

Flat Privacy Policy

- Version dated 5 January 2016 -

1. FLAT APPROACH TO PRIVACY

- 1.1 We operate a service which allows you to create, edit, share and collaborate on music scores using our website located at flat.io (our "site") and the Flat application (available for download on your mobile device) (our "app") (together the "Service")
- 1.2 The Service is operated by Tutteo Limited ("we" or "us") and we act as a data controller in relation to the information below.
- 1.3 We appreciate your interest in our Service. Privacy protection is very important to us and we are committed to protecting you and respecting your privacy. This privacy policy sets out information about how we collect, store, process, transfer, share and use data that identifies or is associated with you when providing our Service (hereinafter "personal information").
- 1.4 You should also be aware that we use cookies to store and access information whilst providing access to our site or our app. You can find out more about our use of cookies in our cookie policy flat.io/legal/cookies-policy.

2. PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

- 2.1 We collect personal information about you when you voluntarily submit information directly to us through our Service. This can include information you provide to us when you register with us, edit your profile, share content, purchase services, correspond with us, subscribe to our mailing lists, newsletters or other forms of marketing communications, respond to a survey, enter a promotion or use some other feature of our Service.
- 2.2 We also collect personal information from you indirectly such as information about the pages you look at on our site or our app or the device you use to view our site or connect to our app with.
- 2.3 The list below sets out the categories of personal information we collect about you and how we use that information.

Contact details: We collect contact information such as your name and your email address. We will use your contact details so that we can create a profile for you and communicate with you directly about the Service and about queries, issues or concerns you or other users have. If you register with us using your email address, we also store your email as your login details.

Other profile information: You can complete a profile by submitting other information, such as a display name and by adding a profile picture. We use the information in your profile for to identify you and in case we need to speak with you regarding any issues you might be experiencing with the Service.

If you are Flat Individual user, your display name and profile picture can be viewed by other users around the world. If you are a Flat Education user, your display name and profile picture will be viewable to users inside your network.

Comments and opinions: When you contact us directly, e.g. by email, phone, post or by completing an online form (for example, by using our "Support" function) we will record your comments and opinions. We will also record comments and opinions you express when responding to surveys, entering competitions or taking part in promotions we run. We will use your comments and opinions to address your queries, issues and concerns and improve our products and services. We will also use comments and opinions you express when responding to surveys, entering competitions or taking part in other promotions to determine products and services that may be of interest to you and to send you marketing communications in accordance with your marketing preferences.

Payment and transaction information: We keep records of the products and services you purchase from us and the payment method you use for the transaction. We will use payment and transaction information to process payment for any product or service you purchase from us. We will also use your payment and transaction information and history to determine products and services that may be of interest to you and send you marketing in accordance with your marketing preferences.

Information provided by social networks you connect to our Service: If you are a Flat Individual user and if you connect a social network, such as Facebook or Google+, to our Service we will collect personal information from the social network in accordance with your privacy settings on that network. The connected social network may provide us with information such as your name, Facebook id, Google id, profile picture, network, gender, username, user ID, age or age range, language, country, friends list, follower list and any other information you have agreed it can share. We will use the personal information provided to help create a profile for you on our Service and, where we provide the functionality, we will also use the information provided to assist you in sharing your experiences on our Service with your friends, followers or contacts on the connected social network. We may also use the connection between the social network and our Service to provide you with updates on the social network that are relevant to any account you have with us or promotion you are taking part in. Such updates will only be provided with your consent, we will not post to your social network or to your friends, followers or contacts without your consent.

If you are a Flat Education user, you can also sign up to Flat through Google Apps for Education.

Service login details: Where you create an account with us we will hold your user name and password details so that we can keep your account secure. Where you are provided with the option to log-in using a social network, for example through Facebook or Google+ sign-in, we will not be provided with your password or other account login details for those accounts.

Content: When you create content via the Service, i.e. a music score, it will be uploaded to our Service.

If you are a Flat Individual user, your content can be viewed by other users around the world, if you choose to make it public. If you choose to share your content on a social network, it will be viewable in accordance with your privacy settings on that social network.

If you are a Flat Education user, your content will be viewable by other users in your school or other educational organisation that you are linked to.

Social Media Functions: If you create a profile on the Service, other users can follow you and like your content. They can also share any content you create.

Your preferences: We hold information about the preferences you set for notifications, marketing communications and how our site is displayed or what content is displayed to you through our app. We will use your preference settings for the purpose of providing notifications, sending marketing communications and displaying our site in accordance with your choices.

Information about how you use and connect to our Service: We collect information about how you use our Service such as the pages you view on our Service, the time you access our Service and how long you use it for, the website from where you came to our Service or go to after leaving our Service and any selections and choices you make when using our Service.

We also collect information about the computer, tablet, smartphone or other electronic device you use to connect to our Service. This information can include details about the type of device, unique device identifying numbers, operating systems, browsers and applications connected to our Service through the device, the language of those browsers or applications, your Internet service provider or mobile network, your IP address and your device's telephone number (if it has one).

We use information about how you use and connect to our Service to present our Service to you on your device and to determine products and services that may be of interest to you for marketing purposes.

Information about your location: Other than information you choose to provide to us, we do not collect information about your precise location. Your device's IP address may help us determine an approximate location. We may use an approximate location to ensure

content on our site is relevant to the area, city, state or country you are using your device in. We will not collect or track your exact location without your consent. Where necessary we will seek your consent before using information about your exact location.

Information provided by other users: Sometimes, other visitors to our site or users of our app provide information that is associated with you. We will use personal information about you that is contained in private messages sent to us by other users to respond to any query, issue or concern they raise. Where users of our Service want to invite you to use our Service or to share information with you about our Service we will use personal information that they provide about you to assist them in doing this; we will only do this though where they indicate that you have provided your consent for them to communicate with you in this way.

Information about fraudulent or criminal activity relating to your account: We will use information about fraudulent or criminal activity relating to your use of our Service for the purposes of detecting and preventing fraud or crime.

All personal information: We will use all the personal information we collect to monitor and improve our Service and business. We also use the personal information we collect to help us develop new products and services. Our use of your personal information in this way will not result in information that was not previously publicly available being made public on our site or through our app.

- 2.4 At various places on our site or our app you may be requested to enter certain personal information. Personal information that must be provided in order to use the requested services will be indicated at the time of collection. Other personal information that you are not required to provide in order to receive our services may be voluntarily given and you are free to decide not to give such personal information.
- 2.5 We may anonymise and aggregate any of the information we collect (so that it does not directly identify you). We may use anonymised information for purposes that include testing our IT systems, research, data analysis, improving our site and developing new products and features.

3. INFORMATION WE SHARE WITH THIRD PARTIES

3.1 We may share your personal information with the following parties:

- (a) **Social networks:** if you are a Flat Individual user you can choose to make your content public and share your content on a social network. If you do, we will share your content with that social network. As part of the Service, other users can share your public content with social networks.

- (b) **Companies in the same group of companies as us:** our subsidiaries (i.e. any organisation we own or control) or our holding company or ultimate holding company (i.e. any organisation that owns or controls us) and any subsidiaries they own. These companies will only use your personal information in the same way as we can under this privacy policy.
- (c) **Service providers and advisors:** third parties who provide a service to us. For example, third party service providers either provide IT infrastructure or help support it, help us to provide you with support in relation to the Service, process payments from you on our behalf, develop analytical information for us about our products and services and provide professional services such as legal and accountancy services. These third parties will only be allowed to use your personal information in accordance with our instructions and will be required to keep your information secure.
- (d) **Purchasers of our business:** personal information may be disclosed or transferred to buyers or perspective buyers of our business or any of our assets as part of any such sale.
- (e) **Law enforcement, regulators and other parties for legal reasons:** third parties who we are under a legal obligation to disclose your personal information to or to whom we need to disclose your personal information to protect our rights, property or safety or to protect the rights, property or safety of others. We may also disclose personal information to third parties to help detect and investigate illegal activities and breaches of any agreement we have with you.

3.2 We do not disclose information about identifiable individuals to anyone else except as set out above. We may provide third parties with aggregate statistical information and analytics about users of our Service but we will make sure no one can be identified from this information before we disclose it.

4. MARKETING AND ADVERTISING

- 4.1 From time to time we may contact you with information about our products and services. Most marketing messages we send will be by email. If you are using our app we may also send you push notifications. If you do not want to receive marketing messages from us, you will usually be able to tell us by selecting certain boxes on forms we use when we first collect your contact details.
- 4.2 We will only send marketing messages to users of our Flat Individual service or to users of our Flat Education service that have a designated 'teacher' account.
- 4.3 You can also change your marketing preference at a later date by following the instructions outlined below.

Email – click on the unsubscribe link at the bottom of our marketing emails. If you have an online account with us you might be able to opt-out of marketing emails, features updates and comment notifications through your account settings.

App push notifications – you can change your push notification preferences at anytime in the account settings for the app.

If you receive marketing from us through other channels e.g. post or by phone, and you no longer want to receive such messages, you can tell us to stop marketing to you by post or phone marketing messages by using our contact details at the end of this privacy policy. Please note that most marketing messages we send will be by email.

- 4.4 You can then let us know at any time that you do not wish to receive marketing anymore by sending an email to us at support@flat.io. You may also be able to unsubscribe from our marketing emails by clicking on the unsubscribe link in the emails we send to you.

5. **STORING AND TRANSFERRING YOUR PERSONAL INFORMATION**

- 5.1 **Cookies and Local Storage:** we may store information (which may include personal information) locally on your device using cookies and other browser and application storage methods. For further information please see our cookie policy (flat.io/legal/cookies-policy).

- 5.2 **Security:** we implement appropriate and reasonable technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, change, or damage but cannot guarantee that we will be able to keep your personal information secure due to the inherent limitations of the Internet and technology.

- 5.3 **International Transfers of your Personal Information:** the personal information we collect may be transferred to and stored in countries outside of the jurisdiction you are in. Some of these countries offer differing levels of protection in respect of personal information and may, in certain instances, be less protective than the country you are typically resident in. We will take all reasonable steps to ensure that your personal information is treated securely and in accordance with applicable law and this privacy policy.

6. **OUR POLICY TOWARDS CHILDREN**

- 6.1 Our Flat Individual Service is not directed to persons under 13 and we do not knowingly collect personal information from children under 13. If you become aware that your child has provided us with personal information, without your consent, then please contact us using the details below so that we can take steps to remove such information and terminate any account your child has created with us.

- 6.2 Our Flat Education Service may be used by children under 13, but only with the prior consent of their parent or school, as permitted by the Children's Online Privacy Protection

Act (COPPA). If Flat collects information from children under 13 through the Flat Education Service, Flat will collect, use, share and store such data only for the purposes of providing services to the student contemplated in our agreement with the school.

7. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

7.1 You have the following rights in relation to your personal information: (i) the right to be informed about how your personal information is being used; (ii) the right to access the personal information we hold about you; and (iii) the right to request the correction of inaccurate personal data we hold about you and to request the blocking or deletion of your personal information where the processing does not comply with local data protection laws.

7.2 To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below. Please provide as much information as you can about the personal information you are looking for and we will be happy to try and help you find it.

8. LINKS TO THIRD PARTY SITES

Our Service may, from time to time, contain links to and from third party websites of our partner networks, advertisers, partner merchants, news publications, retailers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

9. CHANGES TO THIS POLICY

We may update this privacy policy from time to time and so you should review this policy periodically. When we change this privacy policy in a material way, we will update the "last modified" date at the top of this privacy policy. Changes to this privacy policy are effective when they are posted on this page.

10. NOTICE TO YOU

If we need to provide you with information about something, whether for legal, marketing or other business related purposes, we will select what we believe is the best way to get in contact with you. We will usually do this through email or by placing a notice on our site. The fact that we may send notices to you will not stop you from being able to opt out of certain types of contact as described in this privacy policy.

11. CONTACTING US

Questions, comments and requests regarding this privacy policy are welcome and should be addressed to: legal@tutteo.com

This Privacy Policy was last modified on Tuesday, 5 January 2016.