

Privacy Policy

We encourage you to read, download and save this Privacy Policy

This Privacy Policy uses the products, services, contents, functionalities, technologies and functions offered by NEW CREATIVE GENERATION s.l, Calle Iriarte, 40, 38400 Puerto de la Cruz -Tenerife / Canary Island (ES). NIF: and all related sites, applications and services (collectively called "NCG ®"), including, by way of example only, the data provided by the user in relation to the use of NCG ®.

This Privacy Statement explains our practices, including your choices, regarding the collection, use, and disclosure of certain information, including your personal information in connection with the New Creative Generation - NCG Service.

Contacting Us

If you have general questions about your account or how to contact customer service for assistance, please write us at assistance@ncgtelevision.tv. For questions specifically about this Privacy Statement, or our use of your personal information, cookies or similar technologies, please contact our Data Protection Officer/Privacy Office by email at privacy@television.tv.

The data controller of your personal information is **New Creative Generation s.l. – Calle Iriarte 40, Puerto de la Cruz (Santa cruz de Tenerife) 38400, Canary Island (ES)**. Please note that if you contact us to assist you, for your safety and ours we may need to authenticate your identity before fulfilling your request.

Collection of Information

We receive and store information about you such as:

Information you provide to us: We collect information you provide to us which includes:

- ♦ your name, email address, address or postal code, payment method(s), and telephone number. We collect this information in a number of ways, including when you enter it while using our service, interact with our customer service, or participate in surveys or marketing promotions;
- ♦ information when you choose to provide ratings, taste preferences, account settings (including preferences set in the "Account" section of our website), or otherwise provide information to us through our service or elsewhere.

Information we collect automatically: We collect information about you and your use of our service, your interactions with us and our advertising, as well as information regarding your network, network devices, and your computer or other NCG Service capable devices you might use to access our service (such as gaming systems, smart TVs, mobile devices, set top boxes, and other streaming media devices). This information includes:

- ♦ your activity on the NCG service, such as title selections, shows you have watched, and search queries;
- ♦ your interactions with our emails and texts, and with our messages through push and online messaging channels;
- ♦ details of your interactions with our customer service, such as the date, time and reason for contacting us, transcripts of any chat conversations, and if you call us, your phone number and call recordings;
- ♦ device IDs or other unique identifiers, including for your network devices,

and devices that are NCG Service capable on your Wi-Fi network;

- ♦ resettable device identifiers (also known as advertising identifiers), such as those on mobile devices, tablets, and streaming media devices that include such identifiers (see the "Cookies and Internet Advertising" section below for more information);
- ♦ device and software characteristics (such as type and configuration), connection information including type (wifi, cellular), statistics on page views, referring source (for example, referral URLs), IP address (which may tell us your general location), browser and standard web server log information;
- ♦ information collected via the use of cookies, web beacons and other technologies, including ad data (such as information on the availability and delivery of ads, the site URL, as well as the date and time). (See our "Cookies and Internet Advertising" section for more details.)

Information from partners: We collect information from other companies with whom you have a relationship ("Partners"). These Partners might include (depending on what services you use): your TV or internet service provider, or other streaming media device providers who make our service available on their device; mobile phone carriers or other companies who provide services to you and collect payment for the Netflix service for distribution to us or provide pre-paid promotions for the NCG service; and voice assistant platform providers who enable interaction with our service through voice commands. The information Partners provide us varies depending on the nature of the Partner services, and may include:

- ♦ search queries and commands applicable to NCG service that you make through Partner devices or voice assistant platforms;
- ♦ service activation information such as your email address or other contact information;
- ♦ IP addresses, device IDs or other unique identifiers, as well as associated pre-paid promotion, billing and user interface information, that support user authentication, the NCG service registration experience, Partner payment processing, and the presentation of NCG Service content to you through

portions of the Partner user interface.

Information from other sources: We also obtain information from other sources. We protect this information according to the practices described in this Privacy Statement, plus any additional restrictions imposed by the source of the data. These sources vary over time, but could include:

- ♦ service providers that help us determine a location based on your IP address in order to customize our service and for other uses consistent with this Privacy Statement;
- ♦ security service providers who provide us with information to secure our systems, prevent fraud and help us protect the security of NCG accounts;
- ♦ payment service providers who provide us with payment or balance information, or updates to that information, based on their relationship with you;
- ♦ online and offline data providers, from which we obtain aggregated demographic, interest based and online advertising related data;
- ♦ publicly-available sources such as publicly available posts on social media platforms and information available through public databases associating IP addresses with internet service providers (ISPs).

Use of Information

We use information to provide, analyze, administer, enhance and personalize our services and marketing efforts, to manage member referrals, to process your registration, your orders and your payments, and to communicate with you on these and other topics. For example, we use such information to:

- ♦ determine your general geographic location, provide localized content, provide you with customized and personalized viewing recommendations for movies and general TV shows we think will be of interest to you, determine your ISP to support network troubleshooting for you (we also use aggregated ISP information for operational and business purposes), and

help us quickly and efficiently respond to inquiries and requests;

- ♦ coordinate with Partners on making the NCG service available to members and providing information to non members about the availability of the NCG service, based on the specific relationship you have with the Partner;
- ♦ secure our systems, prevent fraud and help us protect the security of NCG accounts;
- ♦ prevent, detect and investigate potentially prohibited or illegal activities, including fraud, and to enforce our terms (such as determining whether and for which NCG signup offers you are eligible and determining whether a particular device is permitted to use the account consistent with our Terms of Use);
- ♦ analyze and understand our audience, improve our service (including our user interface experiences and service performance) and optimize content selection, recommendation algorithms and delivery;
- ♦ communicate with you concerning our service so that we can send you news about NCG, details about new features and content available on NCG, special offers, promotional announcements, consumer surveys, and to assist you with operational requests such as password reset requests.

These communications may be by various methods, such as email, push notifications, text message, online messaging channels, and matched identifier communications (described below). Please see the "Your Account" section of this Privacy Statement to learn how to set or change your communications preferences.

Our legal basis for collecting and using the personal information described in this Privacy Statement will depend on the personal information concerned and the specific context in which we collect and use it. We will normally collect personal information from you where we need the personal information to perform a contract with you (for example, to provide our services to you), where the processing is in our legitimate interests and not overridden by your data protection interests or

fundamental rights and freedoms (for example, our direct marketing activities in accordance with your preferences), or where we have your consent to do so (for example, for you to participate in certain consumer insights activities like specific surveys and focus groups). In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person (for example, to prevent payment fraud or confirm your identity). For questions about our use of your personal information (including legal bases and transfer mechanisms we rely on), cookies or similar technologies, please contact our Data Protection Officer/Privacy Office by email at privacy@ncgtelevision.tv.

Disclosure of Information

We disclose your information for certain purposes and to third parties, as described below:

- **Service Providers:** We use other companies, agents or contractors ("Service Providers") to perform services on our behalf or to assist us with the provision of services to you. For example, we engage Service Providers to provide marketing, advertising, communications, security, infrastructure and IT services, to customize, personalize and optimize our service, to provide bank account or balance information, to process credit card transactions or other payment methods, to provide customer service, to analyze and enhance data (including data about users' interactions with our service), and to process and administer consumer surveys. In the course of providing such services, these Service Providers may have access to your personal or other information. We do not authorize them to use or disclose your personal information except in connection with providing their services (which includes maintaining and improving their services).

- ◆ **Partners:** As described above, you may have a relationship with one or more of our Partners, in which case we may share certain information with them in order to coordinate with them on providing the NCG service to members and providing information about the availability of the NCG service. For example, depending on what Partner services you use, we may share information:
 - in order to facilitate Partner pre-paid promotions or collection of payment for the NCG service for distribution to us;
 - with Partners who operate voice assistant platforms that allow you to interact with our service using voice commands;
 - so that content and features available in the NCG service can be suggested to you in the Partner's user interface. For members, these suggestions are part of the NCG service and may include customized and personalized viewing recommendations.

- ◆ **Promotional offers:** We may offer joint promotions or programs that, in order for your participation, will require us to share your information with third parties. In fulfilling these types of promotions, we may share your name and other information in connection with fulfilling the incentive. Please note that these third parties are responsible for their own privacy practices.

- ◆ **Protection of NCG and others:** NCG and its Service Providers may disclose and otherwise use your personal and other information where we or they reasonably believe such disclosure is needed to (a) satisfy any applicable law, regulation, legal process, or governmental request, (b) enforce applicable terms of use, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address illegal or suspected illegal activities (including payment fraud), security or technical issues, or (d) protect against harm to the rights, property or safety of NCG, its users or the public, as required or permitted by law.

- ♦ **Business transfers:** In connection with any reorganization, restructuring, merger or sale, or other transfer of assets, we will transfer information, including personal information, provided that the receiving party agrees to respect your personal information in a manner that is consistent with our Privacy Statement.

Whenever in the course of sharing information we transfer personal information to countries outside of the European Economic Area and other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with this Privacy Statement and as permitted by the applicable laws on data protection.

You may also choose to disclose your information in the following ways:

- ♦ certain portions of our service may contain a tool which gives you the option to share information by email, text message and social or other sharing applications, using the clients and applications on your smart device;
- ♦ social plugins and similar technologies allow you to share information.

Social plugins and social applications are operated by the social networks themselves, and are subject to their terms of use and privacy policies.

Access to Account and Profiles

- ♦ **“Remember me” function:** For ease of access to your account, you can use the "Remember me on this device" function when you log in to the website. This function uses technology that enables us to provide direct account access and to help administer the NCG service without requiring reentry of any password or other user identification when your browser revisits the service.
- ♦ **Giving others access to your account:** If you share or otherwise allow others to have access to your account, they will be able to see shows you have watched, ratings, and account information (including your email address

or other information in the "Account" area of our website). This remains true even if you use our profiles feature. You might have the option to use seamless account login through the NCG website, which enables login to the Netflix app on smart TVs, set top boxes, and other streaming media devices on the Wi-Fi network to which you are connected. If you use that feature, those devices will remain signed into your account unless you later log out of those devices.

- ◆ **Profiles:** Profiles allow users to have a distinct, personalized NCG experience, built around the movies and shows of interest to them, as well as separate watch histories. Please note that profiles are available to everyone who uses your NCG account, so that anyone with access to your NCG account can navigate to and use, edit or delete profiles. You should explain this to others with access to your account, and if you do not wish them to use or change your profile, be sure to let them know. Profile users may be offered the opportunity to add an email address, phone number or other information to the profile and will be provided with notice of collection and use at the time such information is requested.

Your Choices

Email and Text Messages. If you no longer want to receive certain communications from us via email or text message, simply write us an email at: privacy@ncgtelevision.tv. Please note that you cannot unsubscribe from service-related correspondence from us, such as messages relating to your account transactions.

Push Notifications. You can choose to receive mobile push notifications from NCG. On some device operating systems, you will be automatically enrolled in the notifications. If you subsequently decide you no longer wish to receive these notifications, you can use your mobile device's settings functionality to turn them off. We also offer push notifications on certain web browsers. If you agree to receive those notifications and subsequently decide you no longer wish to receive these notifications, you can use your browser's settings to turn them off.

Interest-Based Ads. Interest-based ads are online ads that are tailored to your likely interests based on your use of various apps and websites across the Internet. If you are using a browser, then cookies and web beacons can be used to collect information to help determine your likely interests. If you are using a mobile device, tablet, or streaming media device that includes a resettable device identifier, then that identifier can be used to help determine your likely interests. For your choices about interest-based ads from NCG, please see the "Cookies and Internet Advertising" section (below).

Matched Identifier Communications. Some third party sites and apps allow us to reach our users with online promotions about our titles and services by sending a privacy protective identifier to the third party. A privacy protective identifier means we convert the original information (such as an email address or phone number) into a value to keep the original information from being revealed. The third party compares the privacy protective identifier to identifiers in its database and there will be a match only if you have used the same identifier (such as an email address) with NCG and the third party. If there is a match, Netflix can then choose whether or not to send a given promotional communication to you on that third party site or app, and can optimize and better measure the effectiveness of online advertising.

Your Information and Rights

You can request access to your personal information, or correct or update out-of-date or inaccurate personal information we hold about you. You may also request that we delete personal information that we hold about you.

When you visit the "Account" portion of our website, where you have the ability to access and update a broad range of information about your account, including your contact information, your NCG payment information, and various related information about your account (such as the content you have viewed and rated).

You must be signed in to access the "Account" section.

For other requests, or if you have a question regarding our privacy practices, please contact our Data Protection Officer/Privacy Office at privacy@netflix.com. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information; if we have collected and process your personal information with your consent, then you can withdraw your consent at any time; withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent; you have the right to complain to a data protection authority about our collection and use of your personal information (for Spain, the Agencia Española de Protección de Datos (AEPD)).

We may retain information as required or permitted by applicable laws and regulations, including to honor your choices, for our billing or records purposes and to fulfill the purposes described in this Privacy Statement. We take reasonable measures to destroy or de-identify personal information in a secure manner when it is no longer required.

Security

We use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorized access, use and modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information.

Other Websites, Platforms and Applications

The NCG service may be provided through and/or utilize features (such as voice controls) operated by third party platforms, or contain links to sites operated by third parties whose policies regarding the handling of information may differ from ours. For example, you may be able to access the NCG service through platforms such as gaming systems, smart TVs, mobile devices, set top boxes and a number of other Internet connected devices. These websites and platforms have separate and independent privacy or data policies, privacy statements, notices and terms of use, which we recommend you read carefully. In addition, you may encounter third party applications that interact with the Netflix service.

Children

You must be at least 18 years of age or older to subscribe to the NCG service. Minors may only use the service with the involvement, supervision, and approval of a parent or legal guardian.

Changes to This Privacy Statement

We will update this Privacy Statement from time to time in response to changing legal, regulatory or operational requirements. We will provide notice of any such changes (including when they will take effect) in accordance with law. Your continued use of the NCG service after any such updates take effect will constitute acknowledgement and (as applicable) acceptance of those changes. If you do not wish to acknowledge or accept any updates to this Privacy Statement, you may cancel your use of the NCG service. To see when this Privacy Statement was last updated, please see the "Last Updated" section below.

Cookies and Internet Advertising

We and our Service Providers use cookies and other technologies (such as web beacons), as well as resettable device identifiers, for various reasons. We want you to be informed about our use of these technologies, so this section explains the types of technologies we use, what they do, and your choices regarding their use.

Cookies and similar technologies, web beacons, and resettable device identifiers

Cookies are small data files that are commonly stored on your device when you browse and use websites and online services. We use other technologies such as browser storage and plugins (e.g., HTML5, IndexedDB, and WebSQL). Like cookies, these other technologies may store small amounts of data on your device. Web beacons (also known as clear gifs or pixel tags) often work in conjunction with cookies. In many cases, declining cookies will impair the effectiveness of web beacons associated with those cookies.

If you use the NCG on a mobile device, tablet, or streaming media device, we may collect a resettable device identifier from your device. Resettable device identifiers (also known as advertising identifiers) are similar to cookies and are found on many mobile devices and tablets (for example, the "Identifier for Advertisers" (or IDFA) on Apple iOS devices and the "Google Advertising ID" on Android devices), and certain streaming media devices. Like cookies, resettable device identifiers are used to make online advertising more relevant and for analytics and optimization purposes.

Why does NCG use these technologies?

We use these types of technologies for various reasons, like making it easy to access our services by remembering you when you return; to provide, analyze, understand and enhance the use of our services; to enforce our terms, prevent fraud; to improve site performance, monitor visitor traffic and actions on our site; and to deliver and tailor our marketing or advertising, and to understand interactions with our emails,

marketing, and online ads on third party sites.

To help you better understand how we use cookies and resettable device identifiers, please see the information below:

- ♦ **Essential cookies:** These cookies are strictly necessary to provide our website or online service. For example, we and our Service Providers may use these cookies to authenticate and identify our members when they use our websites and applications so we can provide our service to them. They also help us to enforce our Terms of Use, prevent fraud and maintain the security of our service.
- ♦ **Performance and functionality cookies:** These cookies help us to customize and enhance your online experience with Netflix. For example, they help us to remember your preferences and prevent you from needing to re-enter information you previously provided (for example, during member sign up). We also use these cookies to collect information (such as popular pages, conversion rates, viewing patterns, click-through and other information) about our visitors' use of the NCG service so that we can enhance and personalize our website and service and conduct market research. Deletion of these types of cookies may result in limited functionality of our service.
- ♦ **Advertising cookies and resettable device identifiers:** These cookies and resettable device identifiers use information about your use of this and other websites and apps, your response to ads and emails, and to deliver ads that are more relevant to you and for analytics and optimization purposes. These types of ads are called "interest-based advertising." The advertising cookies associated with our service belong to our Service Providers.

In connection with our use of these technologies, some of the websites and apps where we advertise, as well as advertising technology companies that we use to purchase, deliver, optimize, and/or measure our advertisements (collectively

“Advertising Partners”), may receive limited information from us as part of our campaign targeting, measurement, and optimization (e.g., steps completed in sign-up and site visit or app open/install information).

Common uses of this type of information are to judge the effectiveness of and optimize ad campaigns, by allowing Advertising Partners to see when someone who saw an ad later signed up for our service. Another common use is to make sure we do not serve ads trying to get individuals to sign up for the Netflix service if they are already a NCG user.

NCG uses contractual and technical measures designed to prevent Advertising Partners from accessing information regarding specific title selections you make, URLs you land on, or shows you have watched on our service. We do not share information about title selections or your shows you have watched on our service.

How can I exercise choice regarding these technologies?

To exercise choice regarding cookies

For more information about cookies set through our website, as well as other types of online tracking (including the collection of information by third parties about your online activities over time and across third-party web sites or online services for online interest based advertising), and to exercise choices regarding them, [click here](#). At this time, we do not respond to web browser "do not track" signals.

To exercise choice regarding resettable device identifiers

To opt out of interest-based ads from NCG in connection with a resettable device

identifier on a mobile device, tablet, or streaming media devices, please configure the appropriate setting on your device (usually found under "privacy" or "ads" in your device's settings). You may still see NCG ads on your device, but they will not be tailored to your likely interests.

To exercise choice using self-regulatory program resources

NCG supports the following self-regulatory programs, which provide additional privacy choices for interest-based advertising:

- In Europe: [European Interactive Digital Advertising Alliance \(EDAA\)](#)

To exercise choice regarding other technologies

There are a number of ways to exercise choice regarding technologies that are similar to cookies, such as browser storage and plugins (e.g., HTML5, IndexedDB, and WebSQL). For example, many popular browsers provide the ability to clear browser storage, commonly in the settings or preferences area; see your browser's help function or support area to learn more. Other technologies, such as Silverlight storage, may be cleared from within the application.

Last updated: January 1, 2021