



ZEE ENTERTAINMENT ENTERPRISES LIMITED

PRIVACY POLICY

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INTRODUCTION

Welcome to ZEE, we provide you both free and subscription-based service that allows our end users to access entertainment content including movies and series streamed over the internet to certain devices. It was launched in India back in 2018 with content in more than 12 languages. The platform is available on the Web, Android, iOS, Smart TVs, among other devices.

Zee values the trust placed in us by data subject ("you", "your", "user", "subscriber") and therefore, we follow the highest standards of privacy guidelines to protect the information shared by you with us. We keep up with the latest developments in the private landscape to ensure that our company is in line with technological and regulatory developments.

A NEW AGE OF PRIVACY

ZEE recognizes the importance of user privacy and is committed to protecting our users' personal data. We understand that privacy is not just a legal requirement but also a fundamental right of our users.

The Entertainment industry is evolving rapidly, and ZEE is keeping up with the latest developments to provide our users with the best possible experience. We see the introduction of many new device capabilities with the capacity to connect and interact with each other. However, with the rise of media companies, most media outlets are interested in obtaining information about consumers' needs and detailed information on these requirements. Therefore, it is crucial for us to prioritize user privacy and provide clear and concise information about our data collection and usage practices.

In this report, we will discuss the key privacy pillars that ZEE is implementing to protect our users' personal data. We firmly believe that user privacy is a competitive advantage, and we are committed to building trust with our users.

OUR VISION ON DATA PRIVACY

ZEE's vision is to become a leading OTT platform that prioritizes user privacy and provides a secure and transparent experience for our users. We recognize that privacy is not just a legal requirement but also a fundamental right of our users. In order to create value by lowering risk and gaining trust in a setting where distrust is on the rise, we will cultivate a culture of respect, honesty, and transparency with regard to how we gather, utilize, and protect data also as the number of privacy regulations worldwide continues to grow, we are committed to meeting the challenges of protecting personal data and meeting regulatory requirements.

PRINCIPLE PILLARS OF PRIVACY

ZEE will handle Personal Data in accordance with the following principles. ZEE ensures that its business partners and vendors comply with the principles of this Policy and applicable legal and regulatory compliance standards through appropriate contractual agreements such as a Data Processing Agreement (wherever relevant).

▪ Lawfulness of Processing

ZEE will collect, store, process, use, share, transfer, analyse or otherwise handle (“Process” or “Processing”) Personal Data in accordance with applicable legal requirements for legitimate business or compliance purpose or if individuals have provided consent to the Processing or any relevant basis as defined by the applicable laws or regulations.

▪ Limit Collection and processing

ZEE strives to limit the Processing of Personal Data in terms of scope and duration, as is necessary for the intended purpose.

▪ Transparency

In accordance with applicable legal requirements, ZEE will provide information to individuals that explains the scope and purpose of Processing, and whom to contact to seek clarifications about privacy or data protection.

▪ Accuracy

ZEE will take all necessary measures, as required by applicable laws and regulations, to ensure that Personal Data processed are accurate for the intended purpose. Any inaccurate personal data, in the context of the purposes for which they are processed, will either be erased or rectified without delay. Accuracy of data may be subject to the data subject's duty to notify and/or utilize the options as outlined in Privacy Notices.

▪ Security and Confidentiality

ZEE aims to protect the security and confidentiality of individuals’ Personal Data and implement physical, technical and organizational measures against accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or access. ZEE ensure measures are appropriate to the risks represented by the Processing it carries out and the nature of those Personal Data.

▪ Privacy by Design

ZEE incorporates the seven principles of Privacy by Design into all of its personal data processes executed using digital systems, technologies or manually. By default, privacy requirements are embedded into every standard, protocol and process followed by ZEEis not only helps us to fulfil global data protection compliance obligations, but it also enables

us to do the right thing when it comes to handling data from our consumers, customers, employees and suppliers.

▪ **Disclosure**

ZEE discloses, when required/asked, personal data to third parties only for the purposes identified in the privacy notice, with the consent of the individual, or as required for lawful purposes. Third parties refer to public authorities, Law Enforcement Agencies and similar authorities.

Our [Privacy Notice](#) explains more about how we collect personal data, why we collect it and what we do with it.

TRANSPARENCY IN ZEE

Data privacy is a key part of our day-to-day operations, and all our employees adhere to the Code of Conduct along with the internal Data Privacy Policy as part of the employee obligations.

DATA SUBJECT RIGHTS

In compliance with any applicable legal obligations, ZEE provides users the chance to exercise any data subject rights that they may have when using the company's services or platforms.

These rights may include the ability to demand access to their personal data, to have inaccurate or incomplete personal data corrected, or to have their personal data processed without their consent. Each Data Subject Request is verified and followed through to completion.

DATA RETENTION

Adhering to both Purpose Limitation & Storage Limitation principles of Privacy, when a purpose has been achieved and a reasonable time period has passed, ZEE will follow its internal retention rules and procedures to destroy/purge Personal Data.

Exception applies if in the context of those purposes, it is necessary to keep the Personal Data indefinitely, or a law requires the Personal Data to be kept for a certain time. ZEE will promptly destroy Personal Data when it is no longer necessary to do so for the reasons for which it was originally collected.