

SCORELIGHT UNDERGROUND PRIVACY POLICY

Scorelight Underground (“Company,” “we,” “us,” or “our”) respects your privacy and is committed to protecting personal data in accordance with:

- The California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA)
- The General Data Protection Regulation (GDPR) (EU) 2016/679
- Other applicable U.S. and international privacy laws

This Privacy Policy explains how we collect, use, disclose, and safeguard personal information when you use our platform and related services.

1. Data Controller Information

Legal Entity Name: Scorelight Underground

Email: privacy@scorelightunderground.com

Scorelight Underground currently offers its services to users in the United States. We do not target or knowingly offer services to individuals located in the European Economic Area (EEA) or United Kingdom. If and when we begin serving users in those regions, we will appoint an EU/UK Representative and, where required, a Data Protection Officer, and update this Policy accordingly.

2. Categories of Personal Information Collected (CPRA-Compliant Classification)

In the past 12 months, we have collected the following categories:

A. Identifiers

- Name
- Email address
- Artist name
- IP address
- Device identifiers
- Account username
- Social media handles
- Self-reported location (city / state / country provided at sign-up)

B. Personal Information Categories Listed in Cal. Civ. Code §1798.80(e)

- Payment-related information (processed via third-party processors)
- Account credentials

C. Commercial Information

- Subscription history
- Transaction records
- Paid feature usage

D. Internet or Other Electronic Network Activity

- Streams
- Engagement metrics
- Pages visited
- Time spent
- Click activity

E. Geolocation Data

- Self-reported location (city / state / country provided at sign-up)

F. Professional or Employment-Related Information

- Artist portfolio information
- Creative metadata

G. Audio, Electronic, or Visual Information

- Uploaded songs
- Cover art
- Lyrics
- Videos

H. Inferences

- Genre classification
- Engagement insights
- Content recommendations

3. Sensitive Personal Information (CPRA)

We may collect:

- Account login credentials
- Payment-related information (processed securely via third parties)
- General geolocation derived from sign up process and through IP address

We collect general location derived from IP address and the city/state/country you provide at sign-up. We do not collect precise GPS geolocation, biometric data, or government-issued identifiers.

Users have the right to limit the use and disclosure of Sensitive Personal Information where applicable.

4. Lawful Basis for Processing (GDPR)

For users in the EEA, we process personal data under the following lawful bases:

Purpose	Lawful Basis
Account creation and platform operation	Contract performance
Payment processing	Contract performance
Analytics and engagement metrics	Legitimate interests
Security monitoring	Legitimate interests
Marketing communications	Consent

Legal compliance

Legal obligation

5. How We Use Personal Information

We use personal information to:

- Operate and maintain the platform
- Facilitate artist discovery and audience engagement
- Process subscriptions and payments
- Provide analytics insights
- Improve recommendation systems
- Prevent fraud and abuse
- Comply with legal obligations

6. Automated Decision-Making & Profiling (GDPR Article 22)

We use automated systems to:

- Recommend content

- Analyze engagement trends
- Categorize genres
- Rank submissions

These systems do not produce legal or similarly significant effects.

Users may request human review of automated decisions where applicable.

7. Sharing of Personal Information

7.1 Service Providers (Processors)

We share information with contracted service providers, including:

- Cloud hosting & infrastructure: Google Firebase / Google Cloud Platform
- Payment processing: Stripe, Inc.

These parties process data under written agreements.

7.2 Business Transfers

Information may be transferred in connection with mergers, acquisitions, or asset sales.

7.3 Legal Compliance

We may disclose data to comply with legal obligations.

7.4 Sale or Sharing of Personal Information

We do not sell personal information for monetary consideration.

We may share certain identifiers and internet activity data with analytics and advertising providers, which may constitute “sharing” under CPRA for cross-context behavioral advertising.

California residents may opt out of such sharing.

To exercise your right to opt out, toggle off “Data Sharing” in your privacy settings.

8. Your Privacy Rights

8.1 California Residents (CPRA Rights)

You have the right to:

- Know what personal information we collect
- Access specific pieces of personal information
- Correct inaccurate personal information
- Delete personal information
- Opt-out of sale or sharing
- Limit use of Sensitive Personal Information
- Non-discrimination for exercising rights

Requests may be submitted to:

privacy@scorelightunderground.com

We may verify identity before processing requests.

8.2 European Economic Area (GDPR Rights)

You have the right to:

- Access your data
- Rectify inaccuracies
- Erase data (“Right to be Forgotten”)
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent at any time
- Lodge a complaint with your local Data Protection Authority

9. International Data Transfers

We transfer data to the United States.

Where required, we rely on:

- Standard Contractual Clauses (SCCs)
 - EU-U.S. Data Privacy Framework (if applicable)
 - Other lawful safeguards under GDPR Chapter V
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10. Data Retention

We retain personal data:

- Account data: For duration of account + 5 years for legal compliance
- Transaction records: 7 years for tax/legal compliance
- Analytics data: Up to 24 months
- Security logs: 12 months
- Deleted accounts: Removed or anonymized within 90 days unless legally required

Retention is determined based on legal, contractual, and operational requirements.

11. Cookies & Tracking Technologies

We use cookies and similar technologies for:

- Authentication
- Security
- Analytics
- Personalization

Where required by law (e.g., EU), we obtain consent prior to placing non-essential cookies.

Users may manage cookie preferences through browser settings or consent banner tools.

12. Data Security

We implement:

- TLS/HTTPS encryption in transit
- AES-256 encryption at rest
- Role-based access control
- Two-factor authentication for administrators
- Continuous security monitoring

No system is 100% secure.

13. Data Breach Notification

If a personal data breach occurs:

- EU users will be notified within 72 hours where required.
 - California residents will be notified as required under state law.
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14. Payment Information & Donation Processing

14.1 Third-Party Payment Processing

Donation payments on Scorelight Underground are processed by Stripe.

When a listener makes a donation:

- Payment information is collected and processed directly by Stripe.
- Scorelight Underground does not store full credit card numbers or banking credentials.
- Stripe may collect identity verification and tax information from Artists as required by law.

Stripe's privacy practices govern the handling of payment data. Users are encouraged to review Stripe's Privacy Policy for additional details.

14.2 Information Collected for Payment Facilitation

In connection with donation functionality, Scorelight Underground may collect:

- Artist name and contact information
- Stripe account status
- Donation transaction confirmations
- Limited payment metadata (e.g., transaction IDs, amounts)

This information is used solely to:

- Facilitate platform functionality
- Monitor fraud and abuse
- Comply with legal obligations
- Maintain financial record accuracy
- Track fan engagement

14.3 Tax & Compliance Information

Artists may be required by Stripe to provide tax identification information for regulatory reporting purposes.

Scorelight Underground does not directly collect tax forms for donation payouts processed through Stripe.

14.4 Data Sharing

Payment-related information may be shared with:

- Stripe for processing and compliance

- Regulatory authorities where required by law
- Fraud prevention partners as necessary

Scorelight Underground does not sell payment information.

15. Children's Privacy

The Platform is not intended for individuals under 18.

We do not knowingly collect data from minors.

If discovered, such data will be deleted promptly.

16. Arbitration & Regional Limitations

Disputes are governed by Delaware law and subject to binding arbitration.

However, for residents of the European Union, mandatory arbitration clauses apply only to the extent permitted under local consumer protection laws.

17. Changes to This Policy

We may update this Privacy Policy periodically.

Material changes will be communicated via email or in-app notification.

18. Contact Us

Privacy Team

Scorelight Underground

privacy@scorelightunderground.com

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