



PRIVACY POLICY

(Updated date: January 2021)

隐私政策

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This Group Privacy Policy ("**Privacy Policy**") concerns BELIEVE SAS, a French company, registered with the Trade and Corporate Registry of Paris under the number 481 625 853, with its main office located 24 rue Toulouse Lautrec 75017 PARIS ("Believe SAS") and its subsidiaries around the World, including TUNECORE, hereafter collectively referred to as "**Believe**", "**We**", or "**Us**".

This Privacy Policy describes Believe's personal data processing practices for the digital distribution of music, the supply of products ("**Products**") and services ("**Service(s)**"), in general or through our websites and/or other electronic communications services (widgets, mobile applications or API), collectively or individually "**Site(s)**"). Believe SAS acts as data controller and its subsidiaries as data processor

We attach particular importance to the secure processing of data, their confidentiality, the protection of privacy and associated rights. Please take time to read our Privacy Policy carefully.

By visiting this Website, providing Believe with Your personal data or other information on the Sites, or by subscribing to the Services, or by entering into a contract with Us, you expressly acknowledge that you have read and agreed to the terms of this Privacy Policy.

This Privacy Policy is independent of other privacy, confidentiality policies or any other service practises published by third party companies, such as Facebook Inc., Apple Inc., Google LLC, Microsoft Corp., Twitter, TIK TOK or any mobile service operator or any third party operating a site or an application or service to which the Site(s) or Services refer to or redirect(s) to, notably by hypertext link, which We do not publish. We assume no liability in this respect.

If you are a performing artist, an artist representative (producer, manager, independent label), a customer, visitor of the Sites ("**User(s)**"), a service provider, supplier, partner, or processor who has entered into a contract with Us (collectively or individually "**You**"; "**Your**"), this Privacy Policy applies to You.

本集团隐私政策（以下简称“**隐私政策**”）涉及 BELIEVE SAS，一家在巴黎贸易和公司注册处注册，注册号为481 625 853的法国股份有限公司，其主营业务地位于24 rue Toulouse Lautrec 75017 PARIS（以下简称“BELIEVE SAS”）及其全球附属公司，包括 TUNECORE，以下合称为“**Believe**”或“**我们**”。

本隐私政策是关于Believe通过其网站和/或其他电子通讯服务(widgets界面工具，手机应用程序或者API应用程序接口)（以下统称或单称“**本网站**”）提供数字音乐发行、产品(以下简称“**产品**”)供应或服务(以下简称“**服务**”)过程中关于个人数据的处理政策， Believe SAS作为数据控制方，其附属公司作为数据处理方。

我们特别重视保密与安全处理数据，并且注重保护用户的隐私与相关权利。请仔细阅读我们的隐私政策。

通过访问本网站、在网站上向Believe提供您的个人资料或其他信息、或通过订阅服务、或通过与我们签订合同，您已明确表示已阅读并同意本隐私政策的条款。

本隐私政策独立于任何第三方公司，例如 Facebook公司、苹果公司、谷歌有限责任公司、微软公司、推特、TIK TOK或任何移动服务运营商或主要通过超文本链接方式向其用户提供本网站或服务的任何第三方，我们并非上述网站的保密或服务政策的发布者，其所发布的其他隐私或保密政策或其他任何服务惯例，我们对此不承担任何责任。

如果您是一名艺术家、艺术家代表人（制作方、经理人、独立厂牌）、客户、本网站的访客（以下简称“**用户**”）、与我们签订合同的服务提供商、服务供应商、合作伙伴或信息处理人员（以下统称或单称“**您**”或“**您的**”），则本隐私政策适用于您。

未成年人（根据各国法律定义）（以下简称“**未成年人**”）未经其父母或法定监护人同意并接受本隐私政策，不得在本网站上订阅服务或购买产品。父母和法定

Minors (as defined by law in various countries) (“**Minors**”) cannot subscribe to the Services or purchase Products on the Sites without first having their parents or legal guardians' consent and accept this Privacy Policy. Parents and legal guardians are responsible for the use that is made of the Services, Products, Sites by their Minors.

Pursuant to the General Data Protection Regulation 2016/679 (“**GDPR**”) and other data protection laws, We reserve the right to amend this Privacy Policy at any time. A notification on the Site(s)' home page will alert You, or a message will be posted in Service(s), or in specific cases, You will receive an e-mail.

1. What information or personal data do We collect from You and why?

We may collect and process personal data and other information as listed below (collectively referred to as “**Data**”) to perform our obligations under the contract You signed with Us, or to provide Products or Services to You.

Please note that We do not collect or process any sensitive personal data (i.e., data which directly or indirectly reveals racial or ethnic origins, political, philosophical or religious opinions or trade union membership, as well as genetic, biometric data for the purpose of identifying a single natural person or which relates to health or sexual life, and for any such purpose). Therefore, We ask You to abstain from sending any such data over to Us.

Our contracts and registration forms indicate any specific Data which You are required to provide.

1.1 Personal Data

Personal Data means information that directly or indirectly relates to You as an identified or identifiable natural person. This may concern, depending on the contract, the Sites, the Products or Services, Your status and/or the means of collection, all or part of the following Personal Data:

- Name(s) and surname;
- Postal address (invoicing or delivery);
- Landline or mobile (personal or professional) phone number;
- Email address;
- Banking information (bank or other account information, bank account details, credit/charge card information, number, expiry date, visual cryptography);
- Passport number or ID number;

监护人应对未成年人使用本服务、产品、网站的行为负责。

根据《一般数据保护条例》2016/679 (“**GDPR**”) 及其他数据保护法律，我们保留随时修改本隐私政策的权利。并将通过在本网站首页上发布通知或发布服务消息的方式予以通知。在特殊情况下，将通过电子邮件予以通知。

1. 我们从您处收集了哪些信息或个人数据，为什么？

我们可以收集和以下所列的个人数据和其他信息（以下统称为“**数据**”），以履行我们在您与我们签订的合同项下的义务，或向您提供产品或服务。

请注意，我们不会收集或处理任何敏感的个人数据（即直接或间接显示种族或民族出身、政治、哲学或宗教观点或工会成员身份的数据，以及为识别特定自然人或与其健康或性生活有关的基因、生物特征数据，以及其他任何此类数据）。因此，我们请求您避免将任何此类数据发送给我们。

我们的合同和注册表格上注明了您需要提供的每项特定资料。

1.1 个人数据

个人数据是指直接或间接与您作为已识别或可识别的自然人有关的信息。根据合同、本网站、产品或服务、您的状态和/或收集方式，可能涉及下全部或部分个人数据：

- 姓名和姓氏；
- 通讯地址(发票开具或送达)；
- 固定电话或移动（个人或职业）电话号码；
- 电子邮件地址；
- 银行信息（银行或其他账户信息、银行账户详细资料、信用卡/借记卡信息、号码、有效期、视觉密码）；
- 护照号码或身份证号码；
- 访问本网站或接受服务时使用的语言；
- 帮助您找回您的个人身份标识或密码的任何机密信息；

- Spoken language or chosen language for the Sites or Services
- Any confidential information to help You recall Your personal identifiers or passwords;
- For Minors: their parents or legal guardian's last name, first name, and email address;
- For performing artists or their representatives only: their stage name, textual, graphic, photographic or video elements or sound and date elements related to a sound recording reproducing the performance ("**Recording**") or videos reproducing an audio-visual work produced by setting images to illustrate the interpretation of a musical work and dates that is the subject of a Recording ("**Music Video**"); sleeves, words, videos, titles of works (compositions with or without words), dates, names, stage names, pseudonyms, biographies, videos and photos of performing artists, names of songs and albums and associated artists, the year of release of songs and albums and the name of the person or entity that holds the rights to album songs, arrangements, and/or illustrations;
- necessary metadata to identify the works fixed on the Recordings and Music Videos, and their assigns, in particular the authors', composers', publishers' names, or all assigns, ISWC, ISRC, UPC codes, etc ;
- only in case of registration for Services requiring the collection of such information: the tax identification number;
- Content of the cart of Products or Services;
- IP address (number automatically assigned by your Internet Access Service Provider or the MAC address of your electronic devices from which access to the Site(s) is made and which are subject to an automatic identification and recording for each use of the Site(s));
- Demographic data on Users (e.g. age, gender, place of residence);
- Data on Users' tastes, musical preferences (playlists) or other shared data collected from music platforms;
- Technical information, such as cookies (for more information **Cookie Policy**)
- Geolocation data, in particular through GPS signals sent by mobile phone devices: when Users use geolocation services offered by the Sites, for example to offer them personalised advertisements, We will first collect their express authorisation (opt-in). Users may in that case, at any time, revoke such authorisation (opt-out);
- 未成年人：父母或法定监护人的姓氏、名字、电子邮件地址；
- 仅限表演艺术家或其代表：与再现表演艺人所表演的录音作品(以下简称“**录音作品**”)相关的艺名、文字、图形、摄影、视频数据或者声音，或者用于再现某一视听作品的视频，该视听作品作为音乐作品的一部分，通过所制作的图像用以描述音乐作品的内容和日期(以下简称“**音乐视频**”);套封、词语、视频、作品的标题(有无词语)、日期、姓名、艺名、笔名、传记、视频和照片、歌曲和专辑的名称及相关艺人信息、歌曲和专辑发行年份及拥有专辑歌曲、编曲和/或插图权利的个人或实体的名称；
- 用于识别固定在录音和音乐视频上的作品及其受让人信息所需的元数据，特别是作词、作曲、版权方、作品ISWC代码、所有受让人的名称、ISRC UPC 码等；
- 仅在注册服务时需要收集此项信息:税务身份识别号码；
- 产品或服务购物车的内容；
- IP地址(由您的互联网接入服务提供商自动分配的号码或访问本网站的电子设备的电子设备访问地址)，该等地址是每次使用本网站时自动识别和记录；
- 用户的人口统计数据（如年龄、性别、居住地等）；
- 通过音乐平台收集的用户品味、音乐偏好（播放列表）或其他共享数据；
- 技术信息，如 cookies（详情请见**cookies政策信息**）
- 地理定位数据，特别是通过移动电话设备发送的GPS信号提供的地理定位数据:当用户使用网站提供的地理定位服务,例如，为他们提供个性化广告时，我们将首先获得用户的明确授权(选择加入)。在这种情况下，用户可随时撤销上述授权(选择退出)；
- 用户提供的第三方数据（即联系人、好友）。在您与我们共享第三方的数据之前，您必须获得该第三方的明确同意。

- Third party's data (i.e., contacts, friends) provided by Users. You must obtain such third party's express consent before You share their data with Us.

1.2 Other information

We also collect other data that does not necessarily lead, directly or indirectly, to Your identification as a natural person ("**Other Information**").

In such a case, We will process it in accordance with the conditions described and for the purposes set out in section 3 below. These Other Information may be :

- Information on the Users' Internet browser and devices to access the Sites, such as the type of device, screen resolution, version of operating system, type and version of the Internet browser, as well as the type and version of the Service used. A unique identifier may be assigned to the device from which Users access the Service(s) delivered by Us or its service providers;
- Data relating to Users' use of widgets, mobile applications or other communication services: within this context We may collect the unique identifier, as well as Other Information relating to the connecting device in order to provide content and advertising to the devices. It may also collect the date and time of access to the servers, as well as the downloaded files and information;
- Server Log files to calculate the Services rate of use, manage the Services, diagnose problems affecting the servers, or determine Users' geolocation data;
- Information collected using cookies, clear gifs, web beacons, pixel tags or other similar technologies (for more information, please read our **Cookie Policy**)
- Demographic or Other Information as long as it does not allow the person's identification;
- Information on the Services' use via analytical tools enabling Us to provide You with enhanced performance level. The information thus collected may provide Us with information regarding the most used services and functions, the type of equipment used, its characteristics, country, and downloading language;
- Information cross-referencing to create User profiles;
- Responses to a survey or questionnaire submitted by Us on the use of the Products, Services or the Sites.

2. How do we collect Your Data?

We collect Your Data from:

- The contract You entered into with Us;
- The account You created or Services You subscribed to;
- Viewing, downloading or using a Site;

1.2 其他信息

我们还收集不一定会直接或间接导致您被识别为自然人的其他数据 ("**其他信息**")。

在此情况下，我们将按照下文第3条所述的条件和目的处理该等信息。该等其他信息可能是：

- 用户的互联网浏览器和访问网站的设备信息，例如设备类型、屏幕分辨率、操作系统版本、浏览器的类型和版本，以及所使用的服务的类型和版本。用户访问服务时使用的设备将由我们或服务提供商分配唯一标识符；
- 与用户使用界面工具widgets、移动应用程序或其他通信服务使用相关的数据:在此情况下，我们可能收集与连接设备相关的唯一标识符，以及其他与设备相关的信息，以便向设备提供内容和广告。也可以收集访问服务器的日期和时间、下载的文件和信息；
- 服务器日志文件，用于计算服务的使用率，管理服务，诊断服务器影响的问题，或确定用户地理位置的数据；
- 通过 cookies、清除GIF、网络信标、像素标签或其他类似技术采集的信息（详情请阅读我们的 **COOKIES政策**）；
- 人口数据或其他信息，该信息不允许确定此人身份；
- 为使我们能够为您提供更高水平的服务而通过分析工具所获得的服务使用信息，所收集的信息可向我们提供用户最常用的服务和功能、使用设备类型、特点、国家和下载语言等；
- 信息交叉引用以创建用户文件；
- 向我们提交的关于产品、服务或网站使用情况的调查或问卷的回复。

2.我们如何收集您的数据？

我们从以下位置收集您的数据：

- 您与我们签订的合同；
- 您创建的账户或订阅的服务；
- 浏览、下载或使用的网站；
- 您的购买记录；
- 您订阅的新闻通讯或其他类型的通讯信息；
- 您对产品或服务的投诉；

- Your purchases;
- Your subscription to newsletters or other types of communications;
- Your claims regarding a Product or Service;
- Your concert or event tickets purchase;
- Public databases;
- Commercial or media partnerships for marketing or promotional operations related to our activity;
- The use of Your User's personal account via one of the social networks, a platform or a third-party service to connect to one or more of its accounts on the Sites. In such a case, certain Personal Data from the Your social network or other third-party service's personal account may be shared with Believe (i.e., the name, e-mail address, photos, contact list, listening history, songs or favourite artists, and any Other Information to which BELIEVE has access when You log on through Your personal account on a social network or on any other third party service);
- Your participation via Your personal account to a social network, a third-party platform or service, or directly on Sites hosting games, competitions, lotteries, quizzes or any other promotional operation organised by Us.

We collect Your Other Information via:

- Browsers, devices, and widgets and other digital applications' use on such devices;
- Server log files;
- Cookies (for more information, please read our

Cookie Policy :

- Geolocation when Users have given their express consent to Us;
- The sharing of information and data.

3. What do We process Your Data for?

We process Your Data to:

- Create and administer Your personal accounts;
- Perform contractual obligations,
- Provide Services or deliver purchased Products;
- Conduct and process various payment transactions;
- Respond to Your requests or inquiries, or provide and improve customer support;
- Organise, implement and manage Your participation in games, contests, lotteries, quizzes, or other similar promotional campaigns, surveys or other features;
- Communicate with You (e.g., administrative, promotional or commercial communications);

- 您购买的音乐会或活动门票；
- 公共数据库；
- 与我们活动相关的营销或推广活动的商业或媒体合作伙伴；
- 如果，您的用户个人账户通过社交网络、平台或第三方服务连接到其在网站上的一个或多个账户。在这种情况下，我们会共享您的社交网络或其他第三方服务的个人账户中的某些个人数据（例如：即姓名、电子邮件地址、照片、联系人名单、收听历史、歌曲或喜爱的艺术家，以及您个人账户在社交网络或任何其他第三方服务上登录时，Believe可以访问的任何其他信息）；
- 您通过您的个人账户参与社交网络、第三方平台或服务，或直接在网站上参与网站组织的游戏、比赛、抽奖、智力竞赛或其他由我们组织的推广活动。

我们通过以下方式收集您的其他信息：

- 浏览器、设备以及用户使用这些设备上的 widget 和其他数字应用软件；
- 服务器日志文件；
- cookies（如需更多信息，请阅读我们的

Cookie政策：

- 当用户明确向我们表示同意时的地理位置；
- 信息和数据的共享。

3.我们处理您的数据的目的是什么？

我们处理您的数据用于：

- 创建和管理您的个人账户；
- 履行合同义务；
- 提供服务或交付购买的产品；
- 进行和处理各种支付交易；
- 回复您的要求或咨询，或提供和改进客户支持；
- 组织、实施和管理您参与的游戏、竞赛、抽奖、智力竞赛或其他类似的推广活动、调查或其他功能；
- 与您沟通（例如，行政、推广或商业通信）；
- 提供、改善、优化和定制您的用户体验，方便您在社交媒体上的分享功能；

- Provide, improve, optimise and customize Your User experience and make it easy for You to share functions on social media;
- Implement, ensure and improve Sites or Services security, combat fraud, and prevent data security breaches as defined by the GDPR;
- Analyse, identify, improve and understand the Services and Sites functioning and the trends of the use of the Sites or Services;
- Determine, customize, and improve marketing and promotion techniques efficiency and adapt promotional and advertising campaigns to Your purposes and needs;
- Send, purchase or share gifts or links to albums or songs, music information, videos or other Services with contacts, friends, and family members or other Users
- Fulfil our legal obligations
- Manage and administer Your Personal Data in compliance with GDPR

4. On what legal ground can We process Your Data?

We may process Your Data based on:

- Your consent;
- A contract You entered into with Us;
- A legal obligation;
- Our legitimate interest (for example, to improve our Products and Services, to prevent fraud, to secure Sites and Services, or to customize our communication.

5. Who receives Your data?

The Data You send to Us, directly or indirectly, is accessed exclusively by authorised individuals, only when necessary, and for the sole purposes referred to in Section 3 above. We make sure that such access complies with the security measures that We implement.

Data recipients may be:

- Our subsidiaries;
- Third-party providers with whom We work to facilitate the Services' provision or access to Sites, such as but not limited to hosting services, data analysis, processing of payment transactions and repayment of royalties or orders of Products and Services, providing infrastructure services, information technology services, customer services, e-mail distribution services, audit or other similar services;
- For performing artists or their representatives only: the provided information may, amongst others, be used to track how certain Recordings sell for ranking

- 按照 GDPR的要求, 实施、保障和改进网站或服务的安全, 打击欺诈行为, 并防止数据安全漏洞 ;
- 分析、识别、改进和理解服务和站点的运作和使用站点或服务的趋势 ;
- 确定、定制和改进营销和推广手段, 以提高的技术效率, 并根据您的目的和需求调整促销和广告活动 ;
- 向联系人、朋友、家庭成员或其他用户发送、购买、分享礼物、专辑或歌曲、音乐信息、视频或其他服务的链接 ;
- 履行我们的法律义务 ;
- 根据 GDPR规定管理和运营您的个人数据。

4. 我们可以根据什么法律依据来处理您的数据？

我们可以根据以下条件处理您的数据：

- 您的同意；
- 您与我们签订的合同；
- 法律义务；
- 我们的合法权益（例如，改进我们的产品和服务，防止欺诈，保护网站和服务安全，或定制我们的沟通方式）。

5. 谁来接收您的数据？

您直接或间接发送给我们的数据，只有在必要时，并仅用于上述第3条所述的目的，经个人授权后方可使用。我们确保这样的访问符合我们所实施的安全措施。

数据接收方可能是：

- 我们的附属公司；
- 为促进服务提供或访问网站而与我们合作的第三方提供商，例如但不限于托管、数据分析、支付交易的处理和特许权使用费的支付、产品和服务订单的处理、提供基础设施、信息技术服务、客户服务、电子邮件发行、审计服务或任何其他类似服务；
- 仅适用于表演艺术家或其代表：所提供的信息可用于跟踪某些录音的销售情况，以便进行排名。通过使用我们的服务，他们同意“believe”可以向第三方（如平台）提供销售记录或音乐视频信息，以图表、示意图和/或其他类似信息支持材料的形式进行汇总，并可根据销售服务的一般条款和条件发布该等信息。

purposes. By using our Services, they agree that Believe may provide sales' Records or Music Videos information to third parties (e.g. platforms), aggregate this information in diagrams, charts and/or other comparative information support materials, and also release it in accordance with the General Terms and Conditions of Sale of the Services.

- Third-party providers or performing artists or managers, producers or labels may send advertising and promotional communications to Users, subject to the contract they entered into with Us. In that case Users will be deemed to have agreed to receive such content via traditional, digital media or other means of communication;

- Third party organisers or managers of promotional campaigns, such as games, contests, lotteries, etc.

Believe may also communicate Your Data to duly authorised individuals, only when necessary for the sole purposes referred to in Section 3 above, in the following cases:

- To comply with applicable law, including the law of countries outside Your place of residence;
- To respond to injunctions or requests from public or governmental authorities, including those outside Your country of residence;
- To perform under or enforce the contract, the General Terms and Conditions of Sale and Use of our Services, or to protect our activities or those of our subsidiaries or our performing artists, managers', labels' and producers' activities;
- To protect the rights, security and property of Believe or those of Believe' subsidiaries, artists, labels, managers or producers;
- To exercise or defend our legal rights or to have such rights recognized;
- To make any necessary recourse or to limit damages or any sentences that may be pronounced against Believe or its subsidiaries;
- For a reorganisation, merger, acquisition, joint venture or any other form of transfer of all or part of Believe or its assets to any such third party;
- To perform specific data transfers upon receiving Your explicit consent;
- To satisfy a public interest;

- 第三方供应商或表演艺人或管理人员、制片人或厂牌可以根据他们与我们签订的合同向用户发送广告和推广信息。在此情况下，用户将被视为已经同意通过传统、数字媒体或其他通讯方式接收此类内容；

- 推广活动（例如游戏、竞赛、彩票等）的第三方组织者或管理者等。

仅必要的情况下，为实现上述第三节所提到的目的，BELIEVE也可以将您的数据传送给授权方。该类情况如下：

- 遵守适用的法律，包括您居住地以外国家的法律；
- 回应公共或政府部门的禁令或要求，包括在您居住国以外的机构；
- 履行或执行服务和销售一般条款和条件使用我们所提供的服务，或保护我们、附属公司或表演艺术家、经理人、厂牌和制片人的活动；
- 保护 believe或believe的附属公司、艺术家、厂牌、经理人或制片人的权利、安全和财产；
- 行使或维护我们的法定权利，或使该等权利得到承认；
- 任何可能对believe或其附属公司产生不利后果的财产索赔或损害赔偿及类似判决；
- 重组、兼并、收购、合资或其他任何形式将 BELIEVE或其资产的全部或部分转让给任何第三方；
- 在收到您的明确同意后，进行特定的数据传输；
- 基于公共利益；
- 保护您或第三方免受欺诈、滥用、非法行为、违约或违反本网站的服务或产品销售的一般条款；
- 您也可以决定使用留言板、论坛、聊天、社交网络的个人主页、博客或任何其他服务提供商建议的方式来传输交流您的数据。在这种情况下，这些服务

- To protect You, or third parties, from fraud, abuse, illegal acts or breach of contract, or of the general terms of use of the Sites or Services or sale of Products;
- You may also decide to communicate Your Data by using the available features on message boards, discussion forums, chats, share profiles on social networks, blogs or via any other means proposed by service providers. In that case, such service providers will be responsible for processing Your Data and You will need to carefully read their privacy or confidentiality policies.
- Information, documents or data published or communicated by You in connection with the Services become public domain information and may therefore be made available to other users of the Services or generally distributed on the Internet or on other communication networks. Under no circumstances whatsoever should We be held liable for the consequences arising from the use or communication of any information or data that was the subject of a voluntary communication by You through any of the Services. We may use and communicate such Data in accordance with the general terms and conditions of use of Services or Products.

6. How long do We use Your Data for? (data retention period)

We keep Data only for the time necessary to execute the contract, achieve the objective pursued, meet Your needs, execute the contract or meet our legal obligations.

The data retention criteria We established includes:

- The term of the contract entered into by You with Us;
- The retention period required by applicable law (i.e., accounting or archiving obligations);
- The duration of the Your consent for a specific use;
- For prospects (in the absence of any subscription to a Service or purchase of a Product): 1 year or less from the day of the Data collection;
- 6 months or less for cookies or 13 months in specific cases (for more details, please read our **Cookie Policy**)

When We no longer need to process Your Data, We delete it from our systems and databases or anonymise it so that You can no longer be identified.

提供商将负责处理您的数据，您需要仔细阅读他们的隐私或保密政策。

- 您发布或交流的与服务相关的信息、文件或数据属于公共领域信息，因此可以向本服务的其他用户提供，或在互联网或其他通信网络上发布。在任何情况下，对于您通过任何服务自愿交流的任何信息或数据所产生的后果，均不承担任何责任。我们可以根据服务或产品使用的一般条款和条件使用和传输该等数据。

6. 我们使用您的数据的时间有多久？（数据保存期限）

我们只在履行合同、实现所求目的、满足您的需求、履行合同或履行我们的法律义务所需时间内保存数据。

我们制定的数据保存标准包括：

- 您与我们签订的合同期限；
- 适用法律规定的保存期限（即会计或归档义务）；
- 您同意某些特定用途的期限；
- 潜在客户（在没有订阅服务或购买产品的情况下）：自数据收集之日起1年或更短时间；
- cookies时间为6个月或更短时间，特定情况下为13个月（详情请阅读我们的**Cookie政策**）

当我们不再需要使用您的数据时，我们会将其从我们的系统和数据库中删除，或将其匿名，以便您不再被识别。

7. 在欧洲联盟之外存储和传输您的数据

我们的服务和网站由法国控制和运营。本隐私权政策受法国法律约束。我们将采取一切必要的措施，在位于欧盟的服务器上托管和存储您的数据。

由于我们在全球范围内存在经营行为，某些数据可能会在您居住的国家以外进行收集、传输、托管和/或一般性处理。各地对数据保护和数据安全的要求各不相同。

7. Hosting-storage and transfer of your data outside the European Union

Our Services and Sites are controlled and operated from France. This Privacy Policy is subject to French law. We take all necessary measures to host and store Your Data on servers located in the European Union.

Due to our global presence, certain Data may be collected, transferred, hosted and/or more generally processed outside Your country of residence. Data protection and data security requirements differ from place to place and may not offer the same level of protection as those of Your country of residence or of origin. However, Believe and its subsidiaries take appropriate measures to protect the transfer of Your Data. Such measures include the use data transfer methods approved by the European Commission, and written agreements with our processors to ensure they process the Data they receive from Us according to the law.

We may, as specified in section 5 above, when needed, disclose Your Data to third parties' partners in order to ensure the Sites' or Services' maintenance and security, offer certain features, or to improve the Sites' and Services' functioning and appearance or create new features.

We require such third parties to provide adequate confidentiality and security guarantees, to take the necessary physical, organisational and technical measures to protect and secure Your Data, in accordance with applicable law. Any transfer of data outside the European Union shall be governed by guarantee mechanisms approved by the European Commission and/or the local competent authorities.

8. Security measures

We implement appropriate physical, technical, administrative and organisational security measures in order to best protect, Your Data against loss, theft, misuse, abusive use, fraudulent access, disclosure, alteration and destruction.

No data transmission on the Internet can be 100% secure but We are committed to implementing security standards recognised in our industry and designed to protect and prevent unauthorised access, disclosure and use of Data.

These measures include but are not limited to:

- Storage on secure servers within the European Union;

同，可能无法提供与您居住国或国籍国相同级别的保护。但是，Believe及其附属公司将采取适当的措施保护您的数据的传输。这些措施包括使用欧洲联盟委员会批准的数据传输方法，以及与我们的人员达成的书面协议，以确保他们依法处理从我们收到的数据。

如上述第5条所述，我们可以在必要时，向第三方合作伙伴披露您的数据，以确保本网站或服务的维护和安全，提供某些功能，或改进本网站和服务的功能和外观或创建新功能。

我们要求这些第三方提供充分的保密和安全保证，根据适用的法律，采取必要的物理、组织和技术措施保护您的数据安全。任何向欧盟之外的数据传输应根据经欧盟委员会和/或地方主管机关批准的保障机制进行。

8. 安全保障措施

我们实施适当的物理、技术、管理和组织上的安全措施，最大限度地保护您的数据不会丢失、被盗、误用、滥用、欺骗性访问、泄露、篡改和破坏。

互联网上的数据传输不可能是100%安全的，但我们承诺实施行业公认的安全标准，旨在保护和防止未经授权的访问、披露和使用数据。

这些措施包括但不限于：

- 在欧盟内的安全服务器上存储信息；
- 提供保护，包括通过数据加密流程，例如使用安全套接字层(“SSL”)用于信用卡交易和其他银行支付交易，以及要求用户需要使用支持SSL的浏览器，例如 Safari、Netscape Navigator 3.0 (或更高版本)、Chrome、Firefox或 Internet Explorer；

- 限制员工或第三方员工访问包含数据的数据库；

- Protection, including through data encryption processes, such as Secure Sockets Layer (“SSL”) for credit card transactions and other bank payment transactions that require the use by Users of an SSL-enabled browser, such as Safari, Netscape Navigator 3.0 (or later version), Chrome, Firefox or Internet Explorer;
- Limited access of employees or third-party staff to databases containing the Data;
- Contractual obligations for our staff handling Data which impose confidentiality requirements they must fulfil.

In addition, You have the opportunity, on the Sites or when using the Services, to create an access account or user account containing an identifier and password that You only are deemed to know to protect access to Your account. In order to further protect Your Data, We recommend that You periodically change your password and under no circumstances should You disclose Your identifiers to anyone.

9. Your rights

If You reside in France you benefit from the protection of the law of 6 January 1978, known as the French Data Protection Act. Residents of the European Union/European Economic Area benefit from the GDPR as follows:

- **Right to Information:** right to obtain clear, transparent and understandable information on how We use Your Personal Data;
- **Right of access:** right to access Your Personal Data held by Us about You;
- **Right of rectification, opposition or limitation:** right to have Your Personal Data corrected if they are inaccurate or incorrect and/or to complete them;
- **Right to erasure/right to be forgotten:** right to request the erasure or deletion of Your Personal Data. This right may, however, be limited by Us by legal grounds or legitimate interest in maintaining said Personal Data. Such a request will result in the termination of User's customer/user account and the User will no longer be able to access the Sites or Services;
- **Right to object to direct marketing:** right to request or modify Your choice at any time to no longer receive communications relating to the offers of Services, Products, news or events from Us or third-party partners. In this case, You may use the hyperlink provided for this purpose in each email or promotional communication received or the STOP SMS in each promotional SMS received. Users may also request to receive non-personalised communications on the Products and Services. We will then use our best efforts

- 确定本公司数据处理人员的合同义务，要求其必须遵守保密要求。

此外，您有机会在本网站或使用本服务时创建一个访问账户或用户账户，该账户包含您认为只用于保护您账户访问的标识符和密码。为了进一步保护您的数据，我们建议您定期更改密码，并且在任何情况下都不应向任何人透露您的标识符。

9. 您的权利

如果您居住在法国，您将受1978年1月6日的《法国数据保护法》保护。欧盟/欧洲经济区的居民根据 GDPR 所享有权利如下：

- **知情权：**获得关于我们如何使用您的个人数据的清晰、透明和可理解信息的权利；
- **访问权利：**有权访问我们所持有的关于您个人数据的权利；
- **纠正、反对或限制权利：**如果您的个人数据不准确或不正确，有权要求改正和/或补充完整数据的权利；
- **删除权/被遗忘权：**请求清理或删除您个人数据的权利。但是，由于我们依据法律或维护上述个人数据的合法权益，该项权利可能受到限制。该请求将导致用户的客户/用户账户被终止，并且用户将无法访问本网站或服务；
- **反对直接营销的权利：**有权随时要求或修改您选择，要求不再接收来自我们或第三方合作伙伴的有关服务、产品、新闻或事件的信息。在此情况下，您可以在收到的每封电子邮件或推广通讯中使用为此目的提供的超链接，或者在收到的每条推广信息中使用“停止”短信。用户亦可要求接收有关产品及服务的非个人化通讯。我们将尽最大努力通知我们的第三方合作伙伴，除非被证明不可能完成或需要付不成比例的工作量。在此情况下，您有责任直接与第三方联系，要求注销/退订/撤回接收上述信息通信。
- **对已经同意数据的随时撤回权：**对于已经获得您授权同意而处理的数据，可以随时撤回您对上述数据处理的同意表示；

to inform our third-party partners unless such communication proves impossible or requires disproportionate efforts. In this case, You will be responsible for contacting the third party in question directly in order to request de-registration/ unsubscribing/ withdrawal from receipt of said communications;

- **Right to withdraw consent at any time for consent-based data processing:** right to withdraw Your consent to the processing of Your Personal Data when such processing is based on consent;

- **Right to data portability:** right to request copying, transferring Your Personal Data to another database. This right applies only to Personal Data provided by Users, and provided that the processing is based on an agreement or consent and made using automated processes. We will return to Users the Data in a structured manner and in a legible format.

In order to exercise these rights, please use [this form](#).

If we do not satisfy Your request, You may contact Your local data protection authority. For France, You may contact the CNIL “*Commission Nationale de l’Informatique et des Libertés*” via www.cnil.fr or CNIL, 3 Place de Fontenoy TSA 80715 - 75334 Paris Cedex 07.

10. What if a data breach occurs?

In accordance with articles 33, 34 and 55 of the GDPR, if We are victim of a Data breach or are aware of such breach, We will report it to the competent local authority and when legally required, notify You of such breach.

BELIEVE will comply with other applicable law containing information security breach reporting/notification requirements, as applicable, depending on the location of the data subjects and other relevant factors.

11. How can You contact us?

To contact Us please go to:

<https://www.believement.com/contact/>

Special notes to:

TUNECORE Users, [please read](#)

California residents, [please read](#)

UK residents, [please read](#)

Italy residents, [please read](#)

People’s Republic of China residents, please [click here](#) to contact Us about data protection

- **数据移植权利：**请求复制、传输您的个人数据到另一个数据库的权利。这项权利仅适用于用户提供的个人数据，数据处理是以协议或同意为基础，并使用自动程序处理。我们将以结构化方式和清晰的格式返还用户数据。

为了行使这些权利，请使用[此表格](#)。

如果我们不满足您的要求，您可以联系您当地的数据保护机构。在法国，您可以通过www.CNIL.fr网站或如下地址联系“**国家信息和自由委员会**”：CNIL, 3 Place de Fontenoy TSA 80715 - 75334 Paris Cedex 07.

10. 如果发生数据泄露怎么办？

根据 GDPR第33、34和55条的规定，如果我们是数据泄露的受害者，或者我们知道该等数据泄露情况，我们将向当地主管机构报告，并在法律要求时通知您该等泄露情况。

BELIEVE将遵守其他适用法律，其中包含有关信息安全违规报告/通知的要求（视情况而定），具体取决于数据主体的位置和其他相关因素。

11. 您如何与我们联系？

若要与我们联系，请访问：

<https://www.believement.com/contact/>

特别说明：

TUNECORE用户，[请阅读](#)

加利福尼亚居民，[请阅读](#)

英国居民，[请阅读](#)

意大利居民，[请阅读](#)

中华人民共和国居民，请单击此处与我们联系以获取有关数据保护的信息[click here](#)

