

IMPORTANT PRIVACY INFORMATION

In order to use the service, we may ask you to enter your name and email. We will also automatically collect from your device IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, and other unique identifiers (such as IDFA and AAID). We need this data to provide our services, analyze how our customers use the service and to measure ads.

For improving the service and serving ads, we use third party solutions. As a result, we may process data using solutions developed by **Amazon, Amplitude, Intercom, Facebook, Google, Firebase, Hotjar, Twitter, SendGrid**. Therefore, some of the data is stored and processed on the servers of such third parties. This enables us to (1) analyze different interactions (how often users listen podcasts, what podcasts our users viewed); (2) serve and measure ads (and show them only to a particular group of users).

If you decide to publish a podcast on our website, we will ask you to provide your email, name, photo, podcast name, RSS feed, and bio. We will use this data to make your podcast publicly available and to provide other services, for example communication with your listeners in a comments section.

Please read our Privacy Policy below to know more about what we do with data (Section 3), what data privacy rights are available to you (Section 6) and who will be the data controller (Section 1). If any questions remain unanswered, please contact us at help@galas.fm.

PRIVACY POLICY

This Privacy Policy explains what personal data is collected when you use website located at: <https://galas.fm/> (the “**Website**”), and the services and products provided through them (together with the Website, the “**Service**”), how such personal data will be processed.

BY USING THE SERVICE, YOU PROMISE US THAT (I) YOU HAVE READ, UNDERSTAND AND AGREE TO THIS PRIVACY POLICY, AND (II) YOU ARE OVER 16 YEARS OF AGE (OR HAVE HAD YOUR PARENT OR GUARDIAN READ AND AGREE TO THIS PRIVACY POLICY FOR YOU). If you do not agree, or are unable to make this promise, you must not use the Service. In such case, you must (a) contact us and request deletion of your data; (b) delete the App from your device or leave the Website and not access or use it; and (c) cancel any active subscriptions or trials.

Any translation from English version is provided for your convenience only. In the event of any difference in meaning or interpretation between the English language version of this Privacy Policy available at [LINK], and any translation, the English language version will prevail. The original English text shall be the sole legally binding version.

“**GDPR**” means the General Data Protection 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.

“**EEA**” includes all current member states to the European Union and the European Free Trade Association. For the purpose of this policy EEA shall include the United Kingdom of Great Britain and Northern Ireland.

“**Process**”, in respect of personal data, includes to collect, store, and disclose to others.

“**CCPA**” means the California Consumer Privacy Act of 2018.

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1. PERSONAL DATA CONTROLLER

Vodelif Limited, a company registered under the laws of the Republic of Cyprus, having its registered office at 24 Peiraios Str., 1st floor, Strovolos, Nicosia, 2023, Cyprus, will be the controller of your personal data.

2. CATEGORIES OF PERSONAL DATA WE COLLECT

We collect data you give us voluntarily (for example, name and email address). We also collect data automatically (for example, your IP address).

2.1. Data you give us

If you decide to register on the Website, we will ask you to provide your name and email address. We may also ask your bio to tailor your podcast page. You do not have to give this data to us in order to use the Website. You can also provide us with your email when you contact our support team.

2.2. Data we collect automatically:

2.2.1. Data about how you found us

We collect data about your referring app or URL (that is, the app or place on the web where you were when you tapped/clicked on our ad).

2.2.2. Device and Location data

We collect data from your device. Examples of such data include: IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, hardware ID.

2.2.3. Usage data

We record how you interact with our Service. For example, we log what pages you have viewed, the features and content you interact with, how often you use the Service, how long you are on the Service.

2.2.4. Advertising IDs

We collect your Apple Identifier for Advertising (“IDFA”), Identifier for Vendor (“IDFV”) or Google Advertising ID (“AAID”) (depending on the operating system of your device) when you access our Website from a mobile device. You can typically reset these numbers through the settings of your device’s operating system (but we do not control this).

2.2.5. Cookies

A cookie is a small text file that is stored on a user’s computer for record-keeping purposes. Cookies can be either session cookies or persistent cookies. A session cookie expires when you close your browser and is used to make it easier for you to navigate our Service. A persistent cookie remains on your hard drive for an extended period of time. We also use tracking pixels that set cookies to assist with delivering online advertising.

Cookies are used, in particular, to automatically recognize you the next time you visit our website. As a result, the information, which you have earlier entered in certain fields on the website may automatically appear the next time when you use our Service. Cookie data will be stored on your device and most of the times only for a limited time period.

3. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA

We process your personal data:

3.1. To provide our Service

This includes enabling you to use the Service in a seamless manner and preventing or addressing Service errors or technical issues.

[See less](#)

To host personal data and enable our Service to operate and be distributed we use **Amazon Web Services**, which is a hosting and backend service provided by Amazon.

We use **Firebase Authentication**, which is backend services and UI libraries to authenticate users provided by Google. To learn more, please visit Google’s [Privacy policy](#) and [Privacy and Security in Firebase](#).

3.2. To provide you with customer support

We process your personal data to respond to your requests for technical support, Service information or to any other communication you initiate. For this purpose, we may send you, for example, notifications or emails about, the performance of our Service, security, payment transactions, notices regarding our Terms and Conditions of Use or this Privacy Policy.

3.3. To communicate with you regarding your use of our Service

We communicate with you, for example, by push notifications or by emails. These may include reminders or other information about the Service. As a result, you will, for example, receive a push notification that a new feature has been deployed in the Service. To opt out of receiving push notifications, you need to change the settings on your device. To opt-out of receiving emails, you should click unsubscribe link in the footer of each email.

The services that we use for these purposes may collect data concerning the date and time when the message was viewed by our Service's users, as well as when they interacted with it, such as by tapping/clicking on links included in the message.

Intercom provides us with message and customer service tools, which enable us to communicate with you within the Service. When you chat with us via in-App chat, your information is automatically transferred to Intercom. The transfer is required to enable us to identify (if you shared any name related data with us) and to communicate with you in the in-App chat. Thus, Intercom uses these data to provide and fulfill its services (as set forth in their terms of service). Read more about Intercom's approach to privacy in its [Privacy Policy](#).

3.4. To research and analyze your use of the Service

This helps us to better understand our business, analyze our operations, maintain, improve, innovate, plan, design, and develop the Service and our new products. We also use such data for statistical analysis purposes, to test and improve our offers. This enables us to better understand what categories of users use our Services. As a consequence, we often decide how to improve the Service based on the results obtained from this processing.

Amplitude is an analytics service provided by Amplitude Inc. We use this tool to understand how customers use our Service. Amplitude collects various technical information, in particular, time zone, type of device (phone, tablet or laptop), unique identifiers (including advertising identifiers). Amplitude also allows us to track various interactions that occur in our Service. As a result, Amplitude helps us to decide what features we should focus on. Amplitude provides more information on how they process data in its [Privacy Policy](#).

We also use **Firebase Analytics** and **Google Analytics**, which is an analytics service provided by Google. In order to understand Google's use of data, consult Google's [partner policy](#). Firebase [Privacy information](#). [Google's Privacy Policy](#).

We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data

collected on our behalf. For further details, please see the 'about Hotjar' section of [Hotjar's support site](#).

3.5. To send you marketing communications

We process your personal data for our marketing campaigns. As a result, you will receive information about our products, such as, for example, special offers or new features and products available on the Service. We may show you advertisements on our Service, and send you emails for marketing purposes. If you do not want to receive marketing emails from us, you can unsubscribe following instructions in the footer of the marketing emails.

We use **SendGrid** a multi-channel marketing platform, to deliver emails to our users.

3.6. To personalize our ads

We and our partners use your personal data to tailor ads and possibly even show them to you at the relevant time. For example, if you visited our Website or installed the App, you might see ads of our products in your Facebook's feed.

How to opt out or influence personalized advertising

iOS: On your iPhone or iPad, go to Settings > Privacy > Apple Advertising and deselect Personalized Ads.

Android: To opt-out of ads on an Android device, go to Settings > Privacy > Ads and enable Opt out of Ads personalization. In addition, you can reset your advertising identifier in the same section (this also may help you to see less of personalized ads). To learn even more about how to affect advertising choices on various devices, please look at the information available [here](#).

macOS: On your MacBook, you can disable personalized ads: go to System Preferences > Security & Privacy > Privacy, select Apple Advertising, and deselect Personalized Ads.

Windows: On your laptop running Windows 10, you shall select Start > Settings > Privacy and then turn off the setting for Let apps use advertising ID to make ads more interesting to you based on your app activity. If you have other Windows version, please follow the steps [here](#)

To learn even more about how to affect advertising choices on various devices, please look at the information available [here](#).

In addition, you may get useful information and opt out of some interest-based advertising, by visiting the following links:

- Network Advertising Initiative – <http://optout.networkadvertising.org/>
- Digital Advertising Alliance – <http://optout.aboutads.info/>
- Digital Advertising Alliance (Canada) – <http://youradchoices.ca/choices>
- Digital Advertising Alliance (EU) – <http://www.youonlinechoices.com/>
- DAA AppChoices page – <http://www.aboutads.info/appchoices>

Browsers: It is also may be possible to stop your browser from accepting cookies altogether by changing your browser's cookie settings. You can usually find these settings in the "options" or "preferences" menu of your browser. The following links may be helpful, or you can use the "Help" option in your browser.

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari web](#) and [iOS](#)

Google allows its users to [opt out of Google's personalized ads](#) and to [prevent their data from being used by Google Analytics](#).

We value your right to influence the ads that you see, thus we are letting you know what service providers we use for this purpose and how some of them allow you to control your ad preferences.

We use **Facebook Ads Manager** together with **Facebook Custom Audience**, which allows us to choose audiences that will see our ads on Facebook or other Facebook's products (for example, Instagram). Through Facebook Custom Audience we may create a list of users with certain sets of data, such as an IDFA, choose users that have completed certain actions in the Service (for example, visited certain sections of the Service). As a result, we may ask Facebook to show some ads to a particular list of users. As a result, more of our ads may show up while you are using Facebook or other Facebook's products (for example, Instagram). You may learn how to opt out of advertising provided to you through Facebook Custom Audience [here](#).

Facebook also allows its users to influence the types of ads they see on Facebook. To find how to control the ads you see on Facebook, please go [here](#) or adjust your ads settings on [Facebook](#).

Google Ads is an ad delivery service provided by Google that can deliver ads to users. In particular, Google allows us to tailor the ads in a way that they will appear, for example, only to users that have conducted certain actions with our Service (for example, show our ads to users who have made a purchase). Some other examples of events that may be used for tailoring ads include, in particular, visiting our Website. Google allows its users to [opt out of Google's personalized ads](#) and to [prevent their data from being used by Google Analytics](#).

We also use **Twitter Ads** provided by Twitter to deliver advertising. Twitter Ads allows us to choose specific audiences based on geographic areas or user's interests. As a result, we may ask Twitter to deliver our ads to certain list of users. Twitter allows you [to opt-out its internet-based advertising](#). [Privacy Policy](#).

3.7. To enforce our Terms and Conditions of Use and to prevent and combat fraud

We use personal data to enforce our agreements and contractual commitments, to detect, prevent, and combat fraud. As a result of such processing, we may share your information with others, including law enforcement agencies (in particular, if a dispute arises in connection with our Terms and Conditions of Use).

3.8. To comply with legal obligations

We may process, use, or share your data when the law requires it, in particular, if a law enforcement agency requests your data by available legal means.

4. UNDER WHAT LEGAL BASES WE PROCESS YOUR PERSONAL DATA

In this section, we are letting you know what legal basis we use for each particular purpose of processing. For more information on a particular purpose, please refer to Section 3. This section applies only to EEA-based users.

We process your personal data under the following legal bases:

4.1. your consent

Under this legal basis we will send you marketing communications. You have the right to withdraw your consent any time by using the unsubscribe link in the footer of our emails. We will also send you push notifications if you allow us to. You can disable notifications any time in the settings of your device.

4.2. to perform our contract with you;

Under this legal basis we:

- Provide our Service (in accordance with our Terms and Conditions of Use)
- Customize your experience
- Provide you with customer support
- Communicate with you regarding your use of our Service
- Process your payments

4.3. for our (or others') legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data;

We rely on legitimate interests:

- to research and analyze your use of the Service

Our legitimate interest for this purpose is our interest in improving our Service so that we understand users' preferences and are able to provide you with a better experience (for example, to make the use of the Service easier and more enjoyable, or to introduce and test new features).

- to send you marketing communications

The legitimate interest we rely on for this processing is our interest to promote our Service, including new products and special offers, in a measured and appropriate way.

- to personalize our ads

The legitimate interest we rely on for this processing is our interest to promote our Service in a reasonably targeted way.

- to enforce our Terms and Conditions of Use and to prevent and combat fraud

Our legitimate interests for this purpose are enforcing our legal rights, preventing and addressing fraud and unauthorised use of the Service, non-compliance with our Terms and Conditions of Use.

4.4. to comply with legal obligations.

5. WITH WHOM WE SHARE YOUR PERSONAL DATA

We share information with third parties that help us operate, provide, improve, integrate, customize, support, and market our Service. We may share some sets of personal data, in particular, for purposes and with parties indicated in Section 3 of this Privacy Policy. The types of third parties we share information with include, in particular:

5.1. Service providers

We share personal data with third parties that we hire to provide services or perform business functions on our behalf, based on our instructions. We may share your personal information with the following types of service providers:

- cloud storage providers (Amazon, Google)
- data analytics providers (Facebook, Firebase, Amplitude)
- measurement partners
- communication service providers (Intercom, SendGrid)
- marketing partners (in particular, social media networks, marketing agencies, email delivery services; Facebook, Google, Twitter)

5.2. Law enforcement agencies and other public authorities

We may use and disclose personal data to enforce our Terms and Conditions of Use, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, or in other cases provided for by law.

5.3. Third parties as part of a merger or acquisition

As we develop our business, we may buy or sell assets or business offerings. Customers' information is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g. parent company or subsidiary) and may transfer such information in the course of a corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

6. HOW YOU CAN EXERCISE YOUR PRIVACY RIGHTS

To be in control of your personal data, you have the following rights:

Accessing / reviewing / updating / correcting your personal data. You may review, edit, or change the personal data that you had previously provided on the Service.

Deleting your personal data. You can request erasure of your personal data as permitted by law.

When you request deletion of your personal data, we will use reasonable efforts to honor your request. In some cases, we may be legally required to keep some of the data for a certain time; in such event, we will fulfill your request after we have complied with our obligations.

Objecting to or restricting the use of your personal data. You can ask us to stop using all or some of your personal data or limit our use thereof.

Additional information for EEA-based users:

If you are based in the EEA, you have the following rights in addition to the above:

The right to lodge a complaint with supervisory authority. We would love you to contact us directly, so we could address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or where the alleged infringement has taken place.

The right to data portability. If you wish to receive your personal data in a machine-readable format, you can send respective request to us as described below. To exercise any of your privacy rights, please send a request to help@galas.fm.

7. AGE LIMITATION

We do not knowingly process personal data from persons under 16 years of age. If you learn that anyone younger than 16 has provided us with personal data, please contact us.

8. INTERNATIONAL DATA TRANSFERS

We may transfer personal data to countries other than the country in which the data was originally collected in order to provide the Service set forth in the Terms and Conditions of Use and for purposes indicated in this Privacy Policy. If these countries do not have the same data protection laws as the country in which you initially provided the information, we deploy special safeguards.

In particular, if we transfer personal data originating from the EEA to countries with not adequate level of data protection, we use one of the following legal bases: (i) Standard Contractual Clauses approved by the European Commission (details available [here](#)), or (ii) the European Commission adequacy decisions about certain countries (details available [here](#)).

9. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time. If we decide to make material changes to this Privacy Policy, you will be notified by available means such as email and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.

10. FOR CALIFORNIA RESIDENTS

This section provides additional details about how we process personal data of California consumers and the rights available to them under the California Consumer Privacy Act (“CCPA”) and California’s Shine the Light law. Therefore, this section applies only to residents of California, United States.

Section 2 describes the personal information we have collected about you, including the sources of that information. We collect this information for the purposes described in Section 3. We share this information as described in Section 5.

Subject to certain limitations, the CCPA provides California consumers the right to request to know more details about the categories or specific pieces of personal information we collect (including how we use and disclose this information), to delete their personal information, to opt-out of any “sales” that may be occurring, and to not be discriminated against for exercising these rights.

To exercise any of your privacy rights, please send a request to help@galas.fm.

California’s Shine the Light law gives California residents the right to ask companies once a year what personal information they share with third parties for those third parties’ direct marketing purposes. Learn more about what is considered to be [personal information under the statute](#).

To obtain this information from us, please send an email message to help@galas.fm which includes “Request for California Privacy Information” on the subject line and your state of residence and email address in the body of your message. If you are a California resident, we will provide the requested information to you at your email address in response.

11. DATA RETENTION

We will store your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy (including providing the Service to you). We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

12. HOW “DO NOT TRACK” REQUESTS ARE HANDLED

Various browsers (including Internet Explorer, Firefox, and Safari) offer a DNT option that relies on a technology known as a DNT header that sends a signal to websites visited by the browser user about the

user's DNT preference. You can usually access your browser's DNT option in your browser's preferences.

We currently do not support "Do Not Track" requests because no DNT standard has been adopted.

Our third-party services may collect information about you and your online activities over time and across our Services and other online properties. These third parties may not change their tracking practices in response to DNT settings in your web browser and we do not obligate these parties to honor DNT settings. To determine whether any of the third-party services honor the "Do Not Track" requests, please read their privacy policies.

13. CONTACT US

You may contact us at any time for details regarding this Privacy Policy and its previous versions. For any questions concerning your account or your personal data please contact us at help@galas.fm.

Effective as of: 18 August 2022