

PRIVACY POLICY

We are committed to protecting your privacy, and we take our responsibilities regarding the security of user and customer information very seriously. This policy explains how we use user and customer information and how we protect your privacy.

Please read this policy carefully, as we will ask you to give your express agreement to the terms of it (for example, by ticking the appropriate box on our mobile or desktop application).

1. Introduction

- 1.1 In this policy, "we", "us" and "our" refer to ACAUDIO TECHNOLOGY LTD (UK Company number: 13281040) with registered office at 4 1-4 Mackintosh Lane, London, United Kingdom, E9 6AB (who operates the website at acaudio.com).
- 1.2 You can contact us by emailing us at hello@acaudio.com.

2. Amendments

- 2.1 We may update this policy from time to time by publishing a new version on our application or on our website.
- 2.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 2.3 We may notify you of any significant changes to this policy via our application, by email or using any other contact details we hold for you.

3. How we use your personal data

- 3.1 In this Section 3 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (c) the legal bases of the processing.
- 3.2 We may process data about your use of our application and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and navigation paths, as well as information about the timing, frequency and pattern of your service

use. This usage data may be processed for the purposes of analysing the use of our application and services.

- 3.3 We may process your account data ("account data"). The account data may include your name, email address and preferences. The account data may be processed for the purposes of operating our application, providing our services, ensuring the security of our application and services, maintaining back-ups of our databases and communicating with you.
- 3.4 We may process your personal data that are provided in the course of you using our services ("personal data"). The personal data may include data regarding your contact details, including name, address, email address, profession, date of birth and any other personal data which can be extracted from any information or data you provide to us, or which we obtain from your use of our application and services. Personal data may be used for contacting you in relation to your contract with us or for marketing purposes. The legal basis for this processing will be express consent hereby given.
- 3.5 We may process information contained in any enquiry you submit to us regarding our services ("enquiry data"). The enquiry data may be processed for the purposes of offering, marketing and selling services to you. The legal basis for this processing will be consent.
- 3.6 We may process information relating to transactions, including purchases of goods or services, which you enter into with us and/or through our application ("transaction data"). The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions; and in our marketing, including email marketing and push notifications.
- 3.7 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.8 We may process any of your personal data identified in this policy, for the following reasons, which provide the legal basis for the processing:
 - (a) where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice - the legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks;
 - (b) the proper administration of our application and business, and/or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.9 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject.

4. Providing your personal data to others

4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy. We may also disclose your personal data to any other users of our services where you agree to this, or where this is a part of the normal access by those users of content which you upload to our application.

4.2 We may disclose your personal data to our insurers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4.3 Financial transactions relating to our application and services may be handled and held securely by our third party payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

4.4 We may receive and disclose your personal data to third parties for the purposes of supplying services to you.

4.5 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4.6 The personal data we collect from you may be transferred to, or stored at, a destination outside of the European Economic Area (EEA). It may also be processed by persons operating outside the EEA who work for us or a third party engaged by us. By submitting your personal information to us, you agree to such transfer, storing or processing.

4.7 Your data may be transferred to and stored on third party servers.

5. Retaining and deleting personal data

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 We will retain your personal data for as long as we need to, to meet any possible legal requirements and your contact details indefinitely for the purposes of marketing.
- 5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on how long we consider it is reasonable to retain such data for the purposes specified in Section 3.
- 5.5 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another person.

6. Your rights

- 6.1 In this Section 6, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included. Please seek legal advice or read the information at <https://ico.org.uk/> (the 'ICO Website'), should you wish to know more.
- 6.2 Your principal rights under data protection law are:
 - (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;
 - (d) the right to restrict processing;
 - (e) the right to object to processing;
 - (f) the right to data portability;
 - (g) the right to complain to a supervisory authority; and
 - (h) the right to withdraw consent.
- 6.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. More details can be found on the ICO Website.

- 6.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 6.5 In some circumstances you have the right to the erasure of your personal data without undue delay. However, there are exclusions of the right to erasure. More details can be found on the ICO Website.
- 6.6 In some circumstances you have the right to restrict the processing of your personal data. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent, or for other legal reasons. More details can be found on the ICO Website.
- 6.7 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 6.8 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
 - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,
- and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 6.9 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection.
- 6.10 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 6.11 You may exercise any of your rights in relation to your personal data by contacting us via any possible means on our application or via our website.

7. About cookies

- 7.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser or application. The identifier is then sent back to the server each time the browser or application requests a page from the server.

7.2 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

8. Cookies that we use

8.1 We may use cookies for the following purposes:

- (a) authentication - to identify you when you visit our application or website and as you navigate our application or website;
- (b) personalisation - to store information about your preferences and to personalise our application or website for you;
- (c) security - as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our application, website and services generally;
- (d) advertising - to help us to display advertisements that will be relevant to you;
- (e) analysis - to help us to analyse the use and performance of our application, website and services; and
- (f) cookie consent - to store your preferences in relation to the use of cookies more generally.

9. Cookies used by our service providers

9.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our application or website – such as Google Analytics and Google AdSense advertisements.

10. Managing cookies

10.1 Most browsers or devices allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from each browser or device. You can however obtain up-to-date information about blocking and deleting cookies via searching about your specific browser or device using an internet search engine.

10.2 Blocking all or some cookies may have a negative impact upon the usability of many websites or applications and you may not be able to use all the features.

11. How to contact the appropriate authority

- 11.1 Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office who enforces data protection laws – contact details on the ICO Website.