

Purpose

This Privacy Policy describes the information that Swank Motion Pictures collects through websites we operate and applications used to manage accounts. This policy also describes how we use, disclose and protect your information and the choices you can make about your information.

Data We Collect and Why We Collect This Information

We keep collected information about you as long as it fulfills the purposes described in this policy. Your information will be removed from our systems when it is deemed no longer necessary according to these described purposes.

The following table provides examples of the types of data we collect from you and how we use this information:

<i>Collection Scenario</i>	<i>Types of Data and Purpose</i>
<i>Potential Customer Inquiries</i>	Companies and organizations can reach out to us via phone, email, or entering information on the "Contact Us" page of our website. We request your name, email, phone number and physical address so we can follow up with you to schedule delivery of our product. We may also reach out to you via email or physical mail in the future to let you know about new content/services we can provide.
<i>Support</i>	If you reach out to us regarding support for the content or licensing provided by Swank Motion Pictures, we will record your name, email and phone number so we can follow up to resolve product questions.
<i>Website Access</i>	When you access our website, we may collect information from site cookies if you accept the use of them, as well as your computer's IP address. This information cannot identify you. You can delete the files that contain cookies; those files are stored as part of your internet browser.
<i>Marketing</i>	In order to identify potential new customers, we may obtain your name and contact information from various third parties including your organization's website. This data may be used to send information on new products

and services we can offer to program administrators. The program administrator's information may be sent to a third party we use to facilitate our marketing efforts, but we do not sell your information, do not use it for marketing purposes outside of sending information about our products and services, nor do we provide it to third parties unless required for processing.

For your convenience, our websites contain links to a number of other external third party websites. The privacy policies and procedures described here do not apply to those sites; we suggest contacting those sites directly for information on their data collection and distribution policies.

Cross-Border Transfers

Our company's primary fulfillment and marketing departments are located in the United States; thus the above data will be transferred to the United States in order to complete these functions. By submitting your personal information to us you agree to the transfer, storage and processing of your information in the United States.

Disclosure of Information with Third-Parties

We will not sell or trade your information for commercial purposes. We may utilize a third party to communicate with the program administrator(s) for our Company email marketing campaigns. Please contact our Swank Data Protection Officer for additional information.

Under 13 Years of Age

This website is not intended or designed to attract children under the age of 13. We do not knowingly collect personally identifiable data from or about persons under the age of 13. If you are under 13 years old and wish to ask a question or use this site, we will require you to submit your personal information - please get your parent or guardian to do so on your behalf.

Security of Your Personal Data

We have implemented technologies and policies with the objective of protecting your privacy from unauthorized access and improper use. Swank Motion Pictures will update these measures as appropriate. We pledge to protect your information with technical and organizational measures against the loss, misuse and alteration of information we receive from you.

Your Access to the Information We Hold

Under EU data protection law, you have a right to request access to your personal information. You also have the right to require inaccuracies in your information to be corrected. Lastly, you have the right to request your data be deleted. See below for whom to contact to obtain access to your data and make necessary corrections.

Changes to the Privacy Policy

Should we change our privacy policy, we will post the changes here. We will send an email with any significant changes.

General Data Protection Regulations

This privacy policy has been adopted to comply with the EU General Data Protection Regulation (GDPR). We take responsibility for the personal information we collect about you, we aim to be transparent about how we handle it and we give you control of your information. We are committed to the privacy of all data, including personally identifiable information and non-personally identifiable information.

By “personally identifiable information,” we mean information about you that can be used to identify you as an individual, such as your name, phone number, and email address. By “non-personally identifiable information,” we mean statistical information about your visit to our website. You cannot be identified from this information and it is used only to assist us in providing effective service on this website and other services provided by Swank Motion Pictures. If you wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority.

Breach Notification Response Plan

In the event that sensitive data is accessed or obtained by an unauthorized individual, we shall provide notification as soon as possible and no later than within ten (10) days of the incident.

Swank Motion Pictures will follow this process when a breach event is declared. The security breach notification shall include a list of the types of personal information that is reasonably believed to have been the subject of a breach. If the information is possible to determine at the time the notice is provided, then either (1) the date of the breach, (2) the estimated date of the breach, or (3) the date range within which the breach occurred will be shared. The notification shall also include a general description of the breach incident, if it is possible to determine at the time the notice is provided. Updates will be provided when investigations have completed.

California Privacy Rights

Section 1798.83 of the California Civil Code permits California residents to request from a business, with whom the California resident has an established business relationship, certain information about the types of personal information the business has shared with third parties for those third parties' direct marketing purposes and the names and addresses of the third parties with whom the business has shared such information during the immediately preceding calendar year.

Questions Regarding This Privacy Policy

Concerns regarding this privacy policy can be submitted to us by email at **DPO@Swankmp.com**.

Contact Information

If you have questions, concerns or feedback regarding this privacy policy, what data we collect, or what we do with the data collected, please contact:

Data Protection Officer Name: Kevin Dietz
Email: DPO@swankmp.com
Address: Information Security
10795 Watson Road
St. Louis, MO 63127