

Specialtones Privacy Policy

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1. Introduction

Thanks for choosing Specialtones.

We want to ensure that you can enjoy our service today, tomorrow, and in the future. To do this we need to deliver a truly personalized service specifically for you. And that is why your privacy and the security of your personal data is, and will always be, extremely important to us. Let us clearly explain how and why we gather, store, share and use your personal data - as well as outline the controls and choices you have when you choose to share your personal data. Our Privacy Policy (“Policy”) will explain in further detail below.

2. About this Policy

This Policy sets out the essential details with regards to your personal data relationship with Specialtones. The Policy applies to all Specialtones services and any associated services (referred to as the ‘ Specialtones Service’). The terms governing your use of the Specialtones Service are defined in our Terms and Conditions of Use (the “Terms and Conditions of Use”) published on our website.

From time to time, we may develop new or offer additional services. If the introduction of these new or additional services results in any change to the way we collect or process your personal data we will provide you with more information and additional terms or policies. Unless stated otherwise when we introduce these new or additional services, they will be subject to this Policy.

The aim of this Policy is to:

1. Ensure that you understand what personal data we collect about you, why and how we collect and use it, and who we share it with;
2. Explain the way we use the personal data that you share with us in order to give you the best possible experience when you are using the Specialtones Service; and
3. Explain your rights and choices in relation to the personal data we collect and process about you and how we will protect your privacy.

3. Rights and preferences: Your choice and control

The Customer Support page on our website and the Settings on your App are meant to help users take advantage of the following rights afforded to individuals:

- Right of Access - the right to be informed of and request access to the personal data we process about you;
- Right to Rectification - the right to request that we amend or update your personal data where it is inaccurate or incomplete;
- Right to Erasure - the right to request that we delete your personal data;
- Right to Restrict - the right to request that we temporarily or permanently stop processing all or some of your personal data;
- Right to Object -
 - the right, at any time, to object to us processing your personal data on grounds relating to your particular situation;
 - the right to object to your personal data being processed for direct marketing purposes;
- Right to Data Portability - the right to request a copy of your personal data in electronic format and the right to transmit that personal data for use in another party's service; and
- Right not to be subject to Automated Decision-making - the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

In order to enable you to exercise these rights with ease and to record your preferences in relation to how Specialtones uses your personal data, we provide you with access to the following:

- **Customer Support Page (on our website)** - allows you to exercise all the above mentioned rights upon formal request; and,
- **Notification Settings (on your App)** - allows you to choose which communications you receive from Specialtones.

If you have any questions about your privacy, your rights, or how to exercise them, please use the Customer Support page on our website. We will respond to your request within a reasonable period of time upon verification of your identity.

4. How do we collect your personal data?

We collect your personal data in the following ways:

1. When you register and subscribe to the Specialtones Service - we collect certain personal data such as your email address, name, birth date, country, etc. so you can use the Specialtones Service.
2. Through your use of the Specialtones Service - when you use the Specialtones Service, we collect data such as your questionnaire answers, playlist downloads and listening schedule.
3. From third parties - we will receive personal data about you and your activity from third parties, including partners we work with in order to provide you with the Specialtones Service. We will only use this personal data, either where you have provided your consent to the third party or to Specialtones, where Specialtones has a legitimate interest to use the personal data in order to provide you with the Specialtones Service.

We use anonymised and aggregated information to test our systems, for research, data analysis, creating marketing and promotion models, improving the Service and developing new features and functionalities within the Specialtones Service.

5. What personal data do we collect from you?

Check the categories of personal data about you we collect and use:

Personal data collected when you register with Specialtones

Categories of personal data	Description of category
Account Registration Data	<p>This is the personal data that is provided by you or collected by us to enable you to register for the Specialtones Service. This includes your name and verified email address. This is required in order to create your account.</p> <p>If you use a Third Party Service to create an account, we will receive personal data via that Third Party Service but only when you have consented to that Third Party Service sharing your personal data with us.</p>

Personal data collected through your use of the Specialtones Service

Categories of personal data	Description of category
Specialtones Service Usage Data	<p>This is the personal data that is collected about you when you are using the Specialtones Service - this may include:</p> <ul style="list-style-type: none">• Information about your type of Specialtones subscription or service plan.• Information about your interactions with the Specialtones Service which includes the date and time of any requests you make, questionnaires scores, playlists you download and your interactions with the App. This also may include details of your use of Third Party Applications and advertising you receive.• Messages you send and/or receive via Specialtones and your interactions with the Specialtones team.• Technical Data which may include URL information, cookie data, your IP address, the types of devices you are using to access or connect to the Specialtones Service, unique device IDs, device attributes, network connection type (e.g. WiFi, 3G, LTE, Bluetooth) and provider, network and device performance, browser type, language, information enabling digital rights management, operating system, and Specialtones application version.• Motion-generated or orientation-generated mobile sensor data (e.g. accelerometer or gyroscope) required for the purposes of providing specific features of the Specialtones Service to you.

Personal data collected with your permission that enables us to securely process your payment subscription and provide you with added features

Categories of personal data	Description of category
Payment Data	<p>We will collect such personal data if you sign up for a Trial or purchase a Paid Subscription, or make other purchases through the Specialtones Service. The exact personal data collected will vary depending on the payment method but will include information such as:</p> <ul style="list-style-type: none">• Name;• Date of birth;• Credit or debit card type, expiration date, and certain digits of your card number;• Postal code;• Mobile phone number; and• Details of your transaction history.
Contests, Surveys and Sweepstakes Data	<p>This personal data is used to allow you to sign up and participate in these types of promotions. The exact personal data collected will vary depending on the promotion.</p>
Marketing Data	<p>This personal data is used to enable Specialtones and our partners/service providers to send you communications either:</p> <ul style="list-style-type: none">• Via email;• While using the Specialtones Service; and/or• Direct from the third party. <p>You have complete control over what type of communications you receive from Specialtones for marketing purposes.</p>

6. What do we use your personal data for?

When you use or interact with the Specialtones Service, we use a variety of technologies to process the personal data we collect about you for various reasons. See below the reasons why we process your personal data, the associated legal bases we rely upon to legally permit us to process your personal data, and the categories of personal data used for these purposes:

Description of why Specialtones processes your personal data ('processing purpose')	Legal Basis for the processing purpose	Categories of personal data used by Specialtones for the processing purpose
To provide, personalize, and improve your experience with the Specialtones Service and other services and products provided by Specialtones.	<ul style="list-style-type: none">• Performance of a Contract• Legitimate Interest	<ul style="list-style-type: none">• Account Registration Data• Service Usage Data
To understand how you access and use the Specialtones Service to ensure technical functionality of the Specialtones Service, develop new products and services, and analyze your use of the Specialtones Service, including your interaction with applications, advertising, products, and services that are made available, linked to, or offered through the Specialtones Service.	<ul style="list-style-type: none">• Performance of a Contract• Legitimate Interest	<ul style="list-style-type: none">• Account Registration Data• Service Usage Data

To communicate with you for Specialtones Service-related purposes.

- Performance of a Contract
- Legitimate Interest

- Account Registration Data
- Service Usage Data

To process your payment to prevent or detect fraud including fraudulent payments and fraudulent use of the Specialtones Service.

- Performance of a Contract
- Compliance with legal obligations
- Legitimate Interest

- Payment Data

To communicate with you, either directly or through one of our partners, for:

- Consent
- Legitimate Interest

- Contests, Surveys and Sweepstakes Data
- Marketing Data

- marketing,
- research,
- participation in contests, surveys and sweepstakes,
- promotional purposes,

via emails, notifications, or other messages, consistent with any permissions you may have communicated to us.

7. Sharing your personal data

We have set out the categories of recipients of the personal data collected or generated through your use of the Specialtones Service.

Information we may share

Categories of Recipients	Reason for sharing
Service Providers and Others	<p>We use technical service providers which may operate the technical infrastructure that we need to provide the Specialtones Service, in particular providers which host, store, manage, and maintain the Specialtones application, its content and the data we process. We use technical service providers to help us communicate with you, as described in Section 6 of this Policy.</p>
Specialtones Partners	<p>If you access the Specialtones Service through an offer that you received or purchased from a third party such as your mobile network operator, we share personal data with that third party about your use of the Specialtones Service, such as whether and to what extent you have used the offer, activated a Specialtones account, or actively used the Specialtones Service.</p> <p>Depending on how you sign up for the Specialtones Service (e.g. through a third party service or a mobile provider), we share your Specialtones username or other Account Registration Data as necessary to enable your account.</p>
Research	<p>We will share your personal data for activities such as statistical analysis and academic studies but only in a pseudonymised format.</p>
Law Enforcement and Data Protection Authorities	<p>We will share your personal data when we in good faith believe it is necessary for us to do so in order to comply with a legal obligation under applicable law, or respond to valid legal process, such as a search warrant, a court order, or a subpoena.</p> <p>We also will also share your personal data where we in good faith believe that it is necessary for the purpose of our own, or a third party's legitimate interest relating to national security, law</p>

enforcement, litigation, criminal investigation, protecting the safety of any person, or to prevent death or imminent bodily harm, provided that we deem that such interest is not overridden by your interests or fundamental rights and freedoms requiring the protection of your personal data.

Purchasers of our business We will share your personal data in those cases where we sell or negotiate to sell our business to a buyer or prospective buyer. In this situation, Specialtones will continue to ensure the confidentiality of your personal data and give you notice before your personal data is transferred to the buyer or becomes subject to a different Privacy Policy.

8. Data retention and deletion

We keep your personal data only as long as necessary to provide you with the Specialtones Service and for legitimate and essential business purposes, such as maintaining the performance of the Specialtones Service, making data-driven business decisions about new features and offerings, complying with our legal obligations, and resolving disputes. We keep some of your personal data for as long as you are a user of the Specialtones Service. For example, we securely keep your account information. If you request, we will delete or anonymise your personal data so that it no longer identifies you, unless we are legally allowed or required to maintain certain personal data, including situations such as the following:

- If there is an unresolved issue relating to your account, such as an outstanding credit on your account or an unresolved claim or dispute we will retain the necessary personal data until the issue is resolved;
- Where we are required to retain the personal data for our legal, tax, audit, and accounting obligations, we will retain the necessary personal data for the period required by applicable law; and/or,
- Where necessary for our legitimate business interests such as fraud prevention or to maintain the security of our users.

9. Links

We may display advertisements from third parties and other content that links to third-party websites. We cannot control or be held responsible for third parties' privacy practices and content. If you click on a third-party advertisement or link, please understand that you are leaving the Specialtones Service and any personal data you provide will not be covered by this Policy. Please read their privacy policies to find out how they collect and process your personal data.

10. Keeping your personal data safe

We are committed to protecting our users' personal data. We implement appropriate technical and organisational measures to help protect the security of your personal data; however, please note that no system is ever completely secure. We have implemented various policies including pseudonymisation, encryption, access, and retention policies to guard against unauthorised access and unnecessary retention of personal data in our systems. Your password protects your user account, so we encourage you to use a unique and strong password, limit access to your computer and browser.

11. Changes to this Privacy Policy

We may occasionally make changes to this Policy.

When we make material changes to this Policy, we'll provide you with prominent notice as appropriate under the circumstances, e.g., by displaying a prominent notice within the Specialtones Service or by sending you an email. We may notify you in advance. Please, therefore, make sure you read any such notice carefully.

12. How to contact us

If you have any questions about this Policy, please use the Customer Support form on our website or contact us by regular mail:

Specialtones Inc.

325 Welland Ave, Suite 220

Ste. Catharines, ON, L2R 2R2

Canada