

## PRIVACY & COOKIES POLICY

EVEARA, a limited company with offices at Office 2, A1, Fota Business Park, Carrigtwohill, Co. Cork, T45NX97, Ireland (the "**Company, we, us, our**") provides a digital music distribution platform together with related software, products and/or services (the "**Platform**").

Your access to the Platform may be via a third party website. This Privacy Statement relates only to the processing by the Company as Controller of Personal Data (as defined below) in that context and does not relate to the processing of Personal Data in the context of any websites through which the Platform is accessed, which may be accessed from the Platform, or to which the Platform otherwise relates ("**Linked Websites**").

The Company, through its Platform, uploads data provided by you, including and without limitation music recordings, images, video, podcasts, metadata, names, photographs and likenesses, artwork images and biographical information as well as lyrics and text etc ("**Content**") to digital services providers such as music download portals, music and video streaming services, mobile music platforms, digital (and terrestrial) radio stations and television networks, and mobile networks that enable purchasing streaming or downloading content ("**Consumer Stores**").

The Company uses your information ("**Personal Data**") in line with applicable data protection and privacy laws including the European Union General Data Protection Regulation (together "**Data Protection Laws**"). This Privacy Statement (the "**Statement**") sets out the basis on which we use, process, store or disclose any Personal Data detailed below that we collect from you or that you provide to us through the Website and/or Platform. The information provided by you will be held by us as a controller.

This Statement, together with our [Cookies Policy](#) applies to your use of the Platform.

### 1. OVERVIEW OF THE PERSONAL DATA WE PROCESS

We **collect and process** the following Personal Data from you:

<b>Content Information</b>	When uploading Content to the Platform, Personal Data is collected from you by the Company. This may include information contained in or relating to: <ul style="list-style-type: none"><li>• music recordings, images, video, podcasts, metadata, names, photographs and likenesses, artwork images and biographical information as well as lyrics and text etc; and</li><li>• analytical data including and without limitation data concerning the sale, streams, and interactions by customers of Consumer Stores with the Content.</li></ul>
----------------------------	--

<b>Device Information</b>	When using the Platform, Personal Data is collected from you by the Company. This may include information about: <ul style="list-style-type: none"><li>• your device browser including your IP address; the type of device you used to access the internet; whether you reached the Platform using a search engine or if you clicked a link on another website; and other information derived from cookies used on the Platform; and</li><li>• details of your visits to the Platform such as traffic data, location data and linked websites that you can access through the Platform or through which the Platform is accessed (including and without limitation, third party websites).</li></ul>
---------------------------	--

You **can choose to provide us** with the following Personal Data:

<b>Contact and Payment Information</b>	You may choose to give us Personal Data such as: <ul style="list-style-type: none"><li>• your first name, last name, e-mail, address, city, country, postcode/zipcode (together "<b>Contact Information</b>"); and</li><li>• bank/online payment providers (for example, PayPal, Stripe, Payoneer, etc.) ("<b>Payment Information</b>") account details, personal and/or tax identification number and other details when setting up an account, submitting Content through the Platform, or by e-mailing us.</li></ul> Please note if you choose not to share this Personal Data you may not be able to avail of the Company's services and/or Platform.
--	---

We may obtain the following Personal Data about you from other third parties:

<b>Third Party Information</b>	We may receive limited information about you from our authorised distributors, partners or social media platforms, such as Facebook, Instagram, WhatsApp, Twitter, SnapChat, LinkedIn, etc. when you interact with us via such platforms. This includes information such as details of how you shared our Platform via the social media resources on the Platform.
--------------------------------	--

## 2. HOW AND WHY WE USE YOUR PERSONAL DATA

The following table details the legal basis and the purposes for which we process your Personal Data:

<b>LEGAL BASIS &amp; PURPOSES</b>		
<b>Legal Basis</b>	<b>Purpose(s)</b>	<b>Personal Data Processed</b>
<p><b>Contract</b> It is necessary to process these Personal Data to enter into and perform our contract with you regarding your use of the Platform as set out in the End User Agreement. [EMBED LINK]</p>	<p><b>Access to the Platform</b></p> <ul style="list-style-type: none"> <li>To provide you with access to the Platform and to allow you to use the Platform.</li> <li>To provide you with our services, or those of our authorised distributors or partners, as appropriate.</li> <li>To sell, copy, display, distribute and otherwise exploit the Content by all means and media (whether now known or existing in the future) through any and all Consumer Stores or the Platform.</li> <li>To pay you and to collect fees.</li> </ul>	<ul style="list-style-type: none"> <li>Device Information</li> <li>Contact Information</li> <li>Payment Information</li> <li>Content Information</li> </ul>
<p><b>Legitimate Interests</b> It is necessary for the purpose of our legitimate interests to collect and process these Personal Data for the purposes of improving and monitoring Platform efficiency and enhancing your use of the Platform, and to respond to any queries or requests submitted by you regarding the Website submitted by you to the Company, and improve our service quality.</p>	<p><b>Improving Platform Functionality &amp; Efficiency</b></p> <ul style="list-style-type: none"> <li>To provide, improve, test and monitor the effectiveness of the Platform.</li> <li>To monitor metrics such as total number of visitors, traffic data and demographic patterns.</li> </ul> <p><b>Responding to queries</b></p> <ul style="list-style-type: none"> <li>To process and respond to any enquiries or requests such as customer support you submit to us by email.</li> </ul> <p><b>Promotional or Marketing materials</b></p> <ul style="list-style-type: none"> <li>To provide you with information in relation about our events programme, general news from the Company, signing up to receive discounts and other communications from the Company deemed to be of probable interest (<b>please note that you may opt-out of receiving such marketing information by contacting us at email@eveara.com.</b></li> </ul>	<ul style="list-style-type: none"> <li>Device Information</li> <li>Contact Information</li> <li>Third Party Information</li> <li>Content Information</li> </ul>
<p><b>Consent</b> Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing by contacting us at any time.</p>	<p><b>Third Party Direct Marketing</b></p> <ul style="list-style-type: none"> <li>Subject to receiving your consent, we may facilitate third party directing marketing communications to you via email or text message.</li> </ul>	<ul style="list-style-type: none"> <li>Contact Information</li> </ul>
<p><b>Compliance with Legal Obligations</b> We may process your Personal Data where it is necessary to comply with legal obligations to which we are subject.</p>	<ul style="list-style-type: none"> <li>To comply with the Consumer Information Regulations;</li> <li>To comply with any applicable legal obligation, court order, summons, search warrants, or any other legal or regulatory obligation or request to which EVEARA is subject.</li> </ul>	<ul style="list-style-type: none"> <li>Device Information</li> <li>Contact Information</li> <li>Payment Information</li> <li>Content Information</li> <li>Third Party Information</li> </ul>
<p><b>To Defend, Establish or be a Party to Legal Claims</b> We may process your Personal Data as necessary in order for us to establish, investigate, exercise or defend a legal claim to which you are a party.</p>	<ul style="list-style-type: none"> <li>To investigate, establish, exercise or defend a legal claim.</li> </ul>	<ul style="list-style-type: none"> <li>Contact Information</li> <li>Device Information</li> <li>Third Party Information</li> <li>Content Information</li> <li>Payment Information</li> </ul>

### 3. WHO WE SHARE YOUR PERSONAL DATA WITH

We will disclose your Personal Data to some or all of the following recipients:

RECIPIENT(S)
<b>Group Companies</b> <ul style="list-style-type: none"><li>Members and shareholders of the Company Group.</li><li>Internal business units within the Company Group.</li></ul>
<b>Our Authorised Distributors and Partners</b> <ul style="list-style-type: none"><li>In order to fully provide you with the benefits of our Platform and distribute the Content as per the End User Agreement. [EMBED LINK]</li></ul>
<b>Consumer Stores and Banks/Online Payment Providers</b> <ul style="list-style-type: none"><li>In order to fully provide you with the benefits of our Platform and distribute the Content as per the End User Agreement. [EMBED LINK]</li></ul>
<b>Other Recipients</b> <ul style="list-style-type: none"><li>Regulatory authorities and law enforcement agencies (where we are under a duty to disclose or share your Personal Data in order to comply with any legal or regulatory obligation or request).</li><li>To protect the rights, property or safety of the Company Group, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.</li><li>External advisors e.g. lawyers, accountants and auditors (as necessary to protect the Company's legitimate and legal interests in the performance of business/financial affairs).</li><li>We may share your Personal Data with our current and future affiliated companies and business partners, including should we be involved in a merger, asset sale, or other business reorganisation. We may also share or transfer your Personal Data with any potential successors.</li><li>Service providers for logistical and IT service purposes, and to provide support services such as customer service infrastructure.</li></ul>

### 4. TRANSFERS OF YOUR PERSONAL DATA

Your Personal Data may be stored and transferred outside the European Economic Area ("EEA"). We only transfer your Personal Data outside the EEA where the EU Commission has decided that the third country in question ensures an adequate level of protection in line with EU data protection standards (i.e. that an adequacy decision has been granted in the country's favour) or there are appropriate safeguards in place to protect your Personal Data. If you would like to find out more about the appropriate safeguards that we have in place to govern the transfer of your Personal Data you can contact us at email@eveara.com.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will always do our best to protect your Personal Data, we cannot guarantee the security of any information you transmit to us; any transmission is at your own risk. Once we have received your information, we will endeavour to use strict procedures and security features to try to prevent unauthorised access.

### 5. LINKED WEBSITES

The Platform may operate under, or be accessed from other websites, and may provide access to other websites. The Company is not responsible for the privacy statements or practices on Linked Websites. This Statement governs only information collected on the Platform. When accessing Linked Websites, you should read the privacy statement published on the relevant Linked Website. The terms of our Statement do not apply to Linked Websites. Please check these statements before you submit any Personal Data to Linked Websites.

We accept no liability in connection with any Linked Website, or any contract entered into with any third party on or through a Linked Website.

### 6. HOW LONG WE KEEP YOUR PERSONAL DATA FOR

In general, we will keep your Personal Data for as long as is necessary for the purposes for which it was obtained from the date of collection or, where you enter into a contractual arrangement with us, following the end of the performance of our contract (which may be up to 7 years in some cases).

Please note that in certain circumstances, we may hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your Personal Data.

## 7. YOUR RIGHTS AND HOW TO EXERCISE THEM

You have a number of rights in relation to your Personal Data under the Data Protection Laws as set out in the table below. In particular these rights include the right to object to processing of your Personal Data where that processing is carried out for our legitimate interests. **Note that in certain circumstances these rights might not be absolute.**

Right	Further Information
<b>Right of Access</b>	You have the right to request a copy of the Personal Data held by us about you and to access the information which we hold about you. We will charge you for making such an access request where we feel your request is unjustified or excessive.
<b>Right to Rectification</b>	You have the right to have any inaccurate Personal Data which we hold about you updated or corrected.
<b>Right to Erasure</b>	In certain circumstances, you may also have your Personal Data deleted, for example if you exercise your right to object (see below) and we do not have an overriding reason to process your Personal Data or if we no longer require your Personal Data for the purposes as set out in this Privacy Statement.
<b>Right to Restriction of Processing</b>	You have the right to ask us to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data we hold about you is inaccurate or our use of your Personal Data is unlawful. If you validly exercise this right, we will store your Personal Data and will not carry out any other processing until the issue is resolved.
<b>Right to Data Portability</b>	You may request us to provide you with your Personal Data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your Personal Data directly to another controller where this is technically feasible.  This right only arises where we process your Personal Data on the legal basis of your consent or where it is necessary to perform our contract with you.
<b>Right to Object</b>	You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.

You can exercise any of these rights by submitting a request to email@eveara.com.

We will provide you with information on any action taken upon your request in relation to any of these rights without undue delay within 1 month of receiving your request. We may extend this up to 2 months if necessary however we will inform you if this arises. Please note that we may ask you to verify your identity when you seek to exercise any of your data protection rights.

Our lead regulatory authority under data protection legislation is the Data Protection Commission, which is based in Ireland. You have the right to lodge a complaint with the Data Protection Commission. For further information see [www.dataprotection.ie](http://www.dataprotection.ie) or contact the Data Protection Commission at [info@dataprotection.ie](mailto:info@dataprotection.ie). You also have the right to lodge a complaint with the data protection authority in your European Union country of residence. You can find their contact details here: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

## 8. CHANGES TO THIS STATEMENT & QUESTIONS

This Statement will be regularly reviewed and may be amended and updated from time to time as necessary.

If you have any questions, comments or concerns about the way your Personal Data are being used or processed by the Company, please submit your question, comment or concern in writing to email@eveara.com.

## 9. COOKIES POLICY

This is the Cookie Policy for EVEARA, accessible from [www.eveara.com](http://www.eveara.com)

### What Are Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.

For more general information on cookies see the Wikipedia article on HTTP Cookies.

### How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

### Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the this site. Therefore it is recommended that you do not disable cookies.

### The Cookies We Set

- Account related cookies

If you create an account with us then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out however in some cases they may remain afterwards to remember your site preferences when logged out.

- Login related cookies

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

- Email newsletters related cookies

This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

- Orders processing related cookies

This site offers e-commerce or payment facilities and some cookies are essential to ensure that your order is remembered between pages so that we can process it properly.

- Surveys related cookies

From time to time we offer user surveys and questionnaires to provide you with interesting insights, helpful tools, or to understand our user base more accurately. These surveys may use cookies to remember who has already taken part in a survey or to provide you with accurate results after you change pages.

- Forms related cookies

When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.

- Site preferences cookies

In order to provide you with a great experience on this site we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences.

### **Third Party Cookies**

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

- This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Analytics page.

- Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.
- From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which optimisations our users appreciate the most.
- As we sell products it's important for us to understand statistics about how many of the visitors to our site actually make a purchase and as such this is the kind of data that these cookies will track. This is important to you as it means that we can accurately make business predictions that allow us to monitor our advertising and product costs to ensure the best possible price.
- The Google AdSense service we use to serve advertising uses a DoubleClick cookie to serve more relevant ads across the web and limit the number of times that a given ad is shown to you.

For more information on Google AdSense see the official Google AdSense privacy FAQ.

- We use adverts to offset the costs of running this site and provide funding for further development. The behavioural advertising cookies used by this site are designed to ensure that we provide you with the most relevant adverts where possible by anonymously tracking your interests and presenting similar things that may be of interest.

However, if you are still looking for more information then you can contact us at [email@eveara.com](mailto:email@eveara.com)