



## PRIVACY POLICY WWW.BOLEROMUSIC.COM

Your privacy is important to us. This Cookie Policy ("Policy") applies to services provided by Bolero Music SAS ("we", "us", or "Company") and our website, product pages, mobile or web applications, or other digital products that link to or reference this Policy (collectively, the "Services") and explains what information we collect from users of our Services (a "user", "you", or "your"), including information that may be used to personally identify you ("Personal Information") and how we use it. We encourage you to read the details below. This Policy applies to any user or visitor to or user of our Services.

We reserve the right to change this Policy at any time. We will notify you of any changes to this Policy by posting a new Policy to this page, and/or by sending notice to the primary email address specified in your account. You are advised to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page. You acknowledge that your continued use of our Services after we publish or send a notice about our changes to this Policy means that the collection, use and sharing of your Personal Information is subject to the updated Policy.

### Scope and Applicability

The Policy applies to your information when you visit our website or otherwise use the Services. We will only collect and process information where we have lawful bases. With respect to the information described in this Policy, lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g. to deliver the Services you have requested)), and, in some instances, for "legitimate interests" in the applicable jurisdiction. This Policy does not apply to websites, apps, products, or services that we do not own or control.

### What Information Do We Collect?

When you use the Services or otherwise communicate with us, we collect information that you provide to us directly. For example, we collect information in the following circumstances: you (i) use or visit the Services, (ii) register for the Services or create an account or profile or accept the creation of an account or profile on your behalf (an "Account"), (iii) subscribe to newsletters; (vi) request technical support; (vii) otherwise use the Service where Personal Information is required for such use and/or participation, and (viii) when you contact us via the Services or when you otherwise communicate with us. You can choose not to provide information that is requested of you by us; however, this may limit your ability to use or access the Services.

The information you provide to us directly may include, without limitation, the following information that may, alone or in combination with other data, constitute Personal Information:

- Your email address, crypto address signature, and other information you elect to provide during the account creation process, such as wallet information, username, profile picture, cover photo, display name (“Account Information”).
- Your responses to surveys that we may ask you to complete for research purposes or to help direct Company activities.
- Information you provide in order to subscribe to our marketing communications.
- Information you provide when communicating with us or that you otherwise voluntarily provide to us.

From time to time, we may obtain public key information and wallet information about you from third party sources such as exchange platforms in order to facilitate transactions you participate in on the Services.

Furthermore, we may automatically collect in and through the Services the following “Technical Information”:

- Device data: including, but not limited to, the type of device you use, data on device advertising ID's and similar hardware qualifiers, the browser you use, your operating system, and approximate geographic location data.
- Usage data: including, but not limited to, search terms entered, pages viewed, and other usage behavior identified by analytics events.
- Network and internet information: including, but not limited to, URLs, Internet Protocol addresses, bounce rates, use of spoofing, active (TCP/IP) ports, number of sessions initiated, click streams, location information and network/Wi-Fi access points.
- Information we collect on the use of the Services via cookies and other tracking technologies: please see the “How Do We Use Tracking Technologies” section below for more information.

### **How Do We Use The Information We Collect?**

We use the information we collect to:

- Deliver and improve the Services and your overall user experience.
- To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.
- To link or combine user information with other Personal Information.
- To compare and verify information for accuracy and update our records.
- Email, text, message, or otherwise contact you with information and updates about us and the Services
- To respond to your comments and questions and provide customer service.
- To send you information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages.
- Analyze how you use the Services with tools such as Google Analytics and other tools to help us understand traffic patterns and know if there are problems with the Services.
- Create targeted advertising to promote the Services and engage our users.
- In connection with a merger, acquisition, reorganization or similar transaction.
- When required by law or to respond to legal process.
- To protect our users, other individual lives, and/or the rights or property of Company.
- To maintain the security of the Services.
- For any other purpose with your consent.

### **Do We Share Your Personal Information?**

In addition to the specific situations discussed elsewhere in this privacy policy, we disclose personal

information in the following circumstances:

- With our corporate affiliates and subsidiaries.
- With third parties that perform services to support our core business functions and internal operations, which may include database administrators, cloud computing services, and application services providers.
- To support our audit, compliance, and corporate governance functions.
- In connection with a change of ownership or control of all or part of our business (such as a merger, acquisition, reorganization, or bankruptcy).
- If we have a good-faith belief that access, use, preservation, or disclosure of such information is reasonably necessary to detect or protect against fraud or security issues.
- To fulfill the purpose for which you provided the information, or with your consent or at your direction.

### **How Do We Use Tracking Technologies?**

Some of the features on the Services may require the use of “cookies” - small text files that are stored on your device’s hard drive. You may delete and block all cookies from our Services, but parts of the Services may not work. We want to be open about our cookie use. The following sets out how we may use different categories of cookies and your options for managing cookie settings:

Our third party analytics services providers may use cookies, pixel tags, and other tracking technologies to collect and store data Technical Information to be used for the purposes outlined in this Privacy Policy.

### **How Do We Secure Your Personal Information?**

We take reasonable steps to protect your Personal Information against unauthorized access, alteration, disclosure, misuse, or destruction. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. The safety and security of your Personal Information also depends on you. If you have an account with us, you are responsible for keeping your membership details confidential. Your account is protected by your account password and we urge you to take steps to keep your Personal Information safe by not disclosing your password and by logging out of your account after each use. We further protect your Personal Information from potential security breaches by implementing certain technological security measures including encryption, firewalls and secure socket layer technology. However, these measures do not guarantee that your Personal Information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. By using the Services, you acknowledge that you understand and agree to assume these risks.

### **Data Retention**

We may retain your personal information as long as you continue to use the Services, have an account with us, or for as long as is necessary to fulfill the purposes outlined in this Policy, until you ask us to delete such information. This includes data you or others provided to us and data generated or inferred from your use of the Services.

### **Managing Your Privacy**

All users may review, update, correct or delete the Personal Information furnished by a user in their user account by contacting us at [contact@boleromusic.com](mailto:contact@boleromusic.com) or by accessing your user account. For your protection, we may only share and update the Personal Information associated with the specific email address that you use to send us your request, and we may need to verify your identity before doing so. We will try to comply with such requests in a reasonably timely manner. If you completely and

permanently delete all of your Personal Information, then your user account may become deactivated. If you wish to cancel your account, you may do so through your account page, and any personally identifiable information associated with your account will be deleted as soon as is reasonably practical or as required by applicable law. Please note that we may retain information that is otherwise deleted in anonymized and aggregated form, in archived or backup copies as required pursuant to records retention obligations, or otherwise as required by law. We may retain an archived copy of your records as required by law or for legitimate business purposes.

We may use some of the information we collect for marketing purposes, including to send you promotional communications about new Company features, products, events, or other opportunities. If you wish to stop receiving these communications or to opt out of use of your information for these purposes, please follow the opt-out instructions, such as clicking "Unsubscribe" (or similar opt-out language) in those communications. You can also contact us at [contact@boleromusic.com](mailto:contact@boleromusic.com) to opt out. Despite your indicated email preferences, we may send you service related communications, including notices of any updates to our terms of service or privacy policy.

### **Children Under 16**

The Services are not directed to individuals who are under age of sixteen (16) and we do not solicit nor knowingly collect Personal Information from children under the age of sixteen (16), unless such information was provided with parental consent. If you believe that we have unknowingly collected any Personal Information from someone under the age of sixteen (16), please contact us immediately at [contact@boleromusic.com](mailto:contact@boleromusic.com) and the information will be deleted.

### **Third Party Direct Marketing**

We currently do not share personal data with third parties for their direct marketing purposes without your consent.

### **Contact Us**

If you have any questions about this Policy, your Personal Information, or the Services, you can contact [contact@boleromusic.com](mailto:contact@boleromusic.com).

### **Your Rights (European Residents)**

The laws of certain jurisdictions may provide data subjects with various rights in connection with the processing of Personal Information, including:

1. The right to withdraw any previously provided consent;
2. The right to access certain information about you that we process;
3. The right to have us correct or update any personal information;
4. The right to have certain personal information erased;
5. The right to have us temporarily block our processing of certain personal information;
6. The right to have personal information exported into common machine-readable format;
7. The right to object to our processing of personal information in cases of direct marketing, or when we rely on legitimate interests as our lawful basis to process your information; and
8. The right to lodge a complaint with the appropriate data protection authority.

Where we are deemed a data controller under the laws of certain jurisdictions, we will take steps to help ensure that you are able to exercise your rights regarding Personal Information about you in accordance with applicable law. To do so, you may contact us at [contact@boleromusic.com](mailto:contact@boleromusic.com). Please note these rights may be limited in certain circumstances as provided by applicable law. We will promptly

review all such requests in accordance with applicable laws. Depending on where you live, you may also have a right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Data about you. We encourage you to first reach out to us at [contact@boleromusic.com](mailto:contact@boleromusic.com), so we have an opportunity to address your concerns directly before you do so.

## **1. Historique de version**

La présente politique est entrée en vigueur le 19/07/2024.