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Thank you for using GuitarChild services! This Privacy Notice explains what personal data GuitarChild Ltd. and its subsidiaries (“we” in this notice) collect about you and how we use your personal data, as well as the choices you have about your personal data.

This Privacy Notice applies to all GuitarChild’s services (such as our online music learning app GuitarChild and our instrument tuning apps), websites like GuitarChild.com and related services and properties we control and which we collectively here call the “Services”. We may update this Privacy Notice from time to time by posting a new version of the Privacy Notice on GuitarChild.com. If the changes we make are material, we will notify you by posting a notice in the Services or by other appropriate means. Please note that your use of the Services after the effective date is subject to the new Privacy Notice.

The terms and conditions applicable to our Services have been set out in our Terms of Service

1. CONTACT US

If you have any questions about this Privacy Notice or the ways we use your data, please contact us at privacy@GuitarChild.com.

When we operate the Services, we may share your data with the partners we work with. Some of the partners are data controllers independently of us and they can determine how and why they process your data.

2. WHAT PERSONAL DATA WE COLLECT AND WHERE WE GET THE DATA

Personal data that you provide us:

- Contact information, such as your name, email address or other contact information, if you have provided them to us (for example, if you create an account in our Services or subscribe to our communication),
- Your username and password (if you create an account in our Services),
- Profile information (such as profile photo, if you choose to add this to your profile),
- Your payment related data for processing the billing of your Services subscriptions and other purchases you make,
- School name and contact details, if you enroll our Service as a teacher user to make sure it's a real place of education,
- Your messages to the Services (such as if you are in touch with us or our support agents about resolving issues in the Services, send messages to our forums or support),
- Your comments, feedback or other info you provide, if you participate in our surveys or other research,



- Other data you choose to give us through our Services or otherwise,
- With your consent, other information explained to you when asking for your consent.

Personal Data we get from our partners

- If you choose to connect a third party account (for example a Facebook account) with our Services, we receive information from the third-party account provider (for example if you decide to sign up to our Service with Facebook login, we receive from Facebook your name, email address or other identifier to enable cross-device gameplay, profile picture, and friends information to connect you with your friends who already use our Services).
- Data from platforms that the applications run on (e.g. to verify payments)
- We also receive personal information from our analytics and advertising partners, such as information about your interactions with our ads outside our Services (for example on third party websites), including information on how you were referred to our Services.
- if you make purchases in our Services, we receive data relating to the *transactions* from the third-party payment service providers involved in those transactions to validate those purchases;

Services collect certain data automatically when you use them:

- Information on your use of the Services, such as your data about your use of our Services (e.g. progress, songs played, levels, session length, visits to our websites), and your interactions in the Services (such as data on or purchases you make or content you choose to share) as well as crash logs and other information related to bugs, errors and other issues in our Services
- Your IP address to bring our product to your device, but also to get an idea of your general location through IP geolocation data (on city, state or country level) so that we can manage the content available in the Service in your territory or to show you pricing in your own currency and also to analyze our Service and its usage.
- Device identifiers (such as your device ID, advertising ID, IMEI), identifiers we assign to your account, other technical information about the device you use for our Services (such as device type, operating system, language or browser type and version)
- Cookies and other similar technologies (such as software development kits, SDKs) we use can collect some data automatically. You can find more details about our cookie usage at the end of this document in the “Cookies” -section.
- We may also generate and assign a user ID when you access or use our Services

Providing data to us is not mandatory, but we are unable to provide the Services, or some parts or features of the Services, without processing your data. If you use our Services, we will collect data relating to you for some or all of the purposes described in this notice, depending on the Services you decide to use and your choices when using them. You have a number of options to control the extent to which we process your data, such as whether or not to



connect your third-party accounts to our Services, resetting or limiting the use of your advertising IDs in your device settings, or disable the use of cookies in our cookie banner and/or your browser settings.

We do not intend to collect or process any data relating to you belonging to special categories, such as data revealing racial or ethnic origin, religious or philosophical beliefs or trade union membership, genetic, biometric or health information, or data concerning person's sex life or sexual orientation. Please do not provide this type of information to us or make it available to others in the Services.

3. WHY WE PROCESS YOUR PERSONAL DATA

We will use your personal data for the following purposes on these legal basis:

To make the Services work.

In order for us to perform our contract with you, we process your data necessary to

- set up and maintain your account in our Services (where applicable) and allow you to use our Services
- operate the Services
- provide you the Services and products you request
- process transactions and verify and confirm payments
- send you service-related communications (for example confirmations, administrative messages, technical notices)

To make the Services more suitable to our users.

In order to provide great Services to our users and to provide you the best user experience possible, we have a legitimate interest to process necessary data to

- analyze, develop and improve our Services and the user experience, and customize it for you
- manage our customer relationship with you
- provide social features as part of the Services (for example, leaderboards)
- provide user support and respond to your questions and comments
- analyze your use of our Services, for example to understand what type of content or music genre you are interested in, and customize your service experience
- send you updates, alerts, news and other information related to our Services or other operations
- troubleshoot or debug any errors or other issues in our Services
- create data that is not identifiable to you (for example, aggregated data)
- conduct surveys or other research to learn more about our Services or users



To make sure that we reach interested audiences.

Based on our legitimate interest to promote our Services and to make sure we reach relevant, interested audiences, we to process necessary data to

- provide you with our offers in the Services, in other websites and services, and by email
- send you communications about our events, or other news related to our Services and operations
- keep track on installations of our applications (including the source of each install)
- serve, target, deliver, measure and improve our advertising and the Services (including our advertising outside of our Services)
- request our advertising partners to show personalized ads outside our Services.

For information on how to opt-out from personalized advertisements, see section 'Your rights' below.

To keep services fair and safe.

In order to ensure acceptable, safe and fair use of the Services and to safeguard our operations, we have legitimate interest to process necessary data to

- monitor that the use of the Services is acceptable and to prevent activity in the Services we determine to be misconduct, against our terms and conditions, or potentially illegal and take action against such use or otherwise exercise or defend our legal rights
- audit our operations or processes.

To analyze and segment.

For all of the above purposes, we can analyze and segment all collected data.

With your consent.

If we wish to process your personal data for any other purpose where we are not able to rely on any other legal basis for processing under applicable law, we will ask your consent.

We also may process your data as necessary to comply with legal obligations we consider to apply to us (including cooperating with authorities upon due request and for accounting and tax requirements). We can also process your data for additional purposes compatible to any of the purposes listed above.

We do not use your personal data to make any automated decisions (meaning decisions without any human involvement) which significantly affect you.

4. WHO CAN SEE YOUR DATA



Instead of doing absolutely everything on our own, we need help from others. We have partners that provide services and data processing for us for the purposes described in this notice. We share your data with the following types of recipients:

Social Features.

We have social features in our Services, which means that other users may, for example, see your profile data and your leaderboard position or other activities in the Services, and read or comments or questions you post in our forums.

GuitarChild Companies. Other companies belonging to the GuitarChild group of companies, for example to help us to develop or operate our Services

Partners working for us. Persons or companies outside of the GuitarChild group that process personal data on our behalf and according to our instructions and control. These GuitarChild processor partners include for example providers of hosting services, payment processors that actually deal with billing, banks and credit card companies on behalf of us, analytics services that enable us to gain insight into how we should improve our Services, user support and other services that help us to operate and develop our Services.

Advertising and social media partners who use advertising identifiers, cookies, APIs, and/or SDKs in our Service to enable them to collect and analyze user and device related data and information. Such partners may be for example, our advertising partners or partners providing social media tools allowing sharing of content from our Services. These partners collect and process personal data separately from us under their own privacy policies. We encourage you to check those privacy policies to learn more about their data collection and use practices, use of cookies and other similar tracking technologies. The opt-out instructions for these Partners' services are also included in their privacy policies. For any details on the processing of personal data by our advertising and social media partners, please check Privacy Notice Third Party.

Public authorities and other entities.

- competent law enforcement bodies or courts of law where we find it necessary as a matter of applicable law or regulation,
- potential or actual buyers or their advisors in connection with a planned or actual corporate acquisition or other business restructuring or a similar arrangement.
- to any person or entity where we find disclosure necessary to combat fraud or illegal activity, or to exercise or defend our legal rights or to protect your vital interests or those of any other person.

5. INTERNATIONAL DATA TRANSFERS

Our service is global by nature, and your data can therefore be transferred to and processed in countries outside of the European Union ("EU") and the European Economic Area ("EEA"). For example, our subsidiaries and some of the servers we use to host our Services are located in the USA. We also use partners that are located outside the EU to provide services for us. Since these countries may have different data protection laws than your own country, we take steps to ensure that there are adequate safeguards in place to protect your personal data. These safeguards may include having standard contractual clauses approved by the EU Commission



The power of code

or other lawful safeguards in place. For more details as regards our international advertising and social media partners, please check Privacy Notice Third Party.

6. DATA RETENTION

We retain your data as long as your user account is active or as needed to provide the Services. You may end this relationship by deleting your account. We will then delete all your personal data from our own and our partners' systems, including backups within 30 days, unless there is a legitimate business interest to retain the data, such as to comply with our legal obligations, to enforce our agreements or to resolve disputes. We also periodically review and delete or de-identify inactive user accounts that have been inactive for five years or other data.

7. YOUR RIGHTS

You have the right to access your personal data we store about you. If you request, we will provide you a copy of your personal data in an electronic format. You also have the right to have your data deleted. If you choose to delete your profile, this will erase all personal data we have collected of you through the application thereby also anonymizing all analytics data based on such personal data, unless we, for a legitimate reason, have the right to retain the personal data. You can also demand the restriction of processing in accordance with the legal requirements.

To access your data or in our applications, or to request its deletion, please send a data access or deletion request from the application settings under the “privacy” menu or on your user profile page. We ask you to primarily use these automatic tools to submit requests to help us to validate and process your requests more quickly and reliably.

Our GuitarChild app provides the possibility to control some of the social features of the app and what data you share with others. You can modify your preferences in the settings under the privacy tab of the app.

You also have the right to correct or update your information. You may do this by editing your personal details on your profile if your information changes or happens to be incorrect. Or you can contact us at support@GuitarChild.com.

You also have the right to object to our processing your information to the extent our processing is based on legitimate interests. You can at any time ask us to stop using your information to send you marketing communications. In GuitarChild application, you are able to modify your preferences concerning marketing communications (push and email) under the privacy tab in the GuitarChild application's settings or by following the instructions in such communications.

Any consent that you might have provided can be withdrawn at any moment.

For limiting interest-based advertising, please check out your ad tracking settings of your mobile device or web browser. For your Android or iOS device, select “limit ad tracking” (Apple iOS) or “opt-out of interest-based ads” (Android) in the settings.



If you have any complaints about our handling of personal data or want to know about something specific in this regard, please email us a privacy@GuitarChild.com. We take these matters seriously and will look into all requests and complaints.

Finally, you always have the right to lodge a complaint with the local data protection authority (for example, the Office of the Data Protection Ombudsman in Finland).

8. HOW DO WE KEEP YOUR DATA SECURE

We use appropriate technical and organizational measures designed to protect the data of our users. The measures we employ are designed to provide a level of security appropriate to the risk of processing your personal information and we continuously develop them. Our measures vary, but typically include controls to limit access to services or systems that contain personal data, pseudonymization, databases protected by firewalls, passwords and other technical measures.

9. AGE MATTERS

When we collect personal data, we do not know your age, and we do not knowingly collect or solicit personal data from anyone under the age of 18 or knowingly allow such persons to use our Service. If You are under 18, please do not attempt to access our Services without your parents supervision, take them into use, or send us any information about yourself. If you believe that we might have received any information from or about a child under the age of 18, please contact us at privacy@GuitarChild.com.

10. COOKIES AND SIMILAR TECHNOLOGIES

Cookies are small files stored on a user's computer (or other internet enabled device, such as smartphone) when an online service has been used. We and our partners use cookies and similar technologies to provide the Services and personalize it for you, to run analytics and target advertisements. Some of the cookies used in the Service are "first party" cookies, i.e. from the website itself, and others are third party (partner) cookies that belong to the advertising, analytics entities or social networks.

Users can adjust their browser settings to disable cookies or to delete cookies that have been saved in the browser, but this can result in some parts of the Service not functioning properly.