

# Prado Academy of Music LLC

## Privacy Policy

Modified 24 May 2018

### **Our privacy obligations**

PradoAcademy.com ("**Prado Academy of Music LLC**") is governed by the Federal Trade Commission (FTC) under the *Privacy Act 1974*. The FTC regulates how personal information is handled by Prado Academy of Music.com.

'Personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable. Prado Academy of Music's Privacy Policy applies to personal information collected and/or held by Prado Academy of Music.

This Privacy Policy also explains how we process 'personal data' about people in the European Union (EU), as required under the General Data Protection Regulation (GDPR).

We will review this policy regularly, and we may update it from time to time.

### **The types of personal information we collect and hold**

We collect personal information about our users in order provide our products, services, and customer support. Our products, services, and customer support are provided through many platforms including but not limited to: websites, phone apps, email, and telephone. The specific platform and product, service, or support you interact with may affect the personal data we collect.

Not all information requested, collected, and processed by us is "Personal Information" as it does not identify you as a specific natural person. This will include majority of "User Generated Content" that you provide us with the intention of sharing with other users. Such "Non-Personal Information" is not covered by this privacy policy. However, as non-personal information may be used in aggregate or be linked with existing personal information; when in this form it will be treated as personal information. As such, this privacy policy will list both types of information for the sake of transparency.

In some situation users may provide us with personal information without us asking for it, or through means not intended for the collection of particular types of information. Whilst we may take reasonable steps to protect this data, the user will have bypassed our systems, processes, and control and thus the information provided will not be governed by this privacy policy.

In some situations, users may provide us personal information over platforms that are outside our control; for example, through social media or forums. Whilst any information collected by us is governed by this Privacy Policy, the platform by which it was communicated will be governed by its own Privacy Policy.

### **How we collect personal information**

#### **Information that you specifically give us**

While you use our products and services you may be asked to provide certain types of personal information. This might happen through our website, applications, online chat systems, telephone, paper forms, or in-person meetings. We will give you a Collection Notice at the time, to explain how we will use the personal information we are asking for. The notice may be written or verbal.

We may request, collect, or process the following information:

- **Account Details** - username, password, profile picture.
- **Contact Details** - email address, phone number.
- **Location Details** - physical address, billing address, time zone.
- **Identity Details** - full name, proof of identity (e.g. drivers license, passport), proof of address (e.g. utility bill), photograph of the user.
- **User Generated Content** - project descriptions and attachments, bid description, user profiles, user reviews, contest descriptions and attachment, user messages etc.

#### **Information that we collect from others**

Users can give permission for us to connect to their account on other platforms to collect personal information. This includes but is not limited to Facebook, LinkedIn, and Google. Information collected will be governed by this Privacy Policy. Users can stop us from collecting data from other platforms by removing our access on the other platform or by contacting our support team.

Users have the ability to invite non-users to our platform by providing contact details such as email address. In these situations, the information will be collected and stored by us to contact the non-user and to prevent abuse of the invite systems.

Your payment provider may transmit information about the payment that we may collect or process.

In some situations, personal information of users may be collected from public sources.

We may collect or process the following information:

- **Basic Details** - username, profile picture.
- **Contact Details** - email address, phone number.
- **Location Details** - Physical Address, billing address, time zone.
- **Financial Information** - payment account details (e.g. paypal email address and physical address), and wire transfer details.
- **List of contacts** - email provider address book.
- **User Generated Content** - user profile.

#### **Information we collect as you use our service**

We maintain records of the interactions we have with our users, including the products, services and customer support we have provided. This includes the interactions our users have with our platform such as when a user has viewed a page or clicked a button.

In order to deliver certain products or services we may passively collect your GPS coordinates, where available from your device. Most modern devices such as smartphones will display a permission request when our platform requests this data.

When we are contacted we may collect personal information that is intrinsic to the communication. For example, if we are contacted via email, we will collect the email address used.

We may collect or process the following information:

- **Metadata** - IP address, computer and connection information, referring web page, standard web log information, language settings, time zone, etc.
- **Device Information** - device identifier, device type, device plugins, hardware capabilities, etc.
- **Location** - GPS position.
- **Actions** - pages viewed, buttons clicked, time spent viewing, search keywords, etc.

### **Links to other sites**

On our website, you will encounter links to third party websites. These links may be from us, or they may appear as content generated by other users. These linked sites are not under our control and thus we are not responsible for their actions. Before providing your personal information via any other website, we advise you to examine the terms and conditions of using that website and its privacy policy.

### **What are Cookies?**

Cookies are small pieces of text sent to your web browser by a website you visit. A cookie file is stored in your web browser and allows the Site or a third-party to recognize you and make your next visit easier and the Site more useful to you.

Cookies can be “persistent” or “session” cookies. Persistent cookies remain on your personal computer or mobile device when you go offline, while session cookies are deleted as soon as you close your web browser.

### **How Prado Academy of Music Uses Cookies**

When you use and access the Site, we may place a number of cookies files in your web browser.

We use cookies for the following purposes:

- To enable certain functions of the Site
- To provide analytics
- To store your preferences

We use both session and persistent cookies on the Site and we use different types of cookies to run the Site:

- Essential cookies. We may use cookies to remember information that changes the way the Site behaves or looks, such as a user's language preference on the Site.
- Accounts-related cookies. We may use accounts-related cookies to authenticate users and prevent fraudulent use of user accounts. We may use these cookies to remember information that changes the way the Site behaves or looks, such as the "remember me" functionality.
- Analytics cookies. We may use analytics cookies to track information how the Site is used so that we can make improvements. We may also use analytics cookies to test new advertisements, pages, features or new functionality of the Site to see how our users react to them.

### **Third Party Cookies**

In addition to our own cookies, we may also use various third-party cookies to report usage statistics of the Service. We do not control the operation of third-party cookies.

Our partners also collect data and use cookies for ad personalization and measurement. This information may be transferred outside of the country from which you are accessing this website. You can find more information about the individual cookies we use and the purposes for which we use them below.

Third-party cookies which may be set on the Site include:

#### **Google Analytics**

Google Analytics allows us to collect data about website usage. Google will not associate the IP address with any other data recorded by Google. The Google Privacy Policy can be viewed [here](#).

### **How we use personal information**

The information we request, collect, and process is primarily used to provide users with the product or service they have requested. More specifically, we may use your personal information for the following purposes:

- to provide the service or product you have requested;
- to facilitate the creation of a User Contract (see Terms of Service for more information);
- to provide technical or other support to you;
- to answer enquiries about our services, or to respond to a complaint;
- to promote our other programs, products or services which may be of interest to you (unless you have opted out from such communications);
- to allow for debugging, testing and otherwise operate our platforms;
- to conduct data analysis, research and otherwise build and improve our platforms;

- to comply with legal and regulatory obligations;
- if otherwise permitted or required by law; or
- for other purposes with your consent unless you withdraw your consent for these purposes.

The 'lawful processing' grounds on which we will use personal information about our users are (but are not limited to):

- when a user has given consent;
- when necessary for the performance of a contract to which the user is party;
- processing is necessary for compliance with our legal obligations;
- processing is necessary in order to protect the vital interests of our users or of another natural person.
- processing is done in pursuing our legitimate interests, where these interests do not infringe on the rights of our users.

We use automated decision when helping matching users to jobs. The primary way this occurs is through how we rank users. These rankings are produced by analyzing user generated content, user activity and the outcome of jobs; in this context, user generated content will include reviews that users receive when completing jobs. More information on these ranking guides can be found in our community articles. Automated decision making is also used to recommend potential jobs to our users and as a part of our marketplace security systems.

## **When we disclose personal information**

### **Our third party service providers**

The personal information of users may be held or processed on our behalf outside Australia, including 'in the cloud', by our third party service providers. Our third party service providers are bound by contract to only use your personal information on our behalf, under our instructions.

Our third party service providers include:

- Cloud hosting, storage, networking and related providers
- SMS providers
- Payment and banking providers
- Marketing and analytics providers
- Security providers

### **Other disclosures and transfers**

We may also disclose your personal information to third parties for the following purposes:

- if necessary to provide the service or product you have requested;
- we receive court orders, subpoenas or other requests for information by law enforcement;
- if otherwise permitted or required by law; or

- for other purposes with your consent.

As we are a global company, with offices around the world, your personal information may be processed by staff in any of our offices. Prado Academy of Music currently has offices in the USA, India, and The United Kingdom.

### **Accessing, correcting, or downloading your personal information**

You have the right to request access to the personal information Prado Academy of Music holds about you. Unless an exception applies, we must allow you to see the personal information we hold about you, within a reasonable time period, and without unreasonable expense for no charge. Most personal information can be accessed by logging into your account. If you wish to access information that is not accessible through the platform or wish to download all personal information we hold on you in a portable data format, please contact our Privacy Officer.

You also have the right to request the correction of the personal information we hold about you. All your personal information can be updated through the user settings pages. If you require assistance please contact our customer support.

### **Exercising your other rights**

You have a number of other rights in relation to the personal data Prado Academy of Music holds about you, however, there may be restrictions on how you may exercise the rights. This is largely due to the nature of the products and services we provide. Much of the data we collect is in order to facilitate contracts between users, facilitate payments, and provide protection for the legitimate users of our marketplace - these data uses are protected against the below rights.

You have the right to:

- seek human review of automated decision-making or profiling
- opt-out of direct marketing, and profiling for marketing
- erasure
- temporary restriction of processing.

**Human review of automated decision making / profiling** - In the case of our ranking algorithms, it is not possible to exercise this right as this ranking is a fundamental part of the marketplace that users participate in, opting out would mean not being able to participate in the marketplace. Decisions affecting marketplace security are already reviewed by humans.

**Direct marketing and profiling** - users can control what emails they receive through their settings page.

**Erasure** - Most personal information and user generated content cannot be deleted as they are used to support contracts between users, document financial transactions, and are used in providing protecting other legitimate users of the marketplace. In the case of non-personal data that can be linked with personal data, it will either be erased or otherwise anonymized from the personal data.

**Temporary restriction to processing** - under certain circumstances you may exercise this right, in particular if you believe that the personal data we have is not accurate, or you believe that we

do not have legitimate grounds for processing your information. In either case you may exercise this right by contacting our privacy officer.

Unless stated above, users may exercise any of the above rights by contacting our Privacy Officer.

### **To contact our Privacy Officer**

If you have an enquiry or a complaint about the way we handle your personal information, or to seek to exercise your privacy rights in relation to the personal information we hold about you, you may contact our Privacy Officer as follows:

**By Email:**

[info@Prado Academy of Music.com](mailto:info@PradoAcademyofMusic.com)

**Phone: 310-345-2380**

**By Mail:**

Prado Academy of Music Inc.  
Attn: Privacy Officer  
17418 Chatsworth St.  
Suite 102  
Granada Hills, CA 91344

For the purposes of the GDPR, our Privacy Officer is also our Data Protection Officer (DPO).

While we endeavor to resolve complaints quickly and informally, if you wish to proceed to a formal privacy complaint, we request that you make your complaint in writing to our Privacy Officer, by mail or email as above. We will acknowledge your formal complaint within 10 working days of receipt.

You may also file a report with the FTC at:

**Federal Trade Commission**

Headquarters:  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

You can also follow the instructions on <https://www.ftc.gov/faq/ftc-info/file-comment>