### **PRIVACY POLICY**

Here at Vignola Music, we have always taken your privacy seriously. This policy explains our practices on what we collect and how we utilize your data. We want you to feel comfortable and confident that we take care of your personal data.

### GDPR

On May 25, 2018, a new European Union (EU) data protection law, the General Data Protection Regulation (GDPR), takes effect. The GDPR gives individuals in the EU more control over how their data is used and places certain obligations on businesses that process information of those individuals. We've updated our Privacy Policy to take into account the new requirements of the GDPR.

By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

# Visiting our Website

Vignola Music uses Google Analytics and Cookies in order to improve our service, user experience, and to analyze how the website is used. The collected information is used to provide an overview of how people are accessing and using our website. This data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics and Sharpspring.

### Cookies

Cookies are small text files a Web site uses to recognize repeat users, facilitate the user's ongoing access to the site and facilitate the use of the site. "Cookies" also allow a site to track usage behavior and compile site usage information that will allow for the improvement of content. This information is anonymous and we use this information only internally – we never give away this information about our users.

# Personally Identifiable Information

When you purchase something on our site, we collect personal information from you including your name, billing address, phone number, and the e-mail address to use for order confirmation. Your credit card information is only used for completing the purchase transaction. If you choose to withhold any data requested by us, it may not be possible to gain access to certain parts of our site or to complete a purchase. Our website is encrypted over secure HTTPS with an SSL certificate, and all payment information is handled securely by our payment processors, and PayPal.

We use the information provided by our customers; through our website, Facebook, Google Analytics, and Cookies to analyze product trends and user experience. This analysis helps us improve the quality of our Web site and product mix.

# **Providing Personal Data to Other Entities**

Financial transactions relating to our website and services are OR may be handled by our payment services providers, and PayPal. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices <u>here</u>.

Payment Data Is NOT Collected or Retained by Vignola Music. Payment processing for our store is exclusively processed through PayPal, regardless of whether you are paying via a PayPal account, credit card, or debit card. We **do not** collect, process, or retain your payment data. It does not exist on nor pass through our web server. We have **NO access whatsoever** to your payment account information.

### Email

When registering on our website, requesting information, or joining our mailing list, you will be required to provide your email address. By providing your e-mail address, you are agreeing that Vignola Music can send you important information about our products, including announcements of new releases, sales, and other pertinent information. If you do not wish to receive email information from us, please notify us to be removed from our mailing list.

### Disclosures

Our policy is not to disclose personally identifiable information to unrelated third parties unless required to do so by law or legal process. Vignola Music., at its sole discretion, reserves the right to make exceptions to this policy in extraordinary circumstances (such as a bomb or suicide threat, or instances of suspected illegal activity) on a case-by-case basis. Although Vignola Music. will take reasonable measures not to disclose information about you or the contents of your communications, we may be compelled to do so in the good faith belief that such action is reasonably necessary (a) to comply with the law; (b) to comply with legal process; (c) to enforce these terms and conditions; (d) to respond to claims that any content violates the rights of third parties; (e) to facilitate the terms of an acquisition of Vignola Music by, or merger with, another company or (f) to protect the interests of Vignola Music or others.

# Vignola Music Data Protection Officer

Our Data Protection Officer can be contacted at info@vignolamusic.com.

# Updates to This Policy

As our Web site evolves over time or our data handling policies change, we will update this privacy policy. This privacy policy will be governed by the laws of the United States and the State of New York.