

## **Trevanna Tracks, LLC**

### **Privacy Policy**

As of [UPDATE DATE]

This privacy policy (“Privacy Policy”) applies to our cloud-based software platform (the “Product”), as modified from time to time and serves to explain how Trevanna Tracks, LLC (“Trevanna”, the “Company”, “us” or “we”) and some of the companies we work with collect, use, share and protect your information and your choices about the collection and use of your information, including your Personally Identifiable Information (“PII”) collected from our Product. PII, as used in U.S. privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our Privacy Policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your PII and other information collected from you, in accordance with our Product.

This Privacy Policy does **not** apply to:

- websites, mobile applications, products, services or other environments, including third party websites that are linked to the Product, that do not display, refer or link to this Privacy Policy or that have their own privacy statements; or
- information collected from you offline or through other means.

#### **What personal information do we collect from users of our Product?**

When using our Product, you may be asked to enter your email or other details to help you with your experience.

We collect the following types of information:

- **Information you provide directly or allow us to access:** We collect information (name, email, job title, company affiliation) when you sign up or enter information into the Product.
- **Passive collection of information:** We may collect information about your visits to our Product without you actively submitting such information. This information can make your use of our Product easier and more meaningful by allowing us to provide a better service or user experience, customize features based on user preferences, compile statistics, product usage data, and otherwise administer and improve our Product. Here are some of the types of information collected when using our Product:
  - **Log data:** When you use our Product, our servers automatically record information (“log data”), including information that your browser sends whenever you use our Product. This log data may include your Internet Protocol address, browser type and settings, the date and time of your request, how you used our Product.

- ***Analytics Data:*** Our application collects data on user behavior within our application. This is only accessed for the purpose of improving user experience.

### **How do we use your information?**

We may use the information we collect from you when you accept the invitation to register or use certain other Product features in the following ways:

- to alert you to website maintenance or service
- to notify you of product updates
- and in any other ways specified by us at the time your information is collected.

### **How long do we keep your information?**

If the company cancels their subscription to the Product, the personal data related to that company will be destroyed within thirty days. In the event that you, the user, become inactive, we will destroy the information related to your account within twenty-six months.

### **User management:**

The system includes rights management options, accessible by project administrators, to define and manage user and team rights.

There are six levels of access rights available:

1. Administrator or Super Admin
2. All-Access Pass (permission to all projects)
3. Per Project User (permission on a project-by-project basis)
4. Backstage Pass (view-only access to all projects)
5. View Only (view-only access on a project-by-project basis)
6. Deactivated

### **How do we protect visitor information?**

Our Product is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

We also use regular Malware Scanning programs.

Your personal information is encrypted behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive information you supply is encrypted via Secure Socket Layer (SSL) technology and other techniques.

### **Password policy:**

Passwords are hashed in our system, and never held plain. We use a hashing algorithm and store the result. Users can reset their password at any time: this process is automatically handled.

In order to help Companies to comply with specific information protection and data privacy requirements, a custom password policy can be implemented by request, in order to help compliance with their

requirements. Different policies can be applied to Users and administrators, for example: password length, complexity, entropy, special character usage or even a regular expression.

### **Third-party disclosure:**

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information. This does not include hosting partners and other parties who assist us in hosting the Product, so long as those parties agree to keep this information confidential. We may also release information when it is appropriate to comply with the law, enforce our Product policies, or protect ours or others' rights, property or safety.

### **How do you get the Company to change your personal information?**

- By emailing us at [insert].
- By calling us at [insert].

### **Data collection and processing:**

Trevanna Tracks does not collect nor process any personal data such as age, race, gender, religion, ethnicity, sexual preference, or national origin.

### **Cookies:**

We use cookies but they do not contain any personal data. They are used only to authenticate Users through our services and the Trevanna Tracks Support Team. One of the cookies we use is Google Analytics. Google's ability to use and share information collected by Google Analytics about your visits to the Website is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). Google offers an opt-out mechanism for the web available [here](#).

Cookies, web beacons, Flash cookies and similar technologies serve many important functions that help us serve you better. However, you have a variety of tools to manage cookies and similar technologies, including:

- Web browser controls to block and delete cookies, or adjust your tracking preferences;
- Visiting the Digital Advertising Alliance's opt-out page [here](#) to opt out from receiving third party advertiser cookies;

For information on how to manage privacy and storage settings for Flash cookies, click [here](#).

### **Do Not Track (DNT):**

Some web browsers may transmit "do-not-track" signals to websites with which the browser communicates. Our online services do not currently respond to these "do-not-track" signals.

### **California Privacy Rights:**

*For California Residents Only.* California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes (if applicable), such as types of personal information we share and who we share it with. To make such a request, please write to us at the postal address [above](#). Please be sure to include your name and address.

#### **Children:**

Our Website is not intended for children. We do not knowingly collect any personal information from children under 13-years old. However, if the parent or the guardian of a child under 13 years old believes that the child has provided us with personal information, the parent or guardian of that child should contact us at the information provided above to request the information's deletion. Anyone under 13 years old should seek their parent's or guardian's permission prior to using the Website or disclosing any personal information to us.

#### **Changes to our Privacy Policy:**

We may modify or update this Privacy Policy from time to time, so please review it periodically. We may provide you with additional forms of notice of modifications or updates as appropriate under the circumstances. Your continued use of our Product after any modification to this Privacy Policy will constitute your acceptance of such modification.

#### **Contacting Us:**

If there are any questions regarding this privacy policy you may contact us using the information below:

Trevanna Tracks, LLC  
11833 Mississippi Avenue, 1<sup>st</sup> Floor  
Los Angeles, CA 90025  
Phone: 310.820.7678  
Email: [hello@trevannatracks.com](mailto:hello@trevannatracks.com)

#### **Privacy Policy:**

We include a Data Privacy clause in all our contracts.  
All our US contractors are registered within the Privacy Shield Framework.

We look forward to being your partner in the world of music licensing. If you have any questions about our privacy policy, please reach out to our friendly support team by emailing us at [hello@trevannatracks.com](mailto:hello@trevannatracks.com).