

Privacy Notice

Sony AI Privacy-Preserving Machine Learning Projects

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I. General

1. This Privacy Notice explains how the Privacy-Preserving Machine Learning team ("PPML"), as part of Sony AI America Inc. with offices at 25 Madison Avenue, New York, NY 10010, United States ("Sony", "we", "us", "our") processes personal data that we collect as part of our projects where we develop computer vision technology and solutions in a privacy-preserving manner. It also describes your data protection rights, including the right to object (or "opt-out") to some of the processing which Sony carries out. More information about your rights, and how to exercise them, is set out in **Section VIII "Your Privacy Rights"** below.
2. **If you object to your personal data being processed by Sony for the purposes of AI training as explained in this Privacy Notice, you have the opportunity to opt-out from the outset of this processing by raising your objection to us by March 18, 2026.** Our ability to fulfil any data rights requests may be limited in certain circumstances and will be further limited after this date. Please refer to **Section VIII "Your Privacy Rights"** for more information. Our relevant contact details are set out in **Section IX "Contact Us"**. You can also contact us if you have any queries or concerns about the information in this Privacy Notice.
3. Please note that this Privacy Notice applies to the research and development work of PPML only. Other research, development, products and services of Sony (or Sony Group Companies) may have their own privacy policies regarding use of your information in relation to those activities. Additionally, where Sony collects personal data made available by third-party sources, please refer to those third-party data providers own privacy policies regarding their initial collection and processing activities, which are not covered by this Privacy Notice.
4. In this Privacy Notice, "Sony Group Company" means Sony Group Corporation, which is the ultimate parent company of Sony and any legal entities controlled by Sony Group Corporation (the term "control" in this context means the direct or indirect ownership of at least fifty percent (50%) of the voting interest in such corporation or the power in fact to control the management decisions of such entity).
5. For the purposes of the GDPR and other applicable data protection laws and regulations where the concepts of "Controller" and "Processor" are defined, Sony is the "Controller" of the Collected Data.

II. Information We Collect

6. As part of the work of PPML, we may collect the following types of personal data about you (“Collected Data”) indirectly through publicly accessible data sources and third-party websites and data providers:
 - a. Identification data: your name, email address, Flickr (or other image sharing site) username and identifiers;
 - b. Demographic data: age, gender, country, location;
 - c. Image data: your images, photos and videos, including those that may show or depict your face and physical characteristics, poses, actions as well as your location and surrounding environment;
 - d. License data: license and copyright information associated with the images such as license type; and
 - e. Any information or metadata which may accompany images or content appearing online or in datasets, such as direct image or Flickr URLs, image titles, annotations, captions, descriptions and tags, geolocation, date and timestamps, and camera information.
2. If you contact us with a query or make a request for data that we hold about you, we collect your contact details such as your name and email address, details of your request or query and associated information that will assist us in responding to you.
3. Sony does not intentionally collect special categories or sensitive data. However, where this occurs, Sony will take reasonable steps to remove and delete such data.

III. Processing Purposes

7. Sony collects and processes Collected Data for the following purposes:
 - a. To research, study and develop software, models, algorithms and other machine learning and artificial intelligence (“AI”) technologies which aim to preserve the privacy of individuals (“PPML Technologies”). We base this processing on our legitimate interests to develop and advance privacy-preserving solutions for our business, customers and the AI research community. In this context, we may use Collected Data to:
 - i. Create image datasets to train, evaluate, analyse and develop commercial and non-commercial PPML Technologies, in the field of computer vision, especially machine learning and AI enabled object detection, head pose and pose estimation, segmentation, classification and image annotation, captioning or pseudo-labelling systems.
 - ii. Create commercial products and services based on results from research, study and development of PPML Technologies. This includes processing to maintain or improve functioning of PPML Technologies which are made available on the market.

- iii. Create and publish academic and research papers based on its results from research, study and development of PPML Technologies.
 - b. To respond to your queries and process your searches and requests for information when you contact us.
 - c. To comply with applicable laws, regulations and court orders and to comply with valid legal information requests from such bodies. We may also use Collected Data to protect, enforce or defend the business interests and legal rights of Sony Group Companies. This includes processing to verify image licenses or to comply with data rights requests. In these cases, we base the processing on a legal obligation to which Sony is subject or on our legitimate interest to protect and defend our legal rights.
8. Please note that processing of Collected Data will include pseudonymising, modifying and/or removing identifiable features of an individual before it is used for training. This means where an image contains a face, it will be pseudonymised (i.e. blurred), and where data (such as your name or other identifier) is contained alongside an image, this information will be deleted from our systems after it is collected. This means that while underlying data used to train and develop PPML Technologies may constitute as personal data, this will not be used to identify individuals and will subsequently impact and limit the ability for Sony to fulfil opt-out and data rights requests.

IV. Disclosure and Transfer of Personal Data

9. In order to conduct the work of PPML for the above purposes, we will need to share Collected Data with:
- a. Sony AI, Sony Research and Sony Europe B.V. personnel with access on a 'need to know' basis and only where they have signed a confidentiality agreement with Sony;
 - b. Other Sony Group Companies, including those in Japan, the USA, Sweden, Singapore, China and the United Kingdom;
 - c. Companies in the technology (both hardware and software manufacturers) and cloud services sectors, acting as third-party processors on the instruction of Sony and subject to confidentiality clauses;
 - d. To any prospective purchaser, and its and our professional advisors, in connection with a corporate event such as a merger, business acquisition, reorganisation or disposal.
10. When making international transfers out of the European Economic Area to countries that have not received an adequacy decision, regarding their data protection standards, by the European Commission, we use standard contractual data protection clauses, which have been approved by the European Commission. For further information, including to obtain a

copy of the documents used to protect your information, please contact us as described in the Contact Us section below.

V. Data Security & Retention

11. Collected Data will be kept strictly confidential.
12. We will take all reasonable steps to protect your personal data. This includes setting up processes and procedures to minimise the unauthorised access to or disclosure of Collected Data, and we use reasonable efforts to obtain agreement of Sony Group Companies or other third parties to take steps to protect the confidentiality and integrity of Collected Data we share with them.
13. Sony will keep the Collected Data for as long as it is necessary for the purposes detailed in **Section III “Processing Purposes & Legal Basis”** or otherwise permitted or required under applicable law. If you would like to know more about our retention policy, please contact us using the details in **Section IX “Contact Us”** below.
14. Please note that in many cases, it will not be possible for Sony to delete all relevant personal data used to train and develop PPML Technologies, such as from an AI model itself due to the technical nature of the AI training. Sony implements various safeguards to ensure that AI models and underlying data cannot be traced back to an individual.

VI. Children’s Data

15. Sony does not knowingly, or intend to, collect personal data from children under the age of 18. If you are a parent or guardian and are concerned that your child’s personal data has been provided to us without your consent, you should contact us using the details provided in **Section IX “Contact Us”** below.

VII. Automated Decision-Making and Profiling

16. No automated decisions nor profiles will be made about you as part of the work undertaken by PPML.

VIII. Your Privacy Rights

17. You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provided in a structure, machine readable format. In addition, you can object (or “opt-out”) to the processing of your personal data in some circumstances (in particular where we rely on legitimate interests as our legal basis for processing).
18. Sony may not be able to fulfil rights requests where it does not have the ability to identify individuals (for example where it uses personal data to train AI models). As mentioned above under **Section III “Processing Purposes”** Sony will delete certain data accompanying images and will blur faces present within images before training. This means that where a data rights request is made, Sony may be unable to identify your

personal data within training data as well as any model, algorithm or system that is developed.

19. Please be advised that in order to fulfil any data rights request, we will require as much information as possible regarding the publicly available and third-party sources, websites and datasets which you believe your personal data may be located and subsequently collected by us, including the URL of the image/s and URL or name of the website and dataset (including the version) which the image is contained in. Upon receiving your data rights request, Sony will use reasonable efforts to locate your personal data to fulfil your request using the information which you have provided.
20. Your rights may also be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.
21. Where a request results in deletion, correction or ceasing of processing of your personal data in our possession, this will have no effect on any software, algorithm or other technology derived from use of your personal data before your request.
22. You may exercise the above-mentioned rights by contacting us using the details provided in **Section IX “Contact Us”** below.
23. If you have unresolved concerns, you have the right to complain to a Data Protection Authority either of the country you reside or work, or where the alleged infringement to the GDPR happens.

IX. Contact Us

24. If you have any questions about this Privacy Notice or wish to contact us for any reason in relation to your personal data processing, please contact:
 - ppml-privacy@sony.com

Annex I: Matters Concerning Joint Use under Japan's Act on the Protection of Personal Information

I. Applicability

This annex applies when Japan's Act on the Protection of Personal Information (the "APPI") is applicable and relates to Section IV "Disclosure and Transfer of Personal Data" in this Privacy Notice. Pursuant to Article 27, Paragraph 5, Item 3 of the APPI, this annex sets forth the matters concerning the joint use of personal data by us and Sony group companies. We will make it readily available to the data subject of the fact that the relevant personal data will be jointly used and will disclose the following matters.

II. Items of personal data to be jointly used

Among the personal data we collect, the items listed under Section II "Information we collect" will be jointly used.

III. Scope of persons who jointly use the data

Sony and the group companies specified in b. of Section IV "Disclosure and Transfer of Personal Data."

IV. Purposes for which the persons who use the data will use the personal data

The purposes for which the jointly used personal data will be used are as described in Section III "Processing Purposes". Within the scope of those purposes, the group companies will jointly use the data.

V. Person responsible for management of the personal data

Sony is responsible for the management of the personal data.

VI. Rights of the data subject and contact for inquiries

A data subject may request disclosure, correction, suspension of use, etc., regarding their personal data to us. For such requests and for questions or inquiries regarding joint use, please contact us at Section IX. "Contact us"

VII. Changes

If there are material changes to the contents of the joint use, we will appropriately notify the data subject or revise and publish this annex.

Annex II: Matters Concerning California Consumer Privacy Act (CCPA / CPRA)

I. Applicability

This annex applies to California consumers (as defined by the California Consumer Privacy Act ("CCPA") and the California Privacy Rights Act ("CPRA")) and supplements the Privacy Notice to describe privacy rights and practices specific to California consumers.

For purposes of this annex, "we," "us," and "our" mean Sony AI America Inc. / "Sony" as identified in the Privacy Notice.

II. Definitions

- "Personal information," "sell," "share," "consumer," and other capitalized terms have the meanings given under the CCPA/CPRA.
- "Sensitive personal information" has the meaning set forth in the CPRA.

III. Categories of Personal Information Collected

We collect the categories described in the Privacy Notice. See Section II "**Information We Collect**" in the Privacy Notice for full detail . We do not collect any Sensitive Personal Information.

IV. Sources of Personal Information

We collect personal information publicly accessible data sources and third-party websites and data providers, and as otherwise described in the Privacy Notice.

V. Purposes for Collection and Use

We use personal information for the purposes described in Section III "**Processing Purposes**" in the Privacy Notice.

VI. Categories of Third Parties with Whom We Share Personal Information

We may disclose the categories of personal information described in Section IV "Disclosure and Transfer of Personal Data" in the Privacy Notice.

VII. Do Not Sell / Share for Cross-Context Behavioural Advertising

We do not sell/share personal information as defined under the CCPA/CPRA. If we decide to do so in the future, we will provide a link to opt out of the sale or sharing of your personal information for cross-context behavioural advertising.

VIII. California Consumer Rights

California consumers have the following rights under the CCPA/CPRA as applicable:

1. Subject to certain exceptions, as a California resident, you may have the following rights with regards to your Personal Information:
2. Access. You can request, twice per 12-month period, access to:
 - a. the categories of Personal Information we have collected about you;
 - b. the categories of sources from which your Personal Information is collected;
 - c. the business or commercial purpose for collecting or sharing Personal Information;
 - d. the categories of third parties to whom we disclose your Personal Information;
 - e. the specific pieces of Personal Information we have collected about you.
3. Deletion. You can request deletion of the Personal Information collected from you.
 - a. In addition, if you request deletion of your Personal Information, to the extent permitted by applicable law, we may be required to retain some of your Personal Information. In addition, certain Personal Information is strictly necessary in

order for us to fulfil the purposes described in this Privacy Notice and Annex.

4. Correction. You can request correction of any Personal Information we maintain about you.
5. Opt-out. We do not Sell or Share any Personal Information about you. Therefore, this right does not apply.
6. Restrict Use and Disclosure of Sensitive Personal Information. We do not collect Sensitive Personal Information. Therefore, this right does not apply.
7. Non-discrimination. We will not discriminate against you in connection with Offerings based solely upon you exercising any of your rights related to your Personal Information.

IX. How to Submit a Request

If you are a California resident and wish to exercise any of these rights, please using the details provided in Section IX **“Contact Us”**.

X. Verification and Authorized Agents

When submitting your request, you must include your first and last name, state of residence, and e-mail address. We are not responsible for requests that are not labelled or sent properly, or do not have complete information. You may be asked to provide additional proof of identification so that we can verify your identity, and we may require that you validate the request. To the extent that you elect to designate an authorized agent to make a request on your behalf, such agent must provide appropriate documentation including a written signed permission form from you, proof of your identity, and verification of their identity; or a valid, designated power of attorney, as required under the California Probate Code. We may require additional proof of authority or may need to contact you directly to validate the request.

XI. Retention

Retention of personal information is governed by the retention language in the Privacy Notice; please refer to the Privacy Notice for details on retention periods and criteria .

XII. Changes to this Annex

We may amend this annex to reflect changes in legal requirements or our practices. The effective date will be indicated at the top of this annex and any material changes will be posted as required by law.

XIII. Contact

For questions about this annex or to submit a request, please contact us at through the details set forth in Section X **“Contact Us”** section in the Privacy Notice.