

## PRIVACY POLICY – MUSEiT

Welcome to MUSEiT— the world's first audio platform combining music with messages from your loved ones to boost emotional wellbeing, motivation and connection.

This website and our mobile application are operated by **MUSE-IT FINANCIAL LIMITED** (“we”, “us”, “our”). We are registered in England and Wales under company number 16508736 and our registered office is at Rosemary Cottage, The Green, Ampport, Andover, England SP11 8BA.

This Privacy Policy explains how we collect and use your information through our website and mobile application (“**MUSEiT**”). When we do so we are a ‘controller’ of your personal information under data protection laws including, but not limited to, the UK General Data Protection Regulation, the Data Protection Act 2018 and the Data (Use and Access) Act 2025. Personal information is any information that is capable of identifying you as an individual or your household.

### 1. PERSONAL INFORMATION WE COLLECT

When you use MUSEiT, we may collect and use information about you in the course of providing you our services and support. We may collect this information directly from you, from a third-party source or through cookies. We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity Data** includes your first name and last name and that of the recipient of your MUSEiT Moment;
- **Contact Data** includes your phone number and e-mail address and that of the recipient of your MUSEiT Moment;
- **Communications Data** includes any messages (including emails, SMS or chat or social media messages or comments) that you send using MUSEiT (your MUSEiT Moments), and any messages you send to us or that are otherwise provided to MUSEiT, and the content of feedback or testimonials you leave about us;
- **API Data** includes account information relating to the third-party music player apps you select to pair with your MUSEiT account, such as your Spotify or Apple Music username and music library;
- **Donation Data** includes information about the charity you donate to, the name and email address of your MUSEiT Moment recipient(s), and your payment information such as your card issuer, card number, account number, sort code, security code and billing address;
- **Marketing Data** includes details of your marketing and communication preferences;
- **Technical Data** includes information about your devices and usage of MUSEiT, such as your IP address, identifiers associated with your device, browser and device characteristics, website and app preferences, information regarding websites accessed immediately before and after you visit the website, the date and time of your visit to MUSEiT, and information about how you navigate MUSEiT. We collect this information by using cookies, web pixels and other similar automated technologies. Collection may also include non-precise geolocation data, such as your approximate location based on your IP address. We use this information to better understand, customize and improve the user experience with MUSEiT. For more information about this, please see the section on Cookies below; and
- **Sensitive Data** includes any audio messages you record on MUSEiT as well as information relating to an individual's health, private life, intimate sphere, racial origin, religious, ideological or political activities.

We understand you may provide us with information about other individuals during your use of MUSEiT, which may include Sensitive Data. You must ensure that they have consented to you sharing this data with us. We recommend keeping a record of their consent and providing them with a link to this Policy to ensure they are aware of how we process their personal information.

Please note that the information you provide us in relation to your third party accounts (including Spotify and Apple Music) are additionally governed by the third party provider's Privacy Policy. We recommend referring to their website(s) for further details as to the collection and processing of your personal information.

## 2. HOW AND WHY WE USE YOUR PERSONAL INFORMATION

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose and complies with data protection law.

Data protection laws require us to have a valid reason to process your personal information for each of the different purposes for which we use that information. The law refers to each reason as a 'lawful basis'. The purposes for which we use your personal information in connection with your use of MUSEiT and the lawful basis on which we rely to process it for each purpose is as follows:

Purpose	Data Types	Lawful Basis
To manage our relationship with you, including communicating with and notifying you of updates to MUSEiT.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Communications Data</li> <li>● Marketing Data</li> </ul>	<u>Legitimate Interests</u> – to inform you of any changes to MUSEiT, to respond to your queries and to provide you with updates that may be of interests to you.
To monitor MUSEiT and any investigation into any infringement of (or alleged infringement of) our terms of service.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Technical Data</li> </ul>	<u>Legitimate Interests</u> – necessary to protect our assets and other users of MUSEiT.
To understand how MUSEiT are used and evaluate our performance analytics.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Communications Data</li> <li>● Marketing Data</li> <li>● Technical Data</li> </ul>	<u>Legitimate Interests</u> – necessary to evaluate and improve MUSEiT.
To process your details when you sign up for an account with us.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Communications Data</li> <li>● Marketing Data</li> <li>● Technical Data</li> </ul>	<u>Legitimate interests</u> – to provide you with our services.
To record and facilitate the sharing of your MUSEiT Moment to your chosen recipients.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● API Data</li> <li>● Donation Data</li> <li>● Technical Data</li> <li>● Sensitive Data</li> </ul>	<u>Legitimate interests</u> – to provide you with our services.
To record and facilitate the sharing of your MUSEiT Moment to your chosen recipients.	<ul style="list-style-type: none"> <li>● Donation Data</li> <li>● Sensitive Data</li> </ul>	<u>Consent</u> – from you and the recipient of your MUSEiT Moment where applicable.
To process donations on behalf of our charity partners.	<ul style="list-style-type: none"> <li>● Identity Data</li> <li>● Contact Data</li> <li>● Donation Data</li> </ul>	<u>Legitimate interests</u> – to provide you with our services.

## 3. DISCLOSURE OF YOUR PERSONAL INFORMATION TO THIRD PARTIES

Personal information may also be shared with our third-party service providers who assist with

the running of MUSEiT and the provision of our services, including:

- our charity partners;
- our payment platforms;
- data hosting and warehousing service providers; and
- support and IT service providers.

Our third-party service providers are subject to security and confidentiality obligations and are only permitted to process your personal information for specified purposes and in accordance with our instructions.

In the case of our charity partners, we will only share your personal information with your chosen charity with the purpose of fulfilling your donation, at which point the charities will become controllers of your personal information as well. Please refer to your chosen charity's Privacy Policy for further information as to how they process your personal information from this point forward.

In addition, we may disclose personal information about you:

- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or lawful government or public authority request;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets;
- in the event all or substantially all of our assets and MUSEiT are acquired by a third party, in which case personal information held by us about you will be one of the transferred assets; or
- to enforce or apply our Terms of Use or to establish, exercise or defend the rights of MUSEiT, our staff, members or others.

#### **4. INTERNATIONAL TRANSFERS**

The personal information we receive may be transferred to, and stored, at locations outside of the or the UK for the purposes of processing by us and by third party service providers that work for us.

Where personal information is transferred to and stored in a country which is deemed by UK Secretary of State as providing levels of protection for personal information materially lower than those in the UK, we take steps to provide appropriate safeguards to protect your personal information.

In the absence of an adequacy decision or of appropriate safeguards as referenced above, we will only transfer personal information to a location outside of the UK where one of the following applies:

- the laws in the location provide providing levels of protection for personal information not materially lower than those in the UK;
- the transfer is necessary for the performance of our contractual engagement with you;
- the transfer is necessary for the establishment, exercise or defence of legal claims; or
- you have provided explicit consent to the transfer.

#### **5. HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

Your personal information will not be kept for longer than is necessary for the purposes for which it was collected and processed.

## 6. YOUR RIGHTS

You have a number of rights in relation to your personal information under data protection law.

You have the right to:

- **Request access** to your personal information (commonly known as a "subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure/deletion** of your personal information in certain circumstances. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) as the lawful basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- **Request the transfer** of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Request restriction** of processing of your personal information.
- **Right to complain** about how we process your information.
- **Withdraw consent** at any time where we are relying on consent to process your personal information. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You can exercise any of your rights as described in this privacy policy and under data protection laws by contacting us at [\[insert email\]](#).

Save as described in this Privacy Policy or provided under data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either:

- charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or
- refuse to act on the request.

Where you exercise your right of access, exemptions (such as where disclosing your information would reveal legally privileged information or third-party personal information) may apply, meaning that you may not always receive all the personal information that we process about you. We consider and apply exemptions on a case-by-case basis.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex. In this case, we will notify you and keep you updated.

You may also make a request through a designated agent. To designate an authorised agent to make a request on your behalf, please provide us with a power of attorney or other legally binding written document signed by you and identifying your agent. We may also verify the identity of your designated agent.

## **7. COOKIES**

From time-to-time we may place a cookie on your device. A "cookie" is a small line of code that is stored on your browser and/or device when you visit any cookie-enabled website and MUSEiT. A cookie allows us to track and keep records on user activity.

MUSEiT use cookies to collect anonymous analytics data about how visitors use and interact with us. The information gathered is used solely for our internal analytics to improve your experience and is not shared with any third parties other than our cookie compliance solution. You can control and delete these cookies through your browser and/or mobile application settings.

If you don't want us to use cookies when you use MUSEiT you can set your internet browser settings not to accept cookies. However, if you block cookies some of MUSEiT may not function properly as a result.

## **8. CONTACTING US**

If you have any questions about our Privacy Policy or your information, or to exercise any of your rights as described in this Privacy Policy or under data protection laws, you can contact us at: [\[insert email\]](#).

## **9. COMPLAINTS**

We hope that we can resolve any query or concern you raise about our use of your information. If you have questions or concerns about our use of your personal information, please send an email with the details of your question or concern to [\[insert email\]](#).

You also have the right to complain to a supervisory authority, in particular in the UK or the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk> or telephone: 0303 123 1113.

## **10. CHANGES TO OUR PRIVACY POLICY**

We reserve the right to modify this Privacy Policy at any time. Any changes will be posted on this page with an updated revision date. We will post a prominent notice on MUSEiT to notify you of any significant changes to our privacy policy, or update you by other appropriate means.

This Privacy Policy was last updated on 31 October 2025.