

Soundtrap® Privacy Policy

Welcome to Soundtrap®, a service provided by Spotify (“Soundtrap®”, “we” “our”, “us”).

Your privacy is important to us. This Privacy Policy explains how we collect, store, use and disclose your personal information when you use 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 “Services”).

This Privacy Policy explains the following, amongst other things:

- Our principles with respect to your data and your privacy
- The information we collect about you
- How we use your personal information
- How we share your personal information
- How we use cookies and similar technology
- Your choices with respect to your personal information
- How to contact us regarding privacy issues

By using the Website, the Apps or any of the Services, and in particular by registering a Soundtrap® account, you are consenting to the use of your personal information in the manner set out in this Privacy Policy.

For your convenience, information relating to our use of cookies and similar technologies is set out in a separate Cookies Policy. The Cookies Policy forms part of this Privacy Policy, and whenever we refer to the Privacy Policy, we are referring to the Privacy Policy incorporating the Cookies Policy.

Please take some time to read this Privacy Policy (including the Cookies Policy), and make sure you are happy with our use and disclosure of your personal information.

If you do not agree to any of the provisions of this Privacy Policy, you should not use the Website, the Apps or any of the Services. If you have any questions or concerns, you can contact us at privacy@soundtrap.com.

Please note that this Privacy Policy only applies to the Website, the Apps and the Services (together, the “Platform”). When using the Platform, you may find links to other websites, apps and services, or tools that enable you to share information with other websites, apps and services. Soundtrap® is not responsible for the privacy practices of these other websites, apps and services and we recommend

that you review the privacy policies of each of these websites, apps or services before connecting your Soundtrap® account or sharing any personal information.

Our Principles

We have a pretty simple approach to data protection and privacy, which can be summarized as follows:

You should know exactly what we do with your data

This Privacy Policy is designed to give you full transparency regarding our data protection practices. If there's anything that's not clear from this Privacy Policy, please feel free to email us at [privacy\[at\]soundtrap.com](mailto:privacy[at]soundtrap.com).

You should have full control over your data

We've designed the Website to give you control over the information you publish and share using Soundtrap® and other sites and services to which you connect your Soundtrap® account. Please take full advantage of these tools and make sure you only share what you want to share.

Fundamentals on personal data protection

Protecting the security and privacy of your personal data is essential to us; therefore, we are always working on upholding compliance with applicable laws on data protection and data security, including but not limited to the European Data Protection Directive 95/46/EC and relevant US federal and State laws that may apply to the receipt, storing, maintenance or access to personal information.

Soundtrap is a company established in the European Union. In order to ensure that your personal data is only transferred to and stored in third countries with an adequate level of data protection we have entered into separate agreements with our storage partner Google, adopting the European Commissions' standard contractual clauses for the transfer of personal data to processors established in third countries under Directive 95/46/EC. In addition to upholding European standards on personal data Handling, Google has ensured that it adheres to US-EU Safe Harbour Framework and the US-Swiss Safe Harbour Framework as set forth by the US Department of Commerce regarding the collection, use and retention of personal information from European Union member countries and Switzerland. The above mentioned safeguards are intended to ensure that your personal data is given an adequate level of protection irrespectively of where it is being stored/handled.

A further description of the purposes for which Soundtrap may collect and handle your personal data

can be found below. Since your personal data can be stored on many different locations, please note that it may be subject to privacy laws that are different from those in your country of residence.

Information we collect about you

Depending on how you use the Services and what plan you sign up for, you may be required to provide certain personal information from various sources:

- **Information provided by you**

You don't need to provide us with any personal information in order to visit the Website. However, certain Services do require that you register for a Soundtrap® account and, by doing so, you will provide us with certain personal information. The personal information required for registration may vary depending on the type of Service that you use.

- **Essential Information:** When you register any kind of Soundtrap® account, you will need to provide your email address and choose a password. In addition, if you register a premium account, you will also need to provide your real name, address and payment verification information.
- **Profile Information:** You may choose, at your discretion, to provide additional information for your public profile on Soundtrap® – for example:
 - your real name
 - a user name (which may be your real name or a pseudonym)
 - the city and country in which you live
 - a profile picture or avatar
 - information about how you categorize yourself with respect to your content (for example, whether you are 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

None of this profile information is mandatory, and any information you do provide may be deleted, edited, changed or amended by you at any time. For more information, see the Choice and Control section below.

- Information from Correspondence: You will provide certain personal information if you contact us by email, use any of the web forms on the Website, or contact us by mail, fax or other offline means.
- Survey Information: If you participate in any survey, you will provide certain personal information as part of your response, unless you respond anonymously.
- Information that you post: You may provide personal information when you upload sounds to the Platform, or when you post comments, or contribute to community discussions.

● Information we collect automatically

There is certain information that we collect automatically as the result of your use of the Platform, or through the use of web analytics services as described in our Cookies Policy. This information includes:

- the Internet Protocol (IP) address of the device from which you access the Platform (this can sometimes be used to derive the country or city from which you are accessing the Platform)
- the site that you visited immediately prior to visiting the Website
- the specific actions that you take on the Platform, including the pages that you visit, streaming or downloading sounds, uploading or recording sounds, connecting your 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 you may enter on the Website
- the time, frequency and duration of your visits to the Platform
- your browser type and operating system
- the nature of the device from which you are accessing the Platform, for example, whether you are accessing the Platform from a personal computer or from a mobile device
- information collected through cookies and similar technology, as described in our

Cookies Policy

- information regarding your interaction with email messages, for example, whether you opened, clicked on, or forwarded the email message

● Information from Other Sources

Facebook

Soundtrap® allows you to sign up and log in using your Facebook account. If you sign up using Facebook, Facebook will ask your permission to share certain information from your Facebook account with Soundtrap®. This includes your first name, last name, gender, general location, a link to your Facebook profile, your timezone, birthday, profile picture, your "likes" and your list of friends.

This information is collected by Facebook and is provided to us under the terms of [Facebook's privacy policy](#). You can control the information that we receive from Facebook using the privacy settings in your Facebook account.

If you sign up to Soundtrap® using Facebook, your Soundtrap® account will be connected automatically to your Facebook account, and information regarding your activity on Soundtrap®, specifically any new public sounds that you post on Soundtrap® and any new favourites, will be shared with Facebook and will be published in your timeline and your Facebook friends' newsfeeds. If you do not wish to share your Soundtrap® activity with your Facebook friends, you can control this from the Settings page on the Website – for more information, see the Choice and Control section below. If you signed up using Facebook by mistake, you can delete your account from the Account page within your Settings at any time, or you can email us at privacy@soundtrap.com.

Google+ You can sign up and log in to Soundtrap® using your Google+ account. When you sign up using Google+, Google will ask your permission to share certain information from your Google+ account with Soundtrap®. This includes your first name, last name, a link to your Google+ profile, your profile picture, and your list of friends. This information is collected by Google and is provided to us under the terms of [Google's privacy policy](#).

If you sign up to Soundtrap® using Google+, by default information regarding your activity on Soundtrap® will be visible on Google to everyone in your Google+ circles and shared with Google according to [Google's terms of service](#) and [Google's privacy policy](#). For more information on how to manage the activities you share back to your Google+ account, see [Google's support page](#). You can manage who from your Google+ circles sees your Soundtrap® activity from within your Google+ App settings page. If you want to control the

type of Soundtrap® activity that is shared with your Google+ circles, you can do this from the settings page of your Soundtrap® account under the “Connections” tab.

If you signed up to Soundtrap® using Google+ by mistake, you can delete your account from the account page within your settings at any time, or you can email us at [privacy\[at\]soundtrap.com](mailto:privacy[at]soundtrap.com).

Microsoft 365 You can sign up and log in to Soundtrap® using your Microsoft 365 account. When you sign up using Microsoft 365, Microsoft will ask your permission to share certain information from your Microsoft 365 account with Soundtrap®. [This includes your first name, last name, a link to your Microsoft 365 profile, your profile picture, and your list of friends. This information is collected by Microsoft and is provided to us under the terms of [Microsoft's privacy policy](#).

If you sign up to Soundtrap® using Microsoft 365, by default information regarding your activity on Soundtrap® will be visible on Microsoft to everyone in your Microsoft 365 circles and shared with Microsoft according to [Microsoft's terms of service](#) and [Microsoft's privacy policy](#). For more information on how to manage the activities you share back to your Microsoft 365 account, see [Microsoft's support page](#). You can manage who from your Microsoft 365 circles sees your Soundtrap® activity from within your Microsoft 365 App settings page. If you want to control the type of Soundtrap® activity that is shared with your Microsoft 365 circles, you can do this from the settings page of your Soundtrap® account under the “Connections” tab.

If you signed up to Soundtrap® using Microsoft 365 by mistake, you can delete your account from the account page within your settings at any time, or you can email us at [privacy\[at\]soundtrap.com](mailto:privacy[at]soundtrap.com).

How we use your personal information

We use the information that we collect about you for the following purposes:

- Your email address and password are used to identify you when you log into the Platform.
- Any additional information that you provide as part of your public profile, such as your real name, and links to your website and other social media profiles (but not your email address), will be published on your profile page. This information will be publicly accessible and may be viewed by anyone accessing the Website, or using our API or

other Services. Please bear this in mind when considering whether to provide any additional information about yourself.

- If you subscribe to a premium account, your name, address and payment verification information will be used to process your account subscription and to collect your payment. All payment verification information is transmitted using industry-standard SSL (Secure Socket Layer) encryption. Soundtrap® also complies with the Payment Card Industry Security Standards.
- Your email address will be used to send you service updates and notifications regarding your account, and (if you have elected to receive them using your account preferences) newsletters, marketing messages (except if You are a student under an Educational Plan) and certain email notifications. For information about how to change your preferences, and to unsubscribe from newsletters, marketing messages and email notifications, please see the Choice and Control section, below.
- If you are a Facebook user, and one of your Facebook friends registers for a Soundtrap® account, we will suggest to your Facebook friend that you might be someone they may wish to follow on Soundtrap®.
- If you are a Facebook user and sign up using Facebook, we may also use the information we receive about you from Facebook to suggest or connect you to users that you may wish to follow on Soundtrap®. It will be up to you if you choose to follow these users and you can unfollow them at any time.
- If you are a Google+ user, and one of your Google+ friends registers for a Soundtrap® account, we will suggest to your Google+ friend that you might be someone they may wish to follow on Soundtrap®.
- If you are a Google+ user and sign up using Google+, we may also use the information we receive about you from Google to suggest or connect you to users that you may wish to follow on Soundtrap®. It will be up to you if you choose to follow these users and you can unfollow them at any time.
- If you are a Microsoft 365 user, and one of your Microsoft 365 friends registers for a Soundtrap® account, we will suggest to your Microsoft 365 friend that you might be someone they may wish to follow on Soundtrap®.
- If you are a Microsoft 365 user and sign up using Microsoft 365, we may also use the information we receive about you from Microsoft to suggest or connect you to users that you may wish to follow on Soundtrap®. It will be up to you if you choose to follow these users and you can unfollow them at any time.

Your personal information is also used for the following general purposes:

- To operate and maintain your Soundtrap® account, and to provide you with access to the Website and use of the Apps and any Services that you may request from time to time.
- To identify you as the creator of the sounds that you upload, the comments that you post and/or the other contributions that you make to the Platform.
- To seek your participation in surveys, and to conduct and analyze the results of those surveys if you choose to participate.
- To provide you with technical support
- To provide other users with data regarding people streaming and downloading their sounds.
- To analyze the use of the Platform, and the people visiting the Website and using the Apps and Services, in order to improve Soundtrap®.
- To enable you to communicate with other users of the Platform.
- To respond to you about any comment or enquiry you have submitted.
- To customize your use of the Platform and/or the content of any email newsletter or other material that we may send to you from time to time.
- To prevent or take action against activities that are, or may be, in breach of our Terms of Use, Community Guidelines or applicable law.
- For other purposes, provided we disclose this to you at the relevant time, and provided that you agree to the proposed use of your personal information.

Sharing of your personal information

We will not share your personal information with any third party, except as described in this Privacy Policy (including our Cookies Policy). There are circumstances where we may need to share some of the personal information we collect about you or which you provide to us - these circumstances are as follows:

- Other Users: Any personal information in your public profile (other than your email address) will be accessible by other users of the Platform, who may view your profile information, 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.

- With your consent: We will disclose your personal information if you have explicitly agreed that we may do so. We will make this clear to you at the point at which we collect your information.
- Service Providers: 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 Platform. 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. Where we transfer personal information to these third parties, we ask and require these third parties to implement appropriate organizational and technical security measures to protect against unauthorized disclosure of personal information, and only to process personal information in accordance with our instructions and to the extent necessary to provide their services to us.
- Users of our API: Soundtrap® has an open API, which enables application developers to integrate elements of the Platform into exciting new apps. Some of these developers may be located outside of the European Economic Area. Any personal information that you choose to make public on the Platform, including your public profile information and any public sounds, may be accessible to these developers. Please bear this in mind when deciding what information to publish on your profile. For information on how to limit the information that is available over the API, please see the Choice and Control section below.
- Other networks and connected apps: If you choose to connect your Soundtrap® account to other apps or social networks such as Facebook, Google+, Microsoft 365 Tumblr or Twitter, you will be sharing certain information with these apps or networks. In the case of Facebook, Google+, Microsoft 365, Tumblr or Twitter, any new public sounds that you post or listen to on Soundtrap® or any new favorites will be shared to those networks and will be visible to your followers and friends on those networks. In the case of connected apps, you will need to provide the app developer with full access to your Soundtrap® account in order to upload and download sounds, or comment on, favorite or repost sounds from within the app. This will mean sharing your public information, plus access to your private sounds. Soundtrap® is not responsible for these other apps or networks, so please make sure you only connect your account with apps or services that you trust. For information on how to control the information that you share, and how to disconnect your account from other networks or apps, please see the Choice and Control section below.
- As aggregated data: 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.
- If required by law: We will disclose your 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.

- To protect our interests: We may disclose your 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 Platform and/or the Soundtrap® community.
- In the context of a business transfer: We may transfer your 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, provided that such person or company be bound by the Soundtrap® Privacy Policy or terms substantially similar.

Cookies and similar technology

In common with most websites, we use cookies and other standard Internet technologies to help us improve the Website and the Apps and Services we provide. We have included information about our use of cookies and similar technology in a separate Cookies Policy that forms part of this Privacy Policy. The Cookies Policy also includes information about how you can block or disable third party cookies (which we only use for the purposes of analyzing the use of our Platform and optimizing the content on our Platform), and how to opt out of other technologies such as bug reporting within our mobile apps.

We have done our best to provide you with as much information as possible about our use of cookies and similar technology. If you choose to use the Platform without blocking or disabling these cookies or opting out of other technologies as described in our Cookies Policy, you will indicate your consent to our use of these technologies and to our use (in accordance with this Privacy Policy and our Cookies Policy) of any personal information that we collect using these technologies.

Choice and Control

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

It is not necessary for you to provide us with any information in order to visit the Website, although certain information 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 information in the following ways.

Email preferences

Check out the Email tab within your Account settings page on the Website. When you are logged in to your account, you can access your Settings by clicking on the cog wheel at the top of the screen, and

selecting Account settings from the drop down menu.

From the email tab you can tell us:

- which email notifications (if any) you would like to receive from us; and
- any additional or alternative email addresses that you may wish us to use to communicate with you.

You can also turn off email notifications from the Account page within your Settings.

This will immediately disable all email notifications, other than essential account notifications such as important service updates, reports of copyright infringement and other essential information relating to your account and your use of the Platform.

It is also possible to unsubscribe from email newsletters and notifications (other than essential account notifications) at any time by clicking on the link at the end of each email.

Sharing with other apps and networks

The Connections tab within your Settings on the Website enables you to control the information you share with other networks and applications. As well as selecting those of your social networks you wish to share to, you can also control access to other services and applications to which you have connected your Soundtrap® account.

If you sign up for Soundtrap® using your Facebook, Google+ or Microsoft 365 account, your Soundtrap® account and your Facebook, Google+ or Microsoft 365 account respectively will be connected automatically. Information regarding the public sounds that you post, listen or favorite on Soundtrap® will be shared with the connected Facebook, Google+ or Microsoft 365 account. Content that you share with Facebook will appear on your timeline and in your Facebook friends' newsfeeds. Content you share with Google will be seen by the people from your Google+ circles when they visit your Google+ profile, make relevant Google searches, on Google-served ads, and the services selected in your Google account settings. If you do not want this information shared with Facebook or Google, please change your Settings.

Please note that this Privacy Policy does not apply to any third party sites or applications, and we cannot control the activities of those sites or applications. You are advised to read the privacy policies of those sites or applications before sharing your information with, or connecting your Soundtrap® account to, any of these third party sites or applications.

Sharing with other users

Soundtrap® is a very social place, but if you would prefer to browse the Website anonymously, you can do so by checking the Anonymous Listening box in the Account tab within your Settings on the Website. By checking this box, other users will not be able to see the sounds that you listened to, but we will still have access to this information.

If any of your sounds contain any personal information, you can control who has access to these sounds using the settings in the sound page (click on the pencil icon in the waveform player for the relevant sounds). By setting your sounds to “private”, rather than “public”, you can limit who has access to your sounds.

Sharing with app developers

Soundtrap® has an open API, which allows third party developers to build some really cool apps as an extension of the Platform. If you would prefer that your sounds are not made available to third party app developers, you can disable API access within the sound page for each of the sounds that you upload. Click on the pencil icon in the waveform player, and uncheck the “Apps enabled” box at the bottom of the page. Please note that your public profile information will still be accessible, but this does not include anything that is not publicly available on the Website.

Cookies

Information on how to block or disable cookies is included in our Cookies Policy. Further information is available at <http://aboutcookies.org>

App preferences

You can use the settings within our iOS device or within the Android app to opt-out of analytics tracking and bug reporting. For the opt-out, if you are using our iOS app, go to the settings of your iOS device and open the Soundtrap® tab. With an Android device you need to open the Soundtrap® app and open the basic settings tab within. From there you can simply disable analytics and/or bug reporting to stop any analytics data or bug reporting information being sent from the app. Further information is available in our Cookies Policy.

Deleting your account

You can delete your account from the Account page within your Settings on the Website at any time. Please bear in mind that, if you delete your account, all data associated with your account, including the sounds that you have uploaded and the usage data associated with those sounds, will be deleted and may not be recoverable. You are therefore advised to copy or back up all content uploaded to your account before you delete your account.

Even if you delete your Soundtrap® account, it is possible that your information may still show up in some internet search results for a short while afterwards, if the search engine maintains a temporary cache of web pages. Search engines' caching processes are outside of Soundtrap®'s control and therefore we cannot be responsible for any information that remains cached by search engines after that information has been removed from the Platform.

Please note that deleting any Soundtrap® Apps, or any third party apps to which your Soundtrap® account is connected, will not delete your Soundtrap® account. If you wish to delete your account, you will need to do so from the Account tab in your Settings on the Website. Similarly, if you delete a third party app that is connected to your Soundtrap® account over our API, this will not necessarily delete all data from within that third party app. You will need to refer to the app provider's terms of use and privacy policy to find out how to delete your data from that third party app.

Access to your Data

As described above, most of the personal information you provide to us can be accessed and updated in the Settings page of your Soundtrap® account. If you wish to access, amend or delete any other personal information we hold about you, or if you have any objection to the processing of any information that we hold about you, please contact us at privacy@soundtrap.com, or the address provided below.

If you ask us to delete your account (either via the Settings page or by email), we will do so within a reasonable period of time, but we may need to retain some of your personal information in order to satisfy our legal obligations, or where we have a legitimate reason for doing so.

International data transfers

Soundtrap® is based in Europe, and your personal information is collected, stored, used and shared in accordance with European laws. However, from time to time, it may be necessary for us to transfer your personal data to the US. You should be aware that privacy laws in the US may not be equivalent to the laws in your country, and by using the Platform, you consent to the transfer, storage and processing of your personal information in the US in accordance with this Privacy Policy and

applicable law.

Our policy toward children under the age of 13

In compliance with the Children's Online Privacy Protection Act ("COPPA"), the Platform is not intended for use if you are under 13 years of age unless you are using the

Platform as a part of your school's Educational Plan and the consent of your parent or legal guardian has been obtained by your school as described below.

We are required under COPPA, with limited exceptions, to obtain verifiable parental consent in order to collect, use, or disclose personal information from you, if you are under 13 years of age (a "Child"). COPPA allows your school to obtain consent for the online collection of personal information from you and other children who are students at your school. If you are a Child who wants to use our Educational Plan, you must first obtain an account from your school.

Before an Educational Plan account is provided to a school, we require that the school (a) obtains verifiable parental consent with regard to every Child that will use the Platform, (b) consents (on behalf of the parents/legal guardians) to the collection, use and disclosure of personal information of the Child, through the Platform, in accordance with this Privacy Policy and the consent form available at <https://www.soundtrap.com/edu/consent/> and (c) agrees (on behalf of the parents/legal guardians) that the Child's online activities are subject to the Terms of Use. Soundtrap hereby provides You with the Direct Notice as set forth at https://www.soundtrap.com/public/legal/coppa_direct_notice.pdf in accordance with COPPA. As required under COPPA, we allow parents/legal guardians certain choices regarding the personal information submitted by their children. Parents/legal guardians should make any permitted requests with the school and have the school, as the parent's/legal guardian's agent, pass on those requests to Soundtrap. We may rely on the instructions that we receive from the school that we reasonably believe are given by a Child's parent to the school. For example, if a representative from the Child's school contacts us and provides the account information we request, we may assume that the person calling is acting on behalf of the Child's parent.

We provide parents/legal guardians the following choices with respect to the collection, use, retention and disclosure of personal information. A Child's registration information is always accessible to him/her. A parent/legal guardian has the right to review his/her Child's personal information, which the parent can obtain by contacting his/her Child's school. After reviewing the Child's personal information, the parent/legal guardian may ask us to update or delete the Child's personal information by requesting such changes through the Child's school.

If a parent/legal guardian chooses to prohibit any future collection, use or disclosure of the Child's personal information, the parent/legal guardian may do so by terminating the Child's account through the school, and requesting the deletion of the Child's personal information through the school. Upon receiving such request from the Child's school, we will delete the Child's account information from our live databases and all the information and data stored for such account. Company will not have any liability whatsoever for any termination of the account or related deletion of the Child's personal

information. When we delete personal information, it will be deleted from our active databases but may remain in our archives.

WARNING: any personal information that you voluntarily disclose in any recording may be collected and used by parties other than us and may result in unsolicited messages from other parties. If you believe that a Child has posted any personal information anywhere on our website, please contact us immediately at [privacy\[at\]soundtrap.com](mailto:privacy[at]soundtrap.com) and provide as much information as you can to help us locate and delete the personal information. If you post personal information in any recording, we have no control over this use of your personal information and, as such, cannot be responsible for it. We reserve the right, but not the obligation, to: (a) delete any personal information we discover or which is brought to our attention, at any time, for any reason whatsoever; (b) immediately terminate your account and/or (c) contact your parents regarding the recording.

Our policy on student data

We acknowledge that the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g (FERPA) primarily applies to schools that receive funding from the U.S. Department of Education and that Soundtrap thus will be indirectly affected by the FERPA regulatory framework when providing services to educational institutions in the US.

As required of such schools under FERPA, as an administrator or teacher under an Educational Plan, You agree that You have obtained valid student and parental consent to disclose personally identifiable information to us.

Soundtrap makes the following commitments to schools regulated by FERPA: Soundtrap will protect the confidentiality of any student data and/or personally identifiable information provided to us or any of our representatives. We further acknowledge that we will review and comply with all information security programs, plans, guidelines, standards and policies that apply to our work as a result of the FERPA regulatory framework and will implement and maintain any other reasonable and appropriate security procedures and practices necessary to protect personal information and/or student information from unauthorized access, destruction, use, modification, disclosure or loss.

Soundtrap specifically agrees with schools regulated by FERPA to:

- use personally identifiable student data for no purpose other than in connection with providing the Platform for a legitimate and educational interest;
- use reasonable methods, consistent with reasonable industry standards to protect student data from re-disclosure and not to share the student data received under this Agreement with any other entity without the prior written approval of the school responsible under FERPA;
- not to copy reproduce or transmit student data except as necessary to provide the Platform

in furtherance of a legitimate and educational interest ;

- notify the Chief Information Officer for the school responsible under FERPA without undue delay that it has experienced a data breach, breach of security or unauthorized acquisition or use of student data;
- to maintain sufficient backup copies of data files in case of customer system failure or any other unseen event resulting in loss of student data;
- to, upon request of the school responsible under FERPA, promptly provide the school responsible under FERPA with any specified portion of the student data; and
- to, upon request of the school responsible under FERPA, promptly return and/or erase applicable portions of the student data.

Changes and Updates to this Privacy Policy

Occasionally we may, in our discretion, make changes to the Privacy Policy. If we make material changes to the Privacy Policy , we'll provide you with prominent notice as appropriate under the circumstances, either by sending you an email prior to the implementation of the altered terms or by asking for your explicit approval to the updated terms and conditions within the Services. In case prominent notice is provided to you in the form of an email, your continued use of the Services after the changes have been made will constitute your acceptance of the changes. Please therefore make sure you read any such notice carefully. If you do not wish to continue using the Services under the new version of the Privacy Policy, you may revoke your acceptance hereto by contacting us at privacy@soundtrap.com, or write to us at the address set out below.

Questions?

If you have questions about this Privacy Policy, want to suggest changes to this Privacy Policy or want to know, what information we store about you, please contact us by email at privacy@soundtrap.com, or write to us at:

Spotify USA Inc.
45 West 18th Street 7th floor, New York
New York 10011
USA
office@spotify.com
© Spotify USA Inc.

Don't want to give us your information?

If you decide that you do not want us to use your personal information in the manner described in the Privacy Policy (including our Cookies Policy), please do not use the Platform. If you have already registered an account, you can find out how to terminate or cancel your account on our website FAQ page.