

## PRIVACY POLICY – STANBASE

### 1. INTRODUCTION

1.1 Stanbase Ltd, a company registered in England under company number 12918982 and whose registered office is 10 Old Burlington Street, London, England, W1S 3AG (“**STANBASE**”, “**we**”, “**us**” or “**our**” in this policy), operates the STANBASE platform (including the website [www.stanbase.com](http://www.stanbase.com) and STANBASE mobile app) (“**Services**”). This privacy policy explains how we will process the personal data relating to users (including fans and artists) of the Services.

1.2 STANBASE is a new way to bring artists and fans together. The platform enables superfans (‘Stans’) to consume premium, exclusive content from their favourite music artists as well as provide artists with a sustainable revenue stream.

<p>If you have any questions or comments about this privacy policy please contact us via email at <a href="mailto:privacy@stanbase.com">privacy@stanbase.com</a></p>
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1.3 STANBASE is committed to protecting and respecting your privacy. This policy explains the basis on which personal data we collect from you will be processed by us. Where we decide the purpose or means for which personal data you supply through these Services is processed, we are the “data controller” for the purposes of the General Data Protection Regulation 2016/679 and the General Data Protection Regulation as it forms part of the laws of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018.

1.4 This policy explains the following:

1.4.1 what information STANBASE may collect about you;

1.4.2 how STANBASE will use information we collect about you;

1.4.3 whether STANBASE will disclose your details to anyone else; and

1.4.4 your choices and rights regarding the personal data you have provided to us.

1.5 Artists on our platform may provide hyperlinks to websites owned and operated by third parties. These third-party websites may have their own privacy policies and we recommend that you review them. We do not accept any responsibility or liability for the privacy practices of such third parties and your use of their services is at your own risk.

### 1.6 WHAT INFORMATION WILL STANBASE COLLECT ABOUT ME?

1.7 We collect and process the following information which may include your personal data.

### **Information provided by you when using our Services**

You may give us information about you by filling in forms when setting up your user account with us, using our Services or contacting us with enquiries. Such information may include:

- 1) **Identity, log-in and user account data:** including your name, username, age, profile picture, identification pictures, e-mail address, correspondence address, password and copies of your ID.
- 2) **Transaction data:**
  - where you are a fan and purchase a subscription or access other paid-for content or items, we will keep information related to your purchases (see the section on Payment Information below).
  - where you are an artist and make available subscriptions or access to other paid-for content or items, we will keep information related to your sales.
- 3) **Interaction data:** information related to the interactions you have on our platform, including actions that you take and chat logs and other interactions between you and other users.
- 4) **Data contained within your content:** to the extent you include personal data within content (audio, visual or otherwise) that you post to the Services;
- 5) **Your enquiry to us:** if you contact us about your user account and/or our Services, we may keep the content of such enquiry. You are under no obligation to provide us with any details, but if you do not provide all relevant information, we may not be able to help.

### **Payment Information**

In order to set up an artist account, you will be required to provide bank account details, including name, credit / debit card numbers and billing address.

When you pay for subscriptions or other content or Services, we use the third party payment system provided by Apexx Global ("**Apexx**") which transacts all our payments. Where you make a payment, Apexx will collect your name, credit card, billing address and email address for payment processing. Card payment information is collected by Apexx directly.

For further details of how Apexx collects and uses personal data please see their [privacy policy](#).

Where STANBASE makes a payment to you, STANBASE will further collect your name, credit card, billing address and email address for payment processing, directly from you.

1.8 Please note that some of the information referred to above is essential to our provision of the Services and whilst you are under no obligation to provide us with such information, we may not be able to provide the relevant Service to the extent you do not.

## 2. **DATA SHARING**

2.1 We may disclose personal data to members of our group of companies (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006), our personnel, suppliers or subcontractors (such as IT service providers, professional advisers and data hosting providers) insofar as it is reasonably necessary for the purposes set out in this privacy policy. However, this is on the basis that they do not make independent use of the information and have agreed to safeguard this information. Activities which are carried out by or in collaboration with third party service providers include hosting & IT infrastructure.

2.2 If we are involved in a merger, acquisition, transfer or sale of all or a portion of our assets, you will be notified via email, account message and/or a prominent notice on our website of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

2.3 In addition, we may disclose your information to the extent that we are required to do so by law or regulation (which may include to government bodies, regulators and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

## 3. **HOW WE WILL USE INFORMATION WE COLLECT ABOUT YOU**

### **Providing the Services to you as a User**

We may use and retain your personal data where necessary to perform the contract we are about to enter into or have entered into with you, such as to:

- register you as a new user;
- enable your purchase of paid-for content or items;
- enable you making available paid-for content or items to other users;
- enable your sharing of content or interactions with other users;
- enable and administer your subscription(s); and
- deliver our Services to you or to ensure that the Services function properly and deliver the features promised.

We may also use and retain the personal data that you provide to us when requesting our Services, to pursue our legitimate interest of providing our Services to you, such as to:

- respond to your enquiries;

- analyse and improve our Services; and
- provide you with information and updates about the Services we offer.

**Marketing**

We may send you direct marketing communications where we have obtained your prior consent to keep you informed of our services in which you might be interested, or based on our legitimate interests where we have an existing relationship with you and we wish to contact you about similar services in which you may be interested. You may opt-out from (i.e. ask not to receive) direct marketing communications from us at any time by emailing [privacy@stanbase.com](mailto:privacy@stanbase.com), or by selecting the opt-out option provided in all of our marketing emails.

**Prevention of Harassment, Fraud and other Unacceptable Activity**

We may process your information for the legitimate interests of ensuring that use of our Services is lawful and non-fraudulent, does not disrupt the operation of our Services, does not harass our staff, other users or other individuals, and to enforce our legal rights and comply with our legal and regulatory obligations, including compliance with anti-money laundering regulations (if and where applicable).

Where we suspect that you have engaged in unlawful or fraudulent activity, we may investigate and keep a record of such investigation and its conclusion. Where such investigation concludes in a ban from our Services, we will keep details of such ban to ensure that it can be enforced.

We process information for the legitimate interest of complying with HMRC requirements by retaining records of customer purchases and transactions.

Where we reasonably believe that you are or may be in breach of any of the applicable laws or regulations, we may use your personal data to inform relevant third parties, your email/internet provider or law enforcement agencies about the content.

3.1 Our processing of your personal data as described above, is based on one or more of the following legal bases:

- 3.1.1 our legitimate interests in running the STANBASE website, protecting our rights and responding to user enquiries;
- 3.1.2 the performance of a contract we have with you, for example, if such processing is necessary to provide you with the Services for which you have paid; or
- 3.1.3 compliance with our legal obligations.

**4. YOUR RIGHTS IN RELATION TO PERSONAL DATA WHICH WE PROCESS RELATING TO YOU**

4.1 You have the following rights over the way we process personal data relating to you. We aim to comply without undue delay with any requests by you:

- 4.1.1 for a copy of the personal data we are processing about you and to have inaccuracies corrected;
- 4.1.2 to ask us to restrict, stop processing or to delete your personal data;
- 4.1.3 for a machine-readable copy of your personal data, which you can use with another service provider. Where it is technically feasible, you can ask us to send this information directly to another provider if you prefer; and
- 4.1.4 to make a complaint to a data protection regulator.

4.2 Please send your requests to [privacy@stanbase.com](mailto:privacy@stanbase.com) .

## 5. **DATA RETENTION**

- 5.1 We will hold your personal data on our systems for as long as is necessary for the relevant purpose and to maintain business records for tax, legal and regulatory reasons, or as otherwise described in this privacy policy.
- 5.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal and regulatory requirements.
- 5.3 Where we have banned a user from our Services due to their inappropriate behaviour, we keep information to enforce such ban. This information is held by us indefinitely, consistent with our legitimate interest and reviewed periodically.
- 5.4 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 6. **CHILDREN**

- 6.1 To register with the Services, you must be either at least 13 years old, or if you are required by the laws of the country where you live to be older than 13 years old in order to enter into a legally binding agreement, then you must be the minimum age required by those laws to register.
- 6.2 We therefore do not knowingly solicit data from, or market to, children under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at [privacy@stanbase.com](mailto:privacy@stanbase.com). We will delete such information from our files within a reasonable time.

## 7. **SECURITY**

- 7.1 We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal data.
- 7.2 Please be aware that, although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches. In particular, the transmission of information and data via the

Internet is not completely secure and whilst we do our best to protect your personal data, we cannot guarantee the security of any information or data transmitted to or through the Services.

8. **CHANGES**

We will notify you of any significant changes to this policy by email, notice on the STANBASE website and/or account message.

9. **INTERNATIONAL DATA TRANSFERS**

Our Services are hosted on servers located in the UK and USA and personal data will be stored there. Where we transfer your data outside of the EEA or UK (for example, in respect of the transfer to our USA servers, service providers or affiliates), such transfers will only be made in accordance with applicable data privacy laws, and subject to appropriate safeguards to protect your personal data, such as ensuring we have an agreement in place with the transferee which includes standard data protection clauses adopted by a data protection regulator and approved by the European Commission. If you would like to find out more about the safeguards we deploy, please let us know by writing to [privacy@stanbase.com](mailto:privacy@stanbase.com).