

Privacy Policy

Last Updated: January 21, 2021

This Privacy Policy describes how MRC Data, LLC (“Company” or “we”) collects, uses, and discloses personal information and business information, on or through our websites, services, products, databases, software, tools and apps where this Privacy Policy is located or referenced (collectively, the “Platform”) and in our offline interactions where this Privacy Policy is referenced.

This Privacy Policy does not apply to personal information we collect from our employees and contractors. This Privacy Policy is not a contract and does not create any legal rights or obligations.

For the purpose of European data protection laws, Company acts as a controller in connection with certain personal information described in this Privacy Policy.

If you are a California resident, see [Section 6](#) for information provided pursuant to the California Consumer Privacy Act. If you are a data subject in the European Economic Area, see [Section 7](#) for information provided pursuant to the European Union General Data Protection Regulation. Residents of Canada have additional rights under Canadian law and can learn about them under [Section 8](#).

1. Types of information we collect.

We collect information regarding sales, analytics, engagement and other performance metrics associated with content, services, and performances by musicians, entertainers, creators, and other artists. We also collect information about you when you interact with us or our Platform. We may collect, receive, and develop several different types of personal information, including:

Contact Information. We may collect your name, email address, phone number, and mailing address.

Demographic Information. We may collect demographic information, such as your age, date of birth or gender.

Location Information. We may collect information about your location using your IP address and your zip code.

Information You Submit. We collect any information you provide when you contact us or create an account.

Preference Information. We may collect information about your preferences when using the Platform or our services. We may also collection information about your preferences that you share.

Internet and Network Activity Information. We may collect information about the browser you are using and your IP address. We might also collect device identifiers. We may use tracking tools like cookies to automatically collect information about how you interact with our Platform and online content, such as your browsing and search history on our Platform, what areas of our Platform you visit and for how long, what content you click on, what site you came from, what site you visit when you leave us, and your views and clicks of our digital ads and content on other sites.

Employment-Related Information. We, or our vendors, collect information about your employment, including your job title or occupation, as well as information you submit as part of your user profile or information that is publicly available about your employment.

Inferences. Using the other pieces of personal information collected about you, we may develop and collect inferences about you, reflecting what we believe to be your preferences, characteristics, experiences, predispositions, and attitudes.

2. We use information as described here.

We use information to respond to your requests or questions. For example, we may contact you about the feedback you have given us. We will also use certain pieces of information to verify your identity if you make certain requests pursuant to this Privacy Policy.

We use information to provide services to you. For example, we may use your information to provide you with access to the Platform, provide you with professional or support services in connection with such access, process and fulfill your subscriptions to the Platform, and/or maintain and service your account.

We use certain information to provide information and services to others. For example, we provide performance and other business information to others about music consumption and sales, analytics, engagement and other performance metrics associated with content, services, and performances by musicians, entertainers, creators and other artists.

We use information to improve our Platform. For example, we may use your information or feedback to make our Platform (including our websites, apps, and services) better. We might use your information to customize your experience with us.

We use information to administer our business and services and for internal operations. This might include troubleshooting, data analysis or testing. We might also use information for research, statistical and survey purposes.

We use information for security purposes. We may use information to protect our company or other third parties. These third parties may include business partners, customers or other individuals. We also may use information to protect our Platform, as well as to detect and investigate activities that may be illegal or prohibited.

We use information for marketing purposes. For example, we might use your information to tailor and send you information about our business, products, or services. Our marketing might be for our own Platform, or for other companies' offers, products, or services that we think you might find interesting. To learn about your choices for these communications, read [Section 5](#) below.

We use information to communicate with you about our relationship. For example, we might contact you about our policies or our terms.

We use information as otherwise required, disclosed or permitted by law or as we may notify you from time to time.

3. We collect information from different sources, directly and indirectly.

We collect information directly from you. For example, we collect information if you setup an account or sign up for our email list. We also collect information if you submit feedback or otherwise contact us.

We collect information from your devices. We may use tracking tools like browser cookies and web beacons to automatically collect information about you when you interact with our Platform and emails that we or our vendors send to you. We collect information about users over time and across devices when you use our website. We may have third parties collect personal information this way.

We get information from suppliers we hire. For example, vendors that host or maintain our Platform for us may give us information.

We get information from other parties and sources. If you are authorized to use the Platform by a subscriber (such as your employer), we may receive information from or on behalf of the subscriber. We also work with business and marketing partners that might also include social networks and advertising and analytics providers or content platforms that share information with us. We may also obtain information from public sources. We may also receive information from our affiliates and subsidiaries.

We combine information. For example, we may combine information that we have collected offline with information we collect online. Or we may combine information we get from another party with information we already have.

4. We share information with other parties.

We share information within our family of companies. This includes our subsidiaries, parents, affiliates, and joint venture partners.

We share information with suppliers who perform services on our behalf for our business and operational purposes. We may share information with vendors who send emails for us, manage and operate our Platform, assist us in our marketing and advertising, including partners that contribute to our promotional efforts, track advertising impressions, provide analytics services, investigate and prevent data incidents, audit our records, and provide legal advice. We may also share information with analytics and search engine providers.

We share information with our clients, subscribers, licensees, business partners and marketing companies. We may share information with other parties, including for the other parties' own marketing purposes. We may also share with social media platforms, advertising networks, and ad tech companies. Personal information received by our partners and other parties may also be subject to their privacy policies.

We will share information for safety and security purposes, if we think we have to in order to comply with the law, or to protect ourselves, our customers and others. For example, we may share information to respond to a court order or subpoena. We may also share information if a government agency or investigatory body requests it. We might also share your information in order to enforce our agreements, and to protect the rights and safety of others. We might also share information when we are investigating potential fraud.

We may share information with a successor to all or part of our business. For example, if part of our business is sold, we may include user information as part of that transaction. We may also share your information if there is a change to our corporate structure. We may also share your information with others as they conduct diligence of our corporate changes.

We may share information for other reasons we may describe to you from time to time or as permitted or required by law.

5. You have choices regarding our use of your information.

You can opt out of receiving our promotional emails. To stop receiving our promotional emails, follow the instructions in any promotional email you receive from us.

You can contact MRC Data, LLC as set forth in Section 13 below to request that we not share your name, postal address, email address, phone number, and certain other personal information with third parties for third parties' promotional or marketing purposes.

You can control cookies and certain tracking tools. We may collect information about users over time and across different websites and devices. To do this, we and our vendors use several tracking tools, such as browser cookies, web beacons, and other technologies. For instance, we use Google Analytics to better understand how our users interact with our websites. You can learn about Google Analytics' currently available opt-outs at <https://tools.google.com/dlpage/gaoptout/>. We do not control these opt-out links or whether any particular company chooses to participate in these opt-out programs. We are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

Your browser may give you the ability to control cookies. How you do so depends on the type of cookie. Certain browsers can be set to reject browser cookies. You can also visit www.aboutads.info/choices to opt-out of certain uses of cookies for advertising purposes. To control flash cookies, which we may use on certain websites from time to time, you can go [here](#). Why? Because flash cookies cannot be controlled through your browser settings.

Some browsers have “do not track” features that allow you to tell a U.S. website not to track you. These features are not all uniform. We do not currently respond to those signals. If you block cookies, certain features on our websites may not work. If you block or reject cookies, not all of the tracking described here will stop. Certain options you select are browser and device specific, which means you may need to make the selection for each browser on each device you use.

You can contact us at mrcdata-privacy@mrcentertainment.com or by writing to us at MRC Data, LLC, Attn: Data Privacy, 100 North Crescent Drive, Beverly Hills, California 90210, to request that we not share your name, postal address, email address, phone number, and certain other personal information with third parties for promotional or marketing purposes.

6. Your California Privacy Rights.

This Platform is not consumer directed and is intended only to provide commercial information. In certain circumstances (subject to various exceptions and limitations under the California Consumer Privacy Act of 2018 (“CCPA)), if you are a California resident, you can make the following requests with respect to your personal information:

- **Access** – You can request that we disclose to you the categories of personal information we collected about you, the categories of sources from which we collected the personal information, the categories of personal information we sold or disclosed, our business or commercial purpose for collecting and selling your personal information, the categories of third parties with whom we shared your personal information, and the specific pieces of personal information we collected about you over the past twelve (12) months.
- **Deletion** – You can request that we delete the personal information that we maintain about you, subject to certain exceptions.
- **Opt-out / “Do Not Sell My Personal Information”** – You can request that we not sell your personal information to a third party. For purposes of this Privacy Policy, “sell” means the sale, rental, release, disclosure, dissemination, availability, transfer, or other oral, written, or electronic communication of your personal information to a third party for monetary or other valuable consideration, subject to certain exceptions in the CCPA. We do not currently consider the ways we shared the personal information collected through our Platform in the past 12 months to constitute the “sale” of consumer information as defined in the CCPA.

A California resident can make a request by emailing us at mrcdata-privacy@mrcentertainment.com. We will not discriminate against you because you made a request. We may deny certain requests, or fulfill a request only in part, based on our legal rights and obligations. For example, we may retain personal information as permitted by law, such as for tax or other record keeping purposes and to process transactions and facilitate customer

requests. Except as otherwise provided by applicable California law, note that for purposes of these rights under this Section of the Privacy Policy, personal information does not include information about job applicants, employees and other of our personnel; information about employees and other representatives of third-party entities we may interact with; or information we have collected as a service provider to our clients.

We will take reasonable steps to verify your identity prior to responding to your requests. The verification steps may vary depending on the sensitivity of the personal information. You may designate an authorized agent to make a request on your behalf. When submitting the request, please ensure the authorized agent is identified as an authorized agent.

For purposes of these requests, please note the following regarding how we collect and use personal information as described in this Privacy Policy, including in the past 12 months:

- We may collect, use, and disclose for our business and commercial purposes, categories of personal information as set forth in [Section 1](#).
- We collect and use these categories of personal information for the business and commercial purposes described in [Section 2](#).
- We collect these categories of personal information from the sources described in [Section 3](#).
- We may disclose these categories of personal information for the business and commercial purposes described in this Privacy Policy to the extent permitted by applicable law to the categories of third parties as described in [Section 4](#).

If you reside in California, you may have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. To make a request, please send us an email, or write to us at the address listed below. Indicate in your letter that you are a California resident making a “Shine the Light” inquiry.

7. Your EU Privacy Rights.

As detailed below, where provided under applicable law, you may request information about the personal information about you that we hold, and you may ask about all recipients of the information, the purpose of the processing, request the correction of incorrect information, and request the blocking, deletion and portability of such information by contacting us at mrcdata-privacy@mrcentertainment.com. We may require you to prove your identity with approved identification if you request this information.

Lawful basis for processing your personal data

We process on the following legal bases:

1. Contract: It is necessary for our performance of the contract you have agreed to enter with us. If you do not provide your personal data to us, we will not be able to carry out our obligations under the terms of the contract.
2. Legitimate Interests: We process your personal data if it is based on our legitimate interests. For example, we may process personal data in reliance on a legitimate interest in the effective and lawful operation of our business, the effective delivery and improvement of our products, services, and platforms, information security operations, compliance with laws and regulations, compliance with requests for disclosure to law enforcement, courts, and regulatory bodies, and to prevent and detect fraud or suspected fraud. In relation to general inquiry and complaints you send us, our legitimate interest is to provide you with information you have requested and to provide customer support. You

can object to the processing that we carry out on the grounds of legitimate interests. See the section "Rights of data subjects" below to find out how.

3. Consent: Where you have given us consent to do so, we provide you, or permit third parties to provide you, with information about goods or services which we feel may interest you. You have the right to withdraw your consent. Please see the section "Rights of data subjects" below to find out how.

4. Legal Claims: We need to process your personal data to defend or establish a legal claim (for example, claims relating to the sale of our goods and services under contract law).

Rights of data subjects

You have the following rights, where provided under applicable law, regarding your information (each of which are subject to various exceptions and limitations):

1. The right to be informed: You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Policy.

2. The right of access: You have the right to obtain access to your information (if we are processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you are aware and can check that we are using your information in accordance with data protection law.

3. The right to rectification: You are entitled to have your information corrected if it is inaccurate or incomplete.

4. The right to erasure: This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.

5. The right to restrict processing: You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

6. The right to data portability: You have rights to obtain and reuse your personal data for your own purposes across different services and platforms.

7. The right to object: You have the right to object to certain types of processing, in particular processing based on our legitimate interests. You also can object at any time to your information being used for direct marketing purposes (including profiling related to such direct marketing). Where you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to an EU data protection authority.

Please note your rights in relation to your personal data are not absolute. We may, for example, deny you access to your personal data when required or authorized by law, or if granting access would have an unreasonable impact on another individual's privacy.

We will retain and use your personal information as described in this Privacy Policy, including as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

For purposes of European data protection laws, the controller responsible for the described data collection and processing is MRC Data, LLC, Attn: Data Privacy, 100 North Crescent Drive, Beverly Hills, California 90210.

8. Your Canadian Privacy Rights.

Residents of Canada may access, review, and request correction of their personal information held by us.

We will take reasonable steps to verify your identity prior to responding to your requests. The verification steps will vary depending on the sensitivity of the personal information and whether you have an account with us.

We reserve the right not to change personal information if we disagree that it is incorrect, but we will append your requested alternative information. We may not provide access to personal information where permitted or required to deny access by the applicable law, for example, where the information requested would disclose the personal information, including opinions, of another individual or if it is subject to solicitor-client or litigation privilege.

You have the right to refuse to provide or to withdraw your consent to processing of your personal information at any time with effect for future processing. This would not affect processing where the applicable law allows us to process personal information without consent.

9. Our Platform is not intended for children.

We do not knowingly collect personal information from children under 18. If you are a parent or legal guardian and think your child has given us information, you can contact us at mrcdata-privacy@mrcentertainment.com. You can also write to us at the address listed at the end of this Privacy Policy. Please mark your inquiries “Children’s Information Request.”

10. Information transfer and storage.

Our Platform may be operated in the United States and other countries located outside of the European Economic Area (“EEA”). Please be aware that information you provide to us may be transferred to or processed in the United States or other countries located outside of the EEA. The standard of data protection in the United States and in certain other countries where we may process your information is considered by the European Commission to be not adequate when compared to the data protection standards of the EU and EEA. Please also be aware that by using our Platform or giving us your information, you consent to such transfer.

11. We use certain standard security measures.

We cannot promise that your use of our Platform will be completely safe. Any transmission of your data to our Platform is at your own risk, and your use of the Platform indicates your agreement to assume this risk. We encourage you to use caution when using the Platform. This includes not sharing your passwords. We keep personal information as long as it is necessary or relevant for the practices described in this Privacy Policy, including, for example, for legal compliance, dispute resolution, contract enforcement, backup, archival, and other internal operations purposes. We also keep information as otherwise required or permitted by law.

12. We may link to third party sites or services we do not control.

If you click on a link to a third-party site, you will be taken to a website we do not control. This Privacy Policy does not apply to the privacy practices of that website, which may collect information from you. Read the privacy policy of other websites carefully. We are not responsible for these third-party websites or their policies. If you access a third-party website from the Platform, you do so at your own risk.

13. Feel free to contact us if you have more questions.

If you have any questions about this Privacy Policy or want to ask us to correct, update, provide access to, delete, or take any other action with respect to your information, please email us at mrcdata-privacy@mrcentertainment.com. Please do not include your credit card number or other sensitive information in your email. You can also write to us at:

MRC Data, LLC
Attn: Data Privacy
100 North Crescent Drive
Beverly Hills, California 90210

14. We may update this Privacy Policy.

From time to time we may change our privacy policies. We will post an updated copy of our Privacy Policy on our Platform. Please check our site periodically for updates. Your continued use of our sites or services means that you consent to the collection, use and disclosure of your information as set out in the updated Privacy Policy.