

Privacy Policy for Fan Marketing Platform

Last Updated: [2025-Feb]

This Privacy Policy sets out how **SNFT, Inc.** (“**Sony**”, “**we**”, “**our**” or “**us**”) collects, uses, stores and otherwise processes Collected Data (defined below) in relation to the use of our blockchain service platform called “Fan Marketing Platform” (collectively, the “**Service**”).

It also describes your data protection rights, including the right to object to some of the processing which Sony carries out. More information about your rights, and how to exercise them, is set out in **Section 8 “Privacy Rights”** below.

The Service can be used by both Users and third parties for many purposes including:

Users (e.g., fans and acquirers)

- Simplifying NFT redemption with an easy wallet for receiving NFTs.
- Accessing exclusive content and updates from NFT projects through the project portal site.
- Viewing “My Collection” to check acquired NFTs, download images, and confirm their utility.

Third Party Customers (e.g., companies, projects, artists, and distributors)

- Creating NFT campaigns by choosing images, quantity, acquisition conditions, and campaign forms.
- Setting up dedicated portals with exclusive channels for content distribution.
- Accessing measurement analysis like page views, session numbers, and NFT acquisition rates, along with trend analysis.

For French users, the third-party customer is Sony Music France only.

Please note that the Service provides access to services, sites, technology, applications and resources that are provided or otherwise made available by third-party service providers (“**Third-Party Services**”). Your access and use of Third-Party Services (such as third-party wallet and authentication services) are not governed by this Privacy Policy and our Terms of Service and will be subject to the terms of conditions, privacy policies and/or other agreements with the relevant Third-Party Services.

Table of Contents

- [1. Definitions](#)
- [2. What personal data we collect](#)
- [3. Why we process personal data](#)

- 4. With whom we share Collected Data**
- 5. Where we transfer Collected Data**
- 6. How long we retain your personal data**
- 7. Children**
- 8. Privacy Rights**
- 9. Changes to this Privacy Policy**
- 10. Contact Information**

1. Definitions

- 1.1 **“Collected Data”** has the meaning set forth in **Section 2** below.
- 1.2 **“Sony Group Company”** means Sony Group Corporation, which is the ultimate parent company of Sony and any legal entities controlled by Sony Group Corporation (the term “control” in this context means the direct or indirect ownership of at least fifty percent (50%) of the voting interest in such corporation or the power in fact to control the management decisions of such entity).
- 1.3 **“Service Provider”** means any third party who processes personal data on behalf of Sony, including but not limited to hosting providers, analytics service providers and customer support providers.
- 1.4 **“Third Party Customer”** means third parties utilising the Service such as companies, projects, artists, and distributors.
- 1.5 **“Users”** means individuals engaging with the Service such as fans and acquirers.

2. What personal data we collect

Sony collects data as described below, which may include personal data, (collectively, the **“Collected Data”**) directly from you or indirectly through other Sony Group Companies and/or third parties, if any. For the purposes of the GDPR and other applicable data protection laws and regulations where the concepts of **“Controller”** and **“Processor”** are defined, Sony is the **“Controller”** of the Collected Data.

Information we collect directly from you

2.1 Information about you

- (1) Country or region of residence
- (2) Email address
- (3) Password
- (4) If you use a third-party account as a means of identification, information related to that account.
- (5) Wallet Information (wallet address, public key information regarding passkey, etc.) set up with us or

connected to the Service

<Collection method>

When you use this service, you will provide the above information to us. If you use a third-party account as a means of identification, the information described in (2) and (4) will be provided by the third party.

(6) IP address

<Collection method> Sony collects the above information automatically when you use the Service.

2.2 Additional Information you submit to us

Information you provide to us including responses to surveys, information submitted to participate in campaigns and your inquiries to us.

<Collection method>

If you contact us, Sony collects any information you provide through that communication. Sony may also ask you whether you would like to participate in a survey.

2.3 Information about the Service

Information about the Services including NFT information and history of the use of the Service

<Collection method>

Sony collects the above information automatically when you use the Service. Information collected through Cookies will only be used with the customer's consent. For more information about Cookie, please see below.

Information we collect from other sources

2.4 Publicly Available Blockchain Data ("Blockchain Data")

Publicly Available Blockchain Data ("Blockchain Data")

<Collection method>

Sony may collect public blockchain data including timestamps or events, transaction IDs, digital signatures, transaction amounts wallet addresses and information about NFT.

Please note that information relating to your use of the Services may be recorded on a public blockchain. A public blockchain is a decentralized, open and permissionless network that allows anyone to participate in its activities and is intended to record transactions across a wide range of computer systems. Public blockchains may be open to analysis which can lead to information relating to your use of the Services to be combined with other data which may reveal your information.

2.5 Other Information available on the internet including handle name, user generated contents, information related to campaigns and community activities for example on third-party social media platforms.

<Collection method>

Sony may search and collect information related to our business on internet and may communicate with you, organize or support online activities on third party communication platform.

2.6 Information about the Service

Information regarding the fulfilment of conditions for earning NFTs.

<Collection Method>

Sony collects the above information automatically when you participate in a specific campaign.

2.7 Cookies

We use the term 'cookies' to refer to all technologies which store and access information on the device that you use to access the Service, such as your computer, tablet or mobile phone.

There are different types of cookies, for example:

- Cookies served directly by Sony ('first party cookies') and cookies served on our behalf, for example by advertisers and data analytics companies ('third party cookies')
- Cookies which endure for different periods of time, including those that only last only as long as your browser is open (referred to as 'session cookies') These are deleted automatically once you close your browser. Other cookies are 'permanent cookies', meaning that they survive after your browser is closed. For example, they recognise your device when you open your browser and browse the internet again.

Which cookies do we use and why do we use them?

Sony uses strictly necessary cookies to operate the Service. These cookies are essential, and will always remain active. Sony also uses optional cookies to improve site functionality, analyze usage of the services as described below.

<i>Type of cookie</i>	<i>Source</i>	<i>Cookie Duration</i>	<i>What these cookies do</i>	<i>How to exercise your cookie choices</i>
Analytics cookies	First-party Cookies	400 days	These cookies allow us to count visits and traffic sources so we	You can control and delete these cookies

			can measure and improve the performance of our site. They help us know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited our site.	via our cookie banner [here]
--	--	--	---	--

How can you exercise your choices regarding the installation/removal of cookies?

Depending on applicable law, you might have the right to choose whether or not to accept cookies. For some parts of the Service, you should be aware that if you choose to refuse or remove cookies, this could affect the availability and functionality of the Service.

If you don't want the Service to use cookies and you are in a jurisdiction that requires that you have the ability to disable cookies, you can make your choice by following these links: [\[link to cookie banner\]](#)

Alternatively, you may be able to control whether or not you accept cookies through the settings of your own web browser or smartphone. Your web browser or smartphone gives you the option to delete all cookies, including all of our cookies. Please note, however, that disabling cookies in your browser may result in preventing access to some of the features of the Service and we decline any liability in this respect.

Explanations about how to manage settings of your web browser is often provided by your web browser on the "help" menu of your browser.

You may allow, block, or remove cookies installed on your own device by changing the configuration of your browser. For additional information on how to block cookies, you may access the following sections and links concerning the most popular browsers:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Safari](#)

Please note that your choice to refuse cookies is specific to the browser that you are using. So, if you make a choice to opt out from one device and you want your opt-out to apply to a different device as well, you will have to opt out from that device too.

For further information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, please visit www.allaboutcookies.org and www.youronlinechoices.eu.

Sony collects the following information using cookies for the purpose of analyzing your use of the Services:

- (1) Device information (Name, type, model, etc.)
- (2) OS information (Name, Version)
- (3) Information inferred from IP addresses (Source country or region, city, etc.)
- (4) Customer operation information on the Service
- (5) Website browsing information for the Service

<Collection method>

Sony automatically collects information necessary for the proper functioning of the website when you use the Service. If you consent to the use of cookies on the Service for analytics purposes, the above information will be automatically collected through the cookies.

Sony does not intentionally collect special categories or sensitive data.

3. **Why we process personal data**

- 3.1 Sony processes your Collected Data for the purposes as described below. For these purposes, Sony may use Collected Data in conjunction with the information collected through other Sony Group Companies' products and services if you use one of those.

Purpose of Use	Category of Collected Data	Legal Basis
Provision of functions and/or services of the Service To deliver functions and/or services you have asked us to provide to you. This includes making necessary notifications and providing software updates.	Collected Data listed in Section 2.1.-2.7	We have a legitimate interest to deliver the functions and/or the Services with you, to check if any improvement are needed or any bugs are to be fixed. We process your Collected Data to provide the Services and fulfil contractual obligations we may have to you.
Enhancement of our products, services and business based on statistical data To analyse your use of the Service in order to improve and develop Sony Group Companies' products, services and business.	Collected Data listed in Section 2.1.-2.7	We have a legitimate interest in understanding how our products and services are used, to learn what business strategies are effective and to improve them.
General marketing and communication Sony will provide you with general news, offers, recommendations and survey requests via emails.	Collected Data listed in Section 2.1.-2.6	This processing is based on your consent. You can withdraw your consent at any time by menu > Email notification settings.
Protecting the interests of Sony Group Companies and users To protect Sony Group Companies' business interests and legal rights and the interests and legal rights of our users. This includes the use of Collected Data in connection with legal claims, compliance,	Collected Data listed in Section 2.1.-2.7	We have a legitimate interest in protecting Sony Group Companies' business interests and legal rights, and the interests and legal rights of our users.

regulatory, auditing, investigative purposes (including disclosure of such information in connection with legal proceedings or litigation).		
Compliance with law To respond to requests from and, where required, report content to government or public authorities, law enforcement officials, courts, regulators or similar in accordance with our legal and regulatory obligations under applicable laws and regulations.	Collected Data listed in Section 2.1.-2.7	When we have a legal obligation under EU/UK, Singapore, and Thai laws: We process Collected Data in order to comply with applicable law and regulations. When we have a legal obligation under laws and regulations outside the EU/UK, Singapore and Thailand: We have a legitimate interest in protecting Sony Group Companies' business interests and legal rights, and the interests and legal rights of our users.

3.2 Where we collect the Collected Data to perform a contract with you to the extent permitted under applicable laws and regulations, or where we have to collect Collected Data by law, provision of this data is mandatory and we will not be able to provide services to you without this information- or it may result in us and/or you being in violation of with applicable law and regulations. In all other cases, provision of any requested Collected Data is optional, but not providing information may affect your ability to use the services or use particular aspects of the services if information is needed for those purposes.

3.3 There are instances where we have a legitimate interest to use the Collected Data, to the extent permitted under applicable laws and regulations. Our legitimate interest will vary depending on what we are using the Collected Data for, and we explain above what the interest is and how it relates to the processing operations that we are carrying out. Where we process the Collected Data on the basis of a legitimate interest, then – as required by data protection law – we have carried out a balancing test to document our interests, to consider what the impact of the

processing will be on individuals and to determine whether individuals' interests outweigh our interests in the processing taking place. You can obtain more information about this balancing test by using the contact details at the end of the notice.

4. **With whom we share Collected Data**

Sony shares your Collected Data with the following entities.

Entities with whom we share Collected Data	Detail
Sony Group Companies	We share Collected Data with Sony Group Companies where those companies process it on our behalf to provide products and services to you. If we have your permission, we also share Collected Data under the following categories with Sony Group Companies for them to send you marketing materials or survey requests. <Categories of Collected Data> [2.1.-2.7]
Service Providers	We share Collected Data under the following categories with Service Providers, including Sony Group Companies. <Categories of Collected Data> [2.1.-2.7]
Third Party Customers	When you participate in a campaign, event, or project posted on our Service available on, Third Party Customers that organized such campaign, event or project will receive certain information about you. <Categories of Collected Data> [2.1,2.2,2.3, 2.4,2.6, 2.7]
Government authorities, law enforcement officials, regulators, and court and similar.	We may share some or all Collected Data under the following categories with government authorities and/or law enforcement officials if required by law, or if necessary for us to protect our legitimate interests, or the interests of others, in compliance with applicable laws and regulations. <Categories of Collected Data> [All information listed in Section 2]
Counterparty of Business transfer	In the event that we undertake a merger, acquisition, reorganization or disposal, some or all Collected Data under the following categories may be disclosed to any

	<p>prospective purchaser and/or its advisers and will be passed to the new owners of the business.</p> <p><Categories of Collected Data></p> <p>[All information listed in Section 2]</p>
Professional advisors	<p>In some cases, if this is necessary for the purposes listed above, we may share some or all Collected Data under the following categories with professional advisers including lawyers, auditors, or insurers.</p> <p><Categories of Collected Data></p> <p>[All information listed in Section 2]</p>

5. **Where we transfer Collected Data**

We will process, store and transfer Collected Data for the purposes outlined in this Privacy Policy from your country or regions of residence globally to countries or regions outside your country or region of residence. Collected Data will be processed by staff operating outside your country or region of residence who work for us or for one of our Service Providers. Some of the countries and regions may not provide the same level of data protection as your country. However, we take appropriate measures to ensure that all transfers of Collected Data outside of your country or region meet the requirements of applicable data protection legislation.

For EEA/UK Individuals: Sony takes appropriate measures to ensure that all transfers of Collected Data outside of the EEA/the UK meet the requirements of applicable EU and UK data protection legislation. Where information is transferred outside the EEA and the UK, where the privacy laws may not provide an equivalent level of protection to those in your home country and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission or the UK Government, the personal data is adequately protected by the vendor's EU / UK Processor Binding Corporate Rules, the EU Commission's approved standard contractual clauses which can be accessed [here](#) or the addendum to the EU Commission's standard contractual clauses or standalone international data transfer agreement approved under UK data protection law (as applicable). A copy of the relevant mechanism can be obtained for your review on request by using the contact details below.

Please note the once it is recorded on the blockchain, the data may be accessed and retrieved by anyone around the world.

6. **How long we retain your personal data**

- 6.1 We retain Collected Data (except Blockchain Data) for as long as we continue to make the Service available to you.-

- 6.2 Due to the technical nature of blockchain technology, it is not possible to delete Collected Data once recorded on the blockchain.
- 6.3 If there is a claim or a potential claim, or if we are required to retain information by law then we will keep the data for so long as is reasonably necessary for this.

7. **Children**

Sony is committed to complying with all applicable laws and regulations regarding the collection, storage and use of Collected Data concerning children. The Service is not directed to and does not knowingly collect Collected Data from children. Depending on your country or region of residence, this threshold age for a child may differ. If you are a parent or guardian and are concerned that your child has provided us with Collected Data without your consent, you should contact us as indicated in **Section 10 “Contact Information”** below.

8. **Privacy Rights**

8.1 In some countries or regions, you may have certain rights with respect to Collected Data Sony processes about you, subject to local law. These include the following rights to:

- (1) Ask us for access to or a copy of Collected Data and ask us to disclose the source(s) of Collected Data where it has been obtained without your consent
- (2) Ask us to correct, rectify, complete or update the Collected Data
- (3) Ask us to delete, destroy, de-identify or restrict our processing of Collected Data
- (4) Request us to transmit some or all of the Collected Data that you have provided to us, to a third party in a format which is generally readable or usable by automatic tools or devices without hindrance, or to give you a copy of it in a format which is generally readable or usable by automatic tools or devices so that you can transmit it to a third party, where technically feasible
- (5) Object to our processing Collected Data on the basis of our legitimate interests (or those of a third party) or other circumstances as provided under applicable data protection laws
- (6) Where we have asked for your consent, to withdraw consent at any time. If you ask to withdraw your consent, this will not affect any processing which has already taken place at that time-
- (7) Ask us to suspend the use of Collected Data

8.2 To the extent required by applicable laws, you can exercise these rights by contacting us as indicated in **Section 10 “Contact Information”** below. These rights may be limited under

applicable data protection laws, for example, if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

- 8.3 These rights may also be limited due to the technical nature of blockchain technology. For example, it will not be possible to delete, correct, or modify all records of your personal data once recorded on the block chain.
- 8.4 If you have unresolved concerns, you have the right to complain to a data protection authority in the country or region where you live, work, or where you believe a breach has occurred. Details of EU data protection authorities are available ~~here~~, the website of the data protection authority of the UK Information Commissioner's office is ~~here~~ ~~and~~, the website of the Personal Data Privacy Commission of Singapore is ~~here~~, and the website of the Personal Data Protection Committee of Thailand is ~~here~~.

9. Changes to this Privacy Policy

This Privacy Policy may be updated from time to time for any reason. We will notify or request your consent (if necessary under applicable law) of any changes to this Privacy Policy.

10. Contact Information

- 10.1 The data controller for Collected Data is SNFT Inc.. If you have any questions or concerns about this privacy policy or if you wish to exercise any legal right you have in respect of Collected Data, you can contact <https://snft.site/en/fanmarketingpf/support/>.