

Privacy Policy

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Welcome

This Privacy Policy describes how Busker, Inc. handles personal information that we collect through our website located at www.busker.audio (the “Site”) and any other sites or services that link to this Privacy Policy (collectively, the “Services”).

While providing our Services, we recognize the importance of your privacy and carry out our activities in line with the applicable data protection regulation including the United Kingdom General Data Protection Regulation (“UK GDPR”), the Turkish Personal Data Protection Law (“KVKK”), and other relevant laws and regulations.

Personal information we collect

Information you provide us. Personal information that you may provide to us through the Services includes:

- **Identity information**, you may provide us with certain identity details, such as your full name, date and place of birth, mother’s name, father’s name, nationality, and identity number;
- **Contact information**, you may provide us with certain contact information, such as your residential address, country, email address, social media handles, and links to your external websites;
- **Your professional experience information**, such as your occupation, biography, education status and industry;
- **Your account and profile information**, such as your username, password, account settings and profile photo;
- **Web3 transaction information**, such as your wallet provider, public wallet address, smart contract interactions, transaction amount, or information relating to transactions to be processed by the Services.
- **Marketing, feedback or correspondence information**, such as your preferences for receiving communications and other information that you provide when you contact us with questions, feedback, or otherwise correspond with us online.
- **Your identity verification information**, such as your government-issued ID, passport, proof of residence or other identification documents, selfie, the invoice of a subscribed service (e.g., electricity, water, natural gas, telephone services);
- **If you are an artist, you may provide certain details about your art**, such as your artist name, music label, producer and information about your music content including individual tracks, albums, remixes, live performances, DJ sets, and sound effects.

Information we obtain from third parties:

- **Publicly available blockchain information.** We may obtain information from public blockchains, such as transaction information and other related information.
- **Social media information.** We may maintain pages on social media platforms, such as Instagram, LinkedIn, Twitter, and other third-party platforms. When you visit or interact with our pages on those platforms, the platform provider's privacy policy will apply to your interactions and their collection, use and processing of your personal information. You or the platforms may provide us with information such as your biographical, educational, and professional experience, and we will treat such information in accordance with this Privacy Policy.

Automatic data collection. When you visit our Site, we and our service providers may automatically log information about you, your computer or mobile device, and your interactions over time with our Services, our communications and other online services, such as:

- **Usage information,** such as information about how you use and interact with the Services.**Device data,** such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 4G), and general location information such as city, state or geographic area.
- **Online activity data,** such as pages or screens you viewed, how long you spent on a page or screen, browsing history, navigation paths between pages or screens, information about your activity on a page or screen, access times, duration of access, and whether you have opened our marketing emails or clicked links within them.

We may use the following tools for automatic data collection:

- **Cookies,** which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns.
- **Local storage technologies,** like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web beacons,** also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

How we use your personal information

To operate our Services:

- Provide, operate, maintain, secure and improve our Services.
- Allow you to build your digital collection and connect with the artists and other collectors.
- Communicate with you about our Services, including by sending you announcements, updates, and support and administrative messages.
- Respond to your requests, questions and feedback.

For research and development. We may use your personal information for research and development purposes, including to analyse and improve our Services and our business. As part of these activities, we may create aggregated, de-identified, or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyse and improve our Services and promote our business.

Direct marketing. If you have provided us with your email, and only if you have consented to it, we may from time-to-time send you direct marketing communications as permitted by law, including, but not limited to, notifying you of new features and other information related to the Services. You may opt out of our marketing communications as described in the “**Opt out of marketing communications**” section below.

Compliance and protection. We may use personal information to:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.
- Verify your email. Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims). Audit our internal processes for compliance with legal and contractual requirements and internal policies.
- Verify your identity, inform the public authorities when necessary and conduct financial verifications to comply with applicable know-your-customer, anti-money laundering, counter-terrorism financing regulations.
- Enforce the terms and conditions that govern our Services.
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorised, unethical or illegal activity, including cyberattacks and identity theft.

How we share your personal information

We may share your personal data with our suppliers, business partners, information technology service providers, authorised public institutions and organisations, and legally authorised persons.

For example;

- **At your direction.** We may share your personal information at your direction. For example, as a purchaser of NFTs through our Services, you may be able to opt-in to share your email with the NFT creator to receive newsletters, updates, or other communications that may be of interest to you.
- **Service providers.** We may share your personal information with third party companies and individuals that provide services on our behalf or help us operate our Services (such as lawyers, bankers, auditors, insurers, and providers that assist with hosting, analytics, email delivery, marketing, and database management).
- **Authorities and others.** We may disclose your personal information to law enforcement and government and regulatory authorities, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above. We may share your

personal information to comply with our reporting obligations within the framework of preventing money laundering and the financing of terrorism.

- Business transfers. We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganisation or sale of assets, or in the event of bankruptcy or dissolution. In such a case, we will make reasonable efforts to require the recipient to honour this Privacy Policy.

For compliance with the UK GDPR, we ensure our suppliers and business partners, whether located outside the UK or not, take appropriate technical and organisational security measures in accordance with applicable data protection laws and use it solely for the purposes specified by us.

Unless otherwise stipulated in the KVKK or other regulations, we will take measures to ensure that third parties with whom we share your personal data will only process them for the specific purpose of the sharing.

Our Legal Bases for Processing

We collect and process your personal data on the following bases, which are stated in Article 6 of the UK GDPR and Article 5 of the KVKK:

- You have given clear consent for us to process your personal data for a specific purpose. [UK GDPR article 6/1(a)], [KVKK article 5/1].

For example, we will send you marketing communications only if you have provided your consent.

- Processing is necessary for the performance of our contract. [UK GDPR article 6/1(b)], [KVKK article 5/2(c)]

For example, we will rely on this legal basis when we process your data for the purpose of enabling you to sign up and utilise our Services.

- Processing is necessary for compliance with a legal obligation to which we are subject, or processing is expressly stipulated in the law. [UK GDPR article 6/1(c)], [KVKK article 5/2(a), KVKK article 5/2(ç)]

For example, we will rely on this legal basis when we process your data for the purpose of fighting corruption, money laundering, and terrorist financing.

- Processing is necessary to establish, exercise or defend legal claims [KVKK article 5/2(e)].

For example, we will rely on this legal basis when we process your data for the purpose of protecting, defending and establishing the rights related to an existing or possible legal dispute.

- Processing is necessary for the purposes of our legitimate interests, provided that such interests are not overridden by your interests or fundamental rights and freedoms which require protection of personal data. [UK GDPR article 6/1(f)], [KVKK article 5/2(f)].

We have a legitimate interest in improving and personalising our Services based on your needs, requests and suggestions, retaining and evaluating information on your recent visits to

our website and how you move around different sections of our website. We will rely on this legal basis when we process your data for the purpose of securing and improving our Services.

Your choices

Privacy rights. You have the right to submit requests about your personal information, depending on your location and the nature of your interactions with our Services:

a. Under Article 11 of the KVKK, you are entitled to:

- Learn whether your personal data is processed or not,
- Request information as to if your personal data have been processed,
- Learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose,
- Know the third parties to whom your personal data are transferred in-country or abroad,
- Request the rectification of the incomplete or inaccurate data, if any and request reporting of operations as the rectification of the incomplete or inaccurate data to the third parties to whom your personal data have been transferred,
- Request erasure or destruction of the personal data if there are no applicable legal basis for processing and reporting of operations as the erasure or destruction to the third parties to whom your personal data have been transferred,
- Object to the occurrence of a result against you; by analysing the data processed solely through automated systems,
- Claim compensation for the damage arising from the unlawful processing of your personal data.

b. Under Chapter III of the UK GDPR, you are entitled to:

- **Access:** You have the right to request information about how we process your personal data and to obtain a copy of that personal data.
- **Rectification:** You have the right to request the rectification of inaccurate personal data about you and for any incomplete personal information about you to be completed.
- **Objection:** You have the right to object to the processing of your personal information, which is based on our legitimate interests (as described above).
- **Deletion:** You can delete your account by using the corresponding functionality directly on the service.
- **Automated decision-making:** You have the right to object to a decision made about you that is based solely on automated processing if that decision produces legal or similarly significant effects concerning you.
- **Restriction:** You have the right to ask us to restrict our processing of your personal data so that we no longer process that personal data until the restriction is lifted.
- **Portability:** You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and to have that personal data transmitted to another organisation in certain circumstances.
- **Complaint:** You have a right to lodge a complaint with the authorised data protection authority if you have concerns about how we process your personal data.

To make a request, please email us as provided in the “**Contact Us**” section below. We may ask for specific information from you to help us confirm your identity. We will require authorised agents to

confirm their identity and authority, in accordance with applicable laws. You are entitled to exercise the rights described above free from discrimination.

Limits on your privacy rights and choices. In some instances, your choices may be limited, such as where fulfilling your request would impair the rights of others, or our ability to comply with our legal obligations and enforce our legal rights. Additionally, as data on a blockchain cannot be changed or deleted by design, your ability to exercise your personal information requests with respect to on-chain personal information may be affected. If you are not satisfied with how we address your request, you may submit a complaint by contacting us as provided in the “**How to Contact Us**” section below.

Right to Withdraw Consent

If you have provided your consent to the collection, processing and transfer of your personal data, you have the right to fully or partly withdraw your consent.

Opt out of marketing communications. You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email. You may continue to receive service-related and other non-marketing emails.

Online tracking opt-out. There are a number of ways to limit online tracking, which we have summarised below:

- **Blocking cookies in your browser.** Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit <https://allaboutcookies.org>.
- **Using privacy plug-ins or browsers.** You can block our Services from setting cookies by using a browser with privacy features, like [Brave](#), or installing browser plugins [Privacy Badger](#), [DuckDuckGo](#), [Ghostery](#) or [uBlock Origin](#), and configuring them to block third party cookies/trackers.

Note that because these opt-out mechanisms are specific to the device or browser on which they are exercised, you will need to opt out on every browser and device that you use.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <https://allaboutdnt.com/>.

Third party services

Our Services may contain links to other websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third party website mobile applications or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

Security

We employ a number of technical, organisational, and physical safeguards designed to protect the personal information we collect. However, no security measures are failsafe and we cannot guarantee the security of your personal information.

Retention Of Your Personal Data

We will only retain your personal data for as long as necessary to fulfil our collection purposes, including for the purposes of meeting any legal, accounting, or reporting requirements, or legal retention periods.

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 requirements.

Upon expiry of the applicable retention period, we will securely delete, destroy or anonymize your personal data in accordance with applicable laws and regulations.

Children

Our Services are not intended for use by individuals under 18 years of age. If we learn that we have collected personal information through the Services from an individual under 18 without the consent of the individual's parent or guardian as required by law, we will delete it.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the website.

How to contact us

Please direct any questions or comments about this Privacy Policy or our privacy practices to info@busker.audio.