# COPPA DIRECT NOTICE TO PARENTS/LEGAL GUARDIANS (FOR USE WITHIN USA)

Dear Parent/Legal Guardian,

We, BANDLAB SINGAPORE PTE LTD, are the operator of:

Malon Ed 1

BandLab – a social music platform where musicians can create music, collaborate and engage with each other; and



BandLab for Education – an online learning tool where teachers and students can create music, collaborate and engage with each other.

## **Notice and Parental Consent**

We understand that your child wishes to access and use the services provided under BandLab/BandLab for Education and this will require your child to be registered as a user of BandLab/BandLab for Education. In order for your child to use BandLab/BandLab for Education, certain personal information of your child must be provided to us.

Under the Children's Online Privacy Protection Act ("COPPA"), we must provide parental notification and obtain parental consent before collecting personal information from children under the age of 13 years in the United States. For more information on COPPA, please visit <a href="https://www.ftc.gov/tips-advice/business-center/privacy-and-security/children's-privacy">https://www.ftc.gov/tips-advice/business-center/privacy-and-security/children's-privacy.</a>

#### What information we collect

We may directly collect the following personal information from your child when registering for an account: name, username, password, email address, and Social Network ID (if your child has signed up using a social network account e.g. Facebook or Google). If your child is using BandLab for Education for his/her school-based activities, your child's teacher will provide us with further information on your child's school name and classes, and optionally, the school's phone number and address.

Your child may also voluntarily provide personal information when uploading content which allows others to identify him/her (e.g. photos, audio recordings or text containing him/her name, status updates, comments etc), and when interacting and communicating with us.

In addition, we directly collect personal information about your child from content which is uploaded by other users (e.g. photos of your child, audio recordings or text containing your child's name, status updates, comments on content which refer to your child).

We receive and collect the following information on your child automatically when operating the services:

- analytics information to help us measure traffic and usage trends like web pages you child visits, add-ons, and other information that assists us in improving the services;
- information collected through cookies and similar technology, as described in our Cookies Policy (<a href="https://blog.bandlab.com/privacy-policy/">https://blog.bandlab.com/privacy-policy/</a>). If cookies are blocked, some services and portions of our website may not function properly;
- (c) log file information such as your child's web request, Internet Protocol address, browser type, referring/exit pages and URLs, number of clicks and how your child interacts with links on the services, domain names, landing pages, pages viewed, and other such information. We may also collect similar information from emails sent to your child which then helps us track which emails are opened and which links are clicked by your child; and

(d) device identifiers that uniquely identify your child's mobile device and let us know how your child browses and uses the services. Some features of the services may not function properly if use or availability of device identifiers are impaired or disabled.

## How we use the information collected

Generally, information we collect will be used for the following purposes: (a) register your child's account and to verify his/her identity, (b) to allow your child, and those whom he/she has given permissions to, to access content and information which your child has uploaded; (c) to identify your child with content which your child has uploaded; (d) to provide your child with feature updates, respond to requests, feedback or queries, and to otherwise communicate with your child; (e) to allow other users to communicate with your child to the extent that your child gives them permission to (e.g. by activating chat); (f) to automatically update the BandLab for Education application on your child's device; (g) to remember information so that your child does not have to re-enter it each time he/she uses the services; (h) to provide personalised content to your child; (i) to test, improve and monitor the services, including diagnosing and fixing technology problems, and including use as part of our API; (j) to monitor metrics such as site traffic or demographic patterns, and conduct analysis and analytics; (k) to prevent or take action against activities that are, or may be in breach of our Terms of Use or Privacy Policy; and (l) to comply with applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on us.

If your child is using BandLab for Education for his/her school-based activities, the personal information collected may also be used for the purposes of classroom and assignment management, e.g., notification of classroom activities, setting and tracking of assignments, facilitating discussions, peer reviews and sharing of musical compositions etc. However, your child's personal information will not be used for advertising or marketing purposes. The users your child can interact with will be limited to users who are your child's teacher and schoolmates.

# How we share the information collected

We may share the information we collect with the following parties: (a) our related entities; (b) our third party service providers; and (c) our third party analytics providers. We require that all parties to whom we transfer information to, to implement adequate levels of protection in order to protect the information collected and for them to only process information strictly for the purposes which we engage them for.

We will also share the information collected if there is a change of ownership of our business, if we believe it is required or permitted by law, and if we determine it is necessary to enforce or protect our rights and others' interests.

Additionally, if your child has signed up using his/her social network account or used a link to go from the services to other websites, applications or platforms, your child will be sharing certain information with those other social networks, websites, applications or platforms. We are not responsible for and do not have control of those other social networks, websites, applications or platforms. You are advised to read the privacy policies of those third-party social networks, websites, applications or platforms before allowing your child to connect their account to them or share their content and personal information with them.

Please take a moment to carefully review our Terms of Use (<a href="https://blog.bandlab.com/terms-of-use/">https://blog.bandlab.com/terms-of-use/</a>), as well as our Privacy Policy (<a href="https://blog.bandlab.com/privacy-policy/">https://blog.bandlab.com/privacy-policy/</a>) which sets out the full particulars on the above matters.

After reviewing the above, if you wish to allow your child to use the services on BandLab/BandLab for Education, you should complete, sign and return the COPPA Consent Form enclosed. Alternatively, if your child is using BandLab for Education for his/her school-based activities, COPPA permits your child's school to act in your stead to provide us with the requisite parental consent in certain instances.

If you have questions, comments or concerns about this Notice, please contact us by email at support@bandlab.com.

Sincerely

BANDLAB SINGAPORE PTE LTD

Enc