

Harpr Privacy Policy

Last updated: 22 January 2026.

Company name: 530AM Limited (trading as “harpr”) (“we”, “us”, “our”)

Registered address: 8b Webber Street, Westmere, Auckland, 1022 , New Zealand

Service: harpr Messaging Platform (“Service”).

Contact: privacy@harpr.com.

1. Purpose

This Privacy Policy explains how we collect, use, store, and protect your personal information when you use **harpr’s messaging services** via our website or mobile application.

harpr is a direct communication platform built for musicians and creatives. It helps artists collect fan details, stay in touch, and build real relationships.

We are committed to safeguarding your privacy and complying with the **New Zealand Privacy Act 2020**, as well as other applicable international privacy laws.

2. Information We Collect

Providing your personal information is voluntary. However, if you choose not to provide the requested account details, we will be unable to create your account or provide the Service to you. We may collect and process the following types of personal information:

- **Account details:** your name, email address, phone number, birth dates (if provided) and login credentials.
- **Messaging data:** message content including messages between artist and fans, attachments, timestamps, sender and recipient details.
- **Artist Campaign information:** notes, dates and details of campaigns input by artist
- **Device and technical information:** IP address, device type, operating system, browser or app version, and usage analytics.
- **Payment and billing information:** if applicable, information required to process transactions (securely handled via third-party processors).
- **Support interactions:** any information you provide when you contact us for help or feedback.

3. How We Use Your Information

We use your personal information to:

- Operate, maintain, and provide the Harpr Service.
- Deliver and store messages and attachments.
- Authenticate users and secure accounts.
- Communicate with you about updates, support, and security notifications.
- Improve the Service’s performance and user experience.

Harpr Privacy Policy

- Detect, prevent, or address technical issues, abuse, or fraud.
- Comply with legal and regulatory obligations.

4. Legal Basis for Processing (EEA & UK Users)

If you are located in the **European Economic Area (EEA)** or the **United Kingdom**, we process personal information only when we have a lawful basis to do so under the **GDPR** or **UK GDPR**, such as:

- Your **consent**.
- To **perform a contract** (for example, to provide the Service).
- To **comply with legal obligations**.
- For our **legitimate interests**, provided these do not override your rights and freedoms.

5. Sharing and Disclosure

We do **not** sell or rent your personal information. We share your information only in the following circumstances::

- **Communication between Artists and Fans:** harpr is a communication platform. When a Fan engages with an Artist's campaign or sends a message, their contact details and message content will be shared with that Artist. Artists are independent entities; while they are required to use your data only for harpr-related communications, we encourage you to review the specific privacy practices of the Artists you follow. Harpr is not responsible for how an Artist uses a Fan's contact details once the Fan has shared them through a campaign.
- **Service Providers:** We share data with trusted partners who assist in operating or supporting the platform (e.g., cloud hosting providers, analytics services, payment gateways, and email delivery services).
- **Legal Compliance:** We may disclose information if required by law, subpoena, or government authority, or if we believe such action is necessary to comply with the Privacy Act 2020.
- **Protection and Safety:** To prevent or investigate potential misuse, fraud, or threats to the safety of our users or the public.
- **Business Transfers:** In connection with a merger, acquisition, or reorganization, where equivalent data protections will apply.
- **With Your Consent:** When you explicitly authorize sharing, such as through integrations with third-party social media or music services.

All service providers are required to handle your data in accordance with the **New Zealand Privacy Act 2020** or equivalent international standards.

6. International Data Transfers

Your personal information may be stored or processed on servers located **outside New Zealand**, including in countries that may not have equivalent data protection laws. Where we transfer your data internationally, we ensure it is protected through:

- The use of **contractual safeguards** such as Standard Contractual Clauses; or

Harpr Privacy Policy

- Transfers only to countries recognised as providing **comparable privacy protections**.

7. Data Storage and Security

We take reasonable technical, administrative, and organisational measures to protect your information against unauthorised access, alteration, disclosure, or destruction. Data is stored on secure servers managed by trusted third-party providers in **New Zealand and/or overseas**.

Access to user information is limited to authorised personnel who require it for operational or legal purposes.

8. Message Content and Retention

- All messages are encrypted **in transit** and **at rest**.
- harpr staff do **not** access message content except where required for troubleshooting, abuse prevention, or legal compliance.
- You may delete individual messages or your account at any time. Deleted data is removed from active systems within **[e.g. 30 days]**, though limited backups may be retained for security and disaster recovery purposes.

9. Cookies and Analytics

We use cookies and similar technologies to:

- Keep you signed in to your account.
- Measure and analyse usage trends.
- Improve platform functionality and performance.

You may disable cookies in your browser or mobile settings, but some features may not function correctly if you do.

10. Automated Decision-Making

We may use automated tools to detect spam, abuse, or malicious activity on the Service. These systems do not make decisions with legal or similarly significant effects without human review.

11. Children's Privacy

harpr is not intended for users under the age of **13**. We do not knowingly collect personal data from minors. If you believe a child has provided us with personal information, please contact us so we can delete it.

12. Your Privacy Rights

Provision of Information Providing your personal information to us is voluntary. However, please note that if you choose not to provide certain information (such as a valid email

Harpr Privacy Policy

address or phone number), we will be unable to create your account, authenticate your identity, or provide the harpr Service to you.

New Zealand and Australia In accordance with the New Zealand Privacy Act 2020 and the Australian Privacy Act 1988, you have the right to:

- **Request Access:** You can ask for a copy of the personal information we hold about you.
- **Request Correction:** You can ask us to correct any inaccurate or incomplete information.
- **Response Time:** We will acknowledge your request promptly and provide a response within **20 working days**.
- **Complaints:** If you are not satisfied with our response, you may complain to the Office of the Privacy Commissioner (NZ) at privacy.org.nz or the Office of the Australian Information Commissioner (OAIC).

EEA and UK Users

You may also:

- Request deletion ("right to be forgotten").
- Restrict or object to certain processing.
- Request a copy of your data in a portable format.
- Lodge a complaint with your local **Data Protection Authority**.

United States Users

Residents of certain US states (including California, Colorado, Connecticut, Utah, and Virginia) have additional rights under applicable state privacy laws, including the **CCPA/CPRA**, such as:

- The right to know what personal information we collect and how we use it.
- The right to request deletion of your data.
- The right to opt out of the "sale" or "sharing" of personal information (we do **not** sell personal data).
- The right to non-discrimination for exercising your privacy rights.

To exercise any of these rights, please contact us at privacy@harpr.co.nz.

13. Data Retention

We retain your personal information only as long as necessary for the purposes described in this Policy, or as required by law. Once no longer needed, your information is securely deleted or anonymised.

14. Data Breach Notification

In the event of a data breach that poses a risk of serious harm, we will notify affected users and the appropriate authorities, in accordance with our obligations under the **Privacy Act 2020**, **GDPR**, and other applicable laws.

Harprrr Privacy Policy

15. Third-Party Services and Links

harprrr may include links or integrations with third-party services.

Any information you provide to those third parties is governed by their own privacy policies. We encourage you to review those policies before connecting your account or sharing information.

16. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes to our practices or for other operational, legal, or regulatory reasons.

Any updates will be posted on our website and mobile app, with the “last updated” date revised.

Continued use of the Service after updates indicates your acceptance of the revised policy.

17. Contact Us

If you have any questions, concerns, or complaints about this Privacy Policy or how we handle your personal information, please contact:

530AM Limited (trading as harprrr)

Privacy Email: privacy@harprrr.com

Data Protection Officer Email: , DPO@harprrr.com]