

Privacy Policy

Privacy policy for Mystery Freedom B.V.

1. Who are we and what do we offer?

We are Mystery Freedom B.V. (**Mystery Freedom**, also: **we**, **us** and **our**).

We provide Artists the opportunity to release music on Digital Streaming Platforms on one of our record labels. We facilitate this via Third Party Music Distributors. In addition, we operate three record labels called Mystery Freedom Records, Mystery Freedom Network and Mystery Freedom Entertainment.

You can access our Platform via our **Website**: [www.mysteryfreedom.com]. The use of the Website and related services collectively: our **Services**.

2. Privacy Notice

This is our Privacy Notice. In this document we explain what kind of Personal Data we collect via our Services. We also explain what role we have in the processing of Personal Data, how long we retain Personal Data and what rights you have as a data subject.

3. Personal Data and Controller

We process **Personal Data**. Personal Data means all information by which a person can be directly or indirectly identified. Under the General Data Protection Regulation (**GDPR**) we are the so-called Controller of your Personal Data, meaning we determine the purposes and means of this processing.

If you have questions about the processing of your Personal Data, you can always contact us through the contact details listed at the bottom of this Privacy Notice.

4. What Personal Data do we collect as Controller?

We will process your Personal Data of you as a Rightsholder, of you as an Investor, or if you otherwise use our Services.

If you use our Services as a Rightsholder, we may process the following Personal Data:

4.1 (Personal) Data:	4.2 Purpose(s):	4.3 Legal basis:
<i>If you activate your account on Ampsuite*:</i>	<i>We may use these data to:</i> <ul style="list-style-type: none">- Register your account;- Enable you to access your account and our Services;- Allow us to communicate with you and approach you appropriately in our communications;- Send you service updates related to your use of our	<p>We may process these data, because this is necessary to perform our contract with you – i.e. to provide our Services.</p> <p>We may send you service updates based on our legitimate interest to keep you informed about activities related to your use of our Services. It is always possible to unsubscribe from</p>

	<p>Services; and</p> <ul style="list-style-type: none"> - Flag, report and prevent misuse, fraud and threats of/regarding to our Services. <p>4.4</p>	<p>our service updates via the link at the bottom of each service update.</p> <p>We may also process (some of) these data because we have a legitimate interest to ensure a secure use of our Services.</p>
<p><i>If we upload your music for distribution*:</i></p> <ul style="list-style-type: none"> - Name of the artist(s), songwriter(s) and other contributor(s) - Your function (e.g. artist, manager or producer) - Audio files, track/album titles, covers and artwork 	<p><i>We may use these data to:</i></p> <ul style="list-style-type: none"> - Comply with your request to distribute the music to Digital Streaming Platforms; - Share the music with our Third Party Music Distributors. 	<p>We may process these data because this is necessary to perform our contract with you – i.e. to provide our Services.</p> <p>In this scope we have a legitimate interest to also process the information of various contributors to the uploaded music such as artists, songwriters and producers. We find the processing of this data is an indispensable part of our Service, as this information inextricably linked to the uploaded music (i.a. with respect to credits and copyrights).</p>
<p><i>Payment information*:</i></p> <ul style="list-style-type: none"> - [Name, e-mail address, invoicing details] 	<p><i>We use these data to:</i></p> <ul style="list-style-type: none"> - Process and administer your revenues earned from the Digital Streaming Platforms; - Maintain our list of accounts receivable and outstanding invoices; and - Include in our administration on behalf of the tax authorities. 	<p>We may process these data, because we need these Personal Data to perform our contract with you.</p> <p>4.5 We are also legally obligated to share (some of) these data with the national tax authorities.</p>

Personal Data we may process of everyone via our **Website**:

4.11 (Personal) Data:	4.12 Purpose(s):	4.13 Legal basis:
<i>Technical information:</i>	<i>We may use these data to:</i>	We may process these data

<p>Information on your device type, browser type, session date and time, IP address and browser type.</p>	<ul style="list-style-type: none"> - communicate in the same language of the browser; - adapt our Website to the used device; - enable you to use our Website; and - improve the usability of our Website. 	<p>because we have a legitimate interest to do so, i.e. to provide you with a good functioning Website and improve our Services.</p>
<p><i>If you contact us:</i> Your name, e-mail address and the content of the correspondence.</p>	<p><i>We may use these data to:</i></p> <ul style="list-style-type: none"> - answer your questions and/or handle any complaints; - support you in using our Services; and <p>improve our Services as a result of questions and feedback from you.</p>	<p>We may process these data, because we have a legitimate interest to contact and assist you based on your comment or question and to improve our Services as a result of the questions and feedback we receive.</p>
<p><i>Via our social media pages:</i> Information of visitors who leave a comment or otherwise post something on our social media pages, including the Personal Data within these comments and/or posts.</p>	<p><i>We may use these data to:</i></p> <ul style="list-style-type: none"> - contact the visitors in reply of their post and/or comment via our social media pages; and - process the feedback left on our social media pages. 	<p>We may process these Personal Data, because we have a legitimate interest to process these data and because the visitors voluntarily made public such information.</p> <p>Our social media pages are also controlled by the social medium itself. Please check their own privacy notices, to see how each social medium handles Personal Data:</p> <p>4.14 LinkedIn: Privacy Notice</p> <p>4.15 Facebook: Data Notice</p> <p>4.16 YouTube: Privacy Policy</p>
<p><i>If you subscribe to our newsletter:</i> Name, surname and e-mail address</p>	<p><i>We may use these data to:</i></p> <ul style="list-style-type: none"> - send you our newsletter and keep you informed on all our (future) Services. 	<p>We may process these data, if you gave us your consent to do so (by subscribing [via our Website]).</p> <p>We may send our users who have paid for our Services</p>

		<p>newsletters, because we have a legitimate interest to do so.</p> <p>In every newsletter there is a link via which you can unsubscribe.</p>
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5. Mandatory information (*)

When you engage our Services, it may be legally or contractually required that you provide us with certain Personal Data, as indicated with a (*). For example, we may need your contact details so we are able to contact you. If you do not provide us with such information, this will usually imply that we will not be able to provide you with specific Services or perform part of our agreement with you.

6. Cookies

We may use functional, tracking and/or analytical cookies on our Website. A cookie is a simple small text file that can be stored in your device when visiting the Website. This text file identifies your browser and/or device. When visiting our Website again, the cookie ensures that your browser/device is recognized.

For more information on our use of cookies:

https://www.mysteryfreedom.com/_files/ugd/cc8af4_1c423f8eac6f4729b1c0482e2f445064.pdf.

7. How long do we keep the Personal Data?

We will not process or store any Personal Data that we do not need. We store Personal Data for as long as we need it for the above purposes, unless we are legally obliged to retain the Personal Data for a longer period. In this respect, we apply the following retention periods:

- **Personal Data in your account** | This data is stored as long as you have an account on our Platform and for a maximum period of 12 months [Some of these data can be deleted by the user itself.
- **Personal Data related to the uploaded music** | This data is stored as long as necessary to handle the distribution of your music and for a period of 2 years.
- **Personal Data in our correspondence** | This data is stored as long as necessary to handle your message/question/complaint and for a period of 5 years.
- **Personal Data in our records for the (tax) authorities**
- **Newsletters** | We retain the Personal Data used for sending newsletters until you unsubscribe from our newsletter.

After expiry of the aforementioned retention period(s), we may process and retain certain Personal Data to comply with legal retention obligations and/or for fraud/misuse investigations or to substantiate a (judicial) claim. In such events, we will retain the Personal Data separately and only use such Personal Data for the aforementioned purposes.

8. Do we share your Personal Data with others?

Processors

We use third parties (**Processors**) who support us in providing our Services. Within this context these Processors receive Personal Data from us which they process on our behalf. For instance, we use Processors for [e.g. building and maintaining our Website and Platform, storage of the Personal Data, sending our newsletters and customer support].

These Processors may only use or disclose the data within the scope of our instructions to them and under no circumstances for other purposes. We enter into a data processing agreement with all of our Processors.

Controllers

We may also share your Personal Data with external controllers in the following cases:

Third Party Music Distributors: We use our external music distributors to distribute the music on the Digital Streaming Stores such as Spotify and iTunes. In this respect, we share your (Personal) Data with:

Ampsuite (Amp Suite Ltd.), located in Brighton, England [Privacy Policy Ampsuite](#)

Tax authorities: We are legally obliged to include (some of) the Personal Data in our financial administration, which has to be shared with the national tax authority. The tax authority will process these Personal Data in accordance with its own privacy policies.

Payment Service Providers: Payment via the Platform will be processed via a third-party payment service provider:

Stripe (Stripe Inc.), located in San Francisco, USA [Privacy Policy Stripe](#)

The terms and conditions of this payment providers will apply to your payments. Any Personal Data you provide to this payment provider will be processed by the payment provider (as a separate Controller) in accordance with their own privacy policies.

These parties act as a separate Controller. Therefore, these parties will process the (Personal) Data in accordance with their own privacy policies. Apart from the above, we will not share your Personal Data with third parties, unless we are legally obliged to do so.

9. Export of Personal Data outside the European Union

We may transmit Personal Data to parties outside the European Union, if one of our Processors or external Controllers is established outside the European Union. The Personal Data will only be transferred to countries that provide an adequate level of protection in accordance with the European standards and/or to parties that have committed to providing such adequate level of protection. You may contact us if you wish to receive more information or a copy of the safeguards we take in this scope where necessary.

10. Third party websites

You may find advertising or other (hyper)links on our Website or Platform that link to the websites, products and services of partners, suppliers, advertisers, sponsors, licensors or other third parties. We do not control the content or the links that appear on these websites and we are not responsible for the practices employed by websites linked to or from our Website or Platform. In addition, these websites, products and services, including their content and links, may be constantly changing. These websites, products and services may

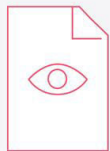
have their own privacy notices, user terms and customer service policies. Browsing and interaction on any other website, including websites that are linked to or from our Website or Platform, are subject to the terms and policies of that website.

11. Changes of the Privacy Notice

This Privacy Notice may be changed from time to time. Please check our Privacy Notice frequently. The new Privacy Notice will be effective immediately upon posting on our Website. If we change our Privacy Notice significantly, then we will state so on our Website together with the revised Privacy Notice.

12. Your rights as a data subject and our contact data

You have the right to...



Access

... obtain confirmation as to whether or not your personal data are being processed by us, and, if that is the case, access to the (categories of) personal data and information about our processing activities and a copy of your personal data.



Restriction of processing

... obtain restriction of processing of your personal data under certain circumstances. In such case, we may still store your personal data, but our use of your personal data for certain purposes will be restricted.



Rectification

... obtain rectification of any inaccurate personal data concerning you. You also have right to have incomplete personal data concerning you completed.



Data portability

... receive the personal data you have provided to us in a structured, commonly used and machine-readable format and to transmit those data to another controller or have us do that for you under certain circumstances.



Erasure

... obtain the erasure of your personal data under certain circumstances, for example if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.



Object

... object to our processing of your personal data based on (among others) legitimate interest under certain circumstances. You may always object to the processing of your personal data for direct marketing purposes.

You are always entitled to file a complaint with a data protection supervisory authority if you believe that we are not processing your Personal Data in accordance with the GDPR. In the Netherlands, the supervisory authority for data protection is the **Autoriteit Persoonsgegevens** www.autoriteitpersoonsgegevens.nl

If you have questions or concerns about this Privacy Notice or your privacy, you can contact via the contact details below.

Mystery Freedom

Mystery Freedom B.V.

Veersegat 33

4341 LD Arnemuiden

The Netherlands

Email: contact@mysteryfreedom.com

W: www.mysteryfreedom.com

Chamber of Commerce: 82917027