

Privacy Policy

Gravity Media (USA) Corp, trading as Gravity Media ("We", "Us", "Our") are committed to protecting and respecting your privacy. Gravity Media Holdings Limited issues this statement on behalf of its group of companies that trade under Gravity Media.

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the [Privacy Policy of Gravity Media Group Ltd](#) and its subsidiaries (collectively, "**we**," "**us**," or "**our**") and applies solely to visitors, users, and others who reside in the State of California ("**consumers**" or "**you**"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("**CCPA**") and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

This Privacy Policy (together with our [terms of use](#) and any other documents referred to the **Policy**, sets out the basis on which we process any Personally Information we collect from you, or that you provide to us. Please read the following carefully. By visiting www.gravitymedia.co.uk/us/ (**our site**) you are accepting and consenting to the practices described in this Policy.

Our site may, from time to time, contain links to and from the websites of, third parties, our partner networks, advertisers and affiliates, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Information to these websites.

The data we collect about you

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collect ed
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
---	--	-----

C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
--	--	----

D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
----------------------------	--	----

E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other	NO
---------------------------	---	----

physical patterns, and sleep, health, or exercise data.

F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
--	--	-----

G. Geolocation data.	Physical location or movements.	NO
----------------------	---------------------------------	----

H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
------------------	--	----

I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
--	---	----

J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
---	--	----

K. Inferences drawn from other	Profile reflecting a person's preferences, characteristics, psychological trends,	NO
--------------------------------	---	----

personal
information.

predispositions, behavior, attitudes,
intelligence, abilities, and aptitudes.

Personal Information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Information about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Information but is not considered Personal Information in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual

orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How do we collect data

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Information you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- Your contact with us, such as via an email or letter sent, or through our chat platform;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Information by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

This website is using Tidio, a chat platform that connects users with the customer support of Gravity Media. We are collecting email addresses, names, and region location, only with the consent of the users, in order to start the chat. The messages and data exchanged are stored within the Tidio application. For more information, please refer to their Privacy Policy. Gravity Media is not making use of these messages or data other than to follow up on users' registered issues or inquiries. Your personal data will be processed and transmitted in accordance with the CCPA.

Third parties or publicly available sources. We may receive Personal Information about you from various third parties and public sources as set out below:

- Technical Data from the following parties: analytics providers, advertising networks and search information providers, based inside and outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

- Identity and Contact Data from data brokers or aggregators and from publicly available sources based inside the EU.

How we use your Personal Information

We will only use your Personal Information when the law allows us to. Most commonly, we will use your Personal Information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your Personal Information other than in relation to sending third party direct marketing communications to you via email or text message or in relation to the use of our chat platform. You have the right to withdraw consent to marketing at any time by contacting us.

Data retention

We will only keep your Personal Information for as long as We are either required to do so by law, or as is required to fulfil the purposes for which it was collected.

We maintain a data retention policy to meet our data protection obligations in this respect. Please contact our Global Data Protection Office by using the following email address: grp-uk-data_protect@gravitymedia.com or any questions or information which you may have in this regard.

Data security

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows

us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

Marketing

We strive to provide you with choices regarding certain Personal Information uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have opted in to receiving such communications when you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion.

Third-party marketing

Gravity Media Holdings Limited is part of the Gravity Media companies. We will get your express opt-in consent before we share your Personal Information with any company outside of the Gravity Media companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to Personal Information provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Disclosure of your information

You agree that we have the right to share your Personal Information with:

- Any other company within Gravity Media.
- Selected third parties including: business partners, suppliers and sub-contractors for the performance of any contract we enter into with you, analytics and search engine providers that assist us in the improvement and optimisation of our site; and credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

- If Gravity Media (USA) Corp is acquired by a third party, we will disclose your Personal Information to the prospective seller or buyer.
- If we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation, or in order to enforce or apply our [terms of use](#) or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Gravity Media (USA) Corp, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your Personal Information and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Information for their own purposes and only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

Where we store your Personal Information

The data that we collect from you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA").

In the course of carrying out the activities referred to above , We will take steps to ensure that your Personal Information is adequately protected in accordance with the applicable data protection legal requirements.

All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your California Privacy Rights:

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

1. **Right to Access, Right to Correction, and Right to Deletion.** Right to Access and Right to Know regarding Personal Information. You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:
 - a. The categories of Personal Information we have collected about you.

- b. The categories of sources from which the Personal Information is collected.
 - c. Our business or commercial purpose for collecting or selling Personal Information.
 - d. The categories of third parties with whom we share Personal Information; and
 - e. The specific pieces of information we have collected about you.
 - f. The categories of Personal Information about you, if any, that we have disclosed for monetary or other valuable consideration and the categories of third parties to which we have disclosed the information, by category or categories of Personal Information for each third party to which we disclosed the Personal Information; and
 - g. The categories of Personal Information about you that we disclosed for a business purpose.
 - h. Right to Correct. You have the right to request that we correct Personal Information that we maintain about you that is inaccurate.
2. **Right to Opt Out of Sales or Sharing.** You have the right to opt out of the disclosure of Personal Information about you for consideration and the sharing of Personal Information about you for digital tracking. Select [Do Not Sell My Info](#) to be directed to a page which you may submit a request to opt-out. To opt-out of collection of information by analytics, you can click on [Cookie Settings here](#) and disable cookies.
3. **Deletion Request Rights.** You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:
- a. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
 - b. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - c. Debug products to identify and repair errors that impair existing intended functionality.

- d. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
 - e. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
 - f. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
 - g. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
 - h. Comply with a legal obligation.
 - i. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
4. **Sensitive Personal Information.** Gravity Media does not use or disclose sensitive Personal Information for purposes that, under applicable law, require us to offer consumers a "Right to Limit" the use or disclosure of sensitive Personal Information.
5. **Right to Non-Discrimination.** We may not discriminate against you because of your exercise of any of the forgoing privacy rights, or any rights under the CCPA, including by:
- a. Denying you goods or services.
 - b. Providing you a different level or quality of goods or services; or
 - c. Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

If you wish to exercise any of these rights, please contact us:

Phone: +1 818 955 9449

Email: grp-uk-data_protect@gravitymedia.com

Postal Address: 7701 Haskell Avenue, Van Nuys, CA 91406, USA

We will respond to your request consistent with applicable laws. To protect your privacy and security, we may require you to verify your identity.

Contact details



If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO by grp-uk-data_protect@gravitymedia.com. Any changes we make to this Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Policy.

Phone: +1 818 955 9449

Email: grp-uk-data_protect@gravitymedia.com

Postal Address: 7701 Haskell Avenue, Van Nuys, CA 91406, USA

Updates to this policy

This policy will be kept under continual review, and changes may be made from time to time.

Updated on: 09 March 2023