

# Soundtrap Privacy Policy

Effective as of 28 Feb 2022

## 1. Introduction

Thanks for choosing Soundtrap!

At Soundtrap, we want to give you the best possible experience to ensure that you enjoy our service today, tomorrow and in the future. Your privacy and the security of your personal data is, and will always be, enormously important to us. So, we want to transparently explain how and why we gather, store, share and use your personal data - as well as outline the controls and choices you have around when and how you share your personal data.

That is our objective, and this Privacy Policy ("Policy") will explain exactly what we mean in further detail below.

## 2. About this Policy

This Policy sets out the essential details relating to your personal data relationship with Soundtrap, a service provided by the Spotify entity indicated in Section 14 "How to Contact Us" ("Soundtrap", "we", "our", "us"). The Policy applies to Soundtrap.com (the "Website"), our mobile and desktop apps (the "Apps") and all related sites, players, widgets, tools, apps, data, software, APIs and other services provided by Soundtrap (the "Service").

We hope this helps you to understand our privacy commitments to you. For information on how to contact us if you ever have any questions or concerns, then please see Section 14 "How to Contact Us". Alternatively, if you do not agree with the content of this Policy, then please remember it is your choice whether you want to use the Soundtrap Service.

## 3. Your rights and your preferences: Giving you choice and control

The General Data Protection Regulation or "GDPR" gives certain rights to individuals in relation to their personal data. As available and except as limited under applicable law, the rights afforded to individuals are:

- *Right of Access* - the right to be informed of and request access to the personal data we process about you;
- *Right to Rectification* - the right to request that we amend or update your personal data where it is inaccurate or incomplete;
- *Right to Erasure* - the right to request that we delete your personal data;
- *Right to Restrict* - the right to request that we temporarily or permanently stop processing all or some of your personal data;
- *Right to Object* -
  - the right, at any time, to object to us processing your personal data on grounds relating to your particular situation;
  - the right to object to your personal data being processed for direct marketing purposes;
- *Right to Data Portability* - the right to request a copy of your personal data in electronic format and the right to transmit that personal data for use in another party's service; and
- *Right not to be subject to Automated Decision-making* - the right to not be subject to a decision based solely on automated decision-making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

If we send you electronic marketing messages based on your consent or otherwise permitted by applicable law, you may, at any time, withdraw such consent or declare your objection ("opt-out") at no cost. The electronic marketing messages you receive from Soundtrap (e.g. those sent via email) will also include an opt-out mechanism within the message itself (e.g. an unsubscribe link in the emails we send to you).

You can learn more about how to set your preferences in relation to how Soundtrap uses your personal data in Section 7 "Choice and Control" and you can control your personal data on the Settings page on the Website.

If you have any questions about your privacy, your rights, or how to exercise them, please contact [privacy@soundtrap.com](mailto:privacy@soundtrap.com). We will respond to your request within a reasonable period of time upon verification of your identity. If you are unhappy with the way we are using your personal data you can also contact, and are free to lodge a complaint with, the Swedish Data Protection Authority (Datainspektionen) or your local Data Protection Authority.

## 4. Personal data we collect from you

We have set out in the tables below the categories of personal data we collect and use about you.

***Personal data collected when you sign up:***

Categories of personal data	Description of category
<b>Account registration data</b>	<p>This is the personal data that is provided by you or collected by us to enable you to sign up for and use the Soundtrap Service. This includes your email address, age, country and password.</p> <p>If you register a premium account, you will also need to provide your real name, address and payment verification information.</p> <p>Some of the personal data we will ask you to provide is required in order to create your account. You also have the option to provide us with some additional personal data in order to make your account more personalized, such as data for your public profile on Soundtrap.</p> <p>The exact data we will collect depends on the type of Soundtrap Service plan you sign up for and whether or not you use a third party service to sign up and use the Soundtrap Service. If you use a third party service to create an account, we will receive personal data via that third party service but only when you have consented to that third party sharing your personal data with us.</p>

***Personal data provided through your use of the Service***

Categories of personal data	Description of category
<b>Service Usage Data</b>	<p>This is the personal data that is collected about you when you are using the Soundtrap Service. This includes:</p> <ul style="list-style-type: none"> <li>● Information about your type of Soundtrap Service plan.</li> <li>● Information about your interactions with the Soundtrap Service which includes date and time of any request you make, sounds you have streamed, recorded, uploaded or downloaded, your interactions with other Soundtrap users, details about your connections and use of third party applications.</li> <li>● Your Content (as defined in the <a href="#">Terms and Conditions of Use</a>), you post to Soundtrap including messages you send and/or receive via Soundtrap and your interactions with the Soundtrap Customer Service team.</li> <li>● Technical Data which may include URL information, cookie data, your IP address, the types of devices you are using to</li> </ul>

	<p>access or connect to the Soundtrap Service, unique device IDs, device attributes, network connection type and provider, network and device performance, browser type, language, operating system, and Soundtrap application version. Further details about the technical data that is processed by us can be found in our <a href="#">Cookie Policy</a>.</p>
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***Personal data collected with your permission that enables us to provide you with additional features/functionality***

<b>Categories of personal data</b>	<b>Description of category</b>
<b>Payment Data</b>	<p>We may collect such personal data if you sign up for a Trial or purchase any of our Paid Subscriptions (as defined in the Terms and Conditions of Use) or make other purchases through the Spotify Service. The exact personal data collected will vary depending on the payment method (e.g. direct via your mobile phone carrier or by invoice) but will include information such as:</p> <ul style="list-style-type: none"> <li>● Name;</li> <li>● Credit or debit card type, expiration date, and certain digits of your card number;</li> <li>● Billing address;</li> <li>● Details of your transaction history.</li> </ul>
<b>Survey and Contest Data</b>	<p>If you participate in any survey or contest, you will provide certain personal data as part of your participation, unless you respond anonymously. The exact personal data collected will vary depending on the survey or contest.</p>

***Personal data collected from third party sources***

We collect personal data about you from various third parties. These third party sources vary over time and include the following:

<b>Categories of personal data</b>	<b>Description of category</b>
<b>Authentication</b>	If you register for or log into our Services using third party

<b>Partners</b>	credentials (e.g. Google), we will import your information for such third party to help create your account with us.
<b>Technical service partners</b>	We work with technical service partners that provide us with certain data, such as mapping IP addresses to non-precise location data (e.g. city, state), to enable us to provide the Soundtrap Service.

## 5. What do we use your personal data for?

When you use or interact with the Soundtrap Service, we use a variety of technologies to process the personal data we collect about you for various reasons. We have set out in the table below the reasons why we process your personal data, the associated legal bases we rely upon to legally permit us to process your personal data, and the categories of personal data (identified in Section 4 “Personal data we collect from you”) used for these purposes:

<b>Description of why Soundtrap process your personal data (‘processing purpose’)</b>	<b>Legal Basis for the processing purpose</b>	<b>Categories of personal data used by Soundtrap for the processing purpose</b>
To provide, personalize, and improve your experience with the Soundtrap Service and other services and products provided by Soundtrap, for example by providing customized, personalized, or localized content, recommendations, features, and advertising on or outside of the Soundtrap Service (including for third party products and services).	<ul style="list-style-type: none"> <li>• Performance of a Contract</li> <li>• Legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>• Account Registration Data</li> <li>• Service Usage Data</li> <li>• Payment Data</li> <li>• Survey and Contest Data</li> </ul>
To understand how you access and use the Soundtrap Service to ensure technical functionality of the Soundtrap Service, develop new products and services, and analyze your use of the Soundtrap Service, including your interaction with applications, products, and services that are made available, linked to, or offered through the Soundtrap Service.	<ul style="list-style-type: none"> <li>• Performance of a Contract</li> <li>• Legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>• Account Registration Data</li> <li>• Service Usage Data</li> <li>• Survey and Contest Data</li> </ul>
To understand, diagnose, troubleshoot and fix issues with the Soundtrap Service.	<ul style="list-style-type: none"> <li>• Performance of a Contract</li> <li>• Legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>• Account Registration Data</li> </ul>

For marketing, promotion, and advertising purposes.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Consent</li> </ul>	<ul style="list-style-type: none"> <li>• Account Registration Data</li> <li>• Service Usage Data</li> <li>• Survey and Contest Data</li> </ul>
To conduct research, contests, and surveys.	<ul style="list-style-type: none"> <li>• Performance of a Contract</li> <li>• Legitimate interest</li> <li>• Consent</li> </ul>	<ul style="list-style-type: none"> <li>• Account Registration Data</li> <li>• Service Usage Data</li> <li>• Survey and Contest Data</li> </ul>
To process your payment to prevent or detect fraud including fraudulent payments and fraudulent use of the Soundtrap Service.	<ul style="list-style-type: none"> <li>• Performance of a Contract</li> <li>• Compliance with legal obligations</li> <li>• Legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>• Account Registration Data</li> <li>• Service Usage Data</li> <li>• Payment Data</li> </ul>
To comply with legal obligations and law enforcement requests. To establish, exercise, or defend legal claims.	<ul style="list-style-type: none"> <li>• Compliance with legal obligations</li> <li>• Legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>• Account Registration Data</li> <li>• Service Usage Data</li> <li>• Payment Data</li> <li>• Survey and Contest Data</li> </ul>

If you require further information about the legal basis and the balancing test that Soundtrap has undertaken to justify its reliance on the legitimate interest legal basis under the GDPR, please see Section 14 “How to Contact Us”.

## 6. Sharing your personal data

We have set out the categories of recipients of the personal data collected or generated through your use of the Soundtrap Platform.

***Publicly available personal data***

Your public profile will be publicly accessible and may be used by anyone accessing the Website, or using our API or other Service.

The following personal data will always be publically available on the Soundtrap Platform: any personal data in your public profile (other than your email address) will be accessible by other users of the Platform, who may view your profile data, listen to and comment on any of your public sounds, add themselves to your list of followers, and send you messages. If you listen to any sounds uploaded by a premium user, the fact that you have listened to those sounds will be shared with that premium user, so that they can track the popularity of their sounds. Similarly, if you comment on any sounds on the Platform, your comments will be available to all users of the Platform.

### ***Personal data you may choose to share***

Your personal data will only be shared with the categories of recipients outlined in the table below if:

- You choose to make use of a specific Soundtrap service feature where sharing of particular personal data is required for the proper use of the feature, or
- You grant us your permission to share the personal data

For information on how to control the data you share, please see Section 7 “Choice and Control” below.

<b>Categories of recipients</b>	<b>Reason for sharing</b>
<b>Other networks and connected apps</b>	If you choose to connect your Soundtrap account to other apps or social networks, you will be sharing certain data with these apps or networks.  This Privacy Policy does not apply to the collection of your information by these third parties. We recommend that you review their privacy policy for more information.  Facebook: <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a> Google: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a> Soundcloud: <a href="https://soundcloud.com/pages/privacy">https://soundcloud.com/pages/privacy</a> Spotify: <a href="https://www.spotify.com/us/legal/privacy-policy/">https://www.spotify.com/us/legal/privacy-policy/</a> Youtube API: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a> <ul style="list-style-type: none"><li>• To revoke access visit: <a href="https://security.google.com/settings/security/permissions">https://security.google.com/settings/security/permissions</a></li></ul>
<b>Support Community</b>	When you register for a Soundtrap Support Account on the Soundtrap Support Community, we will ask you to create a specific Soundtrap Support Community username. This will be publicly displayed to anyone

	who accesses the Soundtrap Support Community along with any questions or comments you post.
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***Personal data we may share***

<b>Categories of recipients</b>	<b>Reason for sharing</b>
<b>Service Providers</b>	We use certain reputable third parties to provide us with certain specialized services related to the Platform, in particular providers which host, store, manage and maintain the Soundtrap application, its content and the data we process. These third parties will have access to certain data about you, but only where this is necessary in order for those third parties to provide their services to us.
<b>Marketing Partners</b>	We may share personal data with certain marketing and advertising partners to promote our Service and to send you marketing communications about Soundtrap. Our marketing partners may help us to serve ads to you by combining this information with data which they have collected about you elsewhere.
<b>Statistical Analysis Platform</b>	We may aggregate your personal data with similar data relating to other users of the Platform in order to create statistical information regarding the Platform and its use, which we may then share with third parties or make publicly available. However, none of this information would include any email address or other contact information, or anything that could be used to identify you individually, either online or in real life.
<b>Other Spotify Group Companies</b>	We will share your personal data with other Spotify Group companies to carry out our daily business operations and to enable us to maintain and provide the Soundtrap Service to you.
<b>Law Enforcement and Data Protection Authorities</b>	We will disclose your personal data 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 your personal data 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 Platform and/or the Soundtrap community.
<b>Purchasers of our business</b>	We may transfer your personal data 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, provided that such person or company be bound by the Soundtrap Privacy Policy or terms substantially similar.
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## 7. Choice and control

We do our best to give you as much choice as possible regarding the amount of personal data you provide to us, and the control you have over that data.

It is not necessary for you to provide us with any data in order to visit the Website, although certain data will be collected automatically by virtue of your visit (as described above). However, if you do decide to register a Soundtrap account, you can control your personal data through Soundtrap privacy settings. This enables you to control, among other things, which email notifications (if any) you would like to receive from us.

## 8. Data retention and deletion

We keep your personal data only as long as necessary to provide you with the Soundtrap Platform and for legitimate and essential business purposes, such as maintaining the performance of the Soundtrap Platform, making data-driven business decisions about new features and offerings, complying with our legal obligations, and resolving disputes. We keep some of your personal data for as long as you are a user of the Soundtrap Platform.

If you request, we will delete or anonymise your personal data so that it no longer identifies you, unless we are legally allowed or required to maintain certain personal data, including situations such as the following:

- If there is an unresolved issue relating to your account, such as an outstanding credit on your account or an unresolved claim or dispute, we will retain the necessary personal data until the issue is resolved;
- Where we are required to retain the personal data for our legal, tax, audit and accounting obligations, we will retain the necessary personal data for the period required by applicable law; and/or,
- Where necessary for our legitimate business interests, such as fraud prevention or to maintain the security of our users.

You can always delete your account by contacting us at [support@soundtrap.com](mailto:support@soundtrap.com) at any time.

## 9. Transfer to other countries

Soundtrap may subcontract processing to, or share your personal data with, third parties located in countries other than your home country. Your personal data may therefore be subjected to privacy laws that are different from those in your country of residence.

Personal data collected within the European Union and Switzerland may, for example, be transferred to and processed by third parties located in a country outside of the European Union and Switzerland. In such instances Soundtrap shall ensure that the transfer of your personal data is carried out in accordance with applicable privacy laws and in particular that appropriate contractual, technical, and organisational measures are in place, such as the Standard Contractual Clauses approved by the EU Commission.

## **10. Keeping your personal data safe**

We are committed to protecting our users' personal data. We implement appropriate technical and organisational measures to help protect the security of your personal data; however, please note that no system is ever completely secure.

Your password protects your user account, so we encourage you to use a unique and strong password, limit access to your computer and browser, and log out after having used the Soundtrap Platform.

## **11. Children**

The Soundtrap Service is not directed to children under the age of 13 years except where schools oversee the child's use of the Soundtrap Education service as described below in Section 12 "Soundtrap Education". However, in some countries, different and potentially more strict age limits may apply under local law. Please see our [Terms and Conditions of Use](#) for further details.

We do not knowingly collect personal data from children under 13 years or under the applicable age limit (the "Age Limit"). If you are a parent of a child under the Age Limit and become aware that your child has provided personal data to Soundtrap outside of the Soundtrap Education service, please contact us as described in Section 14 "How to contact us".

If we learn that we have collected the personal data of a child under the age of 13 years, we will take reasonable steps to delete the personal data. For information about your child's use of Soundtrap Education, please see Section 12 "Soundtrap Education" below.

## **12. Soundtrap Education**

If you are a student or teacher using the Soundtrap Education service, your school acts as a data controller of your personal data and Soundtrap processes the data on the school's behalf. If you have any questions about how we collect personal data in schools or your child's rights and how to exercise them, please contact your school. For a general description of how Soundtrap Education processes student data on a school's behalf, please visit our [Education Privacy Notice](#). If you still have questions or concerns after contacting your school, please contact us as described in Section 14 "How to contact us".

## 13. Changes to this Privacy Policy

We may occasionally make changes to this Policy.

When we make material changes to this Policy, we'll provide you with prominent notice as appropriate under the circumstances, e.g., by displaying a notice within the Soundtrap Service or by sending you an email. We may notify you in advance.

Please therefore make sure you read any such notice carefully.

If you want to find out more about this Policy and how Soundtrap uses your personal data, please contact [privacy@soundtrap.com](mailto:privacy@soundtrap.com) to find out more.

## 14. How to contact us

Thank you for reading our Privacy Policy. If you have questions about this Policy, please contact [privacy@soundtrap.com](mailto:privacy@soundtrap.com) or by writing to us at the address indicated below.

Spotify Inc is the data controller for the purposes of the personal data processed under this Policy if you are based in the US.

**Spotify USA Inc.**

**4 World Trade Center, 150 Greenwich Street, 62nd Floor, New York, NY 10007  
USA**

Spotify AB is the data controller for the purposes of the personal data processed under this Policy if you are based in any other country.

**Spotify AB**

**Regeringsgatan 19, SE-111 53 Stockholm**

**Sweden**  
**SE556703748501**

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