

Privacy Policy

This Privacy Policy describes how Rights, Inc. or The Rights (collectively, “Rights, Inc.,” “we,” “us,” or “our”) collects, uses, shares, and safeguards personal information when you visit one of our websites and/or use any of our online services that link to this Privacy Policy (collectively, the “Services”). This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions. You can jump to particular topics by going to the headings below:

Types Of Information We Collect.

The following provides examples of the type of information that we collect from you and how we use that information.

Account Registration: When you register an account with Rights, Inc., we collect information such as your name and contact information upon account creation. We also collect information relating to the actions that you perform while logged into your account. We use this information to provide account related functionalities to our users.

Call Recordings: We may record customer service calls, focus group calls, and online user test calls. We use this information to improve our services and product offerings.

Cookies and first party tracking: We use cookies and clear GIFs to operate our website and the Rights, Inc. platform. “Cookies” are small pieces of information that a website sends to a computer’s hard drive while a web site is viewed. We use this information to make sure our website and platform operate efficiently.

Cookies and third party tracking: We participate in behavior-based advertising. This means that a third party uses technology (e.g., a cookie) to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests on our website, or on other websites. See our [Cookie Preference Center](#) for more information. We use this information to provide you with more tailored and relevant advertising. Where required by law, we base the use of third party cookies upon consent.

Artist Information: When you upload song information to the platform, we collect the creator information relating to that song. We use this information to provide the Services.

Distance Information: When you use our platform we may collect your location from the GPS, Wi-Fi, and/or cellular technology in your device to determine your location. We use this information to optimize the licensing process.

Email Interconnectivity: If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases. We use this information to understand how you interact with our communications to you.

Job Applicants: If you apply for a job posting, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required for employment. We use this information to provide our obligations of employment. In some contexts, we are also required by law to collect information about our employees. We also use this information to ensure efficient staffing and work force operations.

Feedback/Support: If you provide us feedback or contact us for support we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply. We use this information in order to receive, and act upon, your feedback or issue.

Mailing List: When you sign up for one of our mailing lists we collect your email address. We share information about our Services with individuals that agree to receive such information.

Mobile Devices: We collect information from your mobile device such as unique identifying information broadcast from your device when visiting our website. We use this information to identify unique visitors, and in understanding how users interact with us on their mobile devices.

Partner Promotions: We collect information that you provide as part of a co-branded promotion with another company. We use this information to provide you with the promotional benefits or services.

Subscriptions; License Purchases: We collect your name, billing address, e-mail address, phone number, and credit card number when you sign up for a subscription with us, and/or when you use our Services to enter into a license relationship on the website. We use your information to perform our contract to provide you with products or Services.

Seller Information: When you sell products, including rights to musical works, on the platform, we may collect additional contact information and financial information. We use this information to provide the Services.

Surveys: When you participate in a survey we collect information that you provide through the survey. If the survey is provided by a third party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information. We use this information to understand your opinions and collect information relevant to our organization.

Website Interactions: We use technology to monitor how you interact with our website and platform. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser. We use this information to understand how you interact with our website to better improve it. We also use this information to detect and prevent fraud.

Web Logs: We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors. We use this information to understand how you use our networks and the visitors to our websites.

In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources. For example, if you submit a job application, or become an employee, we may conduct a background check.

To the extent we maintain and use personal information in a deidentified form, we will not attempt to reidentify the information, except for the purpose of determining whether our deidentification processes satisfy our legal obligations.

Use And Processing Of Information.

In addition to the purposes and uses described above, we use information in the following ways:

- To certify ownership of musical rights.
- To identify you when you visit our website or platform.
- To provide products and services.
- To improve our Services and product offerings.
- To streamline the checkout process.
- To streamline the product offering process within the platform.
- To conduct analytics.
- To respond to inquiries related to support, employment opportunities, or other requests.

- To send marketing and promotional materials including information relating to our products, services, sales, or promotions.
- For internal administrative purposes, as well as to manage our relationships.
- To comply with our legal obligations.

Sharing Of Information.

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

1. **Affiliates and Acquisitions.** We may share information with our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires, or plans to acquire, our company, business, or our assets, we will also share information with that company, including at the negotiation stage.
2. **Other Disclosures with Your Consent.** We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.
3. **Other Disclosures Pursuant To Law.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the provision of services by a third party intermediary.
4. **Public.** If you submit information on the platform to create a catalog to solicit offers from potential licensees that information will be publicly available to other users of the platform. If you submit information on the platform to build an offer to request that a rightsowner license its catalog, or a portion thereof, to you, that information will be available to the rightsowners of the musical works that you seek to license. Some of our websites may provide the opportunity to post comments, or reviews, in a public forum. If you decide to submit information on these pages, that information may be publicly available.
5. **Service Providers.** We share your information with service providers. Among other things service providers may help us to administer our website, conduct surveys, provide technical support, process payments, and assist in the fulfillment of orders.

Your Choices.

Depending on your jurisdiction, you may have a right to make the following choices regarding your personal information:

1. **Access To Your Personal Information.** You may request that we confirm whether we process information about you. You may also request access to your personal information by contacting us at the address described below. If required by law, upon request, we will grant you access to the personal information that we have about you in a portable format. Note that California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing.
2. **Changes To Your Personal Information.** We rely on you to update and correct your personal information. Our platform may allow you to modify or delete your account profile. If our platform does not permit you to update or correct certain information, you can contact us at the address described below in order to request that your information be modified. Note that we may keep historical information in our backup files as permitted by law.
3. **Deletion Of Your Personal Information.** Typically we retain your personal information for the period necessary to fulfill the purposes outlined in this policy unless a longer retention period is required or permitted by law. You may, however, request information about how long we keep a specific type of information, or request that we delete your personal information by contacting us at the address described below. If required by law we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply

with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes.

4. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.
5. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive. If you decide not to receive promotional emails, we may still send you service related communications.
6. **Promotional Text Messages.** If you receive a text message from us that contains promotional information you can opt-out of receiving future text messages by replying "STOP."

Please address written requests and questions about your rights to privacy@therights.com.

Note that, as required by law, we will require you to prove your identity. We may verify your identity by phone call or email. Depending on your request, we will ask for information such as your name, details about your most recent purchase, or confirmation of your account information. We may also ask you to provide a signed declaration confirming your identity. Following a request, we will use reasonable efforts to supply, correct or delete personal information about you in our files. If you disagree with our response to a request, you may appeal the response by sending an email to privacy@therights.com. In your email, please provide details regarding the original request and an explanation of why you believe our response was made in error.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. We will require verification that you provided the authorized agent permission to make a request on your behalf. You or the authorized agent must provide us with a copy of the signed permission you have given to the authorized agent to submit the request on your behalf and we will require you to verify your own identity directly with us.

How We Protect Personal Information

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of the Services permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

Other Important Information

The following additional information relates to our privacy practices:

- **Third Party Applications/Websites.** We have no control over the privacy practices of websites or applications that we do not own.
- **Changes To This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy. Our privacy policy includes an "effective" and "last updated" date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.
- **Information for California Residents.** If you are a California resident, you can read more on the Additional California Disclosures page. Note that we do not discriminate against California residents for exercising their rights under this privacy policy.

Contact Information. If you have any questions, comments, or complaints concerning our privacy practices please contact us at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

hello@therights.com
8-10 S Fullerton Ave Fl 2
Montclair NJ 07042
+1 201-283-0515;

Effective Date: Jan 1, 2023

Last Update: _____

*****Separate page to be linked from the Information for California Residents Section*****

California Information Sharing Disclosure

California law indicate that organizations should disclose whether the following categories of personal information are collected, transferred for “valuable consideration,” or transferred for an organization’s “business purpose” (as those terms are defined under California law). We do not “sell” your personal information. The table below indicates the categories of personal information we collect and transfer in a variety of contexts. Please note that because this list is comprehensive, it may refer to types of information that we collect and share about other people. For example, while we transfer credit card or debit card numbers for our business purpose in order to process payments for orders placed with us, we do not collect or transfer credit card or debit card numbers of individuals that submit questions through our website’s “contact us” page.

Categories of Personal Information We Collect	To Whom We Disclose or Share Personal Information for a Business Purpose
<p>Identifiers – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, account name, or other similar identifiers.</p>	<ul style="list-style-type: none"> • Advertising networks • Affiliates or subsidiaries • Business partners • Data analytics providers • Government entities, as may be needed to comply with law or prevent illegal activity, or in connection with licensing metadata for audio files including third-party copyrighted works uploaded to Tone.net. • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms • Social networks
<p>Additional categories of personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) – this may include physical characteristics or description, credit card number, debit card number, and other financial information.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Government entities, as may be needed to comply with law or prevent illegal activity • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms
<p>Characteristics of protected classifications – this may include age.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Government entities, as may be needed to comply with law or prevent illegal activity • Other Service Providers • Professional services organizations, this may include auditors and law firms

<p>Commercial information – this may include information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • Advertising networks • Affiliates or subsidiaries • Business partners • Data analytics providers • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms • Social networks
<p>Internet or other electronic network activity information – this may include browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> • Advertising networks • Affiliates or subsidiaries • Business partners • Data analytics providers • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms • Social networks
<p>Geolocation data</p>	<ul style="list-style-type: none"> • Advertising networks • Affiliates or subsidiaries • Business partners • Data analytics providers • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Professional services organizations, this may include auditors and law firms
<p>Audio and visual information</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Other Service Providers • Professional services organizations, this may include auditors and law firms
<p>Professional or employment-related information (if you apply for employment with us)</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Government entities, as may be needed to

	comply with law or prevent illegal activity <ul style="list-style-type: none"> • Other Service Providers • Professional services organizations, this may include auditors and law firms
Inferences drawn from any of the information listed above	<ul style="list-style-type: none"> • Advertising networks • Affiliates or subsidiaries • Business partners • Data analytics providers • Government entities, as may be needed to comply with law or prevent illegal activity • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms • Social networks

We may also collect the following sensitive personal information:

Categories of Sensitive Personal Information We Collect	Purposes for which it is collected	Is information sold or shared for the purpose of cross-context behavioral advertising	Length of time company intends to retain information
Social security, driver's license, state identification card, or passport number.	To comply with our legal obligations for employment and hiring purposes	No	Until no longer needed to comply with our legal obligations.
Account log-in in combination with any required security or access code, password, or credentials allowing access to an account.	Provision of Services	No	Until deletion of the account.
Precise geolocation.	To provide account related functionalities to our users.	No	Until no longer necessary to fulfill the purposes outlined in this policy unless a longer retention period is required or permitted by law.