

Schubert Music Library Llc. Privacy Policy

Valid from: 2025.06.01

This is a user-friendly summary of – and not a substitute for – the legal data processing information provided on the following pages.

Who we are?

- Company name: Schubert Music Library Llc.
- Address: 1032 Budapest, Kenyeres u. 9., Hungary
- Managing Director: Gusztáv Stiedl
- Email: g.stiedl@schubertmusic.com
- Phone: +36 1 468 2274

What we do?

We respect your rights and strive to fulfill your requests within the deadlines set by law. We treat your data the way we expect others to treat our own data.

The protection of your personal data is of paramount importance to us. We take care of your data, transfer it via encrypted channels, and never sell it to others or use it for purposes other than those for which you provided it.

We have a website, we measure its use, we log it for security reasons, we have online marketing with targeted campaigns, and we process the data you provide.

If you request it, we will release your data after identification. If you request it, we will delete your data.

Our services

- Website

For security reasons, we log your visits to our website (IP address, pages viewed). We use Google Analytics to track what you view so that we can produce more content that is interesting to you (cookies). Facebook and Google AdWords cookies are placed in your browser, and you may see Schubert Music advertisements through these providers. We delete this data after 90 days.

- Newsletter

You can subscribe to our newsletter by providing your email address and name. We will inform you by email about our new services, promotions, news, releases, and interesting facts about the music industry. We include an unsubscribe link in every email so that you can unsubscribe at any time if you change your mind. We store your data for 365 days after your last interaction.

- Subscription

If you subscribe to our service, we will store your contact details and notes in our CRM system for 3 years from our last contact.

Due to legal requirements, we will retain some of your personal data and the data contained in the invoices issued for the period required by applicable law (at least 10 years, up to a maximum of 15 years from the date of the last invoice).

Detailed Privacy Policy

When drafting the provisions of this information notice (hereinafter: Information Notice), the company took particular account of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation or GDPR), Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information ("Infotv."), and Act V of 2013 on the Civil Code ("Ptk.").

Data processing is based on the voluntary, prior, informed consent of the natural persons representing our clients, which consent includes the express consent of our clients to the use of the Personal Data they provide when using our services and the Personal Data generated about them. In the case of data processing based on consent, the customer is entitled to withdraw their consent at any time, which, however, does not affect the lawfulness of data processing prior to withdrawal.

When providing their data, all of our customers also assume responsibility for ensuring that the service is used exclusively by them as our customer, using the email address and data they have provided. In view of this responsibility, any liability in connection with logins using a given email address and/or data shall be borne exclusively by the customer who registered the email address and provided the data.

The customer guarantees that they have lawfully obtained the consent of the natural persons concerned for the processing of personal data provided or made available by them during the use of the services.

In addition to the voluntary consent of the customer, the legal basis for data processing within the framework of the Service or in connection with it may be the legitimate interest of the Data Controller, as well as the guarantee of the fundamental rights to information and freedom of expression, within the framework defined by law.

Name of Data Controller

- Company name: Schubert Music Library Llc.
- Address: 1032. Budapest, Kenyeres u. 9.
- Managing Director: Gusztáv Stiedl
- Email: g.stiedl@schubertmusic.com
- Phone: 06-1-468-2274
- Website: schubertmusiclibrary.com
- Company registration number: 01-09-337248
- EU VAT Number: HU 26651510

Consent form for the processing of my personal data

I hereby give my voluntary and express consent to the processing of my data provided during visits to Schubert Music Library Llc.'s electronic platforms (schubertmusiclibrary.com, Facebook ads, Google Ads ads), subscriptions, and registrations.

By providing my data, I declare that I am over 18 years of age and have legal capacity. I represent a legal entity or other organization without legal personality, and I am an authorized and entitled person to represent the person or organization I represent and to give the consent necessary for data management and data processing in accordance with this information notice.

I declare that I will not provide Schubert Music Library Llc. with any special personal data, either during registration or at any time thereafter. Special personal data includes, among other things, racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic or biometric data that can be used to identify a person; health data; or data related to sex life or sexual orientation.

I declare that I will not provide Schubert Music Library Llc. with any numbers that can be used to identify me, including, but not limited to, my passport number, personal identification number, ID card number, address card number, and driver's license number.

By giving my consent, I acknowledge that Schubert Music Library Llc. may send me letters, information, event invitations, and telephone calls related to its activities.

I may withdraw my consent to the processing of my data at any time in the manner specified in the information sheet, for example by sending a request to g.stiedl@schubertmusic.com.

Legal basis based on legitimate business interests

If you provide your data by filling out a form and indicate your interest in Schubert Music Library Llc., we will consider your application as a contract preparation. In this case, the legal basis for the processing of your personal data will be based on legitimate business interests in accordance with the GDPR. This change in legal basis does not affect your rights or the processing of your personal data; the only difference is that if you do not request the termination of the process during the preparation of the contract, we will continue to process your personal data for the purpose of preparing the contract.

Contractual legal basis

If you use the services of [company name], you do so in accordance with the terms and conditions set out in the General Terms and Conditions. In this case, the legal basis for the processing of your Personal Data will be contractual under the GDPR. This change in legal basis does not affect your rights or the processing of your Personal Data; the only difference is that during the term of the contract, even if you withdraw your consent to the processing of your data provided prior to the conclusion of the contract, we will continue to process your Personal Data for the purposes of performing the contract.

Once the contract is fulfilled or terminated, the legal basis for data processing will change again and we will continue to process your Personal Data in accordance with the law.

After the termination or fulfillment of the contract, in accordance with the law

We are required by law to continue to process your Personal Data in relation to the data contained in the invoice.

Your Rights

You have the following rights. In accordance with the GDPR, we must respond to your request within a maximum of one month. We will do our utmost to respond much sooner than this.

Right to information

You may request information about the personal data we process about you. You may request access to this data.

You can request information at any time by sending a registered letter with return receipt to our address or by sending an email to g.stiedl@schubertmusic.com. We will consider a request for information sent by letter to be authentic if we can clearly identify you based on the request sent.

Requests for information sent by email will only be considered authentic if they are sent from your registered email address, but this does not preclude us from identifying you in other ways for security reasons before providing the information.

The request for information may cover the data we process, their source, the purpose, legal basis and duration of data processing, the names and addresses of any data processors, activities related to data processing, and, in the case of the transfer of personal data, who received or will receive your data and for what purpose.

Right of access

If you request information on whether your Personal Data is being processed, you will receive access to the purpose of the data processing, the categories of data, recipients, data storage period, data subject rights, legal remedies, data source, automated decision-making, and cross-border data transfers.

Right to rectification

You may request the rectification or modification of your Personal Data at any time by sending a registered letter with return receipt to our address or by sending an email to g.stiedl@schubertmusic.com. Taking into account the purpose of data processing, you may request the completion of incomplete Personal Data.

Right to be forgotten (Right to erasure)

You may request the erasure of your Personal Data processed by us. Erasure may be refused (i) for the purpose of exercising the right to freedom of expression and information, or (ii) if the processing of Personal Data is in the public interest (authorized by law); and (iii) for legitimate private interests (for the establishment, exercise, or defense of legal claims).

We will inform you in all cases of the refusal of a request for erasure, indicating the reason for the refusal. Once a request for the erasure of personal data has been complied with, the previous (erased) data cannot be restored.

Newsletters can be unsubscribed from via the unsubscribe link contained therein.

Right to restrict data processing

You may request that we restrict the processing of your Personal Data if you dispute the accuracy of the Personal Data being processed. In this case, the restriction will apply for a period of time that allows us to verify the accuracy of the Personal Data.

We will mark the Personal Data we process if you contest its correctness or accuracy, but the incorrectness or inaccuracy of the contested Personal Data cannot be clearly established.

You may also request that we restrict the processing of your Personal Data if the Data Processing is unlawful, but you oppose the erasure of the Personal Data processed and request the restriction of its use instead.

You may also exercise this right if the purpose of the Data Processing has been fulfilled, but you require the processing of your data for the establishment, exercise, or defense of legal claims.

If you object to the processing of your data, we will restrict the processing of your Personal Data for a period of time until it is determined whether the legitimate grounds of the data controller take precedence over the legitimate grounds of the data subject.

Right to data portability

You may request that we transfer the Personal Data you have provided to us and which is processed by you in an automated manner to you in a structured, commonly used, machine-readable format (XML/XLS/CSV) provided by Schubert Music Library Kft. and/or transfer it to another data controller.

Right to object

You may object to the processing of your Personal Data (i) if the processing of Personal Data is necessary solely for the fulfillment of our legal obligations or the enforcement of our legitimate interests; (ii) if the purpose of the Data Processing is direct marketing, public opinion polling, or scientific research; or (iii) if the Data Processing is carried out in order to perform a task in the public interest.

We will examine the legitimacy of the objection and, if we find the objection to be justified, we will terminate the Data Processing and block the Personal Data processed, and we will notify all those to whom the Personal Data affected by the objection had previously been transferred of the objection and the measures taken on the basis thereof.

Purpose of data processing

- Protecting your rights.
- Identifying you and keeping in touch with you.
- Identifying your entitlements.
- Customizing system and marketing messages sent to you. Providing targeted, relevant messages based on your areas of interest and decision-making criteria.
- Customer support, advice, product presentation, answering questions.
- Preparing statistics and analyses, preparing decisions. Based on this, coordinating content development and product development to ensure that content that is actually read is produced.
- Product development.
- Services undertaken in the general terms and conditions, ensuring service quality and security conditions.
- Compliance with our legal obligations.
- Enforcement of our legitimate business interests.

Schubert Music Library Llc. is considered a data controller with regard to its own customers (information requests, requests for quotes), employees, and website registration, login, newsletters, and cookies.

Data Processed

We process the data you provide:

- Name
- Email
- Phone number
- Website
- LinkedIn/Facebook profile link
- Billing address, location

We log data for security reasons:

- Page/feature viewed
- Exact time
- IP address
- Browser cookie

We build profiles for marketing purposes:

- What problem are you looking to solve, why do you need to use music?
- What are your main decision-making criteria?

Profiles are built based on the data you provide. Our goal is to ensure that you find the messages we send you truly interesting and relevant. We don't like receiving generic messages that are not addressed to us either.

We use manually created filters based on your profile data to target and build newsletters. No decisions are made by automated data processing during this process.

We log our calls:

- Call metadata (who spoke to whom and when)

Names of data processors

Central customer database, customer data storage and management

- Name: MiniCRM Ltd.
- Address: 1075 Budapest, Madách Imre út 13-14.
- Phone: +36 (1) 999 - 0402
- Email: help@minicrm.hu
- Website: <https://www.minicrm.hu/>
- Stored data: name, email address, phone number, inquiries, offers, contracts, archived emails
- Operations: central customer database, task management, invoicing, order management, newsletter sending

Server service:

- Name: Schubert Music Publishing Sp. z o.o.
- Address: ul. Relaksowa 33/39, 02-796 Warsaw, Poland
- Phone: +48 22 546 96 00
- Email: artur@encode.pl
- Website: www.schubertmusic.com

Web analytics, email and document management, calendar, phone contacts, spreadsheet synchronization, targeted advertising:

- Name: Google LLC.
- Address: 1 Hacker Way, Menlo Park, California 94025
- Phone: N/A
- Email: N/A
- Website: <https://www.google.com/>

- Stored data: website visit data, correspondence, individual contracts and offers, calendar entries, phone contacts, data divided into spreadsheets based on filters, unique user IDs, visitor ID cookies.
- Operations: website visit data analysis, A/B testing, email service, document management, calendar service, synchronization of phone contacts between devices, online spreadsheet management, targeted advertising (retargeting).

Displaying targeted ads:

- Name: Facebook Inc.
- Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
- Phone: +1 650-543-4800
- Email: N/A
- Website: <https://www.facebook.com/>
- Stored data: website visit data, unique user IDs, visitor ID cookies.
- Operations: targeted advertising (retargeting).

Calendar, phone contacts:

- Name: Apple Inc
- Address: Apple Park, 1 Apple Park Way, Cupertino, California, U.S.
- Phone: +1 800 220325
- Email: N/A
- Website: <https://www.apple.com/>
- Stored data: calendar entries, phone contacts.
- Operations: calendar service, synchronization of phone contacts between devices.

Encrypted static data, data backups:

- Name: Amazon Web Services Ireland Ltd
- Address: One Burlington Plaza, Burlington Road, Dublin, Ireland
- Phone: +1 (206) 266-1000
- Email: N/A
- Website: <https://www.amazon.com/>
- Stored data: encrypted static files, encrypted backups.
- Operations: static storage (S3), content delivery network (CloudFront).

Accounting:

- Name: Nertia Pénzügyi Szolgáltató Llc.
- Address: 1082 Budapest, Vízakna u. 14.
- Phone:
- Email: zoltanbanga3@t-online.hu

- Website: -
- Stored data: buyer and seller data on invoices, invoice items, detailed invoice data.
- Operations: accounting, preparation of reports and returns required by law.

Online data reporting (invoicing):

- Name: National Tax and Customs Administration (NAV)
- Address: 1134 Budapest, Dózsa György út 128-132.
- Phone: +36-1-427-3200
- Email: N/A
- Website: <https://www.nav.gov.hu/>
- Stored data: buyer and seller data on invoices, invoice items, detailed invoice data.
- Operations: online data reporting from the invoicing module, data analysis, risk analysis, official inspection.

Web analytics on the website

Please note that we use Google Analytics programs to measure traffic to the schubertmusiclibrary.com website, monitor visitor behavior, compile statistics, and measure the effectiveness of our advertisements.

These programs place cookies in your browser, which store unique user IDs. By visiting the schubertmusiclibrary.com website, you consent to the use of Google Analytics programs. You also consent to the monitoring and tracking of your behavior and to the use of all services provided by these programs. In addition, you can disable the recording and storage of cookie data for the future at any time as described below.

In addition, you can disable the recording and storage of cookies for the future at any time as described below. Please note that the settings and use of Google Analytics programs fully comply with the requirements of the data protection authority.

According to Google, Google Analytics mainly uses first-party cookies to report visitor interactions on your website. These cookies only record information that cannot be used to identify individuals. Browsers do not share their own cookies between domains. Further information about cookies can be found in Google's Advertising and Privacy FAQ.

Google Analytics

Schubert Music Library Kft. uses Google Analytics primarily to generate statistics, including measuring the effectiveness of its campaigns. By using this program, Schubert Music Library Kft. mainly obtains information about how many visitors visited its website and how much time visitors spent on the website. The program recognizes the visitor's IP address, so it can track

whether the visitor is a returning or new visitor, as well as track the visitor's path through the Website and where they entered.

Disabling cookies

If you want to manage your cookie settings or disable the feature, you can do so in your browser. Depending on your browser toolbar, this option can be found in the cookies/tracking features menu. You can usually set which tracking functions you allow/disable on your computer under Tools > Settings > Privacy settings.

If you do not want Google Analytics to report on your visits, you can install the Google Analytics opt-out browser add-on. This add-on instructs Google Analytics JavaScript scripts not to send visit information to Google. If you have installed the opt-out browser add-on, you will not participate in content experiments.

If you want to disable Google Analytics web activity, visit the Google Analytics opt-out page and install the add-on for your browser. For more information on installing and removing the add-on, see the help section for your browser.

Data processing principles

- The Data Controller shall process Personal Data in accordance with the principles of good faith, fairness, and transparency, as well as in accordance with applicable laws and the provisions of this Notice.
- The Data Controller shall use Personal Data that is essential for the use of the Services on the basis of the consent of the customer concerned and exclusively for the specified purpose.
- The Data Controller shall process Personal Data only for the purposes specified in this Notice and in the relevant legislation. The scope of the Personal Data processed shall be proportionate to the purpose of the data processing and shall not exceed that purpose (data minimization).
- Schubert Music Library Llc. as a service provider shall not process the Personal Data of persons under the age of 18.
- The Data Controller shall not transfer the Personal Data it processes to third parties other than the Data Processors specified in this Notice and, in certain cases referred to in this Notice, to External Service Providers. An exception to the provision contained in this section is the use of data in a statistically aggregated form, which may not contain any other data suitable for identifying the Customer concerned in any form, and therefore does not constitute Data Processing or data transfer.

- In certain cases – official court or police requests, legal proceedings, copyright, property or other infringements or reasonable suspicion thereof, harm to the interests of the Data Controller, jeopardizing the provision of Services, etc. The Data Controller's system may collect data on the Customer's activity, which cannot be linked to other data provided by the Customer during registration or to data generated when using other websites or services.
- The Data Controller shall inform the Customer of the correction, restriction, or deletion of the Personal Data it processes.
- The Data Controller shall notify the Customer concerned and all those to whom it has previously transferred Personal Data for Data Processing purposes of any correction, restriction or deletion of the Personal Data it processes. Notification may be omitted if it does not prejudice the legitimate interests of the data subject in view of the purpose of the Data Processing.
- The Data Controller shall ensure the security of Personal Data, take the technical and organizational measures and establish the procedural rules necessary to ensure that the data collected, stored, and processed are protected and to prevent their accidental loss, unlawful destruction, unauthorized access, unauthorized use, unauthorized alteration, and unauthorized dissemination. In order to fulfill this obligation, the Data Controller shall call upon all third parties to whom it transfers Personal Data.
- In view of the relevant provisions of the GDPR, the Data Controller is not obliged to appoint a data protection officer.
- The Data Controller is responsible for compliance with the principles.

Confidential data management

Schubert Music Library Llc. treats the recorded data confidentially and does everything in its power to ensure the security of the data, using it in a manner necessary for the proper functioning of the Website. This includes, among other things, sending emails and text messages to you and to the contact details you have provided, in which case the message will be sent via the relevant service provider.

Schubert Music Library Llc. will never sell or lend your personal data to third parties for marketing purposes. Schubert Music Library Llc. may disclose your personal data and other relevant information if required to do so by a subpoena, court order, or legal process.

Furthermore, Schubert Music Library Llc. may secure and exercise its legal rights and defend itself against legal claims.

In order to ensure the secure handling of data, Schubert Music Library Llc. selects the IT tools used for data processing in such a way that, during operation, the processed data is accessible

only to Schubert Music Library Llc. as an authorized party, to preserve the authenticity of the data, to prevent changes to the recorded data outside of the data recording process, and to protect the recorded data from unauthorized access.

The data processed by Schubert Music Library Llc. may be transferred in response to a request from an authority or court, or in accordance with legal requirements, in which case Schubert Music Library Llc. will notify its users in its newsletter, provided that this does not conflict with the request from the authority or court, or the relevant legal requirements.

Our employees' access to personal data

We only grant our employees access to the personal data we process that is strictly necessary for their work. We log all access and only grant strictly limited access to the data backup function.

Duration of data processing

In accordance with the provisions of the GDPR, we process your data with a predetermined limitation period for each data category.

As a rule of thumb, detailed security logs are stored for 90 days and other security logs for 365 days.

Personal data is stored for 365 days after the last contact, except where legal requirements or contract fulfillment require a longer period.

A detailed description of each data category, data processing purposes, and data retention periods can be found in the "Our Services" section.

Data transfer

We are entitled and obliged to transfer all Personal Data available to us and stored by us in accordance with the law to the competent authorities if we are required to do so by law or by a final and binding official order. The Data Controllers cannot be held liable for such data transfer or the consequences thereof.

If we transfer the operation or use of our service in whole or in part to a third party, we may transfer the Personal Data we process in whole or in part to that third party without your separate consent, provided that you are given appropriate prior information and that this data transfer does not place you in a more disadvantageous position than that specified in the data processing rules set out in the current version of this Policy. In the event of data transfer pursuant to this paragraph, we will provide you with the opportunity to object to the data

transfer prior to the transfer. In the event of an objection, your data cannot be transferred pursuant to this section.

The data controller keeps a record of data transfers for the purpose of verifying the lawfulness of the data transfer and informing the data subject, which includes the date of transfer of the personal data processed by it, the legal basis and recipient of the data transfer, the definition of the scope of the personal data transferred, and other data specified in the legislation prescribing data processing.

Updating the Privacy Policy, following changes in legislation

This document is continuously reviewed and updated by the data controller in accordance with changes in the legal environment and official requirements. You can find the current Privacy Policy on the Schubert Music Library Llc. website under "Privacy Policy" menu.

Further questions/answers

You can request information about data management and/or processing at any time by sending an email to [g.stiedl@schubertmusic.com].

If you have any complaints regarding data management, you can contact the National Authority for Data Protection and Freedom of Information directly (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.; telephone: +36-1-391-1400; email: ugyfelszolgalat@naih.hu; website: www.naih.hu).

If your rights are violated, you may take legal action. The court has jurisdiction over the case. The lawsuit may be filed before the court of your place of residence or place of stay, at your discretion. Upon your request, we will inform you about the possibilities and means of legal remedy.

Definitions

- Data processing: any operation or set of operations performed on Personal Data, regardless of the procedure used, in particular the collection, recording, organizing, structuring, storing, adapting, altering, using, retrieving, consulting, using, disclosing, transmitting, disseminating or otherwise making available, publishing, aligning or combining, restricting, erasing, and destroying.
- Personal Data or data: any data or information on the basis of which a natural person can be identified, either directly or indirectly, or such person enters data into the System.
- Data Processor: the service provider who processes Personal Data on behalf of the Data Controller. In the case of the System Services referred to in this Notice, the data

processor is Schubert Music Library Llc. and the sub-processors are the sub-processors specified in the Document.

- GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council ("General Data Protection Regulation").

Last updated: 01.06.2025.