

PRIVACY POLICY

SNGLS DAO and its partners and affiliates (also referred to as “SNGLS DAO”, “we”, “our”, “us”) is a governance technology layer that controls the parameters of the SNGLS Media Distribution Protocol. Please read this data protection notice carefully to understand how we may collect, use and disclose personal data of artists, creators and users (also referred to as “you”, “your”).

1. WHO IS RESPONSIBLE FOR DATA PROCESSING AND WHOM CAN I CONTACT?

Responsible body is:
SingularDTV GmbH
Poststrasse 30, 6300 Zug, Switzerland

You can contact our company Data Protection Officer at:
SingularDTV GmbH
Address: Poststrasse 30, 6300 Zug, Switzerland
Email: legal@singulardtv.com

2. WHICH SOURCES AND DATA DO WE USE?

We process personal data that we receive from our customers as part of our business relationship.

Relevant personal information is:

- Personal data (name, address, e-mail address, telephone number, IP address and other contact details, gender, date and place of birth, nationality);
- Legitimacy data (e.g. ID data), non-EU nationals' residence and / or work permit (only as a part of the ID and address proof);
- Authentication data (e.g. signature sample).

In addition, we may also collect:

- Advertising and sales data (including advertising scores), documentation data;
- Data related to the business relationship and data collected during the ongoing business relationship (including date, time, cause / purpose, channel of communication, copies of correspondence in hard-copy and/or electronic form, recording of telephone calls and the result of communication). In this context, we also automatically collect so-called IT data, i.e. IP address (s), assignment characteristics of any technical devices with which you access our web pages and / or services, cookies (see our "cookie information" below);

3. WHY DO WE PROCESS YOUR DATA (PURPOSE OF THE PROCESSING) AND ON WHICH LEGAL BASIS?

We process personal data in accordance with the provisions of the European General Data Protection Regulation (GDPR):

- a. For the fulfillment of contractual obligations (Article 6 (1) (b) GDPR)
 - The processing of data is carried out to provide our services in the context of the execution of our contracts with our customers or to carry out pre-contractual actions, which are carried out on request.
 - The purpose of the data processing is to adhere to regulatory requirements of KYC and AML checks as well as sending correspondence to customers who opted in to receive the newsletters, updates, and/or other corporate communications. Apart from this, we also process data to answer customer questions for customer success.
 - Please refer to further details of the purpose of data processing in the relevant contract documents and/or terms and conditions of each respective product.
- b. To accomplish the following business purposes in a way that complies with Article 6(1)(f) of the GDPR.
 - Ensuring the IT security and IT operations of the firm;
 - Prevention and investigation of criminal offenses;
 - Business management and development of services and products;
 - Testing and optimization of requirements analysis procedures for direct customer approach;
 - Advertising or market and opinion research, provided that you have not objected to the use of your data.
- c. Based on your consent (Article 6 (1) (a) GDPR).

If you have given us consent to process personal data for specific purposes, the lawfulness of this processing is based on your consent. If you have given us consent to process your personal data, you can revoke that consent at any time but revoking consent does not affect the legality of the data processed until the revocation.
- d. Due to legal requirements (Article 6 (1) (c) GDPR) or in the public interest (Article 6 (1) (e) GDPR).

We are subject to various legal obligations, i.e. legal requirements (Anti-Money Laundering Act, tax laws) as well as banking supervisory requirements. Processing purposes include, but are not limited to, identity and age checks, fraud and money laundering prevention, compliance with tax reporting/reporting obligations and the assessment and management of risks within snglsDAO.

4. WHO RECEIVES YOUR DATA?

SNGLS DAO, affiliated legal entities and, if applicable, third-party service providers contracted by SNGLS DAO, gain access to your data to the extent that the data is required to fulfill the respective contractual and legal obligations. Our service providers and deputy agents may also receive data for these purposes, provided they maintain the appropriate level of confidentiality.

It should be noted that we, as a firm, are under a contractual obligation to maintain secrecy about all customer-related information we have. We may only disclose information about you if it is required by law or if you have given your consent for us to do so.

Under these conditions, recipients of personal data may include companies in the following categories:

- Consulting
- Printing services
- Collection
- IT services
- Logistics
- Marketing
- Telecommunications and sales
- Law enforcement authorities in the presence of a legal or regulatory obligation
- Other companies within the SNGLS DAO risk management network to whom we have legal or regulatory obligation.

Processing of personal data in this context may happen for any of the following purposes:

- Archiving
- Document processing
- Data recovery
- Controlling
- Data destruction
- Purchasing / Procurement
- Customer management
- Marketing
- Media Technology
- Reporting system
- Research
- Risk management
- Security management
- Support / maintenance of EDP / IT applications
- Videolegitimation
- Website Management
- Auditing service

Other data recipients may be those parties to which you have consented us to transmit data, or for which you have exempted us from keeping secrecy.

Please note that the consent may have been issued directly to us or directly to an external intermediary (e.g. a comparison portal).

5. IS DATA TRANSMITTED TO A THIRD COUNTRY OR TO AN INTERNATIONAL ORGANIZATION?

A transfer of data to offices in the countries outside the European Union (so-called “third countries”) takes place when:

- it is necessary to execute your orders (e.g. payment orders, billing of credit card payments);
- it is necessary to fulfill our legal and contractual obligations towards you;
- it is required by law (e.g. tax reporting obligations);
- you have given us your consent or

- in the context of data processing in the order.

Furthermore, a transfer of your personal data to third-country entities is foreseen in the following cases:

Your personal data will be processed in the areas of account management, payment transactions, and risk model development within SNGLS DAO at our locations within the European Economic Area and the US, in compliance with European data protection standards.

The use of third country service providers can be authorized if they provide additional written instructions on how they will comply with the level of data protection in Europe and ensure the adequate level of protection by applying one of the following measures:

- adequacy decision of the Commission;
- binding internal data protection regulations;
- completion of standard data protection clauses;
- approved rules of conduct or
- through an approved certification mechanism

6. HOW LONG WILL MY DATA BE STORED?

We process and store your personal information as long as it is necessary for the fulfillment of our contractual and legal obligations.

If the data is no longer required for the fulfillment of contractual or legal obligations, it will be regularly deleted, unless temporary further processing of that data is necessary for the following purposes:

- fulfillment of commercial and tax-related retention obligations (the deadlines for storage and documentation are two to ten years);
- use for advertising/marketing purposes.

7. WHAT PRIVACY RIGHTS DO I HAVE?

Each data subject has the right to information under Article 15 of the GDPR, the right of correction under Article 16 GDPR, the right to cancellation under Article 17 GDPR, the right to restriction of processing under Article 18 GDPR, the right to object under Article 21 GDPR and the right to data portability under Article 20 GDPR. In addition, there is the right of appeal to a competent data protection supervisory authority (Article 77 GDPR).

You may revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent that were issued to us or our predecessors prior to the validity of the Basic Data Protection Regulation, i.e. before May 25, 2018. Please note that the revocation only works for the future; processing that took place before the revocation is not affected.

8. IS THERE A DUTY FOR ME TO PROVIDE DATA?

As part of our business relationship, you must provide the personal information necessary to enter into a business relationship and perform its contractual obligations, or we are required to collect it by law. Without this information, we will generally not be able to enter into contractual relationship or provide you with our services.

In particular, according to the money laundering regulations, we may be obliged to identify you prior to the establishment of a business relationship on the basis of your identity document and to record the name, place of birth, date of birth, nationality, address and identity card details. In order for us to be able to fulfill this legal obligation, you must provide us with the necessary information and documents in accordance with the Anti Money Laundering Act and immediately notify us of any changes that occur during the business relationship. If you do not provide us with the necessary information and documents, we may not start or continue a potential business relationship with you.

9. TO WHAT EXTENT IS THERE AN AUTOMATED DECISION-MAKING PROCESS?

To establish and conduct the business relationship, we may use automated decision-making processes in accordance with Article 22 GDPR. If required by law, we inform the customer in such a case, taking into account the provisions of Article 13 paragraph 2 lit. f GDPR specifically about this and its rights under Article 22 (3) GDPR.

Further information can be found in section 10 of this privacy policy.

10. IS PROFILING TAKING PLACE?

We sometimes process your data automatically with the aim of evaluating certain personal aspects (so-called profiling). For example, we use profiling in the following cases:

Due to legal and regulatory requirements, we are committed to combating money laundering, the financing of terrorism and property-related offenses. Data evaluations may be carried out to provide you with targeted information and advice on products. To this end, we may use evaluation tools that enable needs-based communication and advertising, including market and opinion research.

INFORMATION ABOUT YOUR RIGHT OF OBJECTION UNDER ARTICLE 21 GENERAL DATA PROTECTION REGULATION (GDPR)

1. Case-specific right of objection

Pursuant to Article 6 (1) lit. e GDPR (Data Processing in the Public Interest) and Article 6 (1) lit. f GDPR (data processing on the basis of a balance of interests) you have the right, at any time during your relationship with us, to prevent the processing of your personal data and profiling, as that term is defined under Article 4(4) GDPR. If you object, we will no longer process your personal information or engage in profiling unless we can establish, in accordance with GDPR guidelines, compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or that the processing is for the purposes of asserting, exercising or defending legal claims.

2. Right to object to the processing of data for direct marketing purposes

In individual cases, we process your personal data in order to operate direct mail. You have the right to object at any time to the processing of personal data concerning you for the purposes of such advertising; this also applies to profiling insofar as it is associated with such direct mail. If you object to such processing for direct marketing purposes, we will no longer process your personal data for these purposes.

The objection should be in writing and should be directed to:

SingularDTV GmbH

Address: Poststrasse 30, 6300 Zug, Switzerland

Email: legal@singulardtv.com

COOKIE INFORMATION

A cookie ("Cookie" or "Cookies") is a small text file that is placed on your hard drive by a web page server. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you. Some Cookies are only accessed when certain features are used or certain preferences are selected, and some Cookies are constantly used. You can find out more about each of our current Cookies on the list below. We update this list periodically, so there may be additional Cookies that are not yet listed. Web beacons, tags and scripts may be used on our website or in emails to help us to deliver Cookies, count visits, understand use and campaign effectiveness and determine whether an email has been opened and acted upon. We may receive reports based on the use of these technologies by our service/analytics providers on an individual and aggregated basis.

WHICH TYPES OF COOKIES ARE THERE IN PRINCIPLE?

- "First Party Cookies" are cookies installed by SINGLS DAO on your device.
- "Third Party Cookies" are Cookies that are installed on your device through the website you are visiting. These are Cookies that have been sent by a company, for example for web analytics, to provide the operator with information about the number of visitors to its website.
- "Session Cookies" log a sequence of web pages on our website snglsdao.io that a user has visited. These Cookies are not permanently stored and are used to serve a website, for example, by allowing a user to switch from one web page to another without having to re-register. Closing the Internet browser deletes all Session Cookies on your computer.
- "Persistent Cookies" are Cookies which remain on your device even after the Internet browser has been closed, until a specified expiration date. Persistent Cookies are always activated when you visit the website that created the Cookie.
- "Flash Cookies" are in general not used on our website.

THIS WEBSITE USES COOKIES IN THE FOLLOWING WAYS:

- First-party cookies are used to legitimize the user for the Session Cookies, which are technically required for the functionality of our website or to fulfill a service or option requested by you
- Persistent cookies that recognize the customer on a web page visit within and/ or between sessions, that remember previously selected options, product features such as credit card type, and/or additional services available (for online customer service users only), or
- To additionally secure access for online customer service and online application.

WEB ANALYSIS OF THE WEBSITE

- First-party / persistent Cookies

WEB ANALYSIS OF THE WEBSITE AND FOR ADVERTISING EFFICIENCY ANALYSIS

- Third party / persistent Cookies

PERFORMANCE ANALYSIS OF THE WEBSITE

- Cookies that help to improve our website by providing us with overall statistics on the number of visitors to the website, which areas of the website are most viewed, and the city or location of users. These can be installed by an external analysis provider commissioned by us. These cookies do not personally identify you.

Please note, in this regard, your opt-out options as listed in the notes below regarding the use of web analytics services.

WHAT DATA IS STORED IN THE COOKIES?

When a Cookie is created, it is assigned a randomly generated identification number. Your name, your IP address or similar data that would allow the Cookie to be assigned to you will not be stored in the Cookie. We only save a session identifier to recognize the user. We also do not store any information in the Cookies that third parties can evaluate. Our Cookies therefore contain pseudonymous data.

HOW TO PREVENT THE STORAGE OF COOKIES?

You can read how to activate or deactivate Cookies in the help function of your browser.

However, some features on our website, such as online application and online customer service, require Cookies to enable navigation and control access. The complete functionality of the website is therefore only available for activated Cookies.

HOW TO DISABLE COOKIES

You can generally activate or deactivate the use of Cookies at any time through a functionality built into your web browser. To learn more about how to control cookie settings through your browser:

Click [here](#) to learn more about the “Private Browsing” setting and managing Cookie settings in Firefox;

Click [here](#) to learn more about “Incognito” and managing cookie settings in Chrome;

Click [here](#) to learn more about “InPrivate” and managing cookie settings in Internet Explorer; and

Click [here](#) to learn more about “Private Browsing” and managing cookie settings in Safari.

If you want to learn more about Cookies, or how to control, disable or delete them, please visit <http://www.aboutcookies.org> for detailed guidance. In addition, certain third-party advertising networks, including Google, permit users to opt out of, or customize preferences associated with your internet browsing. To learn more about this feature from Google, click [here](#).

To control Flash Cookies, which we may use on our website from time to time, you can go to this [link](#) because Flash Cookies cannot be controlled through your browser settings. Please note that if you decline the use of Cookies, some functions of the website may be unavailable, and we will not be able to present personally tailored content and advertisements to you.

We may link the information collected by Cookies with other information we collect from you pursuant to this Privacy Policy, and use the combined information as set forth herein. Similarly, the third parties who enable Cookies on our website may link your name or email address to the other information they collect, which could include past purchases made offline or online, and/or your online

usage information. If you are located in the European Economic Area, you have certain rights that are described above under the header "Notice to EU Data Subjects", including the right to inspect and correct or delete the data that we have about you.

ON WHICH LEGAL BASIS DOES THE USE OF COOKIES BY SNGLS DAO OCCUR?

SNGLS DAO processes personal data as part of the use of Cookies on our websites on the basis of a balance of interests, in accordance with Article 6 paragraph 1 lit. f GDPR.

In accordance with Article 21 (1) of the General Data Protection Regulation, you can object at any time to the processing of data through Cookies by the web analysis service used by SNGLS DAO by setting a "blocker cookie" (also called "opt-out cookie"). You can find out how to set a blocker cookie by exploring the links in the below section "Which web analytics services do we use?".

WHICH WEB ANALYTICS SERVICES DO WE USE?

Matomo Analytics

For web audience measurements, we use Matomo (<http://www.matomo.org>), a cookie based open source web analysis service that we operate on our web server. Matomo helps us understand how visitors use our website. Matomo truncates your IP address so we cannot identify you. We use the information generated by Matomo solely to evaluate how our audience uses the website, i.e. to comply anonymously aggregated reports on website activities. We do not pass any personal data to third parties.

The legal basis for this processing is our legitimate interest in measuring our reach and improving our website. You may disable Matomo based web audience measurement by disabling cookies as mentioned above.

WHICH SOCIAL MEDIA SERVICE DO WE USE?

Integration of services and contents of third parties

It may happen that content from third parties, such as videos from YouTube or Facebook, maps from Google Maps, RSS feeds or graphics from other websites are included on the snglsDAO website. This always presupposes that the providers of this content (hereinafter referred to as "third party provider") perceive the IP address of the users in order to send the content to the browser of each user. The IP address is therefore required for the presentation of this content. We endeavor to use only content whose respective providers use the IP address solely for the delivery of the content. However, we do not have any influence on whether the third parties provide the IP address. If we learn additional information about the policies of the third party providers, we will inform the users.

Further information on the perception and handling of personal data by the respective third-party provider can be found in each party's privacy policy:

[Privacy Policy of Facebook](#)

[Privacy Policy of Twitter](#)

[Google Privacy Policy](#)

[Privacy Policy of xing](#)

[Privacy Policy of LinkedIn](#)

[Privacy Policy of Microsoft](#)