

COPPA NOTICE: DIRECT NOTICE TO SCHOOLS AND PARENTS

This COPPA NOTICE: Direct Notice to Schools and Parents (“COPPA Notice”) gives schools and parents additional information on Soundtrap AB’s (“Soundtrap”) practices in collecting and using personally identifiable information from children under 13 years of age with regard to the Internet web site located at the URL www.soundtrap.com together with our mobile and desktop applications (collectively, "Site") and our related sites, players, widgets, tools, apps, data, software, API’s and other services that we provide (“Services”).

For purposes of this COPPA Notice, (i) “child” or “children” mean a child or children under 13 years of age that is/are child(s) at the school(s) listed on a particular Consent Form and (ii) “you” or “your” refers to the authorized teacher and/or administrator that is authorized to enter into contracts on behalf of such school(s) and that may legally consent, as an agent of parents and legal guardians of children attending the school(s) listed on a particular Consent Form, to Soundtrap’s collection and use of such child personal data.

Notice

Your consent is required before we will collect, use or disclose your child’s personally identifiable information. Subject to your consent, in order to allow your child to use the Site and Services, Soundtrap would like to collect, use and disclose your child’s information as set forth in this COPPA Notice and in our Privacy Policy (a link to the Privacy Policy is below).

What information does the Services and Site collect and use?

Personally identifiable information of children under 13 is only collected from such children with your consent, and if Soundtrap becomes aware of a child under the age of 13 providing personal without your consent, we will attempt to delete that information. While we may receive personally identifiable information directly from you about your children, Soundtrap directly may collect from your children the following: email, password, real name, a user name (which may be a real name or a pseudonym), the city and country in which the child lives, a profile picture or avatar, information about how the child categorizes him or herself with respect to his or her content (for example, whether the child is a musician, a label or some other category of creator), details of your other websites and social media profiles, including links to those websites and profiles, information from correspondence sent to us from a child, information included in any survey responses and information that children post that may include personally identifiable information, including their voice.

On our Site and Services, we use session cookies to make it easier for your child to navigate the Site and Services. For our Site and Services, we set a persistent cookie to store your child’s general usage behavior and IP addresses but not personally identifiable information. Persistent cookies enable us to track, store and target the interests of our users to enhance the experience on our Site. If your child rejects cookies, your child’s ability to our Site and Services may be limited.

Soundtrap also collects the following information automatically:

- the Internet Protocol (IP) address of the device from which a child accesses the Services (this can sometimes be used to derive the country or city from which a child is accessing the Services)

- the site that a child visited immediately prior to visiting the Site
- the specific actions that children take on the Services, including the pages that children visit, streaming or downloading sounds, uploading or recording sounds, connecting a child's Facebook, Google+ or Microsoft 365 account, sharing a track with another user, following or unfollowing another user, joining or leaving a group, posting a comment, or performing a search
- any search terms that a child may enter on the Site
- the time, frequency and duration of a child's visits to the Services
- a child's browser type and operating system
- the nature of the device from which a child is accessing the Services, for example, whether a child is accessing the Services from a personal computer or from a mobile device
- information collected through cookies and similar technology, as described in our Cookies Policy
- information regarding a child's interaction with email messages, for example, whether the child opened, clicked on, or forwarded the email message

If a child signs up through Facebook, Google+ or Microsoft 365 account, we will receive certain information from the child's Facebook, Google+ or Microsoft 365 account as set forth in our Privacy Policy.

How will Soundtrap and the Site use this information?

We use the information that we collect about your child for the following educational purposes as more specifically described in our Privacy Policy:

To identify a child when logging in to the Site and/or Services, to display information in a child's profile, to process your account subscription, to send service updates and notifications and certain email notifications, to connect children with other users, to operate and maintain the child's Soundtrap® account, and to provide children with access to the Services, to identify children as the creator of the sounds that the child uploads or posts, to seek participation in surveys, and to conduct and analyze the results of those surveys, to provide technical support, to provide other users with data regarding people streaming and downloading their sounds (in accordance with the Educational Plan account parameters set by the teacher or administrator), to analyze the use of the Services, and the people visiting the Site and using the Services, in order to improve Soundtrap®, to respond to you about any comment or enquiry you have submitted, and to prevent or take action against activities that are, or may be, in breach of our Terms of Use, Community Guidelines or applicable law.

Does Soundtrap share this information with any third parties?

Within the parameters set by the child's teacher or administrator, any personal information in a child's public profile (other than email address) will be accessible by other users of the Services, who may view their profile information, listen to and comment on any of their public sounds, add themselves to their list of followers, and send them messages. If a child listens to any sounds uploaded by a premium user, the fact that a child has listened to those sounds will be shared with that premium user, so that they can track

the popularity of their sounds. Similarly, if a child comments on any sounds on the Services, the child's comments will be available to all users of the Services.

We use certain reputable third parties, some of whom may be located outside of the European Economic Area, to provide us with certain specialized services related to the Services. These third parties will have access to certain information about you, but only where this is necessary in order for those third parties to provide their services to us.

If a child chooses to connect their Soundtrap® account to other apps or social networks such as Facebook, Google+, Microsoft 365 Tumblr or Twitter, the child will be sharing certain information with these apps or networks.

We may aggregate personal data with similar data relating to other users of the Services in order to create statistical information regarding the Services and its use, which we may then share with third parties or make publicly available.

We will disclose personal information if we believe in good faith that we are permitted or required to do so by law, including in response to a court order, subpoena or other legal demand or request.

We may disclose personal information if we feel this is necessary in order to protect or defend our legitimate rights and interests, or those of our users, employees, directors or shareholders, and/or to ensure the safety and security of the Services and/or the Soundtrap® community.

We may transfer personal information to any person or company that acquires all or substantially all of the assets or business of Soundtrap®, or on a merger of our business, or in the event of our insolvency.

You have the option of allowing the collection and use of your child's personally identifiable information without agreeing to disclosing that information to third parties, such as other children or schools, and in such event your child may not be able to communicate with others through the Services.

How does the Site get consent from parents or schools for the collection of personally identifiable information?

For a child under the age of 13 to use the Site and/or Services, you must complete, sign and submit the consent form located at <https://www.soundtrap.com/edu/consent/> in which you, on behalf of the parent(s) and/or guardian(s) of the child(s) at the school(s) listed on the Consent Form consent to Soundtrap's practices in collecting and using personally identifiable information from children under 13 years of age as specified in the Privacy Policy and this COPPA Notice.

Your affirmative consent, as evidenced by a completed and signed Consent Form, means that you consent, on behalf of the parent(s) and/or legal guardian(s) of the child(s) at the school(s) listed on the Consent Form, to the collection, use and disclosure of the personally identifiable information of your children in accordance with this COPPA Notice and the Privacy Policy.

Can a parent review, change or delete the information collected by the Site and Services about his or her child?

As a school administrator or teacher, you can at any time review or change the information collected by the Site or Services about the children under your school's account by contacting Soundtrap.

Additionally, individual parents and legal guardians may review or change the information collected by the Site or Services about their own children by contacting your school administrator that will then contact Soundtrap. You may consent to the collection and use of their child's personally identifiable information without consenting to the disclosure of that information to third parties, other than the vendors and service agencies that we may engage to assist us in providing our Services. You can also refuse to permit the Site and Services to collect any further personally identifiable information and can request that the Site and Services delete any information already collected.

To contact Soundtrap about a child's personally identifiable information you or a parent or guardian can write Soundtrap at privacy@soundtrap.com

https://www.soundtrap.com/public/legal/privacy_policy.pdf
