

AROBAS MUSIC PRIVACY POLICY

Arobas Music is committed to ensure the highest level of protection of your personal data, in order to protect your privacy.

As part of its activities, Arobas Music provides its customers and Internet users with several websites (guitar-pro.com, artists.guitar-pro.com, education.guitar-pro.com, affiliate.guitar-pro.com, blog.guitar-pro.com, support.guitar-pro.com, mysongbook.com), online sales services accessible from guitar-pro.com and mysongbook.com, Guitar Pro and mySongBook player software for Windows and Mac, as well as iOS and Android apps for smartphones and tablets.

To carry out its services, Arobas Music collects personal data about people using its web content, software and applications. The data collection is carried out on websites, software and applications published by Arobas Music when the sites are accessed, or through the use of software, application purchases, unit purchases or subscription to content and registration to the various services offered by the site publisher.

The purpose of this section is to provide information on how Arobas Music uses the personal data of its customers, users and Internet users.

Arobas Music, as Data Controller, undertakes to comply with the provisions of EU Regulation No. 2016/679 of April 27, 2016 on the protection of personal data.

In the personal data collection forms, whether for purchase, download or for subscription to various services, the customer is informed whether the data collection is mandatory or not. If the user or the customer does not wish to provide certain mandatory information, Arobas Music cannot perform its services.

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1. COLLECTION OF PERSONAL DATA

The company that collects personal data and implements their processing is Arobas Music, a Limited Liability Company with capital of 2,30,000 Euros, registered with the Trade and Companies Register of Lille-Métropole under the number 444 341 028, with its head office at 165 Avenue de Bretagne, Euratechnologies, 59000 Lille, France.

2. PURPOSES OF COLLECTING YOUR PERSONAL DATA

In France as in the European Union, the privacy of users is protected by data protection regulations. In this regard, Arobas Music ensures that it has one or more of the following legal bases to carry out this processing.

- When the user has given his consent (for example, when the user agrees to accept cookies on the Arobas Music sites, to download the trial version of the software Guitar Pro);
- When a sales contract is entered into (for example when purchasing a Guitar Pro license or a subscription on mySongBook);
- When there is a legal obligation (for example, retaining invoices);

- When it is in the legitimate interest of Arobas Music (for example, to prevent fraud or to ensure the network and information security of Arobas Music computer systems and servers).

Arobas Music ensures that the legitimate interest never goes against the rights and freedoms of users.

Arobas Music collects and saves the personal data of its customers and Internet users to perform various processing tasks, some of which include:

- A contract entered into by a Customer and Arobas Music;
- Arobas Music's legitimate interest in improving the quality of products and services;
- The management of customer accounts, shopping carts and orders, license renewal, payment transaction management, order tracking, after sales service, support, and refunds;
- Management of deliveries and downloads;
- Customer relationship management (phone / chat / email), customer satisfaction management (gathering customers' opinions on products and on customer service performance);
- Fraud prevention at the time of payment for the order, and management of unpaid invoices after an order is placed;
- Sharing of data connections with information technology partners themselves subject to European regulations concerning the protection of personal data;
- Measures of traffic, use, and analysis of site anomalies (mobile and desktop), software and mobile applications;
- Operations concerning statistics, analysis, and segmentation of customer and internet databases to improve the knowledge of its customers and their experience on the site, the software and the Guitar Pro applications;
- Sending targeted marketing offers by email, by notifications on software and mobile applications, on social networks, on other websites or any other medium;
- Provision of sharing tools on social networks;
- Promotional and advertising games and contests.

In accordance with the General Data Protection Regulation, the customer and / or user concerned by the data processing has the option to withdraw his consent by making a request using our [Contact form](#) or by writing to the following address:

Arobas Music

165 Avenue de Bretagne
Euratechnologies
59000 Lille
France

3. DATA TRANSMISSION

Your data is transmitted to a very limited number of Arobas Music partners (advertising agencies, management solution providers, customer support solutions and technical support) who process the data solely for Arobas Music and according to the instructions of Arobas Music (they are subcontractors). None of the subcontractors is contractually authorized to reuse this data for their own purposes for advertising or commercial purposes.

The recipients of the data are:

- Business, technical, marketing and advertising partners;
- Banks with regard to online sales;
- Police authorities with regard to court orders concerning fraud prevention.

Arobas Music also uses subcontractors for the following operations:

- Sending prospecting emails and mobile notifications;
- Hosting, downloading and sale of iOS and Android mobile applications;
- Secure payment on sites and mobile applications;
- Managing chat, phone calls, customer support applications, and sending postal mail;
- Maintenance and technical development of websites, internal applications and the Arobas Music information system;
- Gathering customers' opinions.

Arobas Music may also share personal data as part of the company's developments in case of sale, transfer or merger of the company or part of the company, or if Arobas Music acquires or merges with another company. If such a transaction takes place, Arobas Music will ensure that the other party complies with the data protection law and informs its customers of any transfer of customer databases as part of service continuity.

4. YOUR RIGHTS WITH REGARD TO PERSONAL DATA

In accordance with articles 14 to 22 of EU Regulation 2016/679 of April 27, 2016, known as the General Data Protection Regulation, any natural person using the service may exercise the following rights:

- Right to access,
- Right to rectification,
- Right to object to the processing of their data and to delete the data,
- Right to object to profiling,
- Right to restriction of processing,
- Right to data portability.

These rights may be exercised with Arobas Music as follows:

By using the [e-form](#),

By post, by writing to us at:

Arobas Music

165 Avenue de Bretagne

Euratechnologies

59000 Lille

France

Please provide your full name, address, email, and if possible your customer reference and copy of your proof of identity to enable your request to be processed faster. Arobas Music will respond within one month.

In case of exercise of the right to object, the user is informed that he may continue to receive notifications or communication from Arobas Music for a relatively short period of time, until they are fully stopped.

The Internet user or customer may make any new impromptu requests via the [dedicated form](#) so that Arobas Music can look into the reason for these requests and process them in accordance with the user's or the customer's wishes. In the case of no response or unsatisfactory response received, the data subject may approach the supervisory authority of his country of residence:

In France, the CNIL: <https://www.cnil.fr/en/>

5. PERSONAL DATA AFTER A DEATH

The user may at any time formulate guidelines regarding the storage, erasure and communication of his personal data after a death, in accordance with Article 40-1 of Act 78-17 of January 6, 1978. The user can make a request using the [dedicated form](#).

6. IS MY PERSONAL DATA TRANSMITTED OUTSIDE THE EU?

The personal data processed by Arobas Music may be transmitted for the purposes defined above to companies located in countries outside the European Union.

Upon the signature of service contracts or outsourcing contracts with potential partners based outside the European Union prior to the transfer of data outside the European Union and in accordance with the current regulations, Arobas Music implements the procedures required to ensure secure transfers and non-propagation of this data for purposes other than those for which the user or the customer subscribed to at the time of registration or visiting our sites.

Transfers outside France and the European Union may take place mainly in relation to the following activities:

Activity	Country of destination of the data	Data transfer framework
Statistical data management of visits and conversions	United States	Privacy Shield
Paybox online payment solution	France / UE	GDPR / Privacy Shield

Use of data on social networks	United States	Privacy Shield
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7. DATA RETENTION

Arobas Music has specific rules regarding the retention period of users' personal data:

- "Prospects" who have never made a purchase from Arobas Music and its partners;
- "Customers" who have made at least 1 purchase.

With regard to prospects, the data retention period is determined by the initial creation of an account or the first download of one of the resources available on the site when personal data is requested (example: email address).

For customers, the retention period of data is determined by the last purchase made at Arobas Music.

Examples:

- Instructions concerning fraud prevention are retained for 3 years.
- Documents and accounting documents are retained for 10 years, as accounting evidence (determined by Article L123-22 of the French Commercial Code).

8. SECURITY MEASURES FOR PERSONAL DATA PROTECTION

All precautions are taken by Arobas Music as a controller to ensure the security and confidentiality of the data and in particular, to prevent them from being distorted, damaged, or being accessed by unauthorized third parties.

In this regard, Arobas Music and its subcontractors implement a reliable security system to ensure the security of the data collected and to detect data breaches: computer system security, physical security of buildings and secure copies of personal data.

Arobas Music ensures that subcontractors themselves comply with the strictest rules relating to personal data protection.

Online payments

In order to ensure secure payments, Arobas Music offers three online payment options whose security is entrusted to Crédit Mutuel CIC / PayPal for the site www.guitar-pro.com, and Paybox / PayPal for the site www.mysongbook.com, based on the customer's choice.

CREDIT MUTUEL CIC

Location of the data: FRANCE

Framework of the data transfer: GDPR (Europe)

PAYPAL

Location of the data: FRANCE & LUXEMBOURG

Framework of the data transfer: GDPR (Europe)

PAYBOX - VERIPHONE e-Commerce

Location of the data: FRANCE & EUROPEAN UNION

Framework of the data transfer: GDPR

Arobas Music does not store any personal banking data on its servers or archives. Only the bank that collects payments on behalf of Arobas Music retains the payment information.

In the case of deliveries of backup media for its downloadable products, the personal data collected on the site is processed by Arobas Music regardless of banking information processed by the payment partners mentioned above.

9. DATA COLLECTED BY SOCIAL NETWORKS

The use of social networks to interact with Arobas Music could lead to data exchange between Arobas Music and these social networks at the initiative of the customer. Arobas Music requests you to read the personal data management policies of the various social networks to know about the personal data that may be transmitted by them.

List of social networks available on the Arobas Music websites:

- YouTube : <https://policies.google.com/privacy>
- Twitter : <https://twitter.com/en/privacy>
- Facebook : <https://www.facebook.com/about/privacy/>
- Instagram : <https://help.instagram.com/>

10. DATA ON MINORS UNDER 16

A user must be at least 16 years of age to create an account on the Arobas Music website. However, if you are the legal guardian of a minor under the age of 18 and wish to have his / her personal information removed from our files, please contact us using [this form](#). We will then take the necessary measures to delete the personal data of the minor.

11. MARKETING SOLICITATIONS

Arobas Music uses your contact information to send you targeted advertisements by email, post, sms, mobile notifications, through social networks or third party websites.

In this regard, Arobas Music endeavors to comply with the rules applicable to each marketing channel.

To do this, when registering on our sites, you are expressly asked for your consent to receive offers from Arobas Music by email.

The user has the option to stop receiving these offers by clicking on the 'unsubscribe' link provided in each email.

Email retargeting:

Arobas Music does not implement email retargeting which would enable a connection to one of our sites or partner sites.

Notifications in software and mobile applications:

When launching a new version of the software or when a promotion is available on our sites, an advertising message may appear in your Guitar Pro. You can stop receiving these notifications by checking the "do not show" box or by contacting our teams using [this form](#).

When opening a mobile application published by Arobas Music on your smartphone, you must first enable mobile notifications or "Push" notifications. Arobas Music can then provide you with offers through these notifications. You can disable these notifications at any time in the settings of your smartphone.

12. COOKIES, TAGS AND TRACERS

When accessing one of the sites published by Arobas Music, the browsing information of your computer, tablet, smartphone, etc., may be saved in the Cookies stored on your device, subject to the cookie settings that you have chosen on your browser that you can change at any time.

The term "Cookie" encompasses several technologies that make it possible to track browsing or perform behavioral analysis of the user.

A cookie is a small text file saved by the browser of your computer, tablet or smartphone, which helps to store user data to facilitate navigation and enable certain features.

Arobas Music uses several kinds of cookies:

Technical cookies

These cookies are essential for the proper functioning of a website. Examples of technical cookies: to know if you are connected to your customer space or personal account, managing your selection of products or services, etc. Any site may also use cookies to measure statistics and audience, the sections viewed, etc. This information allows the site publisher to identify possible bugs on the site, correct them and offer a suitable solution.

Third party cookies

On some sites, there are applications that allow you to read or share our content with other people, especially on social networks such as Facebook, Twitter, YouTube, etc. Even if you have not used these sharing buttons or applications, it is possible that social networks will track your browsing if your account or session is active on your computer at that time. We recommend that you find out about the data protection methods and policies of these social network sites.

Cookies of advertising partners

These are cookies stored by companies other than the visited site that are often business partners or targeted advertising providers. The site manager does not have any control over these cookies which are managed by other companies. Only the transmitter of a cookie can read or modify the information of this cookie. A site that hosts advertising partners may share with them information

related to your purchases and viewed products. These companies must be committed to maintain the confidentiality of such data in accordance with the French Data Protection Act (January 6, 1978).

Optional cookies

These cookies are intended to improve user experience and facilitate user searches by offering products and offers related to the interests of the user. They are not essential to navigation. Examples of cookies: display of customized banners outside our site, product recommendation system (recently viewed product, you may also like, etc.).

Cookies et scripts	Purpose	Type
Guitar-Pro	Execution of the site	Technical cookie
Zendesk	Execution of the site (support)	Technical cookie
Google Tag Manager	Execution of the site (tags and cookies management)	Technical cookie
Google Analytics	Audience measurement and conversions	Technical cookie
Yandex	Audience measurement	Technical cookie
Soundcloud	Music / sound player	Technical cookie
Veoxa	Advertising provider	Advertising partner cookie

YouTube	Social Networks	Third party cookies
Twitter		
Instagram		
Facebook		

13. YOUR BROWSER SETTINGS

In accordance with Directive 2002/58/EC of July 12, 2002, Arobas Music obtains your consent prior to the deposit of advertising cookies, audience measurement and sharing on social networks.

You can change your cookie settings at any time by following the instructions below.

Your browser settings

You can configure your browser to accept and store cookies on your device or to reject them, either systematically or based on their cookie transmitter.

Depending on the type of your browser, its configuration may vary:

- For [Internet Explorer™](#)
- For [Safari™](#)
- For [Chrome™](#)
- For [Firefox™](#)
- For [Opera™](#)

For browsers not listed above, please refer to their respective user guides.

Setting up your mobile device (smartphone, tablet)

You have the option to control the deposit of Cookies on your smartphone in the settings of the operating system.

Depending on the type of your browser, its configuration may vary:

- For [iOS](#)
- For [Android](#)