# VOCALY'S PRIVACY POLICY

Thank you for using Vocaly services! This privacy policy (hereinafter referred to as the "**Privacy Policy**") explains among others what personal data are collected by Vocaly Pro sp. z o.o. with its registered office in Lublin (hereinafter referred to as "**Vocaly**" or "**Controller**"), how Vocaly uses and processes your personal data, as well as the choices you have about your personal data. Moreover, this Privacy Policy describes the privacy practices that Vocaly receives from the Users by using Vocaly's services with regard to collecting, using and disclosing information, both personal and non-personal information.

This Privacy Policy applies to all services provided by Vocaly, such as the "Vocaly" app., the Vocaly website (https://vocalypro.com), the newsletter, and other related services, which will hereinafter be referred to collectively as the "**Services**".

If you wish to know more or need any additional information, please contact us – info@vocalypro.com

By using the Services, you acknowledge that your personal data submitted to Vocaly or collected by Vocaly in connection with the Services, in particular your name and e-mail address, are processed in the manner, for the purposes and on the legal bases described in this Privacy Policy. Processing based on consent takes place only in the cases expressly indicated in this Privacy Policy.

## WHAT ARE PERSONAL DATA?

According to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the "**GDPR**"), "personal data" means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## WHO IS THE CONTROLLER OF PERSONAL DATA?

The controller of your personal data is a company under the business name Vocaly Pro spółka z ograniczoną odpowiedzialnością with its registered office in Lublin (address: ul. Garbarska 16, 20-340 Lublin), entered into the register of entrepreneurs of the National Court Register kept by the District Court Lublin - Wschód in Lublin with its registered office in Świdnik, VI Commercial Division of the National Court Register under KRS number: 0000777318, holding NIP (tax identification number): 9462687361, statistical number (REGON): 382855837.

## HOW TO CONTACT US?

The contact with the Controller is possible through:

- by sending an e-mail to the following address: info@vocalypro.com;
- sending a written parcel to the following address: Vocaly Pro sp. z o.o., ul. Garbarska 16, 20-340 Lublin.

The Controller has not appointed the data protection officer.

## HOW WE COLLECT INFORMATION?

Vocaly collects your information in the following manner:

- Vocaly collects information when you complete your registration to join Vocaly and access the Services and/or by logging into an account that you already have with certain third-party social networking sites (hereinafter referred to as the “SNS”), including, but not limited, to Facebook, Google, Apple. For example, Vocaly’s Services may allow you to create an account and login to the Services using your Facebook account credentials through Facebook Connect. Vocaly collects information that you voluntarily provide to become a registered user of Vocaly’s Services, and when you use certain aspects of Vocaly’s Services;
- Vocaly collects voluntary information from you, as an account holder, to add to your Account. This is completely voluntary on your part and Vocaly makes every attempt possible to collect as little personally identifiable information to create these profiles;
- Vocaly collects information generated while you use the Application, in particular data on the exercises performed, statistics (development history), the Streak and, in the case of a Student, also data on the completion of homework assigned by the Coach;
- When you browse or use Vocaly’s Services,, technological tools including “cookies” collect certain information, as explained in the following section.

**WHAT INFORMATION DOES VOCALY COLLECT?**

Personal information:

Vocaly collects personally identifiable information (hereinafter referred to as the "**Personally Identifiable Information**") directly when you create an account with Vocaly Services. Personally Identifiable Information is information that identifies you and that may be used to contact you both online and offline. Personally Identifiable Information may include, but is not limited to, first name, last name, age, email address, gender, stage name, profile picture, audio recordings, video recordings etc. During registration, you also indicate the selected User Type (Coach or Vocalist). Additionally, if you will be creating an account on the Services using your SNS account, Vocaly may collect your Personally Identifiable Information that you have already provided within the SNS (including, but not limited to, other information that is publicly available in your SNS account, as well as additional information that you have provided to Vocaly for access through the SNS) to create your account on the Vocaly Services. The information we collect may depend on the privacy policy of the SNS in question, so you should consult with the SNS in question in this regard.

Moreover, Vocaly as part of its Services, collects and stores the audio and video recording. Vocaly does not collect and store audio and video recordings made within the Services that are not connected with a valid, signed-in account.

As part of profiling your account on the Services, you will be able to add a profile picture of yourself. However, adding this photo will not be necessary for you to properly use the Services and is entirely up to you.

The Vocaly application may also include the ability to link certain geographical information made available by Vocaly with your physical location. When you use the Vocaly application, this application may know, in very general terms, your current physical location. To the extent that your physical location can be determined by the Vocaly application, Vocaly may use your location to make available information to you that is relevant because of your physical location. In addition, by using the Services, Vocaly may track your activity on, among other things, third party applications and websites. This data may also be shared with third parties as indicated in this Privacy Policy. If you are an IOS user, you can disable this feature by clicking on the "Ask App Not to Track" notification or disable this feature in your tracking settings.

Your Personally Identifiable Information (and sometimes in combination with Non-Personally Identifiable Information) is used by Vocaly to provide the Services to you (details below).

Non-Identifying Information:

Vocaly may also collect information that you provide as part of the registration or account personalization process on the Vocaly Services that cannot be objectively used to identify or contact you (e.g. individual preferences) (hereinafter after referred to as the "Non-Personally Identifiable Information"). Some Non-Personally Identifiable Information may be considered part of your Personally Identifiable Information if it is combined with other identifiers in a way that makes it possible to identify or contact you. At the same time, the same information will be considered Non-Personally Identifiable Information when taken alone or combined only with other Non-Personally Identifiable Information.

**WHY DOES VOCALY COLLECT AND HOLD YOUR INFORMATION?**

Vocaly collects and holds your personal data in connection with the provision of the Services. This can be divided into the following categories

1. Personal data that you provide as part of the Services as a user (including during registration and personalization of your profile).

   The processing of your personal data is necessary for the proper performance of the agreement between you and Vocaly (hereinafter referred to as the "**Agreement**"), which is concluded by your acceptance of the terms and conditions. The data you provide will enable you to register for an account and to use the Services correctly as a user.

   The data you provide to Vocaly as part of the Services is processed for the purpose of providing the Services - Vocaly processes personal data in order to provide content and Services to its users, including information about available content and services, and most importantly, for the proper and fully satisfactory use of the Vocaly application.

   Legal basis for processing: Article 6(1)(b) of the GDPR (processing is necessary for the performance of an agreement to which the data subject is a party).

2. Data processed in connection with the use of the Coach's Studio.

   User Types (Coach, Student, Vocalist) and the rules for joining and leaving a Coach's Studio are set out in the terms of use of the Services. If, as a Vocalist, you join a Coach's Studio by entering the Coach's code in the Application and selecting the "Join the studio" option, and the Coach accepts you, Vocaly will make available to the Coach your first and last name [and e-mail address] and statistics on the completion of homework assigned to you by that Coach. The Coach does not gain access to your other statistics (including the history from the period in which you were a Vocalist) or to your Streak. The Coach's access to your data ends when you select the "Leave the studio" option or when the Coach removes you from the Coach's Studio. As part of the Coach's Studio, Vocaly also processes the homework assigned by the Coach and the notes kept by the Coach in the Application.

   Legal basis for processing: Article 6(1)(b) of the GDPR (processing is necessary for the performance of an agreement to which the data subject is a party – with respect to the functionalities of the Coach's Studio which the User has chosen to use).

3. Voice recordings and acoustic analysis.

While you perform exercises, the Application records and processes your voice in order to carry out an acoustic analysis and present its results and statistics. Vocaly may also use voice recordings to develop and improve the Application, including its voice analysis functionalities. [Voice recordings are not used to identify the User.]

Legal basis for processing: Article 6(1)(b) of the GDPR (processing is necessary for the performance of an agreement – with respect to the acoustic analysis carried out as part of the Services) and Article 6(1)(f) of the GDPR (Vocaly's legitimate interest, i.e. the development and improvement of the Application – with respect to the use of recordings to develop the Application). You may object at any time to the processing of recordings for the purpose of developing the Application.

4. Personal data you provide in contact forms.

The processing of your personal data may be necessary in order to handle user complaints and claims related to the Services, to contact a user of the Services or a third party using the Services. In addition, the processing of your personal data may be necessary to take explanatory or corrective action. Vocaly does this to answer your questions and to provide you with the necessary assistance.

Legal basis for processing: Article 6(1)(b) of the GDPR (processing is necessary for the performance of an agreement to which the data subject is a party) and Article 6(1)(f) of the GDPR (legitimate interest of Vocaly).

5. Personal data provided for the purpose of making payments for the use of the Services.

In the event that payment would be required to use parts of the Services, then such processing of your personal data will be necessary in order to perform the Agreement and to enable you to use those parts or all of the Services offered by Vocaly. In addition, the processing of such data by Vocaly will be necessary in order to archive documents proving that Vocaly has performed its obligations under the Agreement. The Services are integrated with RevenueCat to manage the in-app purchase functionality of the app. If you make an in-app purchase, RevenueCat will receive an information about that purchase. RevenueCat does not receive or process your payment information, such as a credit card number. RevenueCat's Privacy Policy can be found here https://www.revenuecat.com/privacy/

If you purchase a Paid Plan through the Apple App Store or Google Play, the payment is handled by the operator of the given store as a separate controller, in accordance with its privacy policy. If you purchase a Paid Plan outside app stores (on the basis of a separate agreement or order), Vocaly processes the data necessary to conclude and perform that agreement and to issue an invoice (in particular your first and last name or business name, address and tax identification number), as well as the data of the Users designated by the purchaser to whom the Paid Plan is made available.

Legal basis for processing: Article 6(1)(b) of the GDPR (processing is necessary for the performance of a contract to which the data subject is a party) and Article 6(1)(c) of the GDPR (fulfillment of a legal obligation incumbent on Vocaly).

6. Data automatically stored when using the Services.

When you use the Services offered by Vocaly, the following data may be stored in the system logs: your IP address, the address of the website that referred you to the Vocaly Services, the type of browser you use and its display settings, the type of operating system, the date, time and duration of your visit, etc. The log data collected is used primarily for statistical and analytical purposes and to improve the Services provided by Vocaly, to improve their quality and to adapt their functionality to your needs

Legal basis for processing: Article 6(1)(f) of the GDPR (legitimate interest of Vocaly).

7. Data processed for marketing purposes and to improve the quality of the Services.

   In order for Vocaly to undertake marketing activities and to improve the quality of the Services - Vocaly also processes your personal data for its marketing activities and to continually improve its Services. Vocaly strives to ensure the highest quality of the Services offered and to promote them.

   Legal basis for processing: Article 6(1)(f) of the GDPR (Vocaly's legitimate interest, i.e. to improve the Services, to ensure their best quality and to tailor marketing information to the interests of users of the Services).

**INFORMATION SHARED WITH THIRD PARTIES**

Vocaly may share aggregated information that does not include Personally Identifiable Information and we may otherwise disclose Non-Identifying Information and log data with third parties for industry analysis, demographic profiling and other purposes. Any aggregated information shared in these contexts will not contain your Personally Identifiable Information. Vocaly may provide Personally Identifiable Information to business partners or other third parties for the purpose of sending you information about their goods or services only with your prior consent (Article 6(1)(a) of the GDPR).

If you use the content of service provided by other platforms, e.g. YouTube, Facebook, Twitter, within the Services, you agree to share your Personally Identifiable Information with such platform.

Vocaly may employ third party companies and individuals to facilitate the Services, to provide the Services on behalf of Vocaly, to perform Services-related services (e.g. maintenance services, database management, analytics and improvement of the Services features) or to assist Vocaly in analyzing how Services are used. These third parties have access to your Personally Identifiable Information only to perform tasks on behalf of Vocaly.

The recipients of your personal data may include, in particular: app store operators (Apple, Google), the provider of the subscription management service (RevenueCat), hosting and IT service providers and, in the case of a Student, the Coach to whose Coach’s Studio the Student belongs, to the extent described in this Privacy Policy.

Some recipients of your personal data are established outside the European Economic Area (in particular in the United States). In such a case, the transfer of data takes place on the basis of an adequacy decision of the European Commission (including under the EU-U.S. Data Privacy Framework) or on the basis of standard contractual clauses adopted by the European Commission. You may obtain information on the safeguards applied and a copy of them by contacting us.

**POLICY TOWARDS CHILDREN**

The Services are not directed to children under 13, and Vocaly does not knowingly collect Personally Identifiable Information from children under 13. If Vocaly realizes that it has collected Personally Identifiable Information of a child under 13 without the consent of parent or legal guardian, Vocaly will take steps to delete such information from its files as soon as possible. Vocaly encourages parents to take precautions to assure that their household is safe and protected when creating and sharing this video content.

For children user who pretends to be an adult and use the adult-age to register within the Services or the children user who borrows adult accounts to use the Services, Vocaly may collect the personal information of the children user as an adult user since Vocaly cannot realize that the user is a child before Vocaly detects and identifies him or her as a child. If Vocaly detects and identifies the user as a child under 13, Vocaly will block the user account and forbid the user to use the Services.

A User under 16 years of age may give the consents provided for in this Privacy Policy only with the consent or authorisation of his/her statutory representative. A User under 18 years of age may purchase a Paid Plan only with the consent of his/her statutory representative, in accordance with the terms of use of the Services.

**WHAT ARE YOUR RIGHTS?**

In connection with the processing of your personal data, you have the following rights:

- the right to confirm the processing of your personal data;
- the right to access to your personal data;
- the right to rectification of your personal data;
- the right to erasure your personal data (“right to be forgotten”);
- the right to restriction of the processing of your personal data;
- the right to withdraw your consent to the processing of personal data;
- the right to object to the processing of your personal data;
- the right to portability of your personal data;
- right to lodge a complaint with a supervisory authority.

To exercise these rights, please contact us.

We explain these rights in more detail below

1. Right to confirm the processing of your personal data and access it.

   You have the right to obtain confirmation from us as to whether we are processing your personal data and where that is the case, you have the right to access to the personal data and to obtain information regarding the processing of your personal data.

2. Right to rectification of your personal data

   You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. You also have the right to request completion of your personal data if you believe that your personal data is incomplete.

3. Right to erasure your personal data (“right to be forgotten”)

   You have the right to obtain from the controller the erasure of personal data concerning you without undue delay and we erase personal data without undue delay where one of the following grounds applies:

   a. your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

b. you withdrawn consent on which the processing is based and there is no other legal ground for the processing of your personal data;
c. you objected to the processing of your personal data and there is no compelling legitimate grounds for the processing;
d. you objected to the processing of your personal data for direct marketing purposes;
e. your personal data have been unlawfully processed;
f. your personal data has to be erased for compliance with a legal obligation in the European Union or Republic of Poland;

4. Right to restriction of the processing of your personal data

You have the right to obtain from us restriction of processing of your personal data where one of the following applies:

a. you contested the accuracy of the personal data – for a period enabling us to verify the accuracy of the personal data;
b. the processing of your personal data is in your opinion unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
c. we no longer need Your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
d. you objected to the processing of your personal data by us – until such time as we determine whether our legitimate grounds override the grounds for your objection.

5. Right to withdraw your consent to the processing of personal data

You have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

6. right to object to the processing of your personal data

You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data. In such a case, we will no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of you or for the establishment, exercise or defence of legal claims. Moreover, you have the right to object at any time to processing of your personal data for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing.

7. Right to portability of your personal data

You have the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to another controller without hindrance from us. Moreover, you have the right to have the personal data transmitted directly from us to another controller, where technically feasible. The right to portability of your personal data only applies to data whose processing is based on consent or based on a contract.

8. Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority, if you consider that the processing of your personal data infringes GDPR. The supervisory authority is the President of the Office for Personal Data Protection (ul. Stawki 2, 00-193 Warsaw, Poland).

Vocaly does not make decisions about you based solely on automated processing, including profiling, which would produce legal effects concerning you or similarly significantly affect

you. The automatic calculation of statistics and the Streak does not constitute such a decision.

**CALIFORNIA PRIVACY RIGHTS**

"**CCPA**" means the California Consumer Privacy Act of 2018 (Cal. Civ. Code §§ 1798.100 to 1798.199), as amended from time to time, and any related regulations and guidance provided by the California Attorney General pertaining to same.

For purposes of the CCPA, personal information means any information that identifies, relates to, describes, or may be associated or reasonably expected to be associated, directly or indirectly, with you.

Residents of California have the following rights:

- the right to know what personal information Vocaly collects about you and where it collects it from;
- the right to know if personal information is sold or shared and to whom;
- the right to object to the sale of personal information;
- the right to access your own personal information;
- the right to equal service and price, even for consumers who exercise their right to privacy (non-discrimination).

To make such a request, please send an e-mail to the address indicated in this Privacy Policy.

**HOW LONG WE PROCESS YOUR PERSONAL DATA?**

Personal data provided by you upon registration or as part of the completion of a user profile in connection with the use of the Services will be processed for as long as the Agreement between you and Vocaly, which is entered into by your acceptance of the terms and conditions. After termination of the Agreement, your personal data is retained for as long as you could pursue claims against Vocaly relating to the non-performance or improper performance of the Agreement by Vocaly and for as long as Vocaly could pursue such claims against you.

Data on the completion of homework are made available to the Coach only for as long as the Student remains in the Coach's Studio. Accounting documents, including invoices, are retained for the period required by tax and accounting laws (as a rule, 5 years). Data processed on the basis of Vocaly's legitimate interest are processed until an effective objection is raised.

If your personal data is processed with your consent, Vocaly will process your data until you either withdraw the consent you have given Vocaly or prohibit Vocaly from processing it. You have the right to withdraw your consent at any time, but this will not affect the lawfulness of the processing that was carried out on the basis of your consent before withdrawal.

**SECURITY OF INFORMATION**

Vocaly takes appropriate precautions to protect your personal data. Vocaly uses physical, electronic and procedural safeguards that comply with applicable regulations to protect your personal data.

**AMENDMENTS TO THE PRIVACY POLICY**

The Controller may amend the Privacy Policy at any time by informing users of the Services of the changes by e-mail or otherwise as part of the use of the Services (e.g., a message displayed when logging into a profile under the Services).

This Privacy Policy, as amended, is effective as of 23.11.2026.