## "Guitar-Chords" Privacy Policy

Updated: July 28, 2022

Effective date: July 28, 2022

Company: Digitally Constructed Co

This privacy policy will help you understand the following main policies:

- 1) In order to ensure the normal function of the product's core functions and other functions, we will collect some of your necessary information;
- 2) We will not share, provide, transfer or obtain your personal information from third parties, except with your consent;
- 3) We will strive to take reasonable security measures to protect your personal information. In particular, we will use the methods commonly used in the industry and use our best business efforts to protect the security of your personal sensitive information;
- 4) The way you access, correct, delete personal information, withdraw your consent and authorization, and make complaint "guitar-chords" reports.

If you do not agree with this privacy policy and start using it, we will only collect the information necessary to maintain the basic functions of "guitar-chords", which will prevent us from providing you with complete products and services, but we will also use de-identification, Encryption and other measures to protect this information. When you use it again, it is necessary to realize the performance of the contract and service. It will be deemed that you accept and acknowledge that we will process your relevant information in accordance with this policy.

We take the protection of our users' personal information very seriously and treat them with diligence and prudence. When you download, install, open, browse, use (hereinafter referred to as "use") the software and related services, we will collect, save, use, share, disclose and protect your personal information in accordance with this privacy policy. We want to introduce to you how we treat your personal information through this privacy policy, so we recommend that you read all the terms of this privacy policy carefully and completely. Among them, the content related to your information and rights will be reminded in bold form, please read the following:

- I. How we collect and use personal information
- II. Our use of cookies and similar technologies
- III. How we store personal information

- IV. How we share, transfer, and publicly disclose personal information
- V. How do we protect the security of personal information
- VI. Your rights
- VII. Terms of use for minors
- VIII. Amendments and notices of privacy policy
- IX. scope of application
- X. How to contact us
- XI. other
- I. How we collect and use personal information

During your use of "Guitar-Chords" software and services, we will collect information in accordance with the principles of lawfulness, fairness and necessity. The information we collect or ask you to provide will be used to:

- 1. Ensure the normal operation of the product's foundation;
- 2. Optimize and improve products and services;
- 3. Ensure the safety of products, services and users;
- 4. Recommend to you ads, information, etc. that may interest you;
- (I) Personal Information We Proactively Collect and Use

We will collect the information that you proactively provide when you use the service, and the information generated during your use of the function or receiving the service in the following ways:

Ensure the normal operation of the "Guitar-Chords" and services

When you use "Guitar-Chords" and related services, in order to ensure the normal operation of "guitar-chords" and services, we will collect your hardware model, operating system version number, network device hardware address (MAC), IP address, software version number, network connection Input method and type, operation log and other information. Please understand that this information is the basic information we must collect to provide services and ensure the normal operation of our products.

N u m b e	Authority name	Method of obtaining	Purpose of obtaining the permission	
1	Get device identification code and status	Dynamic acquisition, user active authorization	<ol> <li>Used as a basis for identifying real users rather than plug-in software and machines when logging in and registering.</li> <li>Used for advertising SDK to form feature tags to provide you with more relevant advertisements.</li> <li>Used to collect bug information generated by the application so that we can better improve the product.</li> </ol>	
2	Access network	Silent acquisition	Used to obtain the "User Agreement" and "Privacy Policy" of this application.	
3	Read storage permissions	Dynamic acquisition, user active authorization	Used for data caching, page caching, optimizing the display effect on the page, and improving response speed. Used to retrieve chords	
4	Play Audio	Dynamic acquisition, user active authorization	Used to play retrieved chords	
5	Foreground Service	Dynamic acquisition, user active authorization	Used to comeback into foreground	

# 2. Share your information with other third-party statistical codes

- (1) During your use of our products, in order to reduce the impact of bugs on your use, and according to your behavior habits, change the interaction to improve your experience, we will upload behavior information and crash logs to the Google statistics platform for detailed statistics Crash log and behavior analysis.
- (2) During your use of our products, we will show you third-party advertisements and information.

#### 3. Third-party services:

Third party service	Pro vide r	Information collected and purpose	Privacy Policy
Google Analytics	Goo gle	Used for statistical detailed crash logs and row data analysis	https://policies.goog le.com/privacy?
Google Admob	Goo gle	Display third-party ads	https://support.goog le.com/admob/answ er/6128543?hl=en

### 4. Ensure the safety of products, services and users

To help us better understand the operation of "guitar-chords" and related services, so as to ensure the security of operation and provision of services, we use third-party statistical tools to record network log information, as well as the frequency of use of software and related services, crash data, general installation, usage, performance data, etc.

Please understand that when we collected and used the above information, we performed de-identification / anonymization. The data analysis only corresponds to specific codes that cannot be directly associated with the user's identity.

(I) Handling of changes in the purpose of collecting and using personal information

Please understand that with the development of our business, the functions and services provided by "guitar-chords" may be adjusted and changed. In principle, when new functions or services are related to such as LED subtitle function. The personal information collected and used will have a direct or reasonable correlation with the original processing purpose. Where there is no direct or reasonable connection with the original purpose, we will collect and use your personal information, and we will inform you again and obtain your consent.

(II) Personal information exempted from obtaining consent to collect and use according to law

Please understand that in the following situations, we do not need your authorization to collect and use your personal information in accordance with laws and regulations and / or relevant national standards:

- (1) Directly related to national security and national defense security;
- (2) Directly related to public safety, public health, and major public interests;

- (3) Directly related to crime investigation, prosecution, trial and judgment enforcement;
- (4) It is difficult to obtain the consent of the personal information subject or other individuals because they have significant legal rights such as life and property;
- (5) Your personal information collected is disclosed to the public by yourself;
- (6) Your personal information collected from legally publicly disclosed information, such as legal news reports, government information disclosure, etc.;
- (7) Necessary for signing and performing contracts according to your requirements;
- (8) Other circumstances required by laws and regulations.

It is particularly reminded that if the information cannot identify you personally or in combination with other information, it does not belong to your personal information in the legal sense; when your information can identify your personal identity alone or in combination with other information or we When data that cannot be linked to any particular personal information is used in combination with other personal information about you, that information will be treated and protected as your personal information in accordance with this privacy policy during the combined use.

## II. Use of Cookies and Similar Technologies

Cookies and similar technologies are commonly used technologies on the Internet. When you use the software and related services, we may use related technologies to send one or more cookies or anonymous identifiers to your device to collect and store information when you access and use this product. We may set authentication and security cookies or anonymous identifiers to ensure the safe and efficient operation of our products and services, help us improve the efficiency of our services, and increase login and response speed. Using such technologies can also help you avoid the need to repeat the steps and processes of selecting personalization settings (for example: record the status of options in settings), and help you get an easier access experience.

How we store personal information

### (I) Location of information storage

In accordance with laws and regulations, we store your personal information collected and generated during domestic operations in the USA (Amazon Web Services Provider). At this time, we will not transfer the above information overseas.

#### (II) Storage period

We only retain your personal information for the period necessary for the purpose of providing software and services, and after the necessary period, we will delete or anonymize your personal information, but otherwise provided by laws and regulations except.

IV. How we share, transfer, and publicly disclose personal information

## (I) Sharing

Respecting the privacy of users is a basic principle of ours. We will not share your personal information with any company, organization, or individual except:

- 1. Sharing with explicit consent: After obtaining your explicit consent, we will share your personal information with other parties.
- 2. We may share your personal information with external parties in accordance with the requirements of judicial or administrative agencies.
- 3. Sharing with related parties: Your personal information may be shared with our affiliated companies. We only share necessary personal information and are subject to the purposes stated in this privacy policy. If the affiliate wants to change the purpose of processing personal information, it will ask for your authorization again.
- 4. Sharing with authorized partners: For the purposes stated in this policy, some of our services will be provided by authorized partners. We may share some of your personal information with our partners to provide better customer service and user experience. We will only share your personal information for legitimate, proper, necessary, specific, and clear purposes, and we will only share the personal information necessary to provide the service, such as when you purchase our products online to share your information. Our partners are not authorized to use the shared personal information for any other purpose. For companies, organizations and individuals with whom we share personal information, we will sign strict confidentiality agreements with them, requiring them to process personal information in accordance with our instructions, this privacy policy and any other relevant confidentiality and security measures.

#### (II) Transfer

We will not transfer your personal information to any company, organization, or individual, except as follows:

1. Transfer with explicit consent: After obtaining your explicit consent, we will transfer your personal information to other parties.

#### (III) Public disclosure

We will only disclose your personal information publicly if:

- 1. Disclose the personal information you specified in a disclosure method that you explicitly agree to
- 2. Where it is necessary to provide your personal information in accordance with the requirements of laws, regulations, mandatory administrative enforcement or judicial requirements, we may publicly disclose your personal information according to the type of personal information required and the manner of disclosure. Subject to laws and regulations, when we receive the above request for information disclosure, we will require the corresponding legal documents, such as subpoenas or investigation letters.
- 3. Please understand that in the following situations, we do not need your authorization to share, transfer, or publicly disclose your personal information in accordance with laws and regulations and / or relevant national standards
- (1) Directly related to national security and national defense security;
- (2) Directly related to public safety, public health, and major public interests;
- (3) Directly related to crime investigation, prosecution, trial and judgment enforcement;
- (4) It is difficult to obtain your own consent in order to protect your or other individuals' important legal rights such as life and property;
- (5) Personal information that you disclose to the public;
- (6) Where personal information is collected from legally publicly disclosed information, such as legal news reports, government information disclosure and other channels.
- V. How do we protect the security of personal information
- (I) We attach great importance to the security of your personal information and will strive to take reasonable security measures (including technical and management aspects) to protect your personal information and prevent the personal information you provide from being used improperly or without authorization Accessed, publicly disclosed, used, modified, damaged, lost or leaked.
- (II) We will use reasonable and feasible means such as encryption technology and anonymization to protect your personal information, and use security protection mechanisms to prevent your personal information from being maliciously attacked.
- (III) We will establish special security departments, security management systems, and data security processes to ensure the security of your personal information. We adopt a strict data usage and access system to ensure that only authorized

personnel can access your personal information and conduct security audits of data and technology in a timely manner.

- (IV) Although the above-mentioned reasonable and effective measures have been taken and the standards required by relevant laws and regulations have been complied with, please understand that due to technical limitations and possible malicious means, in the Internet industry, even if we can do our best to strengthen Security measures cannot always ensure 100% security of information, and we will do our best to ensure the security of the personal information you provide to us. You understand and understand that the systems and communication networks you use to access our services may cause problems due to factors beyond our control. Therefore, we strongly recommend that you take proactive measures to protect the security of your personal information.
- (V) We will formulate emergency response plans, and immediately launch emergency response plans when user information security incidents occur, and strive to prevent the impact and consequences of such security incidents from expanding. Once a user information security incident (leakage, loss, etc.) occurs, we will promptly inform you in accordance with the requirements of laws and regulations: the basic situation and possible impact of the security incident, the measures we have taken or are about to take, and you can choose Advice on preventing and reducing risks, remedies for you, etc. We will promptly inform you about the event in the form of push notifications, emails, letters, text messages, etc. If it is difficult to notify them one by one, we will take a reasonable and effective way to make announcements. At the same time, we will also report the handling of user information security incidents in accordance with the requirements of relevant regulatory authorities.
- (VI) We would like to remind you that the personal information protection measures provided in this privacy policy only apply to the software and related services. Once you leave "guitar-chords" and related services, browse or use other websites, services and content resources, we have no ability and obligation to protect any personal information submitted by you in software and websites other than "guitar-chords" and related services, Regardless of whether you log in, browse or use the above software, or whether the website is based on links or directions from "guitar-chords".

#### VI. Your rights

We attach great importance to the management of your personal information, and do our best to protect your right to access, modify (update or correct), delete, and withdraw your authorization and consent and the right to cancel your account, so that you have sufficient capacity protection Your privacy and security, your comments will be processed in a timely manner.

#### (I) Manage and withdraw your authorized information

You can withdraw your consent by turning off features, changing application permissions in your device settings, changing the scope of your authorization for us to continue collecting personal information, or withdrawing your authorization. Please understand that certain business functions and services will require your information to be completed. After you withdraw your consent or authorization, we cannot continue to provide you with the functions and services corresponding to the withdrawal of consent or authorization, and we will no longer process your corresponding Personal information. However, your decision to withdraw consent or authorization will not affect the processing of personal information previously based on your authorization.

#### (II) Access Privacy Policy

You can view the entire content of this privacy policy in "Settings"-"Privacy Policy" in the client.

Please understand that the related services described in this privacy policy may vary according to the mobile phone model, system version, software application version, mobile client and other factors you are using. The final products and services are subject to the software and related services you use.

### (III) Informing you of your right to stop operations

If we cease operations, we will stop collecting your personal information in a timely manner, we will notify you of the suspension of operations in the form of one-by-one delivery or announcement, and delete or anonymize your personal information.

#### (IV) Cancel the account

You can cancel your account by contacting us through "Settings"-"Cancel Account" or the method specified in this privacy policy. We will delete your account within 15 working days after verifying your identity.

Customer Service Email: apps.service@digitallyconstructed.ru

Your cancellation of the above account is irreversible. We will stop providing you with products or services, will no longer collect your personal information, and delete personal information related to your account or make anonymization according to your request, but laws and regulations Unless otherwise specified or otherwise required by the regulatory authority.

### (V) Complaints and reports

You can make a complaint or report in accordance with our publicized system. If you think that your personal information rights may be infringed, or you find clues that

infringe your personal information rights, you can go to "Settings"-"Customer Service Center" and enter the feedback interface to contact us. After verification, we will feedback your complaint and report within 15 working days.

#### VII. Minor clauses

If you are a minor under the age of 18, you should read and agree to this privacy policy under the supervision and guidance of your parents or other guardians before using the software and related services.

We protect the personal information of minors in accordance with the relevant national laws and regulations. We will only collect, use, share or disclose minors' individuals if permitted by law, parents or other guardians expressly agree or protect the minors Information; if we find that personal information from a minor has been collected without prior verifiable parental consent, we will try to delete the information as soon as possible.

If you are the guardian of a minor, if you have any questions about the personal information of the minor under your guardianship, please contact us through the contact information disclosed in this privacy policy.

VIII. Amendments and notices of privacy policy

- (I) In order to provide you with better services, the software and related services will be updated and changed from time to time, and we will amend this privacy policy in a timely manner. This amendment forms part of this privacy policy and is equivalent to this privacy policy. Effectiveness. However, without your explicit consent, we will not reduce your rights under this privacy policy in effect.
- (II) After this privacy policy is updated, we will remind you of the updated content in an appropriate manner on the application client and before the updated terms take effect, so that you can keep abreast of the latest version of this privacy policy. If you continue to use our service, you agree to accept the content of this revised policy, but if the updated content requires the collection of personal sensitive information such as audio and video, contact information, and geographic location, your consent will still be sought in a significant way again.
- (III) For major changes, we will also provide more prominent notices (we will explain the specific changes to the privacy policy by including, but not limited to, mail, text messages, private messages, or special reminders on the browse page).

Significant changes referred to in this privacy policy include, but are not limited to:

1. Major changes have taken place in our service model. Such as the purpose of processing personal information, the type of personal information processed, the way in which personal information is used, etc.;

- 2. We have undergone major changes in terms of ownership structure and organizational structure. Such as business adjustment, bankruptcy mergers and acquisitions, etc.;
- 3. The main objects of personal information sharing, transfer or public disclosure change;
- 4. Significant changes have occurred in your right to participate in the processing of personal information and how you exercise it;
- 5. When our responsible department for handling personal information security, contact methods and complaint channels change.

#### IX. scope of application

This privacy policy applies to all services provided by Digitally Constructed Co. and its affiliates, including "guitar-chords" clients, websites, etc., and does not apply to those who have a separate privacy policy and are not included in this privacy policy. Third-party products or services.

This privacy policy does not apply to:

- 1. Other third-party products or services may include products or websites and advertising content displayed to you in personalized recommendations or other products or websites linked to in "guitar-chords" service;
- 2. Other third parties advertising "guitar-chords" service.

Your use of these third party services (including any personal information you provide to these third parties) will be governed by these third party's terms of service and privacy policies (not this privacy policy). Please read the terms of the third parties carefully. Please protect your personal information and provide it to third parties only when necessary.

"guitar-chords" and related services described in this privacy policy may vary depending on factors such as the phone model, system version, software application version you are using. The final products and services are subject to the software and related services you use.

#### X. How to contact us

- 1. If you have any questions, comments or suggestions about the content of this privacy policy, you can contact us by emailing apps.service@digitallyconstructed.ru.
- 2. If you believe that we have violated laws and regulations or agreed with you to collect and use your personal information, you can also contact us by sending an email (apps.service@digitallyconstructed.ru) and ask to delete your related

individuals information. We promise to confirm the issues involved within 15 working days, and we will reply and deal with them in time after verifying your user identity.

#### XI other

- (I) The headings in this "Privacy Policy" are for convenience and readability only, and do not affect the meaning or interpretation of any provisions in this Privacy Policy.
- (II) Definitions of terms related to this "Privacy Policy":
- 1. A related party means any company, institution, or legal representative of a company or institution that is controlled, controlled, or under common control with or under one party. "Control" refers to the ability to directly or indirectly influence the management of the company mentioned, whether through ownership, voting shares, contracts or other legally recognized methods.
- 2. De-identification refers to the process of processing personal information so that it cannot identify the subject of personal information without resorting to additional information.
- 3. Anonymization refers to the process of making personal information subject unable to be identified and the processed information cannot be restored through the technical processing of personal information.
- (III) The copyright of this "Privacy Policy" is owned by Digitally Constructed Co. We have the right to interpret and modify to the extent permitted by law.