

About Us and this Policy

Who we are and how to get in touch

This Privacy Policy explains when we collect information about you, including Personal Information (“**PI**”), what we collect, why we collect it, how we use it, who we share it with, where it is processed, how we handle it and your choices and legal rights associated with this information.

Scope of this Policy

Sony Interactive Entertainment Europe Limited and its wholly owned subsidiaries Sony Interactive Entertainment Network Europe Limited and Sony Interactive Entertainment Direct Europe Limited (in countries in which PlayStation Direct is available) (“SIE”, “we,” “our,” and “us”) controls the information collected when you interact with PlayStation through our websites, products, services, or other online activities (“Services”).

Sony Interactive Entertainment Europe Limited is established within the European Union (“EU”) through its subsidiaries located in France, Germany, Poland, the Netherlands, Spain, Portugal, Italy, and Finland. Sony Interactive Entertainment Network Europe Limited and Sony Interactive Entertainment Direct Europe Limited have appointed Sony Interactive Entertainment Europe Limited as its EU data protection representative.

Information That We Collect or Receive

What data we collect about you

We collect and receive information from and about you by different means as described below.

Information You Provide to Us

We collect the information that you directly provide to us, such as when you enter it on our website, or include it in an email that you send to us. This type of collection often occurs through our business support processes, such as:

- Registration or PlayStation Network Account (“**Account**”) Creation Processes, where we ask you to provide information such as: Contact information (e.g. name, email or physical address, country, or phone number); Account Administration information (e.g. user name, password, or security questions); Billing information (e.g. credit card or other payment

number, billing address); Date of Birth; and Profile information (e.g. profile photo, languages, likes) .

- Purchase Processes, where we may ask you to provide additional billing info to process payment.
- Technical and Customer Support Processes, where we may ask you to provide contact information and information related to the issue you are contacting us about. We may also record calls you make to PlayStation Support.
- Other business processes, where we may ask you to provide information such as name, email address, and Account ID if you participate in market research surveys, beta and other user testing research, competitions, promotions or events or agree to receive marketing information from us.

In addition, we collect the information that you provide by entering it into certain Service features. For example, when you want to post in a blog, you provide us the content for the blog post (which could contain PI which we collect and then display for you on the blog). Likewise, when you use other features such as voice or text messaging, blogs, surveys, user-generated content, activity streams, or social media, we may first collect the information you enter into the feature.

Please make sure that any personal details which you provide are accurate and current. We will send any important information relating to your Account to you using the contact information you provide (including Account security and privacy notices). You can check and update some of the information you have provided to us any time via Account Management.

Automatic Information Collection

We may also automatically or passively collect information about your use of our Services, see the sub-sections below for a list of categories by sources of such information.

Consoles and other devices

Each time you use a PlayStation console or a PlayStation app on a PlayStation console or other devices (such as a mobile phone or PC), we may automatically collect information about your use of that device and app. If you sign into an Account, we may combine it with other information we have for that Account.

The information that we collect from devices may include:

- Device identifiers such as your PlayStation console ID, mobile device IDs, cookie IDs, or serial numbers.
- Network identifiers such as your IP address and MAC address.
- Account authentication tokens that avoid you having to log in repeatedly.
- Content and ads downloaded to your device for the online services that you access.
- Your current and recent locations.
- Trophies, scores and rankings achieved online and offline.
- Information about the device you are using, any connected peripherals (such as controllers and VR headsets) and how you have configured them.
- Information about how you use the software installed on your device (which may include information about the use of the software offline), such as date and time of use, what games or music you play, what content you browse, share or download, what services you access and for how long, including how often you use chat and other communication applications.
- The actions you take within games or apps published by SIE (e.g. what obstacle you jump over and what levels you reach).
- Software errors and load times details, and if you have the "Report System Software Errors Automatically" setting turned on, detailed information about the crash, including screenshots and video captured before the crash.

On a device or app basis, depending on your region, and for games released after March 2018, you may be provided with choices that control our collection of information. For further information on these options, refer to the Choices section of this Privacy Policy below.

PlayStation Network and Store

Each time you sign into PlayStation Network and access our Services, we may automatically:

- Collect information about your use of PlayStation Network Services on your device.

- Log your activity on our PlayStation Network servers. For example, we may receive device and Account identifiers, such as your PlayStation Network Online ID and Account ID. We may also receive details of: the content, advertisements, and other information your devices request and receive from our servers (such as store content, trophies, and friends lists) and when you receive and interact with them; what content and apps you add to your 'basket' in our Store; and what you purchase.

Games

Each time you play a game developed and/or published by us or another Sony Interactive Entertainment company we may automatically:

- Collect information about your use of that game on your device (including for offline games, which may include information about the use of the game offline).
- Log your activity on our game servers. For example, we may receive device and Account identifiers, such as PlayStation Network Online ID, information about how you use our online games, and which players you play against.

Websites, Marketing, and Advertising

Each time you visit our websites or receive and interact with our marketing communications and advertising on our and third-party websites and services, we may automatically log your activity on web, emails, or advertising and marketing servers we control through cookies (small information files placed on a hard drive), web beacons, tracking pixels, browser configuration details (e.g. browser type, list of installed plugins and list of installed fonts), and embedded scripts (programming code that is temporarily downloaded onto a device) and, website personalisation settings.

Information We Receive from Third Parties

We may receive information, including the following, from third party sources and combine it with information we already directly collect from you. We will handle the information in accordance with this Privacy Policy.

- Game, social media, or other information, from those third parties or services you link your Account with, or who provide information to power PlayStation Network features.

- Information from other users, for example if those users have given us access to their profiles and if you are one of their connections, or information about you is otherwise made accessible to us by them.
- Information from third parties as appropriate given our relationship, for example from anti-fraud service providers we might obtain fraud risk scores; from law enforcement or partners, we might obtain IP addresses and details of suspected unlawful or malicious activity.
- Card account update information provided by your bank to help keep your payment cards up to date on your Account. Following any update, we will continue to charge the applicable payment methods to any purchases you make unless you notify us otherwise.

Information Use

How we use the data we collect

This section explains how we may use the PI we collect about you.

We will only use your PI for certain specified reasons and only where we have a lawful basis to do so. The lawful bases we rely on depend on the type of relationship we have with you and how we interact with you. Further details about the purposes on which we process your PI under these lawful bases are set out in the sections for Information that We Collect of Receive, Information Use, Information Sharing and Transfers. These purposes include the following:

- Contract – to provide our products and services to you and fulfil our contractual relationship with you. For example, when you make a purchase on PlayStation Store, we process your PI to take payment and (if applicable) deliver items to you.
- Legitimate Interests – to fulfil our legitimate interests, or those of a third party in conducting and managing our business and our relationship with you as described in this Privacy Policy. For example, we rely on legitimate interest to (a) detect and prevent fraud, the unauthorised use of our Services, and other harmful or illegal activity, including by reviewing reports submitted by other PlayStation users, (b) improve our products and services, including by performing analytics and business reporting in relation to how you use our Services and any issues you may encounter, and (c) share information with other

Sony Group Corporation companies where necessary to support the security of our Services.

- Legal obligation – to meet our legal obligations under applicable law, including to comply with financial reporting requirements.
- Consent – where you have provided us consent to process your PI for a specific purpose, including to send marketing messages and personalised advertisements to you. When we process your PI on the basis of consent, you can withdraw your consent at any time. See the Choices section of this Privacy Policy for more information.
- We may combine information from any of the sources explained in the “Information That We Collect or Receive” section of this Privacy Policy. For example, we may process together information we have collected from you, your visits to our website, your device gameplay history, etc., for the purposes explained in this Privacy Policy.

Services

We may use your information to operate our Services.

We may also personalise the services we provide to you based on the information we have collected about you (for instance, we may use your IP address to display content relevant for your area) and, to enable accessibility settings functions (for you, or other users), we may convert your voice data to text.

Development

We use the information we collect to understand, improve and enhance our existing Services, your experiences with them, and our business operations, and to develop new ones. For example, we may use the information to develop and optimise user interfaces or game performance.

Moderation and Safety

We cannot monitor the whole of PlayStation Network and make no commitment to do so. However, we reserve the right in our sole discretion to monitor (including through the use of technology that automatically detects images, text, and URLs that breach our Terms of Service) and record your online activity and communication throughout PlayStation Network and to remove

and/or delete any content. We may use the information we collect (as described above) to detect breaches and enforce our PlayStation Network Terms of Service, Software Usage Terms, System Software License Agreements, any other terms of service you have agreed to and any rules or codes of conduct applicable to your use of PlayStation Network.

Marketing and Advertising

We may target and personalise our marketing communications, purchase recommendations and advertisements that we display on our and third-party websites and services based on the information we have collected about you. You may notice this personalisation on the PlayStation Store (whether via console, website or in-game), in marketing communications, or when you visit our and third-party websites (such as social network sites) that show purchase recommendations or advertisements from us. You have options to control our use of information we have collected about you to personalise marketing to you and can learn more about them in the Choices section of this Privacy Policy.

Legal and Compliance

We may use the information we collect for auditing, compliance and legal purposes (for example, protecting the rights and property of Sony, its partners and customers).

Security

In order to help protect you and others, we may use the information we collect and receive in order to:

- Identify fraudulent activities and transactions.
- Prevent abuse of and investigate and/or prosecute any potential threat to or misuse of our Services.
- Protect your account from unauthorised access (for example by preventing access if an attempt is made to log-in from a new location).

Information Sharing and Transfers

Who we share data with and where

This section explains how we may share the information we collect with third parties that provide services to us or provide games and apps on PlayStation Network that you use. We do not and will not accept money in exchange for sharing PI. We may share your information with the following recipients and for the following purposes.

Service Providers

We share information with service providers to SIE, who are persons or companies that provide services which may include handling PI for any of the purposes described in this Privacy Policy. Service providers are required to adhere to confidentiality and security requirements.

Partners

We may share information with the following partners:

- Financial organisations, such as payment details in order to complete your purchase, obtain payment and carry out credit and anti-fraud checks.
- Game publishers of the content you have purchased from PlayStation Store so that they can deliver that content to you in-game, and ensure your entitlement to access that content is reflected across different gaming platforms.
- Other service, application or website providers, for operational purposes, or for additional purposes, with your permission (such as when you link your Account to your account with them).
- Security and fraud partners, including Sony Group, as appropriate to support the security of our Services, fraud prevention, or protect PI.
- Advertising and promotional partners, with whom we are jointly delivering services or features, such as sweepstakes, contests, promotions, or advertising.
- Business transfer partners, in connection with the negotiation and sale of the applicable business, a portion of the business, or certain stock and/or assets, or a corporate merger, consolidation, restructuring, or other corporate change including, without limitation, during the course of any due diligence process.

Other Users

When you create an Account, certain information will form part of your public profile and we will make it accessible to all accounts on PlayStation Network, on the Internet via playstation.com, and some third-party websites, apps or services. This information includes:

- Your PlayStation Network Online ID.
- "About Me" statement, avatar, language, country and gaming scores and statistics.
- Content you have shared.

You are responsible for any content you share using blogs, chat, and messaging features. This content will be accessible to other users who can then share that information further. We recommend you consider carefully what you share and with whom you share your information. We may also index and use content which you have shared publicly, as part of our platform's features like Game Help, PlayStation profiles, or future PlayStation Network services.

Government & Authorities

We may share your information with police, government, and other authorities if we believe that it is reasonably necessary to comply with a law, regulation, or legal process, to detect, protect and enforce the safety of any person, their property or their rights, to address fraud and security and report criminal activity. The majority of the cases in which we have shared information with police, government, and other authorities concern their investigations into stolen devices, unauthorised use of payment methods, or moderation purposes and safety of PlayStation Network and its users. In a small number of cases, we have also provided information in response to anti-fraud or more serious criminal investigations.

Information Handling and Your Choices

How we store your data and your rights

Children's Information

Accounts for children between the age of 7 to 17 years old, must be created by your parent or legal guardian ("Responsible Adult"). If you are creating an account for your child, we recommend that you and your child read our Privacy Information for Young Players to help them understand how we handle their PI and their rights over their PI.

If you are aged 7 - 17, you can ask your Responsible Adult to explain anything you do not understand. You can also read our Privacy Information for Young Players to help you understand how we use your information and your privacy rights over your information.

We will collect, use and share information collected from or about children in accordance with the practices described in this document, with the following exceptions.

Information You Provide to Us

- A Responsible Adult only needs to provide limited information about their child (an email address and date-of-birth) to create an Account for their child. Providing gender is optional.
- Only with the Responsible Adult's approval to create an Account for the child, can a child add their address.
- The spending limit of the Account for your child is set by the associated Responsible Adult's Account.

Information You May Choose to Share

- A Responsible Adult can control, through the "Free Communication" setting on their child's Account, their child's ability to use (and share PI through) text chat, voice chat, video chat, and other messaging features from communicating directly with other users in games, apps or via system software features. Please note that a child's Account can still (1) send and receive predetermined text messages created by a game or app, (2) create and see other users' in-game character names, designs, and clan titles, and (3) use communication services via an Internet browser unless specifically disabled.
- A Responsible Adult can control their child's ability to post or view user-generated content, including photos, videos, drawings, and content imported from outside sources (any of which might contain PI) through the user-generated content control. This will not prevent video capture of a child Account user's online gameplay.
- A Responsible Adult can agree to our collection and use of their child's PI without consenting to our disclosure to third parties, except when the disclosure is inherent to the Services we are providing.

When a Responsible Adult allows their child's Account to participate in games, chat or user-generated content features, they also allow consent to SIE sharing information with the publishers of the games, applications, or services that incorporate those features and the collection of information entered into such features by the child's Account (e.g. typing text into the chat feature).

If you discover your child under the age of 18 has created an Account, once we verify you are the child's Responsible Adult parent, we will promptly give access and control of the child's account to you.

International Transfers

Our Services are operated in the United States, United Kingdom, Japan, and other countries/areas/regions around the world. Please be aware that information we collect, including PI, will be transferred to, processed and stored in these countries/areas/regions and, as such, courts, law enforcement, and other authorities in these countries may, in certain circumstances, be entitled to access your PI. We ensure there are adequate safeguards in place when transferring your information outside your country by entering contracts with the recipients, European Commission Standard Contractual Clauses or otherwise that the transfer only occurs where permitted by applicable law. By using our Services or providing us with any information through them, you acknowledge this transfer, processing, and storage of your information in these countries in which the privacy laws may not be as comprehensive as those in the country where you reside or are a citizen.

Security and Retention

We seek to maintain appropriate technical and organisational security measures that conform to industry standards to help protect your information against unauthorised or accidental disclosure, access, misuse, loss, or alteration. Although we strive to protect your information, we cannot ensure or warrant the security of such information. There is no such thing as perfect security.

We advise you to make use of the enhanced account access controls that we make available such as 2-Step Verification. Please visit www.playstation.com and/or contact PlayStation Help and Support if you need any assistance in restricting access to your devices or accounts.

Please keep any passwords and passcodes for your devices and accounts safe and do not disclose them to anyone else. Consider ensuring automatic account log-in setting is disabled and the setting requiring a password to be entered before completing purchases is enabled, particularly if your PlayStation device is shared with others. You should contact PlayStation Support immediately if you become aware of any unauthorised use of your accounts or other security breaches.

We may retain information about you as long as it is necessary for us to fulfil the purposes outlined in this Privacy Policy. In addition, we may retain your information for an additional period as is permitted or required to, among other things, comply with our legal obligations, resolve disputes, and enforce agreements. Where required by applicable law, we shall delete your information when the information is no longer necessary or requested to do so. Even if we delete your information from active databases, the information may remain on backup or archival media as well as other information systems.

Your Choices and Rights

Your Choices

You may have certain choices about how your information is collected, used, stored, and shared. These options can be accessed through your Account or device settings. Please ensure that your information is up to date. Among others, you have the following choices:

- **Personalised content and marketing:** Whether we may use the information we have collected about you to personalise advertising and purchase recommendations. Note that we will always slightly customise what you see (e.g. to avoid displaying content you've already purchased from the PlayStation Store), and some older devices, apps and games may still show some commercial personalisation.
- **Personalised communications:** Whether we may use the information we have collected, to personalise emails and notifications.
- **Limited Data/Service Data and Full Data/Additional Data collection:** Whether we may collect only the Limited Data necessary to provide our Services, or Full Data to enable a richer experience.
- **E-Mail Messages:** Whether we send you marketing emails.

- Sharing social PI: Whether to share other information, such as your real, name, PlayStation Network friends, or activities.
- Shared content: Whether to share content such as gameplay videos with other users.
- Collection of cookies: You can manage cookies that are not strictly necessary for the provision of our websites, this will also limit when we can recognise your visits to our websites and target and personalise the advertising and commercial purchase recommendations displayed on those websites.

Your Rights

You can access, amend or delete some information through your Account settings. You can also exercise the rights described below by contacting us at www.playstation.com/data-subject-request. We reserve the right to deny your requests if we cannot verify your identity.

- Right of Access and Portability: You have the right to request certain information about the processing of your PI and to be provided with a copy of your PI. To download a copy of key PI that we process, sign-in to your Account on www.playstation.com and navigate to [Account Settings] > [Privacy Settings] > [Data Access Requests].
- Right of Erasure: You have the right to request that we delete the PI we have collected or retained about you in some circumstances as defined by law. To request removal of certain of your PI from a blog or chat, please contact us as described in the Contact Us section below. Following your request for deletion, please be aware that the information that we collect about you may still be retained for legal, accounting, business continuity (backup), anti-fraud and community reasons. You can close your account for PlayStation Network by contacting PlayStation Support. Information collected from older games and apps may not be integrated with account closure. Following your account closure request, please be aware that the information that we collect about you may still be retained for legal, accounting, business continuity (backup), anti-fraud and community reasons. If you have accounts with other Sony group companies you will need to contact those companies separately to close those accounts. For more information, visit <https://www.sony.co.uk/mysony>.

- Right of rectification: You have the right to rectify your information, restrict processing, and object to the use of your PI in some circumstances as defined by law.
- Right to Object: You have the right to object to the processing of your PI in certain circumstances. For example, you have the right to object to the use of your PI for direct marketing purposes.
- Right to Restrict: You have the right to restrict the processing of your PI in certain circumstances.

In some cases, your choices to provide, change or delete information may affect our ability to deliver our Services, or your user experience. We may decline to process requests which are not otherwise required by applicable law. You have the right not to be unlawfully discriminated against because you have exercised these rights.

For an alternative accessible PDF of the Privacy Policy please contact us using the information in the Contact Us section of this Privacy Policy.

Complaints

If you have a concern about our handling of your PI, please get in contact with us first so we can try to resolve your query using the details in the Contact Us section of this Privacy Policy. You can also contact our Data Protection Officer via email at siee.dpo@sony.com.

If however you feel we have not dealt with your concern and/or that we are failing to meet our legal obligations, you can report this to your local data protection regulator or the Information Commissioner's Office ("ICO") in the United Kingdom. More information on reporting a concern to the ICO can be found at <https://ico.org.uk/>.

Contact Us

Please contact us for further information about our Privacy Policy or our processing of your PI, by either of the following methods:

Post:

Data	Protection	Office
Sony Interactive Entertainment Europe Limited / Sony Interactive Entertainment Network Europe		

Limited / Sony Interactive Entertainment Direct Europe Limited
10 Great Marlborough Street
London
United Kingdom
W1F 7LP

Online:

You can contact us by using our web form:

www.playstation.com/data-subject-request

Sony Interactive Entertainment Europe Limited, Sony Interactive Entertainment Network Europe Limited, and Sony Interactive Entertainment Direct Europe Limited are registered in England under company numbers: 03277793, 06020283, and 03754597.

We have appointed Özdağıstanlı Ekici Avukatlık Ortaklığı as our Turkish Data Controller Representative. If you are located in Turkey, you can contact our Turkish Data Controller Representative by email at info@iptech-legal.com.

Changes to this Policy

We may revise this Privacy Policy at any time and we will update this Privacy Policy with any revisions. By continuing to access or use the Services after those changes become effective, you acknowledge and accept that PI will be handled in accordance with the revised Privacy Policy.

Version 9.2 (January 2024)