

# **BRIDGER PRIVACY POLICY**

**Effective Date: 26/07/2021**

We acknowledge that your privacy is very important, and we take it seriously. Bridger therefore strives to respect the privacy and protect the personal data of every user of its website and services.

For this reason, Bridger has developed this privacy policy to inform you about how it collects, uses, processes, transfers and retains data when you use the <https://www.bridgermusic.io> website (the "Site").

The Privacy Policy has been drawn up in accordance with the provisions of European Regulation No. 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) and the Luxembourg law of 1 August 2018 on the organisation of the National Commission for Data Protection and the general data protection regime.

## **Collection and use of your personal data and information**

### **1. Information provided by the user**

Bridger collects as little information about you as possible and we will not use or share your information with anyone else except as described in this Privacy Policy.

You provide us with information about yourself when you fill out forms on our Site or when you request information from us through the "contact us" feature on the Site. This may include, for example, your name, address, email address and telephone number etc.

### **2. Information that our Site collects**

If you visit our Site, it will automatically collect certain information about you and your visit, including the Internet Protocol (IP) address used to connect your equipment to the Internet and other information such as your browser type and version and the pages you visit on our Site.

Our Site may also download "cookies" to your terminal (see below).

### **3. Use of your data**

Through the Site, we collect and process only the Personal Data necessary for the following purposes: to provide you with the services mentioned on the Site and subscribed to by you, to improve these services, to contact you about your subscription and to provide customer service, to contact you in the context of commercial prospecting, to provide you with personalised advertising, to detect and prevent fraud attempts.

When personal information is collected, the information that is essential for the fulfilment of these purposes and that is required to respond to your requests is indicated by an asterisk (mainly, title, surname, first name, postal address and e-mail). If you have not filled in the mandatory fields, we will not be able to respond to your requests

## **Legal basis to process your data**

The legal bases for processing your data are as follows:

- where the use of your data is necessary to fulfil our obligations under a contract with you (for example, a subscription to a service available on our Site);
- where the use of your data is necessary to serve the legitimate interests of Bridger or others (for example, to ensure the operation and security of the Site, to comply with applicable legal obligations and to defend our rights, to prevent fraud);
- where we obtain your prior express consent.

### **Duration of storage of personal data**

We process and store personal data only for the time necessary to fulfil the purpose of storage or to the extent required by law.

As an exception, cookies collected on the Site will be stored for a period not exceeding 13 months from the date of collection.

### **Cookies**

#### **1. What is a cookie?**

A "cookie" is a text file that may be stored in a dedicated space on the hard disk of your terminal (computer, tablet, smartphone) thanks to the browser software that you use to consult our Site and subject to your choices recorded in your browser regarding cookies. This cookie file allows its issuer to identify the terminal in which it is stored for the duration of the validity or storage of the cookie.

When you visit the Site, information relating to the navigation of your terminal on our Site may be recorded in the "cookie" files installed on your terminal.

When you visit the Site for the first time and Bridger plans to place a cookie on your terminal, you will be informed by means of an information banner at the bottom of the page. You will then be able to give your consent to the installation of cookies.

You can change your cookie settings at any time. Below you will find more information about cookies and how you can manage your cookie settings.

#### **2. Cookies on the Site**

Subject to your choices recorded on your browser, any browsing on the Site may result in the recording of cookies, web beacons, your IP address, geolocation via IP address, connection and browsing information (referral URLs, advertising data, visit statistics, connection identifiers) in your terminal, enabling Bridger to recognise your terminal's browser for the duration of the retention of this information. Bridger collects information about the pages you view, the links you click and other actions you take while browsing the Site. Some anonymous cookies are deposited at the time of connection to the Site and used by Bridger for statistical analysis.

The cookies we store allow us:

- to establish statistics and volumes of traffic and use of the various elements making up the Site (sections and content visited, routes taken) enabling Bridger to improve the interest and ergonomics of its services;

- to adapt the presentation of our Site to the display preferences of your terminal (language used, display resolution, operating system used, etc.) during your visits to the Site, according to the hardware and software for viewing or reading that your terminal has;
- to memorise information relating to a form that you have filled in on the Site or to services or information that you have chosen on the Site;
- to allow you to access reserved and personal areas of the Site, such as your account, thanks to identifiers or data that you may have previously given us;
- to fight against Internet fraud (prevention of payment fraud, identity theft, etc.).

### **3. Your choices regarding cookies**

There are several ways in which you can manage cookies. Any change in your settings may affect your browsing experience and the conditions of access to the Site. You can change these settings at any time by using the procedures described below.

You can configure your browser software so that, depending on your choice, cookies are stored in your terminal or, on the contrary, they are rejected. You can also configure your browser software so that you are asked to accept cookies from time to time before a cookie is saved on your terminal.

#### **a) Consent for cookies**

Except in cases where cookies are absolutely necessary for our service or completely anonymous, any recording of cookies on your terminal is subject to your consent, which you can express and modify at any time and free of charge by modifying the settings of your browser. If you have accepted the recording of cookies on your terminal, the cookies integrated on the pages and contents that you have consulted will be stored in a reserved space on your terminal and will only be readable and recognisable by the issuer.

#### **b) Refusing cookies**

If you refuse to accept cookies or if you delete the ones that are saved, you will no longer be able to benefit from a certain number of functions that are necessary for easy navigation on the Site. This would be the case if you wish to access areas or services where it is necessary to identify yourself. This would also be the case if Bridger or its service providers are unable to recognise, for technical compatibility purposes, the type of browser used by your terminal, its language and display settings or the country/region from which your terminal appears to be connected to the Internet. If this is the case, we decline all responsibility for the consequences of the degraded functioning of our services due to the settings you have chosen.

#### **c) Browser peculiarities**

With regard to the management of cookies, each browser offers different configuration methods that are described in their respective tools or parameters menus

For more information, you can consult the file of the National Commission for Data Protection at the following address: [www.cnpd.lu](http://www.cnpd.lu)

### **Protection and sharing of your data**

We may disclose personal information about you to other Bridger Group entities, as well as to service providers who host our Site or provide other IT services and who process your information on our behalf, under strict conditions of confidentiality and security.

Bridger may also disclose your personal information if required to do so by law, or if we believe it is reasonably necessary to comply with any law, regulation or legal request, to protect the safety of any person, to address fraud, security or technical issues, or to protect the rights or property of Bridger, including, but not limited to:

- a. to comply with legal requirements (e.g. to comply with any law, regulation, legal process or governmental request, in the event of a subpoena or court order, or in dealings with an administrative authority);
- b. enforce the Privacy Policy or other agreements, including investigating possible violations thereof
- c. respond to claims of infringement of the rights of others;
- d. respond to your requests; and/or
- e. to protect the rights, property or personal safety of Bridger, including in the event of illegal or suspected illegal activity (including security breaches, technical problems). This includes exchanging data with other agencies and authorities, for example for fraud prevention and to prevent spam and malware.

We may use survey companies to find out how satisfied you are with our Site and/or our services. In this context, we may need to disclose your name, country, e-mail and telephone number.

The above disclosures may involve the transfer of your personal information abroad. This may include transfers to countries outside the European Economic Area, which do not have strict data privacy regulations. In such cases, we ensure that our agreements with the companies receiving the data are governed by data transfer mechanisms designed to ensure the protection of your personal information (including, where applicable, under an agreement on terms approved for this purpose by the European Commission).

### **Non personal data**

We share non-personal information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to help them understand usage patterns for certain Bridger services.

### **Third party service**

Your data is stored with our hosting provider Google Cloud Platform who has a strict security and privacy policy. You can view it at <https://cloud.google.com/terms/cloud-privacy-notice>.

We may use Google Analytics to help us understand how the Site is used. Google Analytics collects information sent by your browser as part of a web page request, including cookies and your IP address. Google Analytics also receives this information, and its use is governed by the Google Privacy Policy.

### **Protection of your information**

We use appropriate physical, administrative and technical safeguards to preserve the integrity and security of your personal information against accidental or unlawful destruction, accidental loss, alteration, disclosure or unauthorised access.

## **User Rights:**

You have certain rights regarding your data. As a user of the Site, you have the right :

- access, rectification, deletion and suppression of your data;
- to limit the processing of your data;
- to prevent the processing of your data for marketing purposes;
- to object to the way in which we process and disclose certain data (for example, by deciding to unsubscribe from commercial or prospecting e-mail distribution lists by following the instructions at the bottom of such e-mails);
- to transfer your data to a third-party service provider, and to exercise your right to data portability;
- to withdraw your consent to the processing of your data at any time;
- to define directives relating to the fate of your data after your death in accordance with the conditions set out in Article 85 of the French Data Protection Act (loi Informatique et Libertés).

Visit the site [www.cnpd.lu](http://www.cnpd.lu) for more information about your rights

If you wish to know more about your rights or exercise any of your rights under the applicable law, you may contact us at any time by e-mail or post at the following addresses

- BRIDGER SA – 76, avenue de la Liberté – 1930 Luxembourg – Luxembourg
- [legal@bridgermusic.io](mailto:legal@bridgermusic.io)

We will consider all requests and provide you with our response within the time limits set by law.

Please note, however, that some data may be excluded from these requests in certain circumstances, such as if we need to continue processing your data to serve our legitimate interests or to comply with a legal obligation. We may also ask you to provide us with data to confirm your identity before responding to your request, as required or permitted by applicable law.

If you feel, after contacting us, that your rights have not been respected, you may make a complaint to the CNPD.

## **Links to other websites**

We are not responsible for the practices employed by websites linked to the Service, or for the information or content contained therein. Please keep in mind that when you use a link from the Site to another website, our Privacy Policy does not apply. Your browsing and interactions on any other website, including those linked to our website, are subject to the rules and policies of that website. We strongly recommend that you review the privacy and security policies of those third parties.

## **Changes to our privacy policy**

If we change our privacy policies and procedures, we will post those changes on this page to inform you of what information we collect, how we use it, and under what circumstances we may disclose it. Changes to this Privacy Policy are effective when posted on this page.

To determine if the Privacy Policy has changed since you last viewed it, check the "Effective Date" at the top of the document. In any case, you will be duly notified of any changes in accordance with legal requirements.

### **Applicable Law and Jurisdiction**

This Privacy Policy is governed by the laws of Luxembourg and any dispute arising out of it shall be subject to the jurisdiction of the competent courts of Luxembourg.