

PRIVACY POLICY

This Privacy Policy sets out the basis on which any information (which may include personal data, as defined in data protection law) we collect from you, or that you provide to us, through [this website](#) (the “**Site**”) will be processed by us. Please read the following carefully to understand our practices regarding your information and how we will treat it.

WHO WE ARE

This site is operated on behalf of EGA Distro Limited (“**EGA**”) by Universal Music Operations Limited, 4 Pancras Square, London, N1C 4AG, United Kingdom. Data Protection Number - Universal Music Operations Z5512937 (“**Universal Music**”) (EGA and Universal Music together, “**We**”, “**Us**”, “**Our**”). EGA is an independent data controller and Universal Music is an independent data processor under applicable data protection law. Each of EGA and Universal Music separately make the disclosures in this Privacy Policy to you (and where necessary in this Privacy Policy, references to “we” will be deemed to be references to both entities for such purpose).

As used in this Privacy Policy, “Universal Companies” and “EGA” respectively include all entities Universal Music or EGA controls, is controlled by or is under common control with, including subsidiaries, joint ventures or other entities in whom Universal Music or EGA has a substantial ownership interest.

CONTACT

You may contact EGA with any questions, comments and requests regarding this privacy policy at privacy@ega-distro.com.

For questions, comments or requests not related to this privacy policy please see [this FAQ](#) regarding how to contact UNIVERSAL MUSIC.

INFORMATION WE MAY COLLECT FROM YOU

When you use the Site or contact us by e-mail, social media, SMS, telephone, or other methods, Universal Music and EGA may collect and process the following data about you:

- Information you give us, including:
 - o Forms filled out by you on the Site;
 - o Content of correspondence with us by phone, e-mail or otherwise;
 - o Registration on the Site;
 - o Subscriptions or orders placed on the Site;
 - o Participation in discussion boards or other social media functions on the Site;
 - o Entering a competition, promotion or survey;
 - o Reporting a problem or requesting support for the Site.

The information you give us may include your name, address, e-mail address and phone number, date of birth, payment information, personal description, photographs or images or comments.

- Information we collect about you:

With regard to each of your visits to the Site we may automatically collect the following information:

- o Technical information, including IP address, login information, browser type and version, time zone sending, browser plug-in types and versions, operating system and platform;
- o Information about your visit, including the full URL clickstream to, through and from the Site (including date and time);
- o Pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

UNIVERSAL MUSIC and EGA may also collect information our about your devices (including phones, computers or other devices) where you access and visit the Site. Such information may include unique device identifiers and mobile network information (including phone number), IP address, language and time zone, operating system, hardware version, device locations (including specific geographic locations, such as through GPS, Bluetooth or WiFi signals).

INFORMATION WE COLLECT FROM OTHER SOURCES

UNIVERSAL MUSIC and EGA may also work with third parties (including, for example, business partners, sub- contractors in technical, payment and delivery services, advertising networks, analytics providers, social networks such as Facebook and Twitter, search information providers, credit reference agencies, third parties who enable sign on functionality and social network integration) and may receive information about you from them.

If you choose to use features on the Site that connect to your online profiles, accounts or services (including social media accounts) ("**Connected Accounts**"), we may collect any information that you permit through your sedngs on those Connected Accounts. For example, if you log in to the Site using your Facebook account and choose to allow Facebook to share your profile with us, we may

collect that information. Information we receive from Connected Accounts includes email address, first and last name, location (hometown and country), gender, date of birth, likes, posts or other social activity. Please review your Connected Account privacy settings to control what information is provided to us through this option.

HOW YOUR INFORMATION MAY BE USED

UNIVERSAL MUSIC and EGA may use information held about you in the following ways:

- To help us respond to your queries;
- To fulfil your orders or purchases on the Site;
- To provide you with information on the relevant products or services;
- To provide you, or permit selected third parties to provide you, with information about other goods and services we offer that are similar to those that you have already purchased or enquired about or that we feel may interest you;
- To make suggestions and recommendations to you and other users of the Site about goods or services that may interest you or them;
- To provide or permit third parties to provide targeted advertising via websites you visit about goods or services that you may find interesting (see more on this in our Cookies Policy below);
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To track the progress and number of entries in competitions and promotions.
- To allow you to interact with the Site, for example by posting comments or to share information from the Site on third party social media platforms;
- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To manage your access to the services or notify you about changes to the services;
- To comply with legal and regulatory requirements;
- To administer the Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve the Site to ensure that content is presented in the most effective manner for you and for your computer;
- As part of our efforts to keep the Site safe and secure.

We may combine information we receive from other sources with information you give to us and information we collect about you (including information in relation to your devices). We may use this combined information for the purposes set out above.

DISCLOSURE OF YOUR INFORMATION

UNIVERSAL MUSIC and EGA may share your personal data with any, and with selected third parties including:

- To the extent permitted by applicable law;
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you in order to provide you with a product or service;
- Business partners, suppliers and sub-contractors to provide you with information about promotions and offers;

- Advertisers, advertising networks and social networks that require the data to select and serve relevant adverts to you and others. We may also use aggregate and other information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
- Analytics and search engine providers that assist us in the improvement and optimization of the Site;
- Third parties when you consent to or request such sharing.

UNIVERSAL MUSIC and EGA may disclose your personal data to

third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If the UNIVERSAL MUSIC Company that operates the Site or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of UNIVERSAL MUSIC or EGA Companies, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- To any other third party where lawful.

STORAGE AND TRANSFER OF DATA

All the information you provide may be processed and stored, transferred or accessed by entities around the world as described in this policy. We will take steps to ensure that your data is treated securely and in accordance with this Privacy Policy. We have put in place technical and organisational procedures designed to safeguard the information we collected on the Site.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk.

COOKIES

The Site uses cookies and other tracking technologies to distinguish you from other users of the Site. This helps us to provide you with a good experience when you browse the Site and also allows us to improve the Site. For detailed information on the cookies and other technologies we use and the purposes for which we use them see our Cookies Policy below.

SOCIAL MEDIA AND OTHER THIRD PARTIES THAT PROVIDE CONTENT, ADVERTISING OR FUNCTIONALITY ON OUR SERVICES

Some of the content, advertising and functionality on the Site may be provided by third parties that are not affiliated with us. For example, you may have the opportunity to log in to the Site using sign-in services such as Facebook Connect or an Open ID provider. These services will authenticate your identity and provide you the option to share certain personal data with us. Services like Facebook Connect give you the option to post information about your activities on this Site to your profile page to share with others within your network.

Third-party advertisers also may have a presence on the Site. These and other third parties may collect or receive certain information about your use of the Site, including through the use of cookies and other Internet technologies, and this information may be collected over time and combined with information collected across different websites and online services.

Some of these companies participate in industry-developed programs designed to provide consumers choices about whether to receive targeted advertising. Please visit the websites operated by the [Network Advertising Initiative](#), [Digital Advertising Alliance](#), and [European Interactive Digital Advertising Alliance](#).

CHILDREN

The Site is not directed toward children (as defined by local law) nor does UNIVERSAL MUSIC or EGA knowingly collect information from children (as defined by local law) without parental consent except where in compliance with applicable laws. If we become aware that we have collected personal data from a child without legally-valid parental consent we will take reasonable steps to delete it as soon as possible.

YOUR RIGHTS

You may be entitled, in accordance with applicable law, to object to or request the restriction of processing of your personal data, and to request access to, rectification, erasure, and portability of your own personal data by contacting us as described in the “Contact” section. We may require you to prove your identity with approved identification if you request this information.

You may also be entitled, in accordance with applicable law, to lodge a complaint with a supervisory authority if you consider that our processing of your personal data infringes applicable law.

You are responsible for keeping your information current and up-to-date. You may update your information by contacting us as described in the “Contact” section.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

If you wish to subscribe to an artist specific mailing list, only EGA will be authorized to use your name and email address to send you news, special offer, promotions and messages tailored to your interests. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, accessing the email preferences in your account settings page or you can contact EGA as described in the “Contact” section.

YOUR CALIFORNIA PRIVACY RIGHTS

California residents have certain rights regarding the collection, use, disclosure, and sale of their personal data. As defined in the California Consumer Privacy Act, we engage in industry-standard advertising business practices that may be considered a sale. We do not knowingly sell personal data related to children under 16 years of age. UNIVERSAL MUSIC may have sold personal data in the last 12 months in the following ways:

- By allowing advertising networks we partner with to place cookies or other tracking technologies through the Site;

- By sharing hashed or pseudonymized identifiers with advertising networks to create audiences for use in online advertising.

California residents have the right to request:

- Disclosure of personal data we collect, use, disclose, and sell about you;
- Deletion of your personal data that we maintain;
- To opt out of the sale of your personal data.

To opt out of the sale of your personal data, designate an authorized representative, make a request, or for more information, contact us at described in the Contact Section.

In most cases, we will verify your request by confirming that you control the email address associated with your personal data. If necessary, and taking into account available technology, security and privacy concerns, and the burden on our business, we reserve the right to take additional steps or require additional information to verify your request.

You have the right not to receive discriminatory treatment for exercising your privacy rights.

Other California Privacy Rights

You may opt out of having your personally identifiable information shared with third parties for those third parties' direct marketing purposes by contacting us at described in the Contact Section.

Do-Not-Track Signals and Similar Mechanisms. Some web browsers may transmit "do-not-track" signals to the websites and other online services with which a user communicates. There is no industry standard that governs what, if anything, websites should do when they receive these signals. Neither UNIVERSAL MUSIC nor EGA currently takes action in response to these signals.

LINKS TO THIRD PARTY WEBSITES

The Site, newsletters and other communications may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

CHANGES TO OUR PRIVACY POLICY

Any material changes we may make to our Privacy Policy in the future will be posted on this page prior to the change becoming effective and/or we will notify you through the Site or, where appropriate, by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

USERS OF THE SITE IN THE EUROPEAN ECONOMIC AREA OR UNITED KINGDOM

This section of this Privacy Policy applies only if you use the Site from a country that is a Member State of the European Economic Area (EEA) or the United Kingdom (UK) and supplements the information in this Privacy Policy.

Legal Basis for Data Processing

UNIVERSAL MUSIC and EGA process personal data for the purposes set out in this Privacy Policy, as described above. Our legal basis to process personal data includes processing that is: necessary for the

performance of the contract between you and us (for example, to provide you with the services you request and to identify and authenticate you so you may use the Site); necessary to comply with legal requirements (for example, to comply with applicable accounting rules and to make mandatory disclosures to law enforcement); necessary for our legitimate interests (for example, to manage our relationship with you and to improve the Site); and based on consent by our customers (for example, to communicate with you about our products and services and provide you with marketing information), which may subsequently be withdrawn at any time (by using preference settings in emails or on the Site or emailing us as set out in the Contact section) without affecting the lawfulness of processing based on consent before its withdrawal.

We may use automated decision-making technologies, including profiling, to support our data processing activities. Our automated decision-making capabilities include logic that attempts to identify artists, music, communications, products, or offers that we believe may interest you. By using this logic, it helps us personalize your interactions with UNIVERSAL MUSIC or EGA. For you, this means that you may see online advertisements, direct marketing communications (if you have subscribed), or other advertising or marketing messages or special offers based on your activity on the Site or interactions with us or our third party partners.

In some instances, you may be required to provide us with personal data for processing as described above, in order for us to be able to provide you to use all the features of the Site.

International transfers

Our sharing your personal data in accordance with this Privacy Policy, may involve transferring your data outside the EEA or UK. Whenever we transfer your personal data out of the EEA or UK, we ensure a similar degree of protection is afforded to it by ensuring, where required by law, at least one of the following safeguards is implemented:

- transferring personal data to countries that have been deemed to provide an adequate level of protection for personal data by the relevant authorities;
- using specific contracts approved by the relevant authorities which give personal data the same protection it has in the exporting country.

You may be entitled, in accordance with applicable law, to request a copy of relevant safeguards by contacting Us as described in the “Contact” section.

COOKIES POLICY

INFORMATION ABOUT OUR USE OF COOKIES AND TRACKING TECHNOLOGIES

The Site uses cookies and other similar technologies (as described below) to distinguish you from other users of the Site. This helps us to provide you with a good experience when you browse the Site, allows us to improve the Site and provide you with tailored content and advertising.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

We may use cookies:

- i. to collect anonymised data on users behaviour on the Site. We may also capture what site a user has come from and what site they go to and also some demographic data (e.g. the user's location) and we may use that data to analyse user behaviour across multiple sites;
- ii. to categorise pools of users (on an anonymised basis) based on demographic and/or behavioural data and use this to, (1) target our advertising to cookie-ed users on third party websites, UNIVERSAL MUSIC websites and EGA websites, and (2) use that data to allow targeted third party advertising to categorised cookie-ed users either in respect of advertising placement We have bought/placed and targeted to users on behalf of third parties or in respect of advertising bought/placed by third parties and targeted to cookie pools We have "sold" to these third parties.

The Site may use Google AdSense to publish advertisements, including information about your demographics and interests. When you view or click on an advertisement a cookie will be set to help better provide advertisements that may be of interest to you on this and other websites. You may opt-out of the use of this cookie by visiting Google's Advertising and Privacy page: http://www.google.com/privacy_ads.html.

Most internet browsers are automatically set up to accept cookies. However, if you want to refuse or delete any cookies (or similar technologies), please refer to the help and support area on your internet browser for instructions on how to block or delete cookies. Please note you may not be able to take advantage of all the features of the Site, including certain personalised features, if you delete or disable cookies.

For more information on managing cookies, please go to www.allaboutcookies.org, or visit www.youronlinechoices.eu which has further information about behavioural advertising and online privacy.

Web Beacons

We, or our third party partners, may employ a software technology called web beacons (also known as web bugs, clear gifs or pixels) which helps us understand what content is effective, for example by counting the number of users who have visited these pages, and to understand usage patterns. Web beacons are any graphics with a unique identifier, similar in function to cookies, and are used to let us know when content is viewed. In contrast to cookies, which are stored on a user's computer hard drive, web beacons are embedded on web pages, ads, and e-mail. We, or our third party partners, may tie the information gathered by web beacons to the other information we collect about you.

In addition to disabling cookies and other tracking technologies as described above, you may opt-out of receiving targeted advertising from participating ad networks, audience segment providers, ad serving vendors, and other service providers by visiting websites operated by the [Network Advertising Initiative](#), [Digital Advertising Alliance](#), or [European Interactive Digital Advertising Alliance](#).