WITHIN THE EUROPEAN COMMUNITY:

- 13 years old - Belgium, Denmark, Finland, Latvia, Malta, Sweden;
- 14 years old - Austria, Cyprus, Italy, Lithuania, Spain;
- 15 years old - France; or
- 16 years old - Bulgaria, Croatia, Czech Republic, Estonia, Germany, Greece, Hungary, Ireland, Luxembourg, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia.

If you're under the applicable minimum age and we accidentally collect personal information about you via our sites, that information will be immediately deleted, and we won't be able to process your order or account registration.

If you're under the minimum age, some of the content and products on our sites might not be right for you, so please ask your parent or guardian to check the site first, and then explore it together if they say it's okay.

You can also read our privacy notice for younger music fans.

3. A SPECIAL NOTE TO PARENTS & LEGAL GUARDIANS

While we do not knowingly allow registration on our sites or services by children under the applicable minimum age (depending on the country, as listed above in [section 2](#)), parents and legal guardians should supervise their children's online activities and where appropriate consider using parental control tools available from online services and software manufacturers that help provide a child-friendly online environment. These tools can also prevent children from disclosing online their name, address, and other personal information without parental permission.

We want to encourage younger users to understand their data privacy rights and develop confidence in their online choices. Our sites and services allow the user to set their own privacy and cookie preferences (subject to the browser's parental controls, if applicable). This policy and our cookie preference centre explain what will happen with a user's personal data if they change our default high privacy settings, but we also encourage younger users to speak to a responsible adult first before changing those default settings.

4. HOW WE COLLECT YOUR DATA & WHAT INFORMATION WE COLLECT

From you:

- When you register an account with us and/or place an order for products or services on our sites, we will collect your:
 - first and last name

- email address
 - postal address
 - telephone number
 - billing address
 - payment details.
- We also collect basic contact information when you voluntarily complete customer surveys, provide feedback, and participate in our contests.
 - If you contact us, you'll be sharing with us your email address, name, and any other personal information you might include in your message.

From third parties with your consent:

If you pay for products or services on our sites using PayPal, GooglePay, ShopPay or any other third-party online payment application, in order to process your order we will be provided with your:

- name
- email address
- shipping address.

By using cookies and other tracking technologies:

We use technology on our websites, services and content to collect information that helps us enhance your online experience, measure our audience and, if you have asked to receive updates about artists or products, provide you with personalised content based on your behaviour on our sites.

We call this technology "cookies" throughout this policy but we mean all similar technologies including web beacons, log files, pixel tags, gifs (also described below). For more information see the "Cookies and other tracking technologies" section [below](#).

Sometimes we receive information about you from third parties. For example, if you use a "like" or a "share" button for a feature on our sites, then the third party platform will share information with us. If you participate in activities on other sites, such as participating in a Facebook app, you may allow us to have access to personal data held by Facebook, or other site or app owners, as applicable.

5. HOW WE USE YOUR DATA

We use the data collected via our content, sites and services:

- (a) **To fulfil a contract, or take actions linked to a contract, such as;**
 - to process your order if you purchase anything on our sites;

- to process your details and manage your account if you register on any of our sites;
- to provide you with an entry form link via email when you choose to participate in a contest run by us or the artist (or their record label or management company) where the entry mechanic is to order or pre-order a product on the artist's store; or alternatively, to invite you to enter such a contest, by sending you the entry form link and instructions, in the event you ordered or pre-ordered the product before the contest started;
- to process your entry to any contest managed by us, and to record your agreement to the contest's rules; or
- to send you information about changes to our terms or policies.

(b) **Where you give us consent:**

- Where you ask to receive marketing information via email (by ticking the opt-in box when checking-out), giving us your permission to collect your information and share it with the applicable artist (or their record label or management company) so they can send you updates about the artist and artist-related activities and products;
- Where you allow us to contact you to participate in a survey or focus group about our services, sites, content and products;
- Where you give us consent to place cookies and to use similar tracking technologies; and
- On other occasions where we ask you for consent, for a purpose which we explain at that time.

(c) **Where Ceremony of Roses, Sony Music Entertainment (or a company we work with) has a valid and important business reason for using the data. Those reasons are called our 'legitimate interests'.** For example:

- to provide you with access to content and features on our sites;
- to send you information and updates relating to your account or order
- to send you information you have requested either from us or an artist;
- to ensure the security of our sites and services by trying to prevent unauthorised or malicious activities;
- to make sure users comply with our terms of use and other policies, and to help other organisations protect their rights;
- to personalise content, marketing and offers for you (if you've asked to receive marketing updates); and
- for internal analysis so that we can measure our audience, improve our product range, and enhance the user experience on our sites.

(d) **For reasons required by law:**

- Where we need parental consent to provide online services to children under the applicable age in the country where the child lives. However, our sites and services are not generally designed for children under 13 years old;
- In response to requests by government, the police or other law enforcement authorities as part of an investigation.

6. HOW WE SHARE YOUR DATA

We may share your personal, behavioural and transactional data with:

- (a) Sony Music Entertainment** for internal analytics (to measure our audience, improve our product range, and enhance the user experience), to personalise marketing content (where you have asked to receive artist updates from Sony Music), and for reporting and accounting purposes. We may share the following information with Sony Music Entertainment:
- your basic contact details (name, email address and country);
 - transactional data (such as what you purchased, how much you spent and your billing city, but never your payment details); and
 - information about your actions and behaviours on the store.
- (b) Sony group companies** worldwide, based on our legitimate interests (see [section 5](#) above). Where you give your permission, we may share your personal data with other Sony companies for them to use for direct marketing.
- (c) Artists and/or their record label or management company** so they can send you updates (where you have asked to receive marketing information about an artist).
Where you already receive marketing updates from an artist or their record label, or you opt-in to receive marketing when checking-out on an artist's store or at a later date, the artist or their record label may carry out limited profiling by combining certain transactional and behavioural data (such as what you've bought previously and your most recent billing city) with the personal data provided by you when registering for marketing updates. The artist or their management company or record label may use this information to personalise the marketing content you have requested. For example, to let you know about new releases you may like or a show coming up in your city.
- (d) Other third parties** if we need to for a valid business reason or legal purpose. For example, if Ceremony of Roses UK Limited or any part of it, is sold to another company.
- (e) In special circumstances** based on our legitimate interests, where sharing personal data is necessary to identify, contact or take action against

someone who is trying to harm Ceremony of Roses UK or Sony Music Entertainment or its artists' rights or property.

- (f) **Third party suppliers** so they can carry out services on our behalf. For example, we share necessary personal data with other companies and individuals that help us run our business by hosting or operating our sites, processing payment transactions, fulfilling and delivering orders, sending e-mails, and carrying out data analysis.

7. INTERNATIONAL TRANSFER

We might store or transfer data we collect about you to a place in the USA, or another country outside the UK or Europe. For example, if we or a company that we work with (a "service provider") has servers located outside the UK or Europe; or if one of our service providers is based in a country outside the UK or Europe; or if we share your data (as described in the '[How we share your data](#)' section above).

We make sure your data is safe in these other places by checking the relevant country's data privacy laws, and adding special wording in our contracts if extra protection is needed.

8. COOKIES AND OTHER TRACKING TECHNOLOGIES

What is a cookie?

Cookies are text files containing small amounts of coded information that are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each future visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

Cookies help us to improve our sites and to deliver a better and more personalised experience, for example, by storing information about how you use our sites and allowing us to recognise you when you return. You may refuse to accept cookies by changing the privacy settings on your internet browser (such as Internet Explorer, Firefox or Google Chrome), but this can mean certain parts of our site may not work properly.

The information we collect may include IP addresses, browser version, number of visits, which pages you access and what you do and the choices you make on the site.

We use the following categories of cookies on our websites, marketing content and services:

Category 1: Strictly Necessary Cookies

We need these cookies so that you can move around the website and use its features. Without these cookies, services you have asked for (like shopping basket

items) cannot be provided. We don't use these cookies to gather information about you that could be used for profiling, advertising or remembering where you've been on the internet.

Category 2: Performance Cookies

These cookies collect information on how a website is used. For example, which pages are most popular, or if a page doesn't work properly. We can't identify you from these cookies. They're only used to improve how a website works.

Category 3: Functionality Cookies

These cookies remember choices you make on the website, for example your language or the country you're in. These can then be used to make your future visits easier for you. We don't identify you personally from these cookies, and they cannot track your activity on other websites.

Category 4: Targeting cookies or advertising cookies

These cookies collect information about your habits online, so the adverts you see are more relevant to you. They are also used to limit the number of times you see an advert, and to help measure how well an advertising campaign is working. The cookies are usually placed by advertising companies with the website owner's permission. These cookies remember the websites you visit, which is then shared with other companies, such as advertisers. This is why you might have seen adverts on your social media feed about something you've just been looking at on another website.

Category 5: Social Media Cookies

These cookies allow you to share on your social media accounts what you've been doing on our websites. We don't control these cookies, and this information may be used for advertising purposes. Check out each social media platform's privacy & cookie policies to understand how their cookies work.

Consent to Cookies

We need your consent to place cookies on your device. You'll see a cookies banner at the bottom of all our sites. If you're okay with us using cookies, click 'Agree' or close the banner by clicking the 'X', or continue using the site.

If you don't want to receive cookies at all, you can change your internet browser settings, but this can mean certain parts of our sites may not work properly. If you're under 18, speak to your parent or guardian if you're not sure how to change those settings.

If you've given us permission to use cookies, you can still change your mind at any time by changing your browser settings. You can also use your browser settings to delete cookies that have already been set (it might be called "clear history" or "clear cookie cache"). The 'Help' function on your browser should tell you how; or ask your parent or guardian for help.

If you want to know more about cookies, visit www.aboutcookies.org,

If don't want to see any personalised advertising, visit www.youronlinechoices.eu.
Opting out doesn't mean you won't receive online advertising, just that the adverts you see won't be based on the website pages you've visited.

9. YOUR DATA PROTECTION RIGHTS

If you live in the UK or Europe, you have the following data protection rights, and you can use them at any time:

- (a) **Withdraw your consent** – If you've given us permission to collect and use your data, you can change your mind at any time. We'll stop using your data when you withdraw consent, unless we have another valid reason to carry on using it for another purpose (see [section 5](#) above).

At any time, you can change your mind about receiving direct marketing (that's called "opting-out"), and you can ask us to stop using your data for profiling (that's where we personalise your marketing content).

It's easy to withdraw consent – you can:

- email us at support@ceremonyofroses.com; or
- click the 'unsubscribe' link at the bottom of any marketing email we send you.

To stop receiving updates from an artist or their record label, or to ask them to stop personalising your marketing content, please read their privacy policy for advice and contact details. You can usually unsubscribe simply by clicking the 'unsubscribe' link in the footer of any marketing email they send you.

- (b) **Access your data** – You can ask us to confirm whether we're processing your personal data, and if we are, the types of data and how we're using it. You can also request a copy of your personal data, which we'll send to you in a simple format, as long as that won't negatively affect someone else's rights. Email your request to support@ceremonyofroses.com.

- (c) **Modify, correct, delete or restrict your data** -

- If you think the personal data we might have about you is wrong or incomplete, you can ask us to change or fix it by emailing us at support@ceremonyofroses.com or by changing your account details on the applicable store (if you have registered an account).
- You can email support@ceremonyofroses.com to ask us to delete your personal data or stop actively using it:
 - if you think we don't need to process your data any more for the original reason it was collected; or
 - you've withdrawn your consent, and that is our only valid reason for processing your data; or

- if you think your data has been processed unlawfully; or
- if your data needs to be deleted for legal reasons.

If there is a valid reason why we can't carry out your request, we will let you know.

You also have the **right to complain** to the relevant 'data protection authority'. In the UK, that's the Information Commissioner's Office (or the ICO). Here's a link: <https://ico.org.uk/make-a-complaint/>; or you can write to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

If you want to learn more about data privacy and your rights, please talk to your parent or guardian, and have a read together of our more detailed privacy policy written for adults.

10. HOW DO I GET IN TOUCH?

EMAIL: support@kontrabandstores.com

ADDRESS: Ceremony of Roses UK Limited, 2 Canal Reach, London N1C 4DB.

11. HOW LONG IS MY DATA STORED?

- Where you purchase something from one of our sites but do not register an account, we will retain your personal data for thirty six (36) months. This is to allow us to resolve any payment queries and/or customer service issues within that time.
- Where you register an account on one of our sites, we process your personal and behavioral data for as long as the purpose and consent is valid, or until you close your account (either via your account or by emailing our support team at support@ceremonyofroses.com and requesting its deletion).
- Where we close down an artist's store, all account details will be deleted as part of that process.
- Where we process your personal and behavioral data for marketing or other purposes with your consent, we process the data until you ask us to stop and for a short amount of time after this (to allow us to carry out your requests). So that we can respect your request in future, we also keep a record that you have asked us not to send you direct marketing or to process your data anymore.
- Where we process personal data in connection with a contract or running a contest, we keep the data for as long as we need to under the relevant country's laws.
- We retain transactional data for as long as is legally required for the purposes of reporting and accounting.

12. OTHER WEBSITES

Our websites may contain links to other websites that are outside our control and are not covered by this privacy and cookie policy. If you access other sites using the links provided, the companies that own these sites may collect and process information from you in a way that is different to how we do so. We encourage you to read these other sites' privacy and cookie policies.

13. CHANGES TO OUR PRIVACY AND COOKIE POLICY

We might update this policy at any time, so check back for the latest version or if you want to remind yourself of your data privacy rights or access more information.

Last updated: 6th March 2023