

Privacy Policy

(Last Updated: 9/26/2022)

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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:

- (i) visit the ecommerce site for Hasbro fans at www.hasbropulse.com ("Pulse");
- (ii) download and use our Pulse mobile app ("Pulse Mobile");
- (iii) view or interact with content or functionality on Pulse or Pulse Mobile to find out more about or order Hasbro products; or
- (iv) interact with us through our Customer Service phone line, mailing address, or the Hasbro Consumer Care portal.

Note About Selfie-Series:

As of September 2022, the Pulse Mobile app includes **Selfie Series**, an optional app experience that allows users located in the United States to create customized products resembling their likeness ("Selfie"). A couple of things to remember about Selfie: first, you do not need to use Selfie to enjoy Pulse Mobile, and second, Selfie is only available through Pulse Mobile; it is not available on the Hasbro Pulse website.

This Privacy Policy refers to the content and functionality of, and related online products and services on, Pulse, Pulse Mobile, and Selfie collectively as the "**Services**".

Pulse is intended only for users and visitors located in the United States and Canada. Pulse Mobile and Selfie are available only to users located in the United States at this time.

The Services 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 mobile applications, please review the applicable posted Hasbro Privacy Policy.

If you are a California resident, please see the "[Additional disclosures for California residents](#)" in section 9.

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. If you do not agree with this **Privacy Policy**, please do not use the Services.

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1. IMPORTANT NOTES TO USERS

GEOGRAPHIC LIMITATION

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 vendors who help support the internal operations of the app and website, 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, the contents thereof, or the specific 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.**

AGE RESTRICTION

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 we have collected information from such an individual, you may directly request the deletion of such information here, contact us at DPO@hasbro.com or contact us via any of the methods or addresses listed in Section 10, below.

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PRIVACY POLICY CHANGES

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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2. 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. opt-in to receiving push notifications;
3. make a purchase or request to purchase a product;
4. rate, review, or ask a question about a product;
5. back a crowdfunding project;
6. participate in contests, events, or promotions;
7. send questions or comments to us, or contact Hasbro Pulse Customer Service;
8. fill out online surveys;
9. sign up for our newsletter or other email alerts;
10. share a website with a friend;
11. otherwise communicate with us through the Services; or
12. applicable only to Selfie, when you consent to us collecting the digital pictures of your face that you have taken in connection with using the Selfie app experience as explained in the [Selfie Series Face Tech User Policy](#) below; to customize your Selfie products.

Depending on the activity, the types of personal information that you provide and we or our service providers process or 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;
6. Face Tech Data ([defined below](#), applicable only to Selfie); and
7. 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.

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 (for example, calling Consumer Care). 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.

Please see Section 5 for an explanation of the data collected if you choose to use Selfie.

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, may include:

1. your computer's Internet Protocol ("IP") address, other unique identifiers (e.g., mobile device ad IDs, ad tags, or other alphanumeric IDs);
2. information about your hardware, including mobile device hardware, mobile carrier, operating system version, browser type and language, screen resolution, geographic location (country, state, and city level);
3. the URL of the website you visited before navigating to the Services;
4. 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.).

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 settings and preferences, support security features, see which areas and features of the Services are popular, count visits, measure users' responses to offers for our Services, and better understand how you use the Services so we can provide you with personalized 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 signals header 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.

Service Use Analytics & Telemetry: We may use one or more types of data analytics applications or providers to understand how consumers interact with our mobile app and/or website in a pseudonymized fashion (i.e., to collect analytics on trends in the aggregate, or to distinguish large, broad groups of different user types). We may also use analytics to provide improvements to our app and website, to assist with bug fixing, and to understand our users' preferences so we improve products and services in the future.

Marketing Retargeting: If you opt-in to our push notification service, email notifications, and/or newsletter services, we may use such notifications to deliver marketing and promotional messages to you about products and services you have demonstrated an interest in.

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 including vendor services in support of the internal operations of Pulse that offer co-branded services or engage in marketing and advertising activities on our behalf; and
- Publicly available sources, including public information: any information, regardless of format that is available in the public domain.

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3. HOW DOES HASBRO USE MY INFORMATION?

USE OF INFORMATION

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

- To operate and improve the Services;
- 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 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;
- To create your customized products (currently applicable only to Selfie); and
- To carry out any other business or commercial purpose, at your direction or with notice to you or with your consent.

To accomplish these legitimate business purposes, we may link or combine your information with other information we get from our service providers or other parties (for example, fulfillment of shipping by our third-party fulfillment partners), or information related to your interactions with other Hasbro sites or online services.

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4. WITH WHOM DOES HASBRO SHARE MY INFORMATION?

SHARING OF INFORMATION

We share information about you with others as described in this Privacy Policy; 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 our vendor services to carry out operational business processes for us; for example, to assist us with product 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 as necessary, 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 those made 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, (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. This Privacy Policy does not govern such sharing. Your use of these online services is subject to the other parties' privacy policies and terms of use and, if available, on the privacy settings you establish with the party that provides social sharing 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.

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5. SELFIE SERIES FACE TECH USER POLICY

Face Tech is a Hasbro-developed technology utilizing your mobile phone camera to take pictures of your face, and uses these images to create a 3D mesh of your facial geometry. That mesh, along with texture maps generated from the same camera images, is used to "grow" a custom 3D-printed plastic action figure head ("Face Tech").

Face Tech data collected (which can only be collected by your explicit consent before using the Selfie functionality) includes a digital file representing the 3D geometry of your face and one or more digital photographs of your face taken during the scanning process that have been altered to stretch over the mesh geometry ("Face Tech Data").

Hasbro cannot, nor will we use Face Tech Data to identify you or any individual on its Services. By clicking the button labeled "**I consent**" and following the instructions in the app to create a scan of your face, Hasbro will not share (or sell) the Face Tech Data with any other persons, companies, or third parties. Hasbro will not link or combine Face Tech Data with any other data. Hasbro processes the Face Tech Data on secure Amazon Web Services cloud servers controlled by Hasbro that enforce data encryption both in transit and at rest.

Users who choose not to make a purchase, will have their Face Tech Data automatically deleted promptly. Users may revoke their consent at any time prior to making a purchase.

Face Tech Data retention: If you have completed a purchase, Hasbro will retain your Face Tech Data only for as long as required to process your order and for QA purposes (up to 60 days from the time of shipment, as described in the commercial terms and conditions for Hasbro Pulse), after which it is automatically deleted.

DATA RETENTION

Other than Face Tech Data, discussed above in paragraph 5, 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. You may request to have your information, other than your Face Tech Data, if any, which is automatically deleted as described above, [by requesting such deletion here](#). 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.

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6. ANALYTICS AND ADVERTISING

WEBSITE AND MOBILE ANALYTICS

We use analytics services, such as Google Analytics, Google advertising tags, and SWRVE, to help us understand how users access and use the Services. These tools and services 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 collected typically includes information such as your IP address, your Internet Service Provider, your web browser, the time spent on web pages, 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 using a customer list to the other party or incorporating a pixel from the