



The Creative Passport Privacy Policy

Last Updated: December 18, 2020

Introduction

At the Creative Passport, we value your support and respect your privacy rights. This Privacy Policy transparently explains how and why we collect, use, share, and store the personal data received from your use of the Creative Passport website and services. We also want to outline the controls and choices you have around when and how you choose to share your personal data.

Except as set forth in this Privacy Policy, as may be further explained in our Terms of Use Agreement ("Terms of Use") and other published guidelines, we do not share personal data about our users without obtaining their further consent.

Personal Data We Collect

Due to the nature of our services, we will need to collect personal information from you to support your networking and career goals in the music industry. Under the European Union's General Data Protection Regulation (GDPR), "personal data" is "any information relating to an identified or identifiable natural person".

We may request that you provide us with your personal data when you are in contact with the Creative Passport or when you are using the Creative Passport's website or services. You are not required to provide the personal data that we have requested, but, if you choose not to do so, in many cases the Creative Passport will not be able to provide you with our services or respond to any queries you may have. Additionally, in some cases, if you decide not to provide certain pieces of suggested information, the effectiveness of our services may be limited.

By choosing to provide us with your personal information, you acknowledge our processing of that information in accordance with this policy.

Below are the different types of personal data we collect.

1) Personal Data You Give Us

We collect the following personal data provided by you when you sign up for our services and as part of the ongoing process to build and use your Creative Passport:

- User data such as real name, date of birth, gender, nationality, home address, and current address.



- Data linked to your Creative Passport including your username, password, and assigned Creative Passport ID.
- Personal contact information including your email address and phone number.
- Artist profile data including your persona name, aliases, biography information, photos, music and non-music roles, skills, instruments played, hardware/software used, favourite instrument manufacturer, interests, current projects, artist inspirations, charities supported, and favourite quote.
- Artist identifiers including ISNI, IPN, IPI, CP ID, and other proprietary IDs.
- Data on your representatives and associated contacts including contact information for associated record labels, publishers, collection societies, distributors, PR agencies, agents, legal representatives, sync agencies, and managers.
- Official social media and digital accounts including personal websites, merchandising, Facebook, Instagram, Twitter, Spotify, Apple, Tidal, and YouTube.
- Data on your collaborations, including verified collaborators, collaboration type, and collaboration role.
- Data included in your government issued IDs or other identity documents such as passports or driver's licenses that you may give us as part of our document authentication service.

2) Your Personal Data We Receive from Other Sources

To facilitate the creation of your Digital ID for use on Creative Passport, we may introduce you our third party partners, such as [Yoti \(https://www.yoti.com/\)](https://www.yoti.com/) or others that we add from time to time. Such third parties may not be subcontractors or suppliers of Creative Passport, and in which case we are not responsible for their services or actions. You may be required to sign up directly with such third parties to activate and enable your Digital ID on Creative Passport, and will be subject to their terms and conditions in relation to such Digital IDs. Once created, we receive your Digital ID from these partners, which includes or is related to the personal data you supplied to them.



We may connect with other third party data sources to collect additional personal data. This may include sourcing data from external online sources which provide open information on artists and their work. We plan to make available to you any personal data we source externally so that you are aware of what exists about you online.

Some existing third party data sources we may source personal data from include: MusicBrainz, iTunes/Apple Music, Discogs, Wikipedia, and ISNI

Personal data we may externally source include: information regarding credits, Grammy awards, other awards, live performances, public appearances, commissioned works, hardware/software used, charities supported, brands, and sponsors. You may also choose to provide this information to us as well.

3) Data We Collect Automatically

We may automatically collect usage data through your use of our service including interactions such as search queries, browsing history, date and time you logged in, and features you've been using. We may also automatically collect device information including online identifiers such as cookie data and IP addresses, device ID and type, and network and connection types. The individual data may be retained for a number of days before being aggregated for Security Development Support.

Please note that, with your consent, we will retain location information that is manually entered into the site.

Cookies and Other Identifiers

Your device stores small pieces of data called cookies when you browse and use websites and online services. We use cookies and other identifiers such as web beacons, to recognize you and/or your device(s). We use cookies to authenticate you, remember your preferences and settings, and analyze site traffic and trends.

Web browsers such as Safari, Internet Explorer, Firefox, and Chrome have a "Do Not Track" ("DNT") feature that notifies a website that a user does not want to have their online activity tracked. If a website responds to DNT signals, then when that website receives a DNT signal, the browser can block that website from collecting certain information about the browser's user. Creative Passport currently responds to most DNT signals. However, where we have enabled certain internal site analytics functionality, such as provided for us by Fathom Analytics, which is only used to track non-personal and non-identifiable activity on the site itself, we do not respond to DNT requests.



You may also manually disable cookies. Most browsers offer instructions on how to reset the browser to reject cookies in the “Help” section of the toolbar. Please note though that if you choose to disable cookies for our website and online services, certain features and conveniences of our website may not work properly.

What We Use Your Personal Data For

The Creative Passport processes the personal data we collect about you for various reasons. In this section, we outline our different processing purposes, and the legal bases we rely upon to legally permit us to process your personal data.

1) Processing Purposes

We process your personal data for the following purposes:

- To administer your Creative Passport account and provide our services to you. This includes, when you provide information to create your artist profile and Creative Passport, we consolidate, maintain, and store that information, and make that information viewable to our partners and certain third parties and other users as directed or enabled by you.
- To provide you with client support and respond to your requests.
- To communicate with you about our services, including communications about account and profile management, and communications about any new developments or changes to the Creative Passport website and services.
- To improve and develop our services, including using information to diagnose, troubleshoot, and fix issues with the Creative Passport website, as well as developing new features for our services.
- To implement a consistent experience across your devices.
- To prevent and fight fraud or other illegal or unauthorized activities.
- To fulfill legal obligations, including complying with legal requirements, and assisting law enforcement when requested to do so.
- To fulfill contractual obligations with third parties and partners, for example obligations to third party music service providers that pay to access the Creative Passport’s database.



2) **Legal Basis**

To process your personal data for the purposes described above, we rely on the following legal bases:

- Contract performance
 - When you sign up for our services, we are contractually bound to perform our services per our Terms of Use and this requires us to process your information.
- Legitimate interests
 - We will use your personal data when we have legitimate interests to do so. Legitimate interests include analyzing data to improve, fix, or develop our services. Legitimate interests also include processing information for client support, client communications, fraud detection and other legal purposes.
- Consent
 - We may request your consent to use your personal data for certain specific reasons. You may withdraw your consent at any time for such processing by contacting us.
 - We will always seek your consent before processing “special category data” which would include processing data about: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data (where used for identification purposes); health; sex life; sexual orientation.

Collection and Use of Non-Personal Data

We may collect aggregated data of user activity on our website and services. Aggregated data is non-personal data for the purposes of this Privacy Policy but can still provide us with useful insight to help us understand which parts of our website and services are of most interest.

If we combine non-personal data with personal data, the combined information will be treated as personal data for as long as it remains combined.

Automated Decision-Making, Including Profiling



You have the right not to be subject to automated decision-making, including profiling. The Creative Passport does not use algorithms or profiling to make decisions significantly affecting you. We do not engage in automated decision-making.

Your Choices

The Creative Passport has features which allow you to access and update your account and profile information. You can access a visualization of your account information and all of your personal data fields such as biography information, skills information, contact information, etc. on the Creative Passport platform. You decide what information you want to enter in each data field. You also decide which data fields are made public or shared. When you update your information, old copies of information may be retained by external services partnered with the Creative Passport.

You may also delete your account to stop all ongoing personal data collection and processing by the Creative Passport. However, even in these circumstances, data may be retained by partners of the Creative Passport for an indefinite period of time.

In the European Union, you may also lodge a complaint with appropriate data protection authority if you have concerns about our processing of your personal data.

Sharing Your Personal Data

After you create your Creative Passport account, you can choose to share your personal data and profile. The goal of the Creative Passport is to consolidate your artist information so that it is easier for you to share your credentials and artist profile with other service providers and players within the music industry.

The Creative Passport is not in the business of selling or exposing our users' behavioural data to third parties. Any behavioural data we collect will be for internal use only. Please note, however, that the Creative Passport service is based around a subscription model for third parties and partners. Although artists sign-up for free, third parties and service providers in the music industry will have to pay a subscription fee to access the Creative Passport's artist database.

Below are the different types of third parties we may share your personal data with:

1) Industry Partners

As directed or enabled by you, we share your personal data with our partners and other third party service providers in the music industry. In doing so, we can help you seamlessly and efficiently update and accurately maintain your artist information across our partners and other service providers in the music



industry. This sharing is completely consent-based and you have control over what information you would like to share. Please note that if you consent to integrate your personal data with other service providers like Spotify, then the process will be separated from the Creative Passport's own processes and we are not responsible for their usage of that information.

2) Service Providers

We share your personal data, as included in your government issued IDs or other identity documents such as passports or driver's licenses that you may give us as part of our document authentication service, with our authentication partners as part of that document authentication process.

We also share your personal data with third parties who support us in providing our Services or help provide, run and manage our internal IT systems. Such third parties may include, for example, providers of information technology, cloud-based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services.

We make sure that the service providers and partners we share your personal data with are secure and obligated to protect your information.

3) Other Users

You share your personal data with other users on the Creative Passport platform when you voluntarily make your profile information public. This sharing is completely consent-based and you have control over what information you would like to share. Other users will be able to search for your artist profile through our search function. Please be careful with your information and make sure that the personal data you share is information you are comfortable with being viewable on our platform through our user search function. We cannot control what others do with your information once you share it.

4) Protection of Creative Passport and Others

We may share your personal data with data protection authorities and law enforcement if required to do so under the law. This may involve disclosing information to public and government officials, or in connection to litigation. We will disclose your personal data if we determine doing so is necessary for national security. We will also disclose your personal data if we have a lawful basis for doing so and if we determine that disclosure is reasonably necessary



for the protection of the Creative Passport and our users, or to enforce our terms and conditions.

5) With Your Consent or at Your Request

You have the right to request that we share your personal data with other third party service providers. Additionally, we may ask for your consent to share your personal data with third parties. In these cases, we will make it clear why we want to share your personal data. This sharing is completely consent-based and you have control over what information you would like to share.

Cross-Border Data Transfers

The Creative Passport website is provided for users worldwide. The Creative Passport may share your personal data globally with multinational third party service providers in the music industry or artists in other countries in order to carry out the activities specified in this Privacy Policy. The Creative Passport may also partner with identity authentication companies in countries other than your country. As a result of these cross-border data transfers, your personal data may be subject to different sets of privacy laws when transferred to parties located in different jurisdictions.

Data Retention and Deletion

We retain your personal data as required and permitted by applicable laws and regulations, to honour your choices and to fulfill purposes described in this Privacy Policy. We only keep your personal data as long as necessary in relation to our obligations and rights.

If you delete your account or request we delete your personal data as held by us, but please keep in mind that because your personal data is often shared through our model, we cannot ensure that data will be deleted by other parties if data has already been widely disseminated to other users and third party service providers and partners. While the Creative Passport will not retain information after a user deletes their account, our partners may have different policies (and should be consulted individually for their policies regarding data retention and deletion).

Links to Third Party Sites and Services

We may display links to third party sites, content, and services on our website. We cannot control or be held responsible for third parties' privacy practices. If you click on a third party link on our website, please understand that you are leaving the Creative Passport service and any personal data you provide will not be covered by this Privacy Policy. We



recommend you read the privacy policies of these third parties to find out how they collect and process your personal data.

Protection of Personal Data

We are committed to protecting your personal data and have security measures in place to guard against unauthorized access and unnecessary retention of your personal data in our systems. We implement appropriate technical measures to help protect your personal data. Data is encrypted and stored in the Cloud. This means that others cannot see any of your personal data unless you decide to make your data public or decide to share your data.

Additionally, we encourage you to limit outside access to your computer and browser. We also recommend refraining from sharing your password with anyone and using a strong and unique password to protect your user account.

Please remember that although we work hard to put measures in place to protect your personal data, we cannot guarantee 100% security.

Your Rights

The GDPR grants individuals certain rights in relation to the processing of their personal data. We outline these rights in this section.

- Right to access
 - You have the right to be informed of and request access to the personal data we hold and process on you. You also have the right to obtain information about our processing of your personal data.
- Right to rectification
 - You have the right to request that your personal data be amended or updated if it is inaccurate or incomplete.
- Right to erasure

You have the right to request deletion of your personal data. If we fulfill your deletion request, we will take reasonable steps to inform any other data controllers also processing your personal data about your deletion request.
- Right to restrict



- o You have the right to request a temporary or permanent stop to our processing of all or some of your personal data.
- Right to object
 - o You have the right at any time to object to us processing your personal data on grounds relating to your particular situation, or for direct marketing, and statistical, scientific, or historical research purposes.
- Right to data portability
 - o You have the right to request a copy of your personal data in electronic format, and you also have the right to transmit your personal data for use in another party's service, including the right to request we directly transmit your personal data to another data controller.

Please note that we may decline deletion or access requests if we believe fulfilling such requests would undermine our legitimate use of data for anti-fraud and security purposes. We may also reject requests regarding your personal data if the request is unlawful or if it may infringe on trade secrets or intellectual property or the privacy of another user. Requests that are unreasonable or not required by law, including requests which may be extremely impractical or disproportionately difficult to technically implement may be rejected as well.

Please contact us for all requests regarding your personal data. Our contact information can be found at the end of this Privacy Policy.

Children

The Creative Passport is offered and available to users who are 18 years of age or older. The Creative Passport is only available for people under the age of 18 who are 13 years old or older with verifiable parental consent. We do not knowingly collect personal data from children under 13 years old. If you are under this age limit, please do not use the Creative Passport's services and do not provide any personal data to us. If we learn that we have collected the personal data of a child under 13 years old we will take steps to immediately delete the data.

Changes to this Policy

The Creative Passport may update its Privacy Policy from time to time. If there are any material changes to this Privacy Policy, we will post a notice provision on our website along



with the updated Privacy Policy and send communications to our users to notify them of such changes.

How to Contact Us

If you have any questions, concerns, or requests regarding your personal data or this Privacy Policy, please contact us: info@creativepassport.net. Please put "Privacy Policy" in the subject line so that we can deal with your query as quickly as possible.

The data controller of your personal data is the Creative Passport. Please note that if you contact us to assist you, for security reasons, we may need to authenticate your identity before fulfilling your request.

California Consumer Privacy Act Supplement

California recently passed a new privacy act, the California Consumer Privacy Act (CCPA). Although the Creative Passport does not fall under the CCPA's jurisdiction, we try our best to incorporate some of the CCPA's privacy standards into our broader privacy policy. If you are a California resident please see the following California Consumer Privacy Act Supplement to learn more about your privacy rights under the CCPA.

California Consumer Privacy Act Supplement

Last Updated: December 7, 2020

This notice on the California Consumer Privacy Act (CCPA) supplements the Creative Passport Privacy Policy.

If you are a California resident you have the following rights under the CCPA:

- Right to request information about the Creative Passport's collection, use, and disclosure of your personal information over the prior 12 months
 - You can ask for: the categories of and specific pieces of personal information that have been collected about you; the categories of sources from which personal information are collected; our purposes for collecting, using, or disclosing personal information; the categories of third parties with whom personal information is shared; the categories of personal information about you disclosed for business purposes; and the categories of personal information about you sold
- Right to request deletion of personal information, subject to certain exceptions
- Right to opt out of the sale of your personal information by a business



- Right to non-discrimination treatment if you exercise any privacy rights under the CCPA

California users of the Creative Passport can exercise their rights directly or through an authorized agent by contacting us at: info@creativepassport.net. Please put "Privacy Policy" in the subject line so that we can deal with your query as quickly as possible.

There are certain pieces of information which are protected classifications under California or United States federal law. These protected classifications cover a broad range of information including race, sex, and marital status. We may collect this sort of information about you if you choose to provide such information in your profile.