

Soundtrap Privacy Policy

Effective as of 25 May 2018

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 Spotify AB ("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 "Services"). This Policy applies to all our users. For users located in the US, additional provisions apply. Please see <https://www.soundtrap.com/legal/>.

If you are a student using the service Soundtrap® Education this Privacy Policy does not apply to you. For information on how and why your personal data is being collected, stored, shared, and used – please contact your school. They are the data controller of personal data processed when using Soundtrap® Education.

Please note that this Policy only applies to the Website, the Apps and the Services (together, the "Platform"). When using the Soundtrap® Platform, you may find links to other websites, apps and services, or tools that enable you to share personal data 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 data.

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. The Cookie Policy also includes information about how you can block or disable third party cookies (which we only use for the purpose of analyzing the use of our Platform and optimising the content on our Platform).

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

Our principles

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

- **You should know exactly what we do with your data** - This Policy is designed to give you full transparency regarding our data protection practices. If there's anything that's not clear from this Policy, please feel free to email us at privacy@soundtrap.com.
- **You should have full control over your data** - We've designed the Website to give you control over the data 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.

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 the 'How to Contact Us', Chapter 13 below.

If you decide that you do not want us to use your personal data in the manner described in the Policy (including our Cookies Policy), please do not use the Platform. If you have already registered an account, contact support@soundtrap.com to delete your account.

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

You may be aware that a new European Union law, called 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 Chapter 8, 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. 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. How do we collect your personal data?

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

1. **Personal data provided by you** - You don't need to provide us with any data 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 data. The personal data required for registration may vary depending on the type of Service that you use.

2. **Personal data we collect automatically** – There is certain data that we collect automatically as a result of your use of the Platform, or through the use of web analytics services as described in our Cookies Policy.
3. **Personal data from third parties** - We will receive personal data about you from third parties in order to provide you with the Soundtrap® Service. We will use this personal data either where you have provided your consent to the third party or to Soundtrap® to that data sharing taking place or where Soundtrap® has a legitimate interest to use the personal data in order to provide you with the Soundtrap® Service.

5. What personal data do we collect from you?

We have set out in the tables below the categories of personal data we collect and use about you. You can learn more about how to control which data you share with us in Chapter 8, Choice and Control and on the Settings page on the Website.

Personal data provided by you

Categories of personal data	Description of category
Essential Data	When you register any kind of Soundtrap® account, you will need to provide your email address, age, country and choose a password.
Premium Essential Data	If you register a premium account, you will also need to provide your real name, age, country, address and payment verification information.
Profile Data	<p>You may choose, at your discretion, to provide additional data for your public profile on Soundtrap® – for example:</p> <ul style="list-style-type: none"> ● your real name ● a user name (which may be your real name or a pseudonym) ● the city in which you live ● a profile picture or avatar ● data on how you categorise 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 <p>None of this profile data is mandatory, and any data you do provide may be deleted, edited, changed or amended by you at any time.</p>

Correspondence Data	You will provide certain personal data 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 Data	If you participate in any survey, you will provide certain personal data as part of your response, unless you respond anonymously.
Data that you post	You may provide personal data when you upload sounds to the Platform, or when you post comments, or contribute to community discussions.

Personal data collected automatically

Categories of personal data	Description of category
Soundtrap® Platform Usage Data	<p>This is the personal data that is collected about you when you are using the Soundtrap® Platform. This includes:</p> <ul style="list-style-type: none"> ● 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 ● data collected through cookies and similar technology, as described in our Cookies Policy ● data regarding your interaction with email messages, for example, whether you opened, clicked on, or forwarded the email message

Personal data collected from third parties

Categories of personal data	Description of category
Data from Facebook	<p>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 data from your Facebook account with Soundtrap®. This includes your email, first name, last name, gender, general location, a link to your Facebook profile, birthday, profile picture and your list of friends.</p> <p>This data is collected by Facebook and is provided to us under the terms of Facebook's privacy policy. You can control the data that we receive from Facebook using the privacy settings in your Facebook account.</p> <p>If you sign up to Soundtrap® using Facebook, your Soundtrap® account will be connected automatically to your Facebook account.</p>
Data from Google	<p>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 data from your Google account with Soundtrap®. This includes your email, first name, last name, a link to your + profile and your profile picture. This data is collected by Google and is provided to us under the terms of Google's privacy policy.</p>
Data from Microsoft 365	<p>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 data from your Microsoft 365 account with Soundtrap®. This includes your email, first name, last name, a link to your Microsoft 365 profile and your profile picture. This data is collected by Microsoft and is provided to us under the terms of Microsoft's privacy policy.</p>

6. What do we use your personal data for?

When you use or interact with the Soundtrap® Platform, we process the personal data we collect about you for various reasons. These reasons include: to identify you when you log in to the Platform, to operate and maintain your Soundtrap® account, to process your account subscription and collect your payment, 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 enable you to communicate with other users of the Platform, to send you service updates and notifications regarding your account, to send you newsletter (if you have consented

to it in your privacy settings), to provide you with technical support, and to analyse the use of the Platform, and the people visiting the Website and using the Apps and Services in order to improve Soundtrap®.

The legal basis for Soundtrap®'s processing of personal data is performance of contract, consent and legitimate interest.

7. 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 Services.

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 that your share, please see Chapter 8, Choice and Control below.

Categories of recipients	Reason for sharing
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

	<p>developers may be located outside of the European Economic Area. Any personal data that you choose to make public on the Platform, including your public profile data and any public sounds, may be accessible to these developers. Please bear this in mind when deciding what data to publish on your profile.</p>
<p>Other networks and connected apps</p>	<p>If you choose to connect your Soundtrap® account to other apps or social networks such as Facebook, Google+, Microsoft 365, Tumblr, Twitter, SoundCloud, Youtube, Spinnup, or Allihoopa you will be sharing certain data with these apps or networks.</p>

Personal data we may share

Categories of recipients	Reason for sharing
<p>Service Providers</p>	<p>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 data about you, but only where this is necessary in order for those third parties to provide their services to us. Where we transfer personal data 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 data, and only to process personal data in accordance with our instructions and to the extent necessary to provide their services to us.</p>
<p>Statistical Analysis Platform</p>	<p>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.</p>
<p>Law Enforcement and Data Protection Authorities</p>	<p>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.</p> <p>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.</p>
<p>Purchasers of</p>	<p>We may transfer your personal data to any person or company that</p>

our business	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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8. 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.

9. 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 at any time.

10. 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.

11. 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.

12. 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 to find out more.

13. How to contact us

Thank you for reading our Privacy Policy. If you have questions about this Policy, please contact privacy@soundtrap.com or by writing to us at the following address:

Spotify AB
Regeringsgatan 19, SE-111 53 Stockholm
Sweden
SE556703748501

Spotify AB is the data controller for the purposes of the personal data processed under this Policy.

We hope you enjoy Soundtrap®!
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