

## Privacy Policy

(Last Updated: 3/16/2020)

WELCOME!

This privacy policy ("**Privacy Policy**") explains how Hasbro, Inc. and its subsidiaries and affiliated companies that operate within the United States (collectively, "**Hasbro**", "**we**", "**our**", or "**us**") collect, use and disclose your information when you visit the ecommerce site for Hasbro fans at [www.hasbropulse.com](http://www.hasbropulse.com) (the "**Site**"), view or interact with content or functionality on the Site to find out more about or order Hasbro products (the Site, such content and functionality, and related online products and services collectively, the "**Services**"), or interact with us offline regarding the Services.

**We note that the Services are intended for users and visitors from the United States and Canada only at this time, and are not directed to or otherwise intended for use by individuals under 16 years of age.**

To learn more about our privacy practices on our child-directed and general audience websites and in relation to mobile applications that we publish, please be sure to review the applicable posted Hasbro Privacy Policy. If you are a California resident, please see the "Additional disclosures for California residents" section below.

This Privacy Policy and the ESRB certification seals shown on the Site confirm that Hasbro is a valid licensee, and participating member, of the Entertainment Software Rating Board's Privacy Certified Program ("**ESRB Privacy Certified**"). To protect your privacy, we have voluntarily undertaken this privacy initiative and have had the Services reviewed and certified by ESRB Privacy Certified to meet established online information collection, use, and disclosure practices. As a licensee of this privacy program, we are subject to frequent audits of the Services and other online products and services operated by us, and other enforcement and accountability mechanisms administered independently by the ESRB.

We ask that you take the time to read this Privacy Policy carefully. By using the Services, you agree to this Privacy Policy. **If you do not agree with this Privacy Policy, please do not use the Services.**

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#### 1. IMPORTANT NOTE TO USERS

We control and operate the Services from the United States, and do not accept orders to be shipped to countries outside the United States (except for APO/FPO addresses) and Canada. **If you choose to access the Services from outside the United States and Canada, your personal information will be transferred**

**to and processed in the United States and may be transferred to and processed by our affiliates, subsidiaries, service providers, and other parties in other countries, where data protection laws may be different from the laws of your country. We make no representation that the Services or its contents or functionality are appropriate or available for use outside the United States and Canada or otherwise comply with any laws, rules, and regulations outside the United States and Canada.**

**The Services are not intended for individuals under 16 years of age, and we do not knowingly solicit or collect personal information from individuals under 16 years of age in connection with the Services.**

If you believe that we may have unintentionally collected your and/or your child's personal information, you may contact us at:

Hasbro, Inc.

Attn: Hasbro Pulse Services Administrator  
1027 Newport Avenue, Mailstop A906  
Pawtucket, RI 02861  
(800) 255-5516

For product-related questions and requests, please contact Hasbro Consumer Care. Please note that any personal information provided by you via our consumer care website is subject to the privacy policy and terms of use of that website. Please read those documents before providing any personal information to us via our consumer care website.

For any other issue related to use of the Services, please contact Hasbro Pulse Customer Service by submitting a question or support request via the Site or emailing us at [CustomerService@HasbroPulse.com](mailto:CustomerService@HasbroPulse.com). We will be happy to take your request.

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## 2. CHANGES TO THIS PRIVACY POLICY

We encourage you to review this Privacy Policy whenever you access the Services to make sure that you understand our information collection, use, and disclosure practices. We may change the provisions of this Privacy Policy at any time and will indicate when changes have been made by revising the date at the top of this Privacy Policy. Your use of the Services, or any portion thereof, following the posting of such changes shall constitute your consent to such changes. If we make material changes to this Privacy Policy, we will provide you with additional notice of such changes by sending you an email at the last email address that you provided us, or by prominently posting notice of the changes on the Site. If you do not agree with the changes we make to this Privacy Policy, please stop using the Services.

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## 3. WHAT INFORMATION IS COLLECTED FROM ME?

### INFORMATION THAT YOU PROVIDE

Hasbro or its service providers collect information that you provide when you use the Services, such as when you:

- (1) create an account or subscribe to the Services;
- (2) make a purchase or request to purchase a product;
- (3) rate, review, or ask a question about a product;
- (4) back a crowdfunded product;
- (5) participate in contests, events or promotions;
- (6) send questions or comments to us, or contact Hasbro Pulse Customer Service;
- (7) fill out online surveys;
- (8) sign up for our newsletter or other email alerts;
- (9) share a website with a friend; or
- (10) otherwise communicate with us through the Services.

Depending on the activity, the types of personal information that you provide and we or our service providers collect, including in the last 12 months, include:

- (1) your first and/or last name;
- (2) email address;
- (3) telephone number;
- (4) address (including billing address and/or shipping address);
- (5) credit card or other payment information; and
- (6) other contact or identifying information that you choose to provide.

Other information you may also provide through your use of the Services includes your product preferences, searches, and browsing activity.

In some cases, we also collect information you provide about others, such as when you refer someone to the Services (including promotions) or when you purchase and ship products to someone. We will use this information to fulfill your requests and will not send communications to your contacts unrelated to your requests, unless they separately consent to receive communications from us.

Please note that this Privacy Policy applies to any information that we collect (or that our service providers collect on our behalf) through your use of the Services or offline. If the Services collect and/or share personal information in a manner that differs from what is described in this Privacy Policy, we will notify you of the purposes for which such information will be collected and/or with whom such information will be shared (if applicable), whether via a just-in-time notification at the point of collection or via an alternate notice.

#### INFORMATION COLLECTED AUTOMATICALLY FROM YOU

When you access or use the Services, we and our service providers may also automatically collect information about your visit. The types of information we and our service providers automatically collect,

including in the last 12 months, include your computer's Internet Protocol ("IP") address, other unique identifiers (e.g., ad tags or IDs), information about your hardware, operating system version, browser type and language, screen resolution, geographic location (country, state, and city level), the URL of the website you visited before navigating to the Services, and other analytics and statistical data regarding use of the Services (e.g., downloads, number of users, access times, sessions, page views, frequency of use, retention, clicks, etc.). In addition to the above, if you access the Services via a mobile device, we may also collect your device ID, device make and model, and mobile carrier.

To collect this information, we and our service providers use various technologies, including the following:

**Cookies:** Cookies are small data files stored on your computer or mobile device by a website. Among other things, cookies help us and our service providers to improve the Services, remember your preferences, support security features, see which areas and features of the Services are popular, count visits, understand usage and campaign effectiveness, and provide and personalize content and advertising. For more information about cookies and how to disable them, please see the "What are my information choices?" section below.

**Clear GIFs:** Clear GIFs, sometimes called "web bugs" or "web beacons," are small electronic images that are placed on a web page or in an email message or advertisement. Clear GIFs may permit us to drop or read cookies, and are often used in combination with cookies to track activity by a particular browser to a particular device. We use clear GIFs to, among other things, collect information, count visits, understand usage and campaign effectiveness, provide and personalize content and advertising, and tell if a recipient has opened and acted upon an email.

**Log Files:** Log files record website activity on the Services and enable us to gather statistics about our users' browsing habits. These entries help Hasbro determine, among other things, how many and how often users have accessed or used the Services, which pages of the Services they've visited, and other similar data.

**Do Not Track (DNT) Signals:** Your browser may allow you to set a Do Not Track (DNT) signal indicating that you do not wish your online activity to be tracked. Currently, our system does not support and cannot act on DNT signal headers that we may receive. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to DNT signals.

We may also associate the information we collect from these technologies with other information that you provide for the purposes described in this Privacy Policy.

#### INFORMATION COLLECTED FROM OTHER SOURCES

We and our service providers may also obtain information from other sources and combine that with information we collect through the Services. For example, if we enable a feature on the Site that permits you to interact with a social media site or platform, or if we partner with a social media site or platform for advertising purposes, we may have access to certain information from that social media site or platform, such as your name, account information, and friends, and engagement with our content or our brands on the social media site or platform, in accordance with your settings for how the social media site or platform may share your information and the authorization procedures determined by such social media site or platform. In addition to social media sites and platforms, the other sources from which we have collected information about you, including in the last 12 months, include:

- **Partners** that offer co-branded services or engage in marketing and advertising activities on our behalf; and
- **Publicly available sources**, including data in the public domain.

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#### 4. HOW DOES HASBRO USE MY INFORMATION?

##### USE OF INFORMATION

We use information collected through or in connection with the Services for the business and commercial purposes described in this Privacy Policy or as otherwise disclosed to you on or in connection with the Services. Our business purposes for collecting and using your information, including in the last 12 months, are:

- To send you advertising or promotional materials, including information about new products, contests, features and enhancements, special offers and other events of interest from Hasbro and our select partners;
- To operate and improve the Services, including by linking or combining your information with other information we get from our service providers or other parties, or information related to your interactions with other Hasbro sites or online services;
- To personalize your experience with the Services, including through Site features such as product search results and product recommendations;
- To provide and deliver the products and services you request, process transactions, and to send you related information, including confirmations and invoices;
- To send you technical notices, updates, security alerts and support and administrative messages;
- To respond to your comments, questions, and requests and provide customer service;
- To monitor performance of the Services and overall usage of the Services and user retention rates, track how users are engaging with the Services, identify how and how frequently Site features are utilized, identify problem areas within the Site, and inform design development for future updates;
- For internal business purposes, including tracking and measuring product sales information; and
- To carry out any other business or commercial purpose, at your direction or with notice to you or with your consent.

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#### 5. WITH WHOM DOES HASBRO SHARE MY INFORMATION?

##### SHARING OF INFORMATION

We share information about you with others as described in this Privacy Policy and in the last 12 months have shared information, including:

- With your consent, including if we notify you through the Services that the information you provide will be shared in a particular manner and you provide such information;

- With consultants and other service providers who are working on our behalf and need access to your information to carry out operational business purposes for us. For example, service providers assist us with payment processing, data analytics, marketing, website hosting, advertising and technical support. We contractually prohibit these entities from retaining, using, or disclosing information about you for any purpose other than performing services for us and require these entities to maintain the confidentiality, security, and integrity of the personal information they obtain from us or through the Site and the Services;
- With vendors and other parties for business or commercial purposes, including analytics and advertising technology companies. Vendors and other parties may act as a service provider, or in certain contexts, independently decide how to process information (review the “Analytics and Advertising” section below for more information);
- With our affiliates for internal business purposes;
- With our affiliates and other parties for Hasbro's own marketing purposes and those affiliates' and other parties' own business purposes, including direct marketing purposes (California residents have certain rights set forth in the section entitled "Shine the Light");
- To facilitate your requests, including at your direction such as when you choose to share information with a social media site or platform about your activities on the Services;
- When we believe it is necessary or appropriate to: (i) comply with applicable law or legal process or to respond to lawful requests or legal authorities; (ii) protect the rights and property of Hasbro and our employees, agents, users and other parties, including to enforce our agreements, policies and terms of use as provided on the Services, and protect against fraudulent, abusive, inappropriate, or unlawful use of the Services; and (iii) protect the safety of Hasbro, our users or any person or entity; and
- In connection with, or during negotiations of, any merger, sale of company assets, bankruptcy or reorganization, financing or acquisition of all or a portion of our business to another company.

We may also share aggregated information or information that we have collected from you through the Services, including on co-branded pages and where we have taken reasonable measures to de-identify such information.

#### SOCIAL SHARING FEATURES

The Services (including content and functionality on or features of the Services provided by our service providers) may offer social sharing features and other integrated tools (such as the Facebook and Twitter widgets), which let you share actions you take on the Services with other media, and vice versa. The use of such features may enable the sharing of information with your friends or the public, depending on the settings you establish with the party that provides these features. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the parties that provide these features.

#### LINKING TO EXTERNAL SITES, APPLICATIONS, AND OTHER ONLINE SERVICES

To provide relevant information not found on the Services and to allow you to interact with other websites, applications, and/or other online services with which you may have accounts (such as Facebook and other social media sites) or which may be of interest to you, Hasbro may provide links or embed applications on the Services that allow you to login to or otherwise engage with online services not

operated or controlled by Hasbro. Your use of these online services is subject to the other parties' privacy policies and terms of use, and we encourage you to read the other parties' privacy policies and terms of use before submitting personal or other information or using their online services.

## 6. ANALYTICS AND ADVERTISING

### WEBSITE ANALYTICS

We use analytics services, such as Google Analytics, to help us understand how users access and use the Services. These tools and services use cookies, web beacons and other devices or technologies on the Services to enable them to track traffic data. The data collected typically includes information such as your IP address, your Internet Service Provider, your web browser, the time spent on web pages, and the links clicked and the advertisements viewed on those pages. We use this information to improve the Services and your experience, to see which areas and features of the Services are popular, and for which visitors, and to count visits.

### INTEREST-BASED ADVERTISING

We work with agencies, ad networks, technology services, and other parties to place ads for our products and services on other websites and online services. These other parties use cookies, web beacons and other devices or technologies to collect information about your visits to websites and mobile applications, including to the Services. The data is collected through first party cookies and third party cookies and typically includes information such as your IP address, your web browser, web pages viewed, time spent on pages, links clicked and whether you purchased an advertised product. These other parties use this information to track your activities across time and services for purposes of associating the different devices you use, and delivering advertising and/or content targeted to your interests.

### MATCHED ADS

Websites and applications owned or operated by other parties may display ads from Hasbro that are targeted to reach people (or people similar to people) on those websites or applications who have visited our Services or are also identified on one of more of Hasbro's databases. This is done by us uploading a customer list to the other party or incorporating a pixel from the other party on our Services, and the other party matching common factors between our data and the data of the other party. For instance, we incorporate the Facebook pixel on our Site and may share your email address with Facebook as part of Facebook Custom Audiences. We may also work with partners to deliver matched ads based on data about you and others in those partners' own databases.

For information about your choices regarding analytics, interest-based advertising, and matched ads, please see the next section.

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## 7. WHAT ARE MY INFORMATION CHOICES?

### REGARDING ACCOUNTS

If you have created an account with the Services, you may at any time review and/or update the contact details and address information we have for you by signing in, or inform us that you want us to remove your account information from our database by contacting Hasbro Consumer Care. If you choose to send

us an email through Consumer Care, please be sure to include the following in your message: the name of the Hasbro website with which you have an account, and the email address you used to sign up for that account so that we can verify your request. If you have requested that we save information for you in connection with placing an order through the Services, please email your request to [CustomerService@HasbroPulse.com](mailto:CustomerService@HasbroPulse.com). We will respond to requests as soon as possible. Please note, however, that we may retain your information following such requests as described in the section on Security below.

#### REGARDING RATINGS, REVIEWS, AND QUESTIONS YOU POST

If you have posted product-related questions, ratings, or review content that you want us to remove from the Site, please email your request to [CustomerService@HasbroPulse.com](mailto:CustomerService@HasbroPulse.com). Please note, however, that we may retain the previously posted information following such requests as described in the section on Security below.

#### REGARDING PROMOTIONAL COMMUNICATIONS

We may send you promotional communications if you sign up to receive them through the Services. If you have signed up to receive promotional communications from Hasbro via another Hasbro ecommerce site, you will continue to receive them through Hasbro Pulse, Hasbro's latest shopping destination for fans.

You may opt out of receiving promotional emails or mail from Hasbro by declining to receive such communications when you place an order or at the time you otherwise provide your contact information to us. You may also opt out of receiving promotional emails at any time by following the instructions to "unsubscribe" in those emails or by sending an email to [CustomerService@HasbroPulse.com](mailto:CustomerService@HasbroPulse.com).

If you opt out, we may still send you transactional or relationship messages, such as emails about your account, an order you have placed, a crowdfunded product you have backed, or our other ongoing business relations.

#### REGARDING COOKIES

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Services.

#### REGARDING ANALYTICS AND INTEREST-BASED ADVERTISING

Google provides tools to manage the collection and use of certain information by Google Analytics at [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

Some of the companies we work with to provide you with targeted advertising participate in the Digital Advertising Alliance ("**DAA**") or the Network Advertising Initiative ("**NAI**"). For more information about the targeted advertising provided by these companies, and how to opt out of having your information used in this way by these companies, please visit: [www.aboutads.info/choices](http://www.aboutads.info/choices) for opt out for DAA participating companies or [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices) for opt out for NAI participating companies. Opting out only means that the selected participants should no longer deliver certain targeted ads to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks).

To opt out of us using your data for matched ads, please contact us as set forth in the “Contact Us” section below and specify that you wish to opt out of matched ads. We will request that the applicable party not serve you matched ads based on information we provide to it. Alternatively, you may directly contact the applicable party to opt out.

You may also limit our use of information collected from or about your mobile device for purposes of serving online behavioral advertising to you by going to your device settings and selecting “Limit Ad Tracking” (for iOS devices) or “Opt out of Ads Personalization” (for Android devices).

Please note that if you opt out using any of these methods, the opt out will only apply to the specific browser or device from which you opt out. Hasbro is not responsible for the effectiveness of, or compliance with, any opt out options or programs, or the accuracy of any third party statements regarding opt out options or programs.

## 8. SECURITY

Hasbro has established policies in an effort to protect your personal information against loss, misuse and unauthorized access, disclosure, alteration and/or destruction. For example, Hasbro strives to provide only those employees performing a legitimate business function with access to users' personal information. Hasbro also reviews its security procedures periodically to consider appropriate new technology and updated methods.

Hasbro retains your information for business purposes, for as long as your account is active, and/or as long as is reasonably necessary to provide you with our products and services. Hasbro will also retain your information as reasonably necessary to comply with our legal obligations, resolve disputes and enforce our agreements. We may also retain cached or archived copies of your information for a reasonable period of time.

Despite our efforts, please be aware that no security measure is ever perfect or impenetrable. To that end, Hasbro will notify users of a data breach when Hasbro determines that is reasonably necessary in accordance with applicable law.

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## 9. ADDITIONAL DISCLOSURES FOR CALIFORNIA RESIDENTS

These additional disclosures for California residents apply only to individuals who reside in California. The California Consumer Privacy Act of 2018 (“CCPA”) provides additional rights to know, delete and opt out, and requires businesses collecting or disclosing personal information to provide notices and means to exercise rights.

### CALIFORNIA NOTICE OF COLLECTION

In the past 12 months, we or our service providers have collected the following categories of personal information enumerated in the CCPA in connection with Hasbro Pulse:

- Identifiers, including name, address, email address, IP address – and an ID number assigned to your account.
- Customer records, phone number, billing address, credit or debit card information.
- Commercial information, including purchases and engagement with the Services.

- Internet activity, including history of visiting and interacting with our Services, browser type, browser language and other information collected automatically.
- Geolocation data.
- Inferences, including information about your interests, preferences and favorite brands and products.

For more information on information we collect, including the sources we receive information from, review the “What Information is collected from me?” section. We collect and use these categories of personal information for the business purposes described in the “Use of Information” section, including to provide, manage and improve our Services.

Hasbro does not generally sell information as the term “sell” is traditionally understood. However, to the extent “sale” under the CCPA is interpreted to include advertising technology activities such as those disclosed in the “Analytics and Advertising” section, we will comply with applicable law as to such activity. Hasbro discloses the following categories of personal information for commercial purposes: identifiers, commercial information, internet activity, geolocation data and inferences. We use and partner with different types of entities to assist with our daily operations and manage our Services. Please review the “Sharing of Information” section for more detail about the parties we have shared information with.

#### RIGHT TO KNOW AND DELETE

If you are a California resident, you have the right to delete personal information we have collected about you and you have the right to know certain information about our data practices in the preceding 12 months. In particular, you have the right to request the:

- categories of personal information we have collected about you;
- categories of sources from which the personal information was collected;
- categories of personal information about you we disclosed for a business purpose or sold;
- categories of third parties to whom the personal information was sold or disclosed for a business purpose;
- business or commercial purpose for collecting or selling the personal information; and
- specific pieces of personal information we have collected about you.

To exercise any of these rights, please submit a request to us by calling our toll-free number at (800) 255-5516, or emailing us at [DPO@hasbro.com](mailto:DPO@hasbro.com). In the request, please specify which right you are seeking to exercise and the scope of the request. We will confirm receipt of your request within 10 days. We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity, we may deny your requests to know or delete.

If personal information about you has been processed by us as a service provider on behalf of a customer and you wish to exercise any rights you have with such personal information, please inquire with our customer directly. If you wish to make your request directly to us, please provide the name of our customer on whose behalf we processed your personal information. We will refer your request to that customer, and will support them to the extent required by applicable law in responding to your request.

#### RIGHT TO OPT OUT

To the extent Hasbro sells your personal information as the term “sell” is defined under the California Consumer Privacy Act, you have the right to opt out of the sale of your personal information by us to third parties at any time. You may submit a request to opt out of advertising technologies we use on the Services by clicking “Do Not Sell My Personal Information” below and following the instructions in that form.

[Do Not Sell My Personal Information button/link.]

Otherwise, you may submit opt out requests by calling our toll-free number at (800) 255-5516, or emailing us at [DPO@hasbro.com](mailto:DPO@hasbro.com).

We do not knowingly “sell” the personal information of California minors under 16 years old.

#### AUTHORIZED AGENT

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent’s permission to do so and verify your identity directly.

#### RIGHT TO NON-DISCRIMINATION

You have the right not to receive discriminatory treatment by us for the exercise of any your rights.

#### SHINE THE LIGHT

California Civil Code Section 1798.83 permits customers of this website who are California residents to request certain information regarding our disclosure of personal information as defined by the statute to our affiliates and third parties for their own direct marketing purposes. For inquiries regarding our disclosure policy, please call or write us at:

Hasbro, Inc.  
Attention: Hasbro Pulse Services Administrator  
1027 Newport Avenue, Mailstop A906  
Pawtucket, RI 02861  
(800) 255-5516

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#### 10. CONTACT US

If you have questions or concerns regarding this Privacy Policy, please contact us using the following contact information:

Hasbro, Inc.  
Attention: Hasbro Pulse Services Administrator  
1027 Newport Avenue, Mailstop A906  
Pawtucket, RI 02861  
(800) 255-5516

If you have a disability and would like to access this Privacy Policy in an alternative format, please contact us at (800) 255-5516 or [consumercare.hasbro.com](mailto:consumercare.hasbro.com).

Additionally, if you are based in Canada, you can also contact our Data Protection Officer at [DPO@hasbro.com](mailto:DPO@hasbro.com) if you are entitled to update, correct or access your information.

For product-related questions and requests, please contact Hasbro Consumer Care.

For any other issues, please contact Customer Service. For additional information about the Services, please review the terms of use provided on the Services.

As aforementioned, Hasbro is a licensee of the ESRB's Privacy Certified Program. If you believe that we have not responded to your privacy-related inquiry or your inquiry has not been satisfactorily addressed, please contact ESRB at <https://www.esrb.org/privacy/contact.aspx> or:

ESRB

Attn: Privacy Certified Program

420 Lexington Avenue, Suite 2240

New York, NY 10170

[privacy@esrb.org](mailto:privacy@esrb.org)

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