

## Privacy Policy

### **Note:**

*The Privacy Policy is a legal requirement in most countries worldwide. There are used to protect users by informing them in a legally binding manner on how their personal data are used, in accordance with applicable privacy laws.*

*This Privacy Policy is a translation of the original version in Italian for the comfort of all users. The original version is the one with legal value, This document in English was translated from Italian using an online translation tool.*

### **1. Definition and nature of personal data**

The following terms and expressions, when used with capital letters, are intended as defined in the Terms and Conditions of [www.tangerineway.com](http://www.tangerineway.com).

When you use our Site, we may ask you to provide us with some of your personal data. The term "personal data" refers to all data that allows the identification of a person, in particular your name, first name, pseudonym, photograph, postal and e-mail address, telephone numbers, date of birth, data relating to your transactions on the Site, the details of your purchases and subscriptions, payment card numbers, VAT number, as well as any other information you choose to communicate to us. Tangerine doesn't use and therefore doesn't store sensitive data.

### **2. Purpose of this information document**

The purpose of this information document (hereinafter the "Document") is to inform the User about the means of collection and management of personal data by Tangerine, in full compliance with your User's rights.

Tangerine complies, in the collection and management of personal data, with regulation EU 2016/679 of 27 April 2016 concerning the protection of personal data as well as the free circulation of such data (hereinafter: the "GDPR").

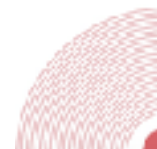
### **3. Identity of the data owner**

The entity responsible for the collection of personal data is Tangerine Srl, Via California, 11, 20144 Milan, Italy, VAT number and CF: IT11810940962 (hereinafter: "We").

### **4. Collection of personal data**

The legal basis for our collection of personal data is as follows:

1) This Collection is necessary to perform the contract entered into when using our Services on our Site.



2) Legitimate interest when you voluntarily provide us with personal data during your visit to our Site, the data is then collected to allow us to better respond to your requests for information on our Services.

Your personal data is collected to fulfill one or more of the following purposes, excluding those not wanted by the Client as indicated through the choice of cookies:

- 1) Manage your access to certain Services accessible on the Site and their use,
- 2) Carry out operations relating to the management of customers in relation to contracts, invoices/receipts, loyalty programs, follow-up of the relationship with customers,
- 3) Allow the connection of Users to each other in order to promote the musical production of the artists and the Reachers' activities.
- 4) maintain a file of registered members, users, customers and potential customers,
- 5) Send newsletters, solicitations and promotional messages. In the event that you are against it, you will have the possibility to express your refusal at the time of the collection of your data, or by sending an email to [team@tangerineway.com](mailto:team@tangerineway.com).
- 6) Develop the commercial and traffic conditions for our Services,
- 7) Manage people's opinions on products, services or content,
- 8) Manage unpaid debts and any content related to the use of our products and Services,
- 9) customize responses to requests for information,
- 10) Comply with our legal and regulatory obligations. We inform Users, during the collection of personal data, which data are mandatory and which are optional (through asterisks visible on the Site). We also inform Users of the possible consequences of a non-response.

## 5. Recipients of the collected data

They will have access to your personal data:

- 1) The employee, contractors and consultant (all of which have signed a Privacy document with us) of our company;
- 2) the functions responsible for control (in particular the auditor);
- 3) our suppliers (of communication services, production software, data hosting services, payment services, billing services, audience analysis and measurement, customer relations);
- 4) Reachers may also have access to certain Customer data to contact them.
- 5) Customers may also have access to certain Reachers' data to contact them.

Public bodies may also be recipients of your personal data, exclusively to fulfill our legal obligations, legal officers, legal officers and bodies responsible for debt collection.

## 6. Duration of retention of personal data

- 1) Data relating to the management of customers and potential customers  
Your personal data will not be stored beyond the period strictly necessary to manage our business relationship with you. However, the data that allow the ascertainment of a right or a contract, which must be kept at the place of fulfillment of an obligation by law, will be



kept for the period required by current legislation.

Regarding any prospecting operations towards customers, their data may be kept for a period defined by existing regulations at the time of the termination of the commercial relationship. Personal data relating to a potential customer may be kept for a period defined by existing regulations at the time of their collection or from the last contact. At the end of period defined by existing regulations, we may contact you again to find out if you wish to continue receiving commercial solicitations.

## 2) Identity documents

In case of exercise of the right of access or reconstruction, the data relating to identity documents may be kept for the period defined by existing regulations. In case of exercise of the right of opposition, such data may be stored during the limitation period defined by existing regulations, by expressing my consent to the processing of personal data referring to art. 7 of the EU Regulation 679/2018,

## 3) Data relating to bank cards and/or financial data

Financial transactions relating to the payment of purchases and commissions through the Site are entrusted to a payment service providers which guarantees their correct performance and security. For the purposes of the Services, this payment service provider may be the recipient of your personal data relating to your credit card numbers, which it collects and stores in our name and on our behalf.

We have no access to this data. To allow you to make regular purchases or pay the related costs on the Site, the data relating to your bank cards and/or financial data are kept during the period of your registration on the Site and, in any case, until the moment you make the last transaction. By checking the box expressly provided for this purpose on the Site, you are giving us your express consent to such retention.

The data relating to the visual cryptogram or CVV, written on your credit card and financial data, is not stored if not for payment related activity. If you refuse the storage of personal data relating to your credit card numbers and/or financial data under the conditions specified above, we will not retain such data beyond the time necessary to allow the execution of the transaction.

In any case, the data relating to them may be stored, for the purposes of proof in the event of a dispute of the operation, in intermediate archives, for the period provided for according to existing regulations. This period can be extended according to existing regulations to take into account the possibility of using deferred debit cards or other financial instrument, including those developed at a later stage or in evolution.

## 4) Management of refusals to receive advertising communication

The information that allows you to take into account your right to object is kept for the time defined by exiting regulations at the date of the exercise of the right to object.

## 5) Audience measurement statistics

The information stored in the users' terminal or any other element used to identify users and allow their traceability or presence will not be stored beyond the terms defined by



existing regulations.

## 7. Security

We inform you that we take all appropriate precautions, organizational and technical measures to preserve the security, integrity and confidentiality of your personal data and, in particular, to prevent them from being distorted, damaged or that unauthorized third parties have access to them. We will also use secure payment systems that comply with the best practices and applicable regulations.

## 8. Hosting

We inform you that your data are stored for the duration of their conservation on the servers of the company DigitalOcean, Inc. located in the European Union.

## 9. Transfer outside the European Union

Your data may be transferred outside the European Union within the framework of the tools we use and our relationships with our suppliers (see point 5 "Recipients of the data collected").

This transfer is secured using the following tools:

- Either this data is transferred to a country that has been deemed to offer a level adequate protection by decision of the European Commission;
- Or we have entered into a specific contract with our subcontractors governing the transfers of your data outside the European Union, based on standard contractual clauses between a controller and an approved subcontractor of the European Commission.

## 10. Access, registration, limitation and deletion of personal data

You have the right to obtain the communication and, where applicable, the correction or deletion of the data concerning you, through online access to your Personal Area according to article 14 of the GDPR.

It is also possible to contact Tangerine as specified in Article 16.

You have the right to obtain the limitation of the processing of your personal data, in the cases defined by art. 18 of the GDPR:

- During the verification period, when you dispute the accuracy of your personal data,
- When the processing of this data is unlawful and you wish to limit this processing rather than delete your data,
- When we no longer need your personal data, but you want it to be kept to exercise your rights,
- During the period of verification of the legitimate reasons, when you have opposed the processing of your personal data.

Persons whose data are collected on the basis of our legitimate interest, as mentioned in Article 4, are reminded that they can object to the processing of data concerning them at any time. However, we may be required to continue processing if there are legal conditions



that prevail over your rights and freedoms or if the processing is necessary to establish, exercise or defend our legal rights. You can unsubscribe from our promotional emails via the link provided in those emails. Even if you choose not to receive promotional messages from us anymore, you will continue to receive our administrative messages.

## **11. Right to define directives for data processing after your death**

You have the right to communicate directives relating to the retention, deletion and communication of your personal data after your death. If you want to communicate us specific instructions for the data processed by our company, please contact us at the coordinates indicated in articles 14.

By submitting us such instructions, you expressly give your consent for these directives to be stored, transmitted and executed in accordance with the terms and conditions.

You can indicate in your directives a person responsible for their execution. This person will be authorised to request their implementation after your death. Without specific guidance, your heirs will be notified of your instructions and can ask us to implement them.

You can modify or cancel your instruction at any time by contacting as indicated in article 15.

## **12. Portability of your personal data**

You have the right to the portability of the personal data you provide to us, understood as data that you have voluntarily and knowingly declared related to the access and use of the Services, as well as the data generated by your activity during the use of the Services. We remind you that this right does not apply to data collected and processed on a legal basis other than consent or the execution of the contract that binds us.

This right can be exercised free of charge, at any time, and in particular upon closing your account on the Site, in order to retrieve and store your personal data.

In this case, we will send you your personal data, by any means deemed useful, in an open standard format of common use and readable by an automatic device, in compliance with existing regulations.

## **13. Filing a complaint with a supervisory authority**

We also inform you that you have the right to lodge a complaint with a competent supervisory authority in the Member State where your habitual residence is, your place of work or the place where you consider a violation of your rights has been committed.

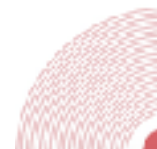
This appeal can be exercised independently of any other appeal to an administrative or judicial jurisdiction.

## **14. Contact person for personal data**

For questions regarding the methods of processing your personal data, or to exercise one of your rights, you can contact us at the following addresses:

- email address: [team@tangerine.com](mailto:team@tangerine.com)

- postal address: Tangerine Srl, c Via California, 11 - 20144 Milan, Italy



## 15. Changes

We reserve the right, in our sole discretion, to amend this Document at any time, in whole or in part. These changes will come into effect from the publication of the new version of the Document of which publication we will communicate to you. The use of the Site following the entry into force of these changes will constitute recognition and acceptance of the new Document. If you do not agree to the content of the new Document, you will no longer have to access the Site.

Milan, 20/10/2021

