

When you use Onsong/HUM, you trust us with your information. We are committed to keeping that trust. That starts with helping you understand our privacy practices.

This policy describes the information Onsongmusic Ltd uses, maintains and discloses information collected, and your choices regarding this information.

Onsong processes your personal data under a legitimate interest basis for the purpose of fulfilling the services delivered and improving the experience.

"we", "us", "our", "HUM" and "Onsong" refer to "Onsongmusic Ltd".

"Users", "employers" and "employees" refer to "Users" of the Onsongmusic Ltd website or HUM.

The policy applies to all "Users" of Onsongmusic Ltd's services.

#### **Data protection registration**

Our data protection officers contact details are:

- Greg Staw, [greg@onsong.co.uk](mailto:greg@onsong.co.uk)

The website [onsong.co.uk](http://onsong.co.uk) and the subscription service 'HUM' are owned and operated by Onsongmusic Ltd.

We are registered in England and Wales under registration number 10563158, and our registered office is at 17 Horns Road, Stroud, GL5 1EB.

#### **The information we collect**

We are acting as a data controller with respect to the personal information of our website visitors and service users.

Onsong collects:

1. Information that you provide on User profile creation.
2. Information created when you use our services, including website generated information
3. Information from other sources, such as third-party partners, e.g. survey providers

The legal basis for this information processing is our legitimate interests, namely monitoring, improving our website, app, services delivered, marketing and IT security.

We are committed to safeguarding the privacy of our website visitors and service users.

The following information is collected by us:

## **1. Information that you provide, may include**

- User profile / account information: We collect information when you create or update your account. This may include your name, email, phone number, login name and password, location, photo and personal biography.
- Demographic data: We may collect demographic information about you to allow us to provide local services, including through user surveys.
- User generated content: We may collect information that you submit when you provide feedback or share content

## **2. Information created when you use our services, may include**

- Services Used: We collect information about how you interact with our services, including information such as service provided, time and dates. The is to allow us to improve the quality of the service provided.
- Location: We collect information with regards to where services are to be delivered / received in relation to our users. The is to allow us to improve the quality and availability of the service provided.
- Website usage & device information: We may collect information about the devices you use to access our services, including the hardware models, device IP address, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, and mobile network information. Access dates and times of the website, pages viewed, and website navigation paths, type of browser, and third-party sites or services you were using before interacting with our services. In some cases, we collect this information through cookies and similar technologies that create and maintain unique identifiers. The information is collected to allow us to improve the quality of the services provided, improve our website and ensure adequate IT Security.
- Communications information: We may enable users to communicate with each other and Onsong through the websites and other services. For example, we may enable facilitators and workplaces to communicate via sharing of agreed contact information, the purpose maybe for additional information or planning when arranging an activity. We may also use this information for customer support services (including to resolve disputes between users), for safety and security purposes, to improve our products and services and for analytics.

### 3. Information from other sources, may include

- User feedback, such as comments on the sessions.
- Delivery partners (for example musical score purchases).
- Publicly available sources.

Onsong may combine the information collected from these sources with other information in its possession. Our website and services are targeted at persons over the age of 16. If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data. In certain circumstances, for example community sessions or when providing activities in school environments where participants may be under this age, agreements and safety checks will be made with the responsible guardians.

### How we use your information

Onsong collects and uses information to enable reliable and convenient service management, delivery.

#### We also use the information we collect:

- To enhance the safety, quality and security of our users and services
- For customer support
- For research and development
- To enable communications to or between users
- In connection with legal proceedings
- Onsong does not sell or share your personal information to third parties for third party direct marketing purposes.

The GDPR requires that companies processing the personal data of EU users do so on the basis of specific legal grounds. As described below, Onsong processes the information of EU users based on one or more of the grounds specified under the GDPR.

Onsong uses the information it collects for purposes including:

#### 1. Providing services and features:

**We use the information we collect to provide, personalise, maintain and improve our products and services. This includes using the information to:**

- Create and update your account.
- Verify your identity.
- Enable service delivery. This includes automated processing of your information to enable quick management capabilities on the app
- To track the progress of service delivery, from initial request through to collecting/ providing feedback and reports.

- Enable features that allow you to share information with other people, such as when you refer a friend, share event details with other potential users internal to you or publicly on social media.
  - Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems, to conduct data analysis, testing, research, monitor and analyse usage and activity trends.
2. **Customer support:** We may use the information we collect to assist you when you contact our customer support services, including to:
    - Direct your questions to the appropriate customer support person
    - Investigate and address your concerns
    - Monitor and improve our customer support responses
  3. **Research and development:** We may use the information we collect for testing, research, analysis and product development. This allows us to improve and enhance the safety, quality and security of our services, develop new features and products, and facilitate finance solutions in connection with our services.
  4. **Communications among users:** We may use the information we collect to enable communications between our users.
  5. **Communications from Onsong:** We may use the information we collect to communicate with you about products, services, promotions, studies, surveys, news, updates and events. This will be based on the privacy controls you have accepted.
  6. **Legal proceedings and requirements:** We may use the information we collect to investigate or address claims or disputes relating to your use of our services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

## **Privacy Controls, Cookies & Third-party technologies**

Onsong uses privacy controls, cookies and other identification technologies on our website, emails, and online ads for purposes described in this policy.

### **Privacy Controls**

Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information. You can access the privacy controls on marketing material this can be managed via mailchimp. In the roadmap for Onsong these will be made available via the platform. When this feature is available notification will be given to users.

### **Cookies**

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We will ask you to consent to our use of cookies when you first visit our website.

Onsong uses cookies and similar technologies for purposes such as:

- Remembering user preferences and settings
- Determining the popularity of content
- Delivering and measuring the effectiveness of advertising campaigns
- Analysing site traffic and trends, and generally understanding the online behaviours and interests of people who interact with our services We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our site and use our services, as well as when you visit other online sites and services.

#### **Cookies used by our Service Providers and Third-party websites**

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:

<https://www.google.com/policies/privacy/>

#### **Managing cookies**

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/kb/PH21411> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites, including Onsong.

## **Information Sharing & Disclosure**

Some of Onsong's products, services and features require that we share information with other users or at your request.

Onsong may share the information we collect as described:

**1. With other users:**

- For example, where the users are a facilitator and workplace employer booking services
- For example, between workplace employers and workplace employees when communicating sessions and driving engagement.
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**2. At your request:**

- Other people at your request. For example, sharing via email templates, social media that you are attending an event and want to encourage others.
- Onsong partners.

**3. With the public when you submit content to a public forum:**

- We love hearing from our users -- including through public forums such as blogs, social media, and certain features on our network. When you communicate with us through those channels, your communications may be viewable by the public.

**4. With Onsong service providers and business partners:**

- We may provide information to its vendors, consultants, marketing partners, research firms, and other service providers or business partners. This may include, for example:
  - Payment processors and facilitators.
  - Cloud storage providers.
  - Marketing partners and marketing platform providers.
  - Data analytics providers.
  - Research partners, including those performing surveys or research projects
  - Vendors that assist us to enhance the safety and security of technology
  - Consultants, lawyers, accountants and other professional service providers.

5. **Data & Information hosting:**We make sure the data we collect from you will be transferred to and stored in regions that are deemed adequate by the European Commission. The European Commission has made an “adequacy decision” with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.
6. **For legal reasons or in the event of a dispute:**We may share your information if we believe it is required by applicable law, regulation, operating agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.
7. **With your consent:**We may share your information other than as described in this policy if we notify you and you consent to the sharing.

### **Information Retention and Deletion**

Onsong retains user profile and other information for as long as you maintain your Onsong/HUM account.

Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

We require user profile information in order to provide its services and retains such information for as long as you maintain your Onsong/HUM account.

We retain certain information, including transaction, location, device and usage information, for a maximum of 5 years in connection with regulatory, tax, insurance and other requirements in the places in which it operates, following the date you unsubscribe from our website. Once such information is no longer necessary for providing Onsongs’ services, enable customer support, enhance the user experience or other operational purposes, we take steps to prevent access to or use of such information for any purpose other than compliance with these requirements or for purposes of safety, security and fraud prevention and detection. Onsong thereafter deletes or anonymises such information in accordance with applicable laws.

You may request deletion of your account at any time through contacting us (HUM@onsong.co.uk), in future versions of the Onsong website/ platform we will make the addition of inbuilt privacy controls, when this is done we will notify users.

Following such request, Onsong deletes the information that it is not required to retain. In certain circumstances, we may be unable to delete your account, such as if there is an outstanding credit on your account or an unresolved claim or dispute. Upon resolution of the issue preventing deletion, we will delete your account as described above.

We may also retain certain information if necessary for its legitimate business interests, such as fraud prevention and enhancing users' safety and security.

### **Choice & Transparency**

Onsong provides means for you to see and control the information that we collect You may also request that Onsong provide you with explanation, copies or correction of your data.

You may also request that Onsong provide you with explanation, copies or correction of your data.

Onsong will take appropriate technical and organisational precautions to secure your personal data / information and to prevent the loss, misuse or alteration of your personal information.

Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority;
- (h) and the right to withdraw consent.

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

Onsong provides means for you to see and control the information that we collect

**1. EXPLANATIONS, COPIES AND CORRECTION:** You may request that Onsong:

- Provide a detailed explanation regarding the information Onsong has collected about you and how it uses that information.
- Receive a copy of the information Onsong has collected about you.
- Request correction of any inaccurate information that Onsong has about you.

**2. You can make these requests by contacting Onsong, [HUM@onsong.co.uk](mailto:HUM@onsong.co.uk).**

**MARKETING OPT-OUTS:** You may opt out of receiving promotional emails from Onsong using the instructions at the bottom of marketing material received, using the mailchimp options. You may also opt out of receiving emails and other messages from Onsong by following the instructions in those messages received.

**3. Deletion:** Users may request deletion of their accounts at any time. Users may request deletion by contacting us, [HUM@onsong.co.uk](mailto:HUM@onsong.co.uk)



You may also submit questions, comments or complaints to Onsong Data Protection Controller.

### **Security**

Onsong will take appropriate technical and organisational precautions to secure your personal data / information and to prevent the loss, misuse or alteration of your personal information.

We will store all your personal data on secure servers, personal computers and mobile devices, and in secure manual record-keeping systems.

Data relating to your enquiries that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.

Acknowledgment that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our website confidential and we will not ask you for your password (except when you log in to our website).

### **Updates to this policy**

**We may occasionally update this policy.**

We may occasionally update this policy. If we make significant changes, we will notify you of the changes through email or through other means, via the website. To the extent permitted under applicable law, by using our services after such notice, you consent to our updates to this policy.

We encourage you to periodically review this policy for the latest information on our privacy practices. We will also make prior versions of our privacy policies available for review, on request.