

Data Collection:

- Information provided during account creation including username, email address, phone number, date of birth, gender, street address, and country
- Street address information to check eligibility for a service option, for billing, to mail services, etc.
- Information related to a user's activities on Spotify including streaming history, user-created playlists, browsing history, etc.
- Use of third-party services, devices, and applications in connection with Spotify
- Information like IP addresses, device identifiers, network connection type related to device running Spotify
- Information related to transactions including payment method and purchase history
- Survey and research information a user provides

Data Sharing Policies:

- Spotify may share data with payment partners to prevent fraud and process payments through Spotify
- Information can be shared with advertising or marketing partners to tailor ads to a user's common interests, or when email marketing campaigns are being implemented
- Data can be shared with law enforcement for legal obligations
- Pseudonymized data can be shared with third parties to fill contractual obligations
- Data can be used to conduct business forecasting models and reporting

User Rights:

- Users can request to review a copy of data collected by Spotify
- Users have the right to request to delete certain portions of personal data, in addition a user can edit personal information through the application such as profile picture
- Users can object to tailored advertising through the application settings
- Users can request the correction of certain details of personal information

Opt Outs:

- Users can opt out of tailored advertising
- Users can opt out of third-party social media links through Spotify, limiting the data Spotify can achieve from other sources
- Users can opt out of certain data collection through a request

Update Procedure:

- Users will be notified of updates to the privacy policy through the Spotify application or email
- Continued use of Spotify will assume a user understands updates to the privacy policy

Summary Matrix:

<u>Aspect</u>	<u>Details</u>
Data Collection	User data (name, email, etc.), usage data (streaming history, etc.), technical data (device information), location data, payment data, survey responses, and data from third-party services connected to Spotify.
Data Sharing	Shares with payment partners, advertising and marketing partners, marketing partners, service providers, and law enforcement agencies.
User Rights	Rights to access, delete, and correct personal data. These rights can be exercised through account settings or by contacting Spotify.
Opt-Out Options	Opportunities to opt out of tailored advertising, marketing campaigns, and disconnect third-party applications.
Updates	Notifies users of significant changes to the Privacy Policy with the Spotify Service or email; continued use after changes implies acceptance of new policies

Regulatory Comparison (Compiled with help of ChatGPT)**CCPA (California Consumer Privacy Act)**

Notice Requirements: Includes detailed clauses about the collection of personal information, the purposes of collection, and categories of third parties with whom data is shared.

Consumer Rights: Users can request what personal data has been collected and how it's used; users can request deletion of their personal data from Spotify; Spotify offers the ability to opt out of sale or sharing of personal data by changing account settings and cookie preferences; Spotify says it won't discriminate users for exercising their privacy rights.

Opt-Out Provisions: Users can disable targeted advertising through privacy settings; Spotify supports cookie-based opt-outs; marketing communications can be unsubscribed via email.

VCDPA (Virginia Consumer Data Protection Act)

Processing Limitations: Spotify collects only data that is necessary for its company purposes; explicit consent is required for collecting sensitive information such as voice data and data from third-party social medias

Consumer Rights: Users can view and download a copy of their personal data; users may correct inaccuracies through account settings; Spotify provides account deletion options that remove user data from their systems; data is downloadable in a machine-readable format via the privacy center; users can opt out of profiling and targeted advertising.

Business Obligations: Spotify performs risk assessments for features involving large-scale or sensitive data

GDPR (General Data Protection Regulation)

Data Subject Rights: Users can obtain information about their stored personal data; users can update or correct their personal details; users can delete their account and request removal of associated data; users may request that Spotify limit processing under certain circumstances; users can export their listening history and account data in standard formats; users may object to processing based on legitimate interest or direct marketing.

Consent Requirements: Consent is obtained explicitly for voice data, marketing preferences, and connected account data; Spotify allows users to withdraw consent at any time.

Data Transfer Provisions: Spotify relies on SCC's for transfers of personal data outside the EU

Processing Limitations: Data is collected for only defined purposes such as providing personalized music marketing; Spotify practices data minimization and only retains data for as long as necessary to complete projects.

Documentation Requirements: DPIAs are conducted for AI-based personalization features and third-party integrations that pose high risks.