

## **About The Protection of Personal Information (Privacy Policy)**

Soundventure Kft recognizes the importance of protecting the privacy of all personal information provided by users of this website. We created the following policy guidelines with fundamental respect for our users' right to privacy and because we value our relationships with our users.

Soundventure Kft (hereinafter referred to as "we" or "Soundventure") and its group companies may ask you to register your personal information, including your name, address, telephone number, and e-mail address, when we conduct online surveys, we distribute email newsletters, you wish to register products and inquire about product information or support. We recognize that it is our social responsibility to protect such personal information.

Soundventure Kft takes reasonable precautions to keep the personal information disclosed to us secure. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, technical, electronic and managerial security procedures to safeguard and secure the personal information we collect online from our users. Nevertheless, Soundventure Kft does not guarantee the security, accuracy or completeness of any such information or procedures. Our protection of personal information is based on the following principles.

### **1. We use it only for the stated purposes**

We always limit our use of personal information to within the purposes stated below. If we need to use personal information for other purposes, we will inform you in advance. If you do not agree to the new purposes, you can deny permission for us to use your personal information for such purposes.

#### *Purposes of use*

Provision of a variety of information by e-mail and direct mail

- To offer information related to products and services of the Company and group companies including promotion and advertising and event information
- To offer information including promotion, advertising and event information related to products and services of third parties that have been engaged by the Company

Customer Support

- To receive inquiries from, consult with and correspond with users
- To provide after-sales services, such as version updates, to users
- To dispatch repaired products back to users

Other

- To notify changes of the purposes of use of the personal information and obtain consent
- Otherwise, to be used pursuant to consent separately obtained from the member

## **2. We will not disclose personal information to third parties**

We will not disclose the personal information you submit to us to any third party except as provided below.

- When you agree to such disclosure
- When we, under strict controls, disclose personal information to such companies with which we have an agreement to delegate the processing of personal information
- When it is considered appropriate in order to enable a group companies or distributor to respond to your inquiry
- When we are required to disclose or provide personal information by law or regulation
- When disclosure is needed to protect human health or safety, or assets, and it is difficult to obtain your prior consent quickly
- When we need to cooperate with national or local governments, and obtaining your consent may hinder those efforts
- When we use personal information with group companies as described in section 4.

## **3. We will not transfer personal information overseas**

We will not transfer personal information you submit to us to an overseas location, except as provided below.

- When you agree to such transfer
- When providing the personal information to any person/entity who has established safeguards/protocols that comply with the standards set forth under the rules of the Personal Information Protection Committee as adequate, on a continuous basis, to the measures which should be taken by a business operator handling personal information. Group companies referred to as recipients of personal information as described in section 4, comply with such standards.
- When we are required to disclose or provide the personal information by law or regulation
- When disclosure is needed to protect human health or safety, or assets, and it is difficult to obtain your prior consent
- When we need to cooperate with national or local governments and obtaining your consent may hinder those efforts

#### **4. We take necessary and appropriate safety measures**

We will take necessary and appropriate safety measures to prevent leakage, loss, or damage to personal information. We also conduct necessary and appropriate supervision of employees and contractors (including subcontractors) handling personal information. Our company regulations describe specific safety measures to ensure the safe processing of personal information, including the following.

##### *Physical safety measures*

- Personal information stored in documents, electronic media, etc. is appropriately managed in accordance with company regulations on personal information protection, document management, and information system security.

##### *Technical safety measures*

- Access control is implemented to limit employees who have access to personal information and how much personal information they have access to.

##### *Understanding external environment*

- Some of the personal information we collect is stored on servers not located in our plant. We understand rules on protection of personal information in these countries and implement safety measures.

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#### **5. About cookies**

A “cookie” is a small piece of data transmitted from a web server and stored on your computer. Although our web server can identify your computer by using a cookie, this allows you to efficiently access our web pages, and we shall not use it for any other purpose.

You can reject cookies from being stored on your computer via your computer’s browser settings, but please be aware that, in such cases, certain functions of our website may be impaired or unavailable to you.

In addition, in order to deliver the most relevant advertising to customers, we use behavioral targeting advertising services provided by the following companies using cookies. If you want to disable this service, please access the particular company’s webpage provided below and follow the instructions to opt-out.

Google, LLC

<https://policies.google.com/technologies/ads>

## **6. Tracking system**

A tracking system based on the use of Company cookies is employed by our website which gather IP address, access date/time, etc. We shall not use this information in combination with any personal information beyond what is stated above about use for stated purposes.

Also a tracking system for the use of third-party cookies is employed on parts of Soundventure Kft's website in order to gather anonymous statistical information which is not linked to specific personal information.

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## **7. The Use of YouTube API Services**

When using this website or our apps, videos and other contents may be displayed through the YouTube API Services provided by Google LLC. Please reference the YouTube Terms of Service (<https://www.youtube.com/t/terms>) and Google Privacy Policy (<https://policies.google.com/privacy>) for more information.

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## **8. Disclosure of personal information**

Where a customer requests the disclosure of customer's personal information, or the disclosure of records relating to the provision of personal information to a third party in accordance with the Personal Information Protection Law, we respond within a reasonable period after confirming that the request is made by the customer. Provided, however, that this provision shall not apply where we are not obliged to disclose pursuant to the Personal Information Protection Law or other laws and regulations. If we are unable to respond to your request, we will notify you accordingly.

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## **9. Correction, etc. of personal information**

Where a customer requests correction, addition or deletion, suspension of use or deletion of customers' personal information or suspension of provision to a third party (hereinafter referred to as the "Correction, etc.") in accordance with the Personal Information Protection Law, we will conduct the necessary investigation after confirming that the request is made by the customer and respond to Correction, etc. based on the results of the investigation. Provided, however, that this shall not apply in the event that we are not obliged to Correction, etc. under the Personal Information Protection Law or other laws and regulations. If we are unable to respond to your request, we will notify you accordingly.

inquiry for personal information

We recommend that you regularly check this ABOUT THE PROTECTION OF PERSONAL INFORMATION (PRIVACY POLICY) because we may modify the policies in order to further

enhance our protection of personal information or in accordance with changes to laws or regulations.

If you have any questions about this Privacy Policy, or the terms of this site, please inform us via email on [neotone@digitalhandpan.com](mailto:neotone@digitalhandpan.com)

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## **About The Protection of Personal Data For GDPR**

Soundventure Kft recognizes the importance of protecting the privacy of all personal information provided by users of this website. The following policy guidelines are intended to comply with the EU General Data Protection Regulation (hereinafter referred to as “GDPR”) as well as the Data Protection Act 2018 of the United Kingdom (UK-GDPR) when we process personal data of those who reside in European Economic Area (hereinafter referred to as “EEA”), Switzerland or the UK.

Soundventure Kft (hereinafter referred to collectively as “we”) may ask you to register your personal data, including your name, address, telephone number, and e-mail address, when we conduct online surveys, we distribute e-mail newsletters, you submit applications for events and contests, you wish to register products, and you inquire about product support. We recognize that it is our social responsibility to protect such personal data.

We retain personal data (also called “personal information” or “personally identifiable information”) covered by this Privacy Policy on servers operated by 2022 DigitalOcean, LLC.

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### **1. GDPR applies to following cases**

With regard to our processing of personal data, GDPR applies to the following case.

- Where we process personal data which is collected directly from users, not being transferred from our European subsidiaries, through provision of products and services within the EEA, Switzerland or the UK

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### **2. We collect following categories of personal data**

We may collect the following categories of personal data for the purpose stated in this Privacy Policy.

- Name
- Email address

### **3. We process personal data based on stated legal bases and only for the stated purposes**

We always limit our use of personal data to within the purposes stated below. If we need to use personal data for other purposes, we will inform you in advance. If you do not agree to the new purposes, you can deny permission for us to use your personal data for such purposes. We also process your personal data based on the legal bases provided below.

#### *Purposes of use*

##### Provision of a variety of information by e-mails and direct mail

- To offer information related to products and services of the Company and group companies including promotion and advertising and event information:  
This is based on our legitimate interest of providing a professional services business
- To offer information including promotion and advertising and event information related to products and services of third parties that have been engaged by the Company:  
This is based on our legitimate interest of providing a professional services business
- To notify and inform registered users about other information:  
This is necessary for performance of contract

##### Customer Support

- To receive inquiries from, consult with and correspond with users:  
This is necessary for performance of contract
- To provide after-sales services, such as version updates, to users:  
This is necessary for performance of contract
- To dispatch repaired products back to users:  
This is necessary for performance of contract

##### Other

- To notify changes of the purposes of use of the personal data and obtain consent:  
This may be necessary for performance of contract or based on our legitimate interest of providing a professional services business
- Otherwise, to be used pursuant to consent separately obtained from the member:  
This is subject to your continued consent

#### 4. You have following rights

You have the following rights regarding personal data obtained and processed by us.

- Obtaining information regarding our processing of data  
You have the right to obtain from us all the requisite information regarding our data processing activities that concern you
- Access to personal data  
You have the right to obtain from us confirmation as to whether personal data concerning you is being processed, and if so, to be granted access to the personal data and certain related information.
- Rectification or erasure of personal data  
You have the right to have us rectify inaccurate personal data concerning you without undue delay and the right to have us complete any incomplete personal data. Also, in certain cases you will have the right to have us delete personal data concerning you without undue delay.
- Restriction on processing of personal data  
If certain conditions are satisfied, you will have the right to have us restricted processing of personal data concerning you.
- Objection to processing of personal data  
If certain conditions are satisfied, you will have the right to object to processing of personal data concerning you.
- Data portability of personal data  
If certain conditions are satisfied, you will have the right to receive personal data concerning you in a structured, commonly used, and machine-readable format and the right to transfer those data to another controller without hindrance from us.
- Not to be subject to automated decision-making  
If certain conditions are satisfied, you will have the right not to be subject to solely data-based, automated decision-making (including profiling) that produces any legal or similar material effect on you.
- Not to be subject to direct marketing  
You have the right to object at any time to processing of personal data concerning you for direct marketing.
- Withdraw your consent  
You have the right to withdraw your consent at any time. The withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.
- Lodge a complaint  
You have the right to lodge a complaint in relation to our processing of your personal data with a supervisory authority in an EEA member country, Switzerland or the UK as applicable

If you intend to exercise any of the aforementioned rights, please inquire on [neotone@digitalhandpan.com](mailto:neotone@digitalhandpan.com)

## **5. We keep your personal data secure**

We process your personal data in a manner that ensures appropriate security of the personal data by using appropriate technical and organizational measures.

## **6. Children under the age of 16 need parental consent**

For any child below the age of 16, please provide written consent by your parent or guardian before you submit your personal data to us.

## **7. We will not disclose nor transfer personal data to third parties**

We will not disclose nor transfer the personal data concerning you to any third parties except as provided below.

- When you agree to such disclosure or transfer
- When we, under strict company management, disclose personal data to such companies with which we have an advance agreement to delegate the task of processing personal data
- When it is considered to be appropriate in order to enable a related company or distributor to respond to your inquiry
- When it is allowed under GDPR

## **8. We may transfer personal data to third countries outside of the EEA, Switzerland and the UK**

Regarding the disclosure or transfer of personal data stated in section 7 above, we may transfer the personal data you submit to us to a third party outside of the EEA, Switzerland or the UK. This includes overseas group companies and processors. We will exercise adequate and appropriate supervision over such third parties to ensure appropriate safeguards based on GDPR or UK-GDPR with respect to the transfer.

## **9. About Tracking system**

A tracking system based on the use of Company cookies is employed by Soundventure Kft's website which gather IP addresses, access date/time, etc. We shall not use this information in combination with any personal information beyond what is stated above about use for stated purposes.

## **10. The Use of YouTube API Services**

When using this website, videos and other contents may be displayed through the YouTube API Services provided by Google LLC. Please reference the YouTube Terms of Service (<https://www.youtube.com/t/terms>) and Google Privacy Policy (<https://policies.google.com/privacy>) for more information.

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## **11. We retain personal data for certain period**

We will retain your personal data for as long as necessary to fulfill the aforementioned "Purposes of Use". We will delete your personal data promptly when it becomes unnecessary for us to retain.

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## **12. We may amend this Privacy Policy**

We review and amend this Privacy Policy from time to time for improvement.

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## **13. You can reach us**

Via direct mail on [neotone@digitalhandpan.com](mailto:neotone@digitalhandpan.com)