

Privacy Policy

Last Updated: March 5, 2025

This Privacy Policy explains how your personal information is collected and used when you utilize the Medallion mobile application (the “**App**”), and/or any other Medallion websites, products, services, and applications that are made available to you through the App and other platforms that contain a link to this Privacy Policy (collectively with the App, “**Medallion Service**”). Please review this Privacy Policy carefully before choosing to use the Medallion Service.

1. Important Information
2. What personal information do we collect about you?
3. How do we use the personal information we collect?
4. How do we share the personal information we collect?
5. Do we collect and/or share the personal information of children?
6. Where do we process your personal information?
7. What is our legal basis for using your personal information?
8. How do we keep your personal information safe?
9. How long do we hold your personal information?
10. What rights may I have in relation to my personal information?
11. How do I contact you if I have questions or wish to exercise my data subject rights?
12. What if I have a complaint?

1. Important Information

The App is owned, and the Medallion Service is provided, by Medallion Arts Inc., a Delaware corporation, with a registered address at 169 Madison, Suite 11599, New York, NY 10016 (“**Medallion**,” “**we**,” “**us**,” “**our**”). Medallion is a software developer. We provide a mobile application and services to music fans (“**Fans**”) and musical artists (“**Artists**”). Through our App, Fans can track, curate, and showcase their taste in music and discover music they love. Artists can use the App to build powerful and long-lasting connections with their fans.

Medallion is the controller, as the term is defined by applicable data protection laws, of the personal information that we collect from you when you use the Medallion Service, including when you register for a Medallion account, build your user profile, connect with Artists in the App, engage with Artists and Fans on the App, and otherwise perform actions in the App. This Privacy Policy only covers personal information that is collected by Medallion when you use the Medallion Service. Any personal information that you choose to share with a specific Artist through the App for that specific Artist’s own marketing purposes outside the Medallion Service, including your email address and phone number, shall be governed by that specific Artist’s privacy policy and terms of service, as that Artist is the controller of that information.

We reserve the right to change this Privacy Policy from time to time. The latest version will always be reflected in the App. Any changes will be effective immediately upon the posting of the updated Privacy Policy to the App, or such later date as may be specified. You should review this Privacy Policy

from time to time and monitor for updates. Your continued use of the Medallion Service after such amendments will be deemed your acknowledgement of these changes to the Privacy Policy.

2. What personal information do we collect about you?

Personal information is any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. It does not include data which is de-identified or anonymized, such that an individual or household can no longer be identified. We collect different information about you when you utilize or otherwise access the App and Medallion Service, as set forth in the tables below:

Information provided directly by you to us

When you register with Medallion or update your account:

Categories	Description
Required User Information	<p>Personal information that we need to create your Medallion account and that enables you to use the Medallion Service.</p> <p>During the account registration process, you must provide and we will always collect the following:</p> <ul style="list-style-type: none">● email address● username <p>If you fail to provide us with this information, you will not be able to use the Medallion Service.</p> <p>Depending on how you create your account and whether you use third-party services to register with Medallion, we may also collect some of the following during the account registration process:</p> <ul style="list-style-type: none">● name● profile name● profile image● account ID● other login/account details provided by the third-party service● country
Optional User Information	<p>Personal information that you may provide when creating or updating your Medallion account to personalize your experience in the App and enhance our ability to deliver the Medallion Service to you.</p> <p>You may provide the following personal information to us:</p> <ul style="list-style-type: none">● profile image● geolocation● information about your tastes in and experiences with music, and Artists and Fans you connect to in the App● social media handles and personal websites

	<ul style="list-style-type: none"> mobile phone number
Artist Information	<p>Personal information that we may collect relating to Artists, or which Artists provide to us, including:</p> <ul style="list-style-type: none"> name (including aliases) images biographical information third-party account information (e.g., streaming platforms, social media platforms) information about music and performances

Through your use the App and Services:

Categories	Description
Usage Information	<p>Personal information collected and processed about you when you're accessing or using the Medallion Service. This may include the following:</p> <p>Information about how you use the Medallion Service. For example:</p> <ul style="list-style-type: none"> information about which parts of the Medallion Service you use your actions with the Medallion Service (including date and time), such as (but not limited to): <ul style="list-style-type: none"> search queries connections with Artists and Fans purchase history streaming history concert attendance history browsing, content viewing, and engagement history on the Medallion Service comments and other interactions with Artists and other Fans your use of third-party services, devices and applications in connection with the Medallion Service your actions with third-party services that you choose to connect to your Medallion profile, such as music streaming information, purchase information, concert attendance information, and social media information blockchain address(es), if any, assigned to you in connection with your use of the Medallion Service inferences about your interests and preferences based on your usage of the Medallion Service content you post to any part of the Medallion Service, including images, audio, text, titles,

	<p>descriptions, communications, and other kinds of content</p> <ul style="list-style-type: none"> • to deliver physical goods which you have requested <p>Your technical data. We may collect the following information about you and your devices through automatic data collection technologies:</p> <ul style="list-style-type: none"> • URL information • Online identifiers such as your IP address and MAC address • Information about the device you use, such as: device ID, network connection type, network provider, network and device performance, browser type, language, operating system, App version <p>Your general (non-precise) location. This may include country and region/state/city. We may learn this from technical data (e.g., IP address, language settings) or payment currency. We need this data to:</p> <ul style="list-style-type: none"> • adhere to geographic requirements in our agreements with the owners of content on the Medallion Service • deliver content that's relevant to you
Physical Address	<p>We may ask for and process your street address for the following reasons:</p> <ul style="list-style-type: none"> • to check your eligibility for certain aspects of the Services • to deliver notices which are required by law • to deliver support options • for billing and tax administration • to deliver physical goods which you have requested
Payment and Purchase Information	<p>If you make any purchases using the Medallion Service or sign up for a paid Medallion Service option or a trial, we will need to process your payment information. The exact personal information collected and used will vary depending on the payment method. It may include information such as:</p> <ul style="list-style-type: none"> • name • date of birth • payment method (credit card, debit card, etc.) • card type • expiration date • certain digits of your card number • zip/postal code • mobile phone number

	<ul style="list-style-type: none"> details of your purchase and payment history
Research, Survey, and Feedback Information	When you respond to a survey, take part in user research, or otherwise provide feedback related to the Medallion Service, we collect and use the personal information you provide.

Information provided by third parties

We receive some of the personal information mentioned in the tables above from third parties. The table below explains what kinds of third parties provide what kinds of personal information to us.

Categories of third parties	Description	Data categories
Authentication partners	If you register for or log into the App using another service, that service will send your information to us. This information helps us create your Medallion account	Required User Information
Third-party applications, service and devices you connect to your Medallion account	<p>If you connect your Medallion account to a third-party app, service, or device, we may collect and use information from them. Examples of such third-party apps, services, and devices include:</p> <ul style="list-style-type: none"> digital streaming platforms (DSPs) ticketing, venue, and promoter apps social media platforms online retail platforms transaction processing platforms devices such as audio devices, smart watches, TVs, mobile phones and tablets <p>We'll ask for your permission before we collect your information from certain third parties.</p>	Usage Information
Technical service partners	We work with technical service partners that give us certain data. This includes mapping IP addresses to non-precise location data (e.g., country and region/state/city). These partners make it possible for us to provide the Medallion Service, content, and features. We also work with security service providers to help us protect Fan and Artist accounts.	Usage Information
Payment partners and merchants	<p>If you make purchases using the Medallion Service, we may get information from our payment partners. This allows us to process your payment and give you what you've purchased.</p> <p>If you use the Medallion Service to make a purchase from a third-party merchant (e.g., an Artist), we may get information from the merchant and/or payment partners. This information allows us to calculate</p>	Payment and Purchase Information

	commissions we might be owed, understand your interests, and analyse our merchant partnerships.	
Artists	If you used a pre-existing website community hosted by Medallion on behalf of an On-Platform Artist, we may receive information about you from On-Platform Artists whose communities you were a part of, if those On-Platform Artists authorize us to use it. This makes it possible for us to tailor and improve the Medallion Service, content, and features, to work best for you and the Artists.	Required User Information, Optional User Information, Payment and Purchase Information, Physical Address, Usage Information
Publicly available information about Artists	If you are an Artist (either On-Platform or Off-Platform), we may collect and use publicly available information about you.	Artist Information

3. How do we use the personal information we collect?

We will use the personal information collected to deliver the Medallion Service pursuant to the [Terms of Use](#). More specifically, we will use the personal information we collect through your use of the Medallion Service to:

- Verify your information so that you can create a Medallion account and log into the App;
- Operate, maintain, and improve the Medallion Service;
- Contact you (including by email, SMS message and in-App notifications) for administrative or customer services purposes, for example about purchases you have made via the Medallion Service, or changes to the Medallion Service, our [Terms of Use](#) and this Privacy Policy;
- If you opt into marketing communications from us, send emails and/or SMS messages to you about Medallion and the Medallion Service, for example, about new features on the App, Artists you might be interested in, or other Fans you are connected to. If you have also enabled push notifications, you may also receive marketing communications this way. You can unsubscribe from marketing, and/or disable push notifications at any time;
- Detect fraudulent and other impermissible uses of the Medallion Service;
- Conduct surveys, internal research, obtain feedback, and support internal business operations; and
- Process your personal information as described when you provide the information or at the time we collect it.

4. How do we share the personal information we collect?

We share your personal information for various reasons and with various parties.

Publicly available information

As a Fan, the following personal information is available to other users of the Medallion Service, and may be made available publicly:

- your profile, including username, photo, biographical information, and other information from your catalog that you choose to add to your profile
- content you post on the Medallion Service
- Artists and Fans you have connected to on the Medallion Service

- Artists and Fans who have connected to you on the Medallion Service

As an Artist, your Artist Information will be available to all other users of the Medallion Service, and may be made available publicly.

You or another Fan or Artist can share certain information from the Medallion Service on third-party services, including social media and messaging platforms. This includes:

- your profile
- any content you post on the App and details about that content

When this sharing occurs, the third-party service may store a copy of it to support their features.

Personal information you may choose to share

You may also instruct us to share your personal data with certain third parties to enhance or otherwise personalize your experience with the Medallion Service. For example, you may choose to use a Medallion Service feature or connect to a third-party application, service, or device via the Medallion Service in such a way that requires us to share your personal information to enable the connection.

Categories of recipients	Categories of personal information you can choose to share	Reason for sharing
Third-party applications, services, and devices you connect to your Medallion account	<ul style="list-style-type: none"> • Required User Information • Optional User Information • Usage Information 	<p>To connect your Medallion account, or enable you to use the Medallion Service in connection with third-party apps, services, or devices.</p> <p>Examples include:</p> <ul style="list-style-type: none"> • Music streaming apps • Ticketing, venue, and promoter apps • Ecommerce and/or music merch apps • Social media apps • Speaker devices
On-Platform Artists that you connect to on the App and whose marketing you agree to receive	<ul style="list-style-type: none"> • Required User Information • Whether you have opted in to receive Artist's marketing 	<p>To enable you to receive news or promotional offers from specific On-Platform Artists outside the App.</p> <p>You may choose to share this personal information with any On-Platform Artist that you connect to on the App by opting in to receive marketing from them.</p> <p>Each Artist is responsible for its own activities with respect to personal information it receives from us, including allowing you to unsubscribe from marketing communications. If you consent to marketing from an On-Platform Artist using the Medallion</p>

		Service and subsequently wish to unsubscribe from the Artist's marketing communications, you will need to unsubscribe with the Artist directly in order to be removed from their mailing lists.
--	--	---

Personal information we may share

Below is a list of recipients we may choose to share personal information with, the types of data we may share, and the reasons why we may share it.

Categories of recipients	Categories of personal information we may share	Reason for sharing
Third party service providers	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Physical Address Payment and Purchase Information Research, Survey, and Feedback Information 	So that they can help us do the things we mentioned in section 3 above, "How do we use the personal information we collect?"
Payment partners	<ul style="list-style-type: none"> Required User Information Optional User Information Physical Address Payment and Purchase Information 	So they can process your payments, and for anti-fraud purposes.
Academic and music industry researchers	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information 	So they can carry out statistical analysis for academic or music industry study, but only in a pseudonymised format.
Law enforcement and other authorities, or other parties to litigation	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information 	<p>When we believe in good faith that it's necessary for us to share this information. For example:</p> <ul style="list-style-type: none"> to comply with a legal obligation to respond to a valid legal process (e.g., court order, subpoena, search warrant, governmental request)

		<ul style="list-style-type: none"> for our own or a third party's justifiable interest relating to national security, law enforcement, litigation, criminal investigation, protecting someone's safety, etc.
Third-party auditors, legal advisors, operational consultants, and other similar service providers	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Physical Address Payment and Purchase Data Research, Survey, and Feedback Information 	To audit our business, financial information, data security, policies, and compliance with applicable laws and regulations.
Purchasers of our business	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Physical Address Payment and Purchase Data Research, Survey, and Feedback Information 	<p>If we were to sell or negotiate to sell our business to a buyer or possible buyer, or enter into a corporate merger, consolidation, restructure, sale of substantially all of our shares or assets, or other corporate change.</p> <p>In such an event, we may transfer your data to a subsequent owner, co-owner, operator, successor, or affiliate as part of that transaction.</p>
On-Platform Artists that you connect to on the App	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Physical Address Payment and Purchase Information 	<p>To enable On-Platform Artists to better understand and develop their relationship with their fan base, allowing them to provide the best experience to you, both through the App and directly.</p> <p>Unless you have opted in to receive marketing from an Artist, we require that the Artist does not use this information to send you direct marketing communications.</p>

5. Do we collect and/or share the personal information of children?

We do not intentionally or knowingly gather personal information from individuals under the age of 13. If a child under 13 submits personal information to us and we learn that the information is about or from a child under 13, we will delete the information as soon as possible. If you are a parent or guardian of a child under 13 and believe that we have collected personal information from your child, please contact us at support@medallion.fm. We do not knowingly sell or share personal information about consumers under the age of 13.

6. Where do we process your personal information?

The Medallion Service is operated from the United States. Therefore, if you are located anywhere outside of the United States, please be aware that information we collect, including personal information, will be transferred to, processed in, and stored in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your personal information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States.

7. What is our legal basis for using your personal information?

Medallion relies upon the following legal bases for using your personal information:

Purpose	Legal basis	Personal Information
<p>To provide the Medallion Service in accordance with our contract with you.</p> <p>For example, when we:</p> <ul style="list-style-type: none">• set up your account• personalise your account• provide the Medallion App	Contract (or parental consent).	<ul style="list-style-type: none">• Required User Information• Optional User Information• Usage Information• Physical Address• Payment and Purchase Information• Research, Survey, and Feedback Information
To provide information relating to Artists as part of the Medallion Service.	Our legitimate interest in running our business as appropriate to deliver and improve the Medallion Service.	<ul style="list-style-type: none">• Artist Information
To provide certain voluntary features of the Medallion Service. We will clearly ask for your consent in all such cases.	Consent.	<ul style="list-style-type: none">• Required User Information• Optional User Information• Usage Information• Payment and Purchase Information• Research, Survey, and Feedback Information
To maintain, operate, and improve the Medallion Service.	Our legitimate interest in running our business as appropriate to deliver and improve the Medallion Service.	<ul style="list-style-type: none">• Required User Information• Optional User Information• Usage Information• Physical Address• Payment and Purchase Information• Research, Survey, and Feedback Information

To diagnose, troubleshoot, and fix issues with the Medallion Service.	Contract.	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information
To conduct internal research and support internal business operations.	Our legitimate interest in running our business as appropriate to deliver and improve the Website and Services.	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Research, Survey, and Feedback Information
To provide your data to On-Platform Artists that you connect to on the App.	Our legitimate interest in providing value to On-Platform Artists under our contracts with them.	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Physical Address Payment and Purchase Information
To provide your data to On-Platform Artists that you connect to on the App and whose marketing you agree to receive.	Our legitimate interest in providing value to On-Platform Artists under our contracts with them.	<ul style="list-style-type: none"> Required User Information Whether you have opted in to receive Artist's marketing
To conduct research and surveys.	Our legitimate interest in understanding how Artists and Fans think about and use the Medallion Service.	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Research, Survey, and Feedback Information
To evaluate and develop new features, technologies, and improvements to the Medallion Service	Our legitimate interest in developing and improving products and features for Artists and Fans.	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Research, Survey, and Feedback Information
To contact you (including by email, SMS message and in-App notifications) for administrative or customer services purposes, for example about purchases you	Contract.	<ul style="list-style-type: none"> Required User Information

have made via the Medallion Service, or changes to the Medallion Service, our Terms of Use and this Privacy Policy		
To send push notifications, emails and/or SMS messages to you about Medallion and the Medallion Service, for example, about new features on the App, Artists you might be interested in, or other Fans you are connected to.	Consent (or parental consent).	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Research, Survey, and Feedback Information
To detect fraudulent and other impermissible uses of the Medallion Service.	Our legitimate interest in ensuring the security and safety of the Website or Services.	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Physical Address Payment and Purchase Information
To comply with legal obligations and/or regulatory investigations, court orders, requests from law enforcement or other competent authorities, and assist Medallion in the context of any litigation or arbitration.	Legal obligation; and our legitimate interest in ensuring the proper functioning of the Medallion Service.	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Physical Address Payment and Purchase Information Research, Survey, and Feedback Information
To take appropriate action with reports of intellectual property infringement and inappropriate content	Our legitimate interest in protecting intellectual property and original content.	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Payment and Purchase Information
To protect Medallion against any injury, theft, legal liability, fraud, data losses, abuse, or other misconduct.	Legal obligation; and our legitimate interest in ensuring the proper functioning of the Medallion Service.	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Physical Address Payment and Purchase Information

To conduct business planning, reporting, and forecasting	Our legitimate interest in researching and planning so that we can keep running our business successfully	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Payment and Purchase Information
To process your payments.	Contract.	<ul style="list-style-type: none"> Required User Information Usage Information Payment and Purchase Information
To manage Medallion's transactions (including but not limited to merger, acquisition, divestiture, or liquidation).	Our legitimate interest in conducting Medallion's business dealings.	<ul style="list-style-type: none"> Required User Information Optional User Information Usage Information Physical Address Payment and Purchase Information Research, Survey, and Feedback Information

8. How do we keep your personal information safe?

We protect your personal information by implementing and maintaining appropriate technical and organisational measures, consistent with legal requirements where the personal information was obtained, to safeguard the security of the personal information we maintain. We require any Artists or other organizations receiving your personal information to commit to standards required under data protection laws by entering into contracts with them.

However, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information. Any transmission of personal information is at your own risk.

9. How long do we hold your personal information?

We only retain personal information for the period of time in which retention is necessary to fulfil a legitimate business purpose and delete or de-identify the information thereafter. These legitimate business purposes include:

- maintaining the performance of the Medallion Service
- making data-driven business decisions about new features and offerings for the Medallion Service
- complying with legal obligations
- resolving disputes

Once we determine there is no longer a legitimate business purpose for retaining your personal information, we will delete or de-identify such information, as determined in our sole discretion and as permitted by law. As described in the below section (“What rights do I have in relation to my personal information?”), to the extent provided by the data protection law of your jurisdiction, you may request that we delete your information or restrict the processing of such information by contacting us as indicated below.

If our retention of information is based on your consent, and you withdraw that consent, we will delete or de-identify such information, as determined in our sole discretion and as permitted by law. We may need to retain some basic information (e.g. in order to ensure you are not sent marketing communications if you have opted out).

10. What rights may I have in relation to my personal information?

Under certain data protection laws and depending on the jurisdiction in which you reside, you may have certain data subject rights.

In particular, if you are located in the European Economic Area, the United Kingdom, or Switzerland, you may have the following rights, including:

Your right of access - You may have the right to ask us for copies of your personal information.

Your right to rectification - You may have the right to ask us to rectify personal information you think is inaccurate. You also may have the right to ask us to complete information you think is incomplete.

Your right to erasure - You may have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You may have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You may have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You may have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Your right to withdraw consent - You may have the right to withdraw any consent you previously provided to us and we will apply your preferences going forward.

Your right to lodge a complaint - You may have the right to lodge a complaint with a supervisory authority.

Your rights under “Shine the Light” - California residents are also permitted, pursuant to California Civil Code Section 1798.83, to request information regarding Medallion’s disclosure, if any, of their personal information to third parties for their direct marketing purposes. If this applies, you may obtain the categories of personal information disclosed and the names and addresses of all third parties that received your personal information for their direct marketing purposes during the immediately prior calendar year (e.g., requests made in 2024 will receive information about 2023 sharing activities). To make such a request, please provide sufficient information for us to determine if this applies to you, attest to the fact that you are a California resident and provide a current California address for our response. You may make this request in writing to Medallion Arts Inc., 169 Madison Ave, Suite 11599, New York, NY 10016.

We will respond to any such data subject request in the manner prescribed by applicable data protection law.

If you are located in other jurisdictions, you may still have similar (or different) rights under the applicable data protection laws. If you ask to exercise these rights from a jurisdiction where you do not have the applicable right, we may consider the request at our discretion.

11. How do I contact you if I have questions or wish to exercise my data subject rights?

If you have any questions about this Privacy Policy or the personal information we hold about you, or wish to exercise one of your data subject rights as it relates to the personal information collected by Medallion, you can contact us as follows:

support@medallion.fm

Medallion Arts Inc., 169 Madison Ave, Suite 11599, New York, NY 10016 USA

For any questions about an Artist's privacy policy or the personal information the Artist holds about you, or to exercise your data subject rights as it relates to personal information controlled by the Artist, please contact the Artist in accordance with their privacy policy.

12. What if I have a complaint?

If you have a complaint about our handling of your personal information that is covered by this Privacy Policy, please contact us as follows:

support@medallion.fm

Medallion Arts Inc., 169 Madison Ave, Suite 11599, New York, NY 10016 USA

If we have not been able to resolve your complaint for you, you can contact your relevant supervisory authority.

In the European Economic Area (EEA), depending on what country you are in, you can find the relevant authority here: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

In the UK, the supervisory authority is the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF (www.ico.org.uk).

In Switzerland, the supervisory authority is the Federal Data Protection and Information Commissioner, 1 Feldeggweg, Berne CH3003 (www.edoeb.admin.ch).

Other countries, states, and territories may have their own privacy regulators, who may also be contacted in respect of that country, state, or territory.

For any complaints about the handling of your personal information beyond the scope of this Privacy Policy, please contact the Artist.