

PRIVACY AND COOKIE POLICY

Last updated 6th March 2023

Under 18? Try our 13-17s' version or under 13s' version instead.

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

This privacy and cookie policy explains the data protection practices of **Ceremony of Roses UK Limited**, registered in England & Wales under company number 06776269 with its registered office at 2 Canal Reach, London, N1C 4DB. Ceremony of Roses UK Limited is part of Sony Music Entertainment.

Ceremony of Roses UK Limited operates online stores worldwide for various singers, musicians and artists.

When we refer to "sites" in this policy, it means all websites and sub-domains owned and operated by Ceremony of Roses UK Limited.

Where we refer to "Ceremony of Roses UK", "us" or "we", we mean Ceremony of Roses UK Limited or any Sony Music Entertainment entity using your data in accordance with this policy.

We are committed to protecting and respecting your privacy and the following sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed. Please read the text carefully to understand our views and practices regarding your personal data and how we will treat it.

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
- 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 applicable 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 one of our privacy notices for younger music fans, written for under 13s or for 13 to 17 year olds.

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 the user:

We may collect and process personal data relating to you (such as your name, email address, shipping address, telephone number, billing address and payment details) that you provide to us when registering an account on one or more of our sites, placing an order for products or services on our sites, or by you contacting us. This includes, but is not limited to, information provided at the time of registering an account on any of our sites, subscribing to receive marketing updates about an artist, purchasing products, participating in a contest we may run, voluntarily completing customer surveys and providing feedback, or requesting further services.

If you contact us by email, 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 the user's consent:

If you pay for products or services on our sites using PayPal, GooglePay, ShopPay or any other third-party online payment application, we will be provided with your name, email address and shipping address in order to process the transaction.

By using cookies and other tracking technologies:

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

We refer to this technology as "cookies" throughout this policy but this is intended to cover all similar technologies including web beacons, log files, pixel tags, gifs (also described below). For more information see "[Cookies and other tracking technologies](#)" 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 or apps, 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 personal data collected via our content, sites and services in accordance with this policy for the following purposes:

(a) To fulfil a contract, or take steps linked to a contract;

- i. to process your order if you purchase product on our sites;
- ii. to process your details and manage your account if you create an account on any of our sites;
- iii. 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;
- iv. to process your entry to any contest we run, and to record your agreement to the corresponding contest rules; or

v. to send you information about changes to our terms or policies.

(b) Where this is necessary for purposes which are in our, or third parties', legitimate interests. These interests are (without limitation):

- i. to provide you with access to content and features on our sites;
- ii. to send you information and updates relating to your account or order;
- iii. to send you information you have requested either from us or an artist;
- iv. to ensure the security of our sites and apps by trying to prevent unauthorised or malicious activities;
- v. to enforce compliance with our terms of use and other policies and to help other organisations (such as copyright owners) to enforce their rights;
- vi. to personalise content, advertisements and marketing offers for you (if you've asked to receive marketing or do so at a later date); and
- vii. for internal analysis to measure our audience, improve our product range and enhance the user experience on our sites; and
- viii. where you request to receive marketing from an artist, for the purposes of personalising communications and for internal analysis, the artist or their record label may undertake limited profiling activities, whereby personal data and any other information provided by you may be combined with additional information lawfully collected by them, such as your navigation of and interaction with their websites, services and content.

(c) Where you give us consent:

- i. Where you ask to receive marketing information from us or an artist (or their record label or management company) via a medium where we ask for your consent (for example, email or SMS marketing), and you tick the box on the sign-up form giving us your permission to collect and process your data, or share it with the applicable artist (or their management company or record label) for the purpose of sending you updates about the artist and artist-related activities and products.
- ii. Where you allow us to contact you to participate in market research studies (such as a survey or focus group) conducted by us or third party companies on our behalf.
- iii. Where you give us consent to place cookies and to use similar tracking technologies.
- iv. On other occasions where we ask you for consent, for a purpose which we explain at that time.

(d) For purposes which are required by law:

- i. Where we need parental consent to provide online services to children under 13, or the relevant age below which parental consent is required

(depending on the country in which the child lives). However, our sites and apps are not generally designed for children under 13 years old.

- ii. In response to requests by government or law enforcement authorities conducting an investigation.

6. HOW WE SHARE YOUR DATA

Subject to the other terms of this policy, we may share your personal, behavioural and transactional data with the following:

- (a) Sony Music Entertainment** – We may share 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 behavioural data with Sony Music Entertainment for the purposes of 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 us or Sony Music), and for reporting and accounting purposes.
- (b) Sony Group companies** - We may share your personal data with our affiliated or group companies worldwide, based on our legitimate interests for the purposes listed [above](#). Where you give your permission, we may also share your personal data with other Sony affiliates for them to use for direct marketing.
- (c) Artists & artists’ representatives** - Where you have consented to receive direct marketing about an artist, we will share your personal data with the artist or their record label, who will then use your personal data to keep you updated with information about them. Where you already receive marketing updates about an artist, or you opt-in to receive marketing when checking-out on the artist’s store or at a later date, we may also share limited transactional or behavioural data (such as what you’ve bought previously and your most recent billing city), which the artist or record label may combine with personal information provided by you when registering for updates and additional information lawfully collected by them, for the purposes of personalising the artist updates and for internal analysis.
- (d) Co-promoters and prize providers** - Where a contest is managed or co-promoted by a third party, or the prize is provided and/or fulfilled (in part or in full) by a third party, we will share each winner’s basic contact information for the purpose of managing the contest and fulfilling the prizes. Where a prize includes attending an event, each winner’s full name will also be shared with the venue or event promoter, and they may request to see the winner’s ID before allowing entry to the event. Each winner’s surname and city may also be included on a winners’ list if another contest entrant asks who won.

(e) Other third parties - We may transfer or assign personal data to third parties in connection with the sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation of Ceremony of Roses UK Limited or any part of it.

We may share with others, at our discretion, certain aggregate statistical data about purchases and the use of our content, which data may include demographic data such as the age range and/or geographic location of groups of users. No personal data (such as names or email addresses) will be identifiable from such statistics.

(f) In special circumstances - We may disclose personal data in special cases when we have reason to believe that disclosing this data is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference (either intentionally or unintentionally) with the rights or property of Ceremony of Roses UK Limited or Sony Group companies or artists. Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

(g) Suppliers or partners - We also share data with third parties who perform functions on our behalf, such as hosting or operating our sites, processing payment transactions, fulfilling and delivering orders, sending e-mails, and carrying out data analysis.

7. INTERNATIONAL TRANSFER

The data that we collect may be transferred to, and stored at, a destination within the United States or some other country outside the UK or the European Economic Area ("EEA"). For instance, if any of our, or any of our UK or EEA-based service providers', servers from time to time are located outside the UK or EEA; or if one of our service providers or suppliers is themselves located in a country outside the UK or EEA; or if we share your data (in accordance with the '[How we share your data](#)' section above).

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission-approved standard contractual clauses, or a vendor's Processor Binding Corporate Rules.

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 subsequent 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 service, for instance by storing information about your preferences and allowing us to recognise you when you return to our site. You may refuse to accept cookies by activating settings on your internet browser, however, please note that if you select such settings 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 your viewing preferences.

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

Category 1: Strictly Necessary Cookies

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies, services you have asked for, like any 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 visitors use our website. For example, which pages visitors go to most often, and if you get error messages from web pages. These cookies don't collect information that identifies you as a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

Category 3: Functionality Cookies

These cookies remember choices you make such as the country you visit our website from, language or the region you are in. These can then be used to provide you with an experience more appropriate to your selections and to make your subsequent visits easier and more tailored to your preferences. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

Category 4: Targeting cookies or advertising cookies

These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advert as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third party advertising networks with the website operator's permission. They remember the websites you visit, and that information is shared with other parties 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. Quite often

targeting or advertising cookies will be linked to site functionality provided by the other organisation.

Category 5: Social Media Cookies

These cookies allow you to share what you've been doing on our websites on social media such as Pinterest, Facebook and Twitter. These cookies are not within our control. This information may be linked to targeting/advertising activities for users aged 18 or over. Please refer to the respective social media platform's privacy policies for how their cookies work. Please review the applicable social media platform's privacy and cookie policies to understand how their cookies work.

Use of Web Beacons

Some of our web pages may contain electronic images known as web beacons, among other things, that allow us to count users who have visited these pages. Web beacons collect only limited information including a cookie number, time and date of a page view, and a description of the page on which the web page resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of a particular campaign.

Consent to Cookies

In order to place cookies on your device, we require your consent. 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 modify your browser so that it notifies you when cookies are sent to it or you can refuse cookies altogether. If you're under 18, speak to your parent or guardian if you're not sure how to change those settings.

Please note that if you continue to browse the site, you will be considered to have agreed to our use of cookies.

You can withdraw your consent to our use of cookies at any time. If you wish to restrict or block web browser cookies that have been set on your device, then you can do this through your browser settings (it's often found under "clear history" or "clear cookie cache"); the Help function within your browser should tell you how. You can also use your browser settings to delete cookies that have already been set.

Alternatively, you may wish to visit www.aboutcookies.org, which contains comprehensive information on how to do this on a wide variety of desktop browsers. However, please note that if you select such settings you may be unable to access certain parts of our sites, or certain content or functionality may not be available.

If you'd like to opt out of other third party cookies relating to behavioural advertising, please go to www.youronlinechoices.eu. Opting out does not mean you will no longer receive online advertising. It does mean that the company or

companies from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

9. YOUR RIGHTS

If you live in the UK or Europe, you are entitled to exercise, freely and without charge, the following data protection related rights, at any time:

- (a) Wherever we rely on your consent, you will always be able to **withdraw that consent** at any time, although we may have other legal grounds for processing your data for other purposes, such as those set out above in [section 6](#). In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. At any time, you have an absolute right to opt out of direct marketing from us. You can do this by emailing us at support@ceremonyofroses.com or clicking the unsubscribe link in any marketing email we send you. You can also withdraw your consent to Ceremony of Roses UK sharing with the artist or their record label personal and behavioural data for marketing purposes; simply email us at support@ceremonyofroses.com. To unsubscribe from an artist's newsletter, you can click the unsubscribe link in the footer of any marketing email they send you or contact them at the email address provided in their privacy policy. Withdrawal of consent will not affect the legitimacy of the data processing based on consent given prior to the withdrawal.
- (b) You have the right to access and ask us for a copy of your personal data. This means at any time you may ask us to confirm whether Ceremony of Roses UK is processing your personal data, and if so, the categories of personal data being processed, and any other relevant information about the way your personal data is being processed. You may also request a copy of such personal data, which we will provide as long as doing so will not negatively affect a third party's rights.
- (c) You have the right at any time to modify or correct the personal data Ceremony of Roses UK may hold about you if you believe the information is inaccurate or incomplete. You can do this by emailing support@ceremonyofroses.com.
- (d) You have the right to request deletion of your personal data processed by Ceremony of Roses UK:
 - if you believe that Kontraband's processing of your personal data is no longer necessary for the purposes for which it was collected;
 - where your consent was the only legal basis for the data processing, and you have withdrawn your consent;
 - where you object to such data processing, as set out below;
 - if you believe your personal data has been processed unlawfully;
 - if your personal data must be eliminated to comply with a legal obligation pursuant to applicable legislation.

However, Ceremony of Roses UK may deny your request for deletion if continuing to process the personal data is necessary (i) in order to exercise the right of freedom of expression and information, or (ii) for the fulfilment of a legal obligation, or (iii) for reasons of public interest in matters of health, or (iv) for statistical purposes, or (v) for the initiation of legal action, or the raising of and/or defence against claims.

- (e) You have the right to limit or restrict the active processing of your personal data (i) for as long as it may take to verify the accuracy of such personal data: where you have contested such accuracy, or (ii) where you object to the deletion of your data but you believe its processing is unlawful, or (iii) where you need the data in order to initiate, exercise or defend yourself against claims, or (iv) while Ceremony of Roses UK verifies the validity of the grounds on which you objected to your data being processed.
- (f) You have the right to request the portability of your personal data and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine-readable format. This right includes the possibility of requesting the transfer of your data to another data controller, provided that this would not negatively affect the rights of third parties.
- (g) In addition, you have the right to object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct or indirect marketing). Ceremony of Roses UK will stop processing your personal data in these cases unless there are prevailing and compelling legitimate reasons to continue processing your data, or unless Ceremony of Roses UK needs to process your data in order to exercise its rights or defend itself against claims.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, where it would infringe the rights of a third party (including our rights), or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the UK GDPR (UK General Data Protection Regulation) and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, you can get in touch with us by emailing support@ceremonyofroses.com. If you have unresolved concerns, you have the right to complain to an EU data protection authority where you live, work, or where you believe a breach of your data protection rights may have occurred. In the UK, the relevant authority is the Information Commissioner's Office (<https://ico.org.uk>). You can raise a complaint with the ICO online at <https://ico.org.uk/make-a-complaint/>, or you can write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

Data that is mandatory in order to carry out your request is indicated on relevant forms that you may complete. Where provision of data is mandatory, if relevant data is not provided then we will not be able to fulfil your requests, including without limitation, processing your order, registering your account, receiving newsletter updates, entering a contest, or otherwise engaging with Ceremony of Roses UK or the applicable artist. All other provision of your information is optional.

10. HOW DO I GET IN TOUCH?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or if you would like to stop receiving direct marketing from us, you can get in touch via support@ceremonyofroses.com. Alternatively, you can write to us at: Ceremony of Roses UK Limited, 2 Canal Reach, London N1C 4DB.

11. HOW LONG IS MY DATA STORED?

Where you purchase anything 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 behavioural 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 users' account details in respect of such store will be deleted as part of that process.

Where we process personal, behavioural or transactional data for marketing or other purposes with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract or administering a contest, we keep the data for as long as required under relevant country laws pertaining to the type of data and instance that the data has been collected.

Where we process your personal and transactional data, we shall retain this information in aggregate 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 operators of these sites may collect and process

information from you in a way that is different to how we do so. We encourage you to review such other sites' privacy and cookie policies.

13. CHANGES TO OUR PRIVACY AND COOKIE POLICY

We may modify, alter or otherwise update this privacy and cookie policy at any time. We will indicate any changes by updating the date at the top of the policy and contacting you as appropriate. We encourage you to review this policy from time to time.