

## **MUGO - PRIVACY POLICY**

Welcome to **MUGO - Music on the go**, an online social platform and music player. We at MUGO, Inc. ("**MUGO**", "**we**", "**us**", "**our**") respect your privacy.

This Privacy Policy (the "**Policy**") explains our privacy practices for the services we offer through our mobile app (the "**App**") and website (collectively, the "**Services**"). It describes how we collect personal information, use it and share it and the rights and options available to you with respect to your information.

Providing us with your personal information is a choice you make. We appreciate that and thank you for making this choice. You are not legally obligated to provide us with this information, but we do need it to allow you to use the Services.

This policy is combined into our **Terms of Use** (the "**Terms**"), and is a part of them.

### **In short...**

The following key points of the Privacy Policy are only brought for your convenience. They do not substitute the full Policy.

1. **Information we collect.** We collect information you actively provide us (for example, when you register with the Services). We also collect information about your use of the Service (for example, what music you listen to) and information about your device or computer. Subject to your explicit consent, we may access some of the other features in your device, including your geolocation information (even when the App runs in the background of your mobile device) and your device's camera, photo album and address book.
2. **Using the information we collect.** We use the information we collect to operate the Services, improve and customize them and develop new services. We also use it to tailor ads and commercial offers to your taste and profile and contact you when necessary.
3. **Sharing the Information We collect.** We may share your information in order to operate, maintain and enhance the Services.
4. **Access to Information.** You may request to access your personal information, or have us update, correct or delete such information, if the law provides you those rights.
5. **Third Party Services.** The Services include elements that third parties provide – be it music providers, social networks, advertisement agencies or providers of computer services. Such elements in the Services are subject not to this Policy but rather to the privacy practices of their providers. We do not control their privacy policies.
6. **Aggregated information.** We may use the information we collect from you to create de-identified, statistical or aggregated information, and make it available to others for any purpose.
7. **Retention.** We retain your information for as long as we deem necessary for the purpose it was first obtained.

8. **Security.** We implement measures to reduce the risks of damage and unauthorized access or use of information, but they do not provide absolute information security.
9. **Children privacy.** We do not knowingly or intentionally collect information about children who are under 13 years of age.
10. **Changes to the Policy.** We may change this Policy, by putting you on notice of such changes. Your continued use of the App after the changes take effect indicates your acceptance of the amended Policy.

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### HOW DOES THE SERVICE WORK?

**Your MUGO profile.** Your profile may contain the following:

- Your profile picture and profile information;
- The music styles you prefer to listen to;
- List of users you follow and users who follow you;
- Music you listened to with the App, and its source (YouTube, music on your device, etc.).

Your profile may be available to all registered users of the Service. If you want to avoid that, simply set your account to “private listening” mode (as explained below).

**Your activities.** Unless you set your account to “private listening”, the songs you listen to with the App will appear in your followers’ music feed. Followers may then comment on the music (“**Comments**”), join you in listening to the music, add the songs to their own playlist or share the music with other friends (collectively, “**Activities**”).

**Private Listening.** MUGO accounts are public by default. If you choose to set your account to “private listening” mode, other users of the Service will not be shown which songs you listen to (“**Private Listening**”).

### INFORMATION WE COLLECT

#### Information you actively provide us -

The Service is available only to registered users. You may register using your mobile number.

**Your Activities.** We collect content that you make available on the Service, such as Comments, music, photos and messages. That content is not treated as private or confidential and you should not have any expectation of privacy with respect to it. However, if you set your account to “Private Listening” mode, other users of the Service will not be shown which songs you listen to.

#### Information we automatically collect -

**Analytical data.** We may use third party analytics tools to collect information about your use of the Service and create statistics from such information. For example, we may record the frequency and scope of your use of the Service, the duration of your sessions, the interactions and communications you make with the Service’s interface (played songs, liked songs, shared songs etc.), and content that you view or post while using the Service.

**Device Information.** We may collect information about your personal computer or mobile device, including its model, operating system, unique device identifiers, browser type, mobile network information and the Internet Protocol (IP) address through which you accessed the Service.

**Features we have access to.** Subject to your explicit consent, we have access to the following features and collect the following information: geo-location (even when the App runs in the background of your mobile device), your device’s camera, photo album and address book. You may decline to give us access to your geo-location information, camera, photo album and address book, but in that case you may not be able to enjoy the full features of the Service. In

addition we may have access to your lock screen, system clock, cache storage, push notifications and messaging app for the purpose of providing you the various features of the App.

#### **CHILDREN'S PRIVACY**

We do not knowingly or intentionally collect information about children who are under 13 years of age.

#### **USE OF COLLECTED INFORMATION**

Your consent serves as the legal basis for processing your information. You may withdraw consent at any time, without affecting the lawfulness of data processing we carried out based on your consent before such withdrawal.

We may use the information we collect for the following purposes:

- Operating the Services and providing their features and functionalities;
- Sending you updates, recommendation based on your Activities, notifications and push-notifications, conduct surveys and send you other communications related to the Service;
- Improving and customizing the Services and developing new services;
- Collecting statistical and aggregated information about users' experience within the Services;
- Providing you with support, handling complaints and contacting you when we believe it is necessary;
- Enforcing the Terms and this Policy and preventing misuse of the Services;
- Complying with any applicable law and assisting law enforcement agencies and competent authorities, if we believe it is necessary or justified; and
- Taking any action in any case of dispute involving you, with respect or in relation to the App.

#### **SHARING INFORMATION COLLECTED**

We may share the information outlined in this Policy, with others, in any of the following instances:

- With our contractors and service providers, for data analysis and processing, bug reporting and handling, and in order to operate, maintain and enhance the Service;
- If you have breached the Terms, abused your rights to use the Services, or violated any applicable law. Your personally identifiable information may be shared with competent authorities and with any third party, if we believe it is necessary or justified;
- If the operation of the Services is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition);
- We may share personally identifiable information with our corporate group entities, but their use of such information must comply with the Policy.

#### **ACCESSING, UPDATING OR DELETING YOUR PERSONAL INFORMATION.**

You may ask to access the personal information about you that is stored in our systems, or have us update, correct or delete such information. You are also entitled to ask to transfer your data to another provider ('data portability' right), in accordance with the law. If you wish to exercise any of these rights, contact us at: [contact@mugo.co](mailto:contact@mugo.co).

### **AGGREGATED INFORMATION**

We may use the information we collect, as outlined above, to compile anonymized or aggregated information. We may share, sell or otherwise communicate and make available such anonymized or aggregated information to any other third party, at our sole discretion. However, we will not knowingly or intentionally share information that can be reasonably used to reveal your identity without your consent.

### **TRANSFER OF DATA OUTSIDE YOUR TERRITORY**

We may store and process information in the EU and in other countries such as the United States. We may also process information using cloud services. The laws in those other countries may provide a lesser degree of data protection than the laws of your own country. You agree to the transfer of your information to such other countries for the purpose of processing as described in this Policy, including through cloud services.

### **INFORMATION SECURITY**

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information. These measures do not provide absolute information security. Therefore, it is not guaranteed and you cannot expect that the Services will be immune from information security risks.

### **CALIFORNIA RESIDENTS**

The following disclosure is made pursuant to California Online Privacy Act (CA Civil Code § 22575): When you use our Services, other parties, such as Google, may collect personally identifiable information about your activities over time and across different websites or online services.

### **EUROPEAN CITIZENS**

The following disclosure is made pursuant to the European General Data Protection Regulation (GDPR): You have the right to withdraw your consent at any time; and to submit a complaint to the relevant supervisory data protection authority.

### **DATA RETENTION**

We retain personally identifiable information for as long as we deem necessary for the purposes set forth above. We may delete information from our systems, without notice to you, once we deem it is no longer necessary for the purposes set forth above.

### **CHANGES TO THIS PRIVACY POLICY**

We may change this Policy. We will provide you notice of such changes through the Service interface. Your continued use of the Service constitutes your consent to the amended Policy. If you do not consent to the amended Policy, we may terminate your account and block your access to, and use of, the Service.

### **CONTACT US**

You may contact us with any questions or comments, at: [contact@mugo.co](mailto:contact@mugo.co).

**Effective date of the policy: February 1st, 2017**