

PRIVACY POLICY

Last update: 4 March 2025

This privacy policy (the "**Policy**") has been prepared by Shotgun, a French *société par action simplifiée*, having its registered office at 6 Cité de l'ameublement – 75011 Paris, registered with the French Commercial and Companies registry of Paris under number 802 377 341, and its subsidiaries, with the exclusion of Shotgun Brazil LTDA (hereafter, "**Shotgun**").

Shotgun is a technology company operating an online intermediation service where event organizers can promote their events and sell tickets to potential attendees looking to discover events and buy tickets. As part of its activity, Shotgun also facilitates connections between artists looking to promote their artistic identity and individuals wishing to explore the artistic identity of these artists.

Shotgun primarily acts as a marketplace and ticketing solution, operating as a transparent intermediary in the name of and on behalf of event organizers.

In addition, as part of its ticketing solution, Shotgun connects Clients and Merchandising Sellers, who offer Merchandising products for sale. In this case, Shotgun also acts as a transparent intermediary, operating in the name of and on behalf of Merchandising Sellers.

The Policy describes the processing of personal data that Shotgun conducts in order to fulfill its obligation of information as a data controller within the scope of personal data protection regulations. It is freely accessible on Shotgun's website: [Privacy Policy](#).

The Policy was originally written in French. This translation is provided for convenience only, and the French version shall prevail in case of a contradiction.

1. **DEFINITIONS**

The following definitions apply throughout this document:

- "**Account**": refers to the Users' personalized and dedicated digital environment on the Platform.
- "**Additional Service**": refers to the services offered by Shotgun to which the Organizer, the Merch Seller and/or the Artist may subscribe in addition to the Services.
- "**Agreement**": refers to the General Terms and Conditions of Shotgun, as well as any other specific agreement between Shotgun and a User for the use of the Platform and any agreement between Shotgun and a User for the provision of the Services or additional Services.
- "**Artist**": refers to one or more natural or legal persons providing musical and/or artistic performances and who hold an Artist Page. This definition includes, but is not limited to, DJs, singers, musicians, and music bands.

- **"Artist Page"**: refers to the Artist's page available on the Platform, which showcases, among other things, their artistic identity, the Events they are associated with, access to their social media and streaming platforms, as well as, where applicable, their musical works and Artist Merchandising Products.
- **"Application"**: refers to the "Shotgun" mobile application for Clients, available on the Apple App Store and Google Play Store.
- **"Bundle"**: refers to the offer combining a Ticket and a Merchandising product.
- **"Client"**: refers to any natural person over the age of legal majority who purchases a Ticket and/or a Bundle and/or a Merchandising product on the Platform for private or non-professional purposes.
- **"Data Subject"**: refers to a Visitor, a User, a person invited by a Client to an Event, or a contact of a Client, the Organizer, the Merch Seller or the Artist.
- **"Data Processor"**: refers to a third-party company hired by Shotgun in order to execute the processing of personal data as described hereinafter.
- **"Event"**: refers to any festival, concert, musical or live performance organized and managed by an Organizer through the Platform.
- **"Fan"**: refers to any User subscribed to an Artist Page or an Organizer Page.
- **"Merch Seller"** or **"Merchandising Seller"**: refers to any natural or legal person acting in a professional capacity that uses the Platform to offer for sale Merchandising products related to Events proposed by Organizers.
- **"Organizer"**: refers to any natural or legal person acting in a professional capacity that uses the Platform to organize an Event and sell Tickets to this Event.
- **"Organizer Application"**: refers to the "Shotgun Scan" and "Shotgun Drawer" applications for Organizers, available on the Apple App Store and Google Play Store.
- **"Organizer Page"**: refers to the Organizer's page available on the Platform, which showcases the Organizer's identity, Events, and access to their social networks.
- **"Pedometer"**: refers to an optional feature of the Shotgun app that allows Users to synchronize, after an Event, their step count (and only the step count) via the native health app "Health App" for iOS, to view and share the number of steps taken during the Event.
- **"Platform"**: refers either to the entire Website and Application for Clients, or to the entire Website and Organizer Application for Organizers.
- **"Promoter"**: refers to any natural person identified as a Promoter by an Organizer in the Organizer Smartboard, who participates in promoting (sharing, initiating sales) one or more Event(s).

- **“Regulation”**: refers to the regulation (EU) 2016/679 of the European Parliament and of the Council of 27 april 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as to the French law n°78-17 of January 1978 (*Loi relative à l’informatique, aux fichiers et aux libertés*) in its latest version in force.
- **“Services”**: refers to all the services provided by Shotgun within the scope of the Platform.
- **“Ticket”**: refers to the agreement concluded between the Organizer and the Client that gives the Client the right to attend an Event.
- **“User”**: refers to any person who holds an Account or browses the Platform (including, but not limited to, Clients, Organizers, Merch Sellers, Artists and Promoters)
- **“Visitor”**: refers to any other party visiting the Website.
- **“Website”**: refers to Shotgun’s website accessible at <https://shotgun.live>, and its subdomains.

Unless circumstances request otherwise, definitions in the singular include the plural, and *vice versa*.

2. DATA PROCESSING, PURPOSES AND LEGAL BASIS

N°	Data Processing	Purposes	Legal Basis
1.	Prospection and analysis of Visitors	Identify Visitors of the Website for marketing purposes, including displaying the most appropriate content based on their activity.	Consent
2.	Contacting Interested Visitors	Re-contact Visitors who have provided their contact details to learn more about Shotgun's Services.	Consent
3.	Account creation	Create Accounts in order of Users to use the Platform.	Performance of the Contract
4.	User login	Identify Users when they access their Account in order to retrieve the information related to their Account.	Performance of the Contract

5.	Contract monitoring	Monitor and store the proof of acceptance of General Terms & Conditions, Special Terms, or any agreement between Shotgun and the Data subject.	Performance of the Contract
6.	Order management	Monitor the proper execution of orders (Tickets, Bundles and/or Merchandising products), particularly to ensure proper intermediation in the purchase and delivery of Tickets, as well as the purchase of Bundles or Merchandising products, and to manage subscriptions to waiting lists.	Performance of the Contract
7.	Payments	Process payments and manage payment issues.	Performance of the Contract
8.	Invoicing & Accounting	Allow Shotgun to fulfil its obligations with regard to accounting and taxes, to provide the necessary tax and accounting documents to Users or authorities when applicable.	Legal requirement

9.	Processing of support requests related to the Services	Answer Users' support requests related to the provision of the Services.	Performance of the Contract
10.	Creation of User profiles	Identify Client, Event, Organizer, Merch Seller, Artist profiles based on statistical methods in order to suggest more relevant content to Clients and Additional Services to Organizers, Merch Seller and Artists.	Consent
11.	Newsletter	Inform Users about content available on the Platform.	Consent

12.	Music library	Inform Users interested by Events involving Artists that they listen to, and allow Organizers, Merch Seller and Artists gain insights into their community.	Consent
13.	Prospection and sales	Inform Users of the development of the Shotgun Services offering.	Legitimate interest of Shotgun in processing these data
14.	Satisfaction surveys, improvement of the Platform and of the Services	Identification of improvements of the Platform and of the Services, notably via usage statistics satisfaction surveys.	Legitimate interest of Shotgun in processing these data to improve the Platform and the Services
15.	Tax and social requirements	Answer information requests from tax and social authorities regarding sales and Users on the Platform.	Legal requirement
16.	Litigation	Allow Shotgun to organize its defense in case of litigation or pre-litigation.	Legitimate interest of Shotgun in processing these data to fight potential litigations
17.	Fraud	Protect Shotgun and Users from fraud, including, but not limited to, the use of stolen credit cards.	Legitimate interest of Shotgun in processing these data to prevent fraud

3. ROLE AND RESPONSIBILITIES OF SHOTGUN

3.1 Shotgun as data controller

Under the Regulation, Shotgun is data controller of the following personal data:

- General information on Data Subjects (login, name, first name, date of birth, protected password, email addresses, telephone number);
 - Data Subjects login information (login, password, session start and end time, IP address, location, session history, unique cookie identifier);
 - Payment and invoicing data (billing address, payment method, banking, transaction history);
 - User preferences when visiting the Platform (language and display);
 - Other personal data of Data Subjects in the context of support requests (issues encountered by users, tracking of user sessions).
 - Answers to satisfaction and other surveys by Data Subjects, if they consented to sharing this data (satisfaction, comments, questions regarding specific Events or the usage of the Platform);
- **Data related to Clients only**
- Client profile (past Events attended and associated step count (as part of Shotgun's Pedometer feature), followed Events, friends, musical library and preferred Artists, if the Client has connected their contact list, social media accounts or music streaming accounts to their Shotgun account);
 - Client orders data (name and date of Event, quantity, type and price of Tickets bought or resold, email address where the Ticket will be sent, contact information of Client's guest if any, number and price of purchased Merchandising products, postal address for the shipment of Merchandising products);
- **Data related to the Organizer only**
- Legal information related to the Organizer or to the Event (legal entity name, responsible person name, company registration number, live event license number, registration address, tax identification number, VAT number, name, date and location of Events, Artists, numbers of Tickets sold, ticketing revenues, number of orders, Shotgun fees, refunds, bank account associated with the Organizer account, and any other document requested by Shotgun in order to confirm the truthfulness of this information);
 - Organizer profile (types of Events);
 - Information related to the Events offered (name, date, and location of the Events, as well as the Artists associated with the Event);
 - Information related to completed transactions (number of Tickets sold, total revenue, number of transactions, deducted Shotgun fees, potential refunds, financial account ID where the revenue is deposited, and any other document requested by Shotgun to verify the accuracy of this information)
- **Data related to the Merch Seller only**

- Legal information related to the Merch Seller (legal entity name, responsible person name, company registration number, registered office address, registration number and tax identification number, VAT number, permanent establishment, total revenues, number of transactions, Shotgun fees deducted, potential refunds, identifier of the financial account where revenues are deposited, and any other document requested by Shotgun to verify the accuracy of this information);
- Information related to completed transactions (total revenue, number of transactions, deducted Shotgun fees, potential refunds, financial account ID where the revenue is deposited, and any other document requested by Shotgun to verify the accuracy of this information);
- Information on Merchandising Products (products offered for sale, number of products sold);
- Profile of the Merchandising Seller.
 - **Data related to the Artist only**
- Legal information related to Artist (legal entity name, responsible person name, company registration number, registered office address, registration number and tax identification number, VAT number, permanent establishment, any applicable affiliate commissions, financial account identifier where affiliate commissions are paid, and any other document requested by Shotgun to verify the accuracy of this information);
- Artist Profile (name, dates, and locations of Events the Artist has been associated with by an Organizer, names, dates, and locations of external Events added by the Artist and not listed on Shotgun, their uploaded musical works synchronized from their streaming platforms, links to their social media, and the Shopify link for the Artist Merchandising Products).
 - **Data related to the Promoter only**
- History of Promoted Events (Events for which the Promoter has been activated by one or more Organizers).

For any question related to the processing personal data by Shotgun, or in order to exercise any of the right provided under the Regulation, Data Subjects can contact Shotgun as follows:

- by completing the support form available on the Platform;
- by email, at support@shotgun.live;
- by postal mail, at: Shotgun, Personal Data, 6 Cité de l'ameublement, Paris (75011), France.

3.2 Shotgun as data processor

Shotgun collects personal data on behalf of Organizers, Merch Seller or Artists. In that case, Shotgun also acts as a data processor under the Regulation for the following personal data.

3.2.1 Shotgun as a data processor for Organizers

Organizers may instruct Shotgun to process the following personal data:

- Organizers contacts uploaded to their Account;

- Ticket purchase information (telephone number and date of birth, additional information requested by Organizers, including but not limited to the identity of guests of the Client);
- Client and/or Fans contact information (name, first name, email address, telephone number, additional information on Client and / or their guests);
- Promoters contact information (pseudonym assigned by the Organizer, email address);
- Information on ticket sales generated by Promoters (number of Tickets sold through different marketing actions, Events for which Promoters were activated, Sales history associated with each Promoter – accessible only by the relevant Organizer);
- Organizer contact information (depending on the information that Organizers are willing to share with Clients : name, first name or alias of the Organizer, telephone number, email address, social network accounts);
- Event information (name, first name or alias of the Artists, name, date and location of the Event);
- Data exchanged between Users through the platform (email address of the Client and/or of the Organizer, content of the exchanges);
- Data collected on the Platform by Organizers on Users in case they consent to the use of trackers (number of visits on the Platform, items added to cart, orders for Events organized by the Organizer).

3.2.2 Shotgun as data processor for Merch Seller

Merch Sellers may instruct Shotgun to process the following personal data:

- Merch Seller contacts uploaded to their Account;
- Ticket purchase information (telephone number and date of birth, additional information requested by the Merch Seller about Clients, including product variants if applicable (size, color) and the postal address for delivery);
- Client contact information (name, first name, email address, telephone number, additional information on Client);
- Merchandising Seller contact information (depending on the information the Merch Seller are willing to share with Clients: name, first name or alias of the Merch Seller, telephone number, email address, social networks accounts);
- Data exchanged between Users through the platform (email address of the Client and/or of the Merch Seller, content of the exchanges);
- Data collected on the Platform by Merch Seller on Users in case they consent to the use of trackers (number of visits on the Platform, number of sales).

3.2.3 Shotgun as data processor for Artists

- Fans contact information (name, first name, email address, telephone number, additional information on Client);
- Artist contact information (depending on the information the Artist are willing to share with Fans: name, first name or alias of the Artist, telephone number, email address, social networks accounts);
- Information on external events outside of Shotgun (name, date, and location of the event);
- Data Exchanged Between Users via the Platform (email address of the Fan or Artist, content of the exchanges).

Since Shotgun has no control over the means and purposes of data processing carried out by Users, including Organizers, Merch Seller and Artists, it acts as a data processor within the meaning of the Regulation. The manner in which the Organizer, the Merch Seller and/or the Artist has entrusted it with the processing of personal data has been subject to contractual provisions under the Contract signed between Shotgun and the Organizer, the Merch Seller and/ or the Artist in accordance with the Regulation.

As a result, Users contacting Shotgun at the above address will be redirected to the data controller responsible for their personal data processing.

4. RECIPIENTS OF PROCESSED PERSONAL DATA

The personal data collected by Shotgun as a Data Controller from the Data Subjects and processed are necessary for the pursuit of all the aforementioned purposes, and are exclusively intended for Shotgun's internal services as well as, where applicable, third party Data Processors.

The categories of Data Processors to whom personal data may be transmitted are:

- **Daily Operations:** third parties who provide digital solutions used for Shotgun's daily operations, such as data hosting solutions, client and prospect management, detection of software errors or bugs, monitoring of the usage and proper functioning of the Platform;
- **Maintenance Operations:** third parties who have access to the Shotgun technology in order to perform maintenance operations or address technical issues in case of emergencies;
- **Marketing & Communication:** third parties who offer online marketing and advertising solutions.
- **Financial services:** third parties who offer specialized financial services, including payment processing services.

For the avoidance of doubt, it is hereby reminded that neither Shotgun, nor its Data Processor engage in the sale of the personal data of Data Subjects to third parties.

5. STORAGE OF PERSONAL DATA

The data of the Data Subjects are stored for the entire duration of the relationship with Shotgun, in order to achieve the purposes described in Article 2 and to enable Shotgun to fulfill its legal obligations.

6. DATA SUBJECT RIGHTS

6.1 Nature of Rights

In accordance with the Regulation, the Data Subject has rights as provided by the Regulation, namely:

- **Right of access:** any Data Subject can find out what personal data Shotgun has about them and obtain a copy.
- **Right of rectification and erasure:** any Data Subject can request the correction of inaccurate or outdated personal data about them, as well as their deletion.
- **Right to object and restrict processing:** any Data Subject can object to how Shotgun processes their personal data or request that the processing concerning them be restricted, to the extent possible and subject to compelling legitimate grounds that Shotgun may have for continuing processing, such as legal obligations in the fight against money laundering and the financing of terrorism.
- **Right to data portability:** any Data Subject can request Shotgun to send their personal data in a structured, commonly used, and machine-readable format to transmit to another data controller, if possible.
- **Right to file a complaint with a supervisory authority:** any Data Subject can contact the CNIL or any other competent supervisory authority if they believe that Shotgun has not complied with certain rules provided by the Regulation (information on how to contact the CNIL is provided on their [website](#)).

6.2 Exercise of Rights

The exercise of rights provided by the Regulation is not without limit (Shotgun is entitled not to respond to manifestly unfounded or excessive requests), and each of them is subject to conditions imposed by the Regulation. In this regard, the following points are to be noted:

- **Identity:** any Data Subject must verify their identity and provide the address at which they prefer to be contacted;
- **Response time:** requests are processed by Shotgun within a reasonable timeframe, taking into account complexity, the number of requests, and the Regulation.
- **Free exercise:** the exercise of rights is generally free of charge. In cases where a request would entail significant costs, the Data Subject may be required to cover the associated expenses.

Requests that fail to comply with these principles will not be processed.

7. DATA TRANSFERS

Personal data processed by Shotgun are hosted by Supabase, whose servers are located in Germany.

Some of the personal data may be transferred outside the European Union, including to the United States. In such a case, if transfers occur to countries that do not benefit from an adequacy decision, Shotgun has ensured that the relevant data processors and/or Shotgun subsidiaries implement appropriate legal, technical, and organizational measures to regulate any transfer of personal data, including the use of standard contractual clauses developed by the European Commission.

Data Subjects can obtain a copy of personal data being transferred by writing to the dedicated email address: support@shotgun.live.

8. COOKIES

A "cookie" is a tracking program deposited and read when visiting a website, consulting an email, installing or using software or a mobile application, regardless of the type of device used (computer, smartphone, e-reader, other smart device, etc.).

Under Article 82 of the *Loi Informatique et Liberté*, any subscriber or user of an electronic communications service must be informed clearly and comprehensively, unless they have been previously informed, by the data controller or their representative, (i) of the purpose of any action aimed at accessing, by electronic transmission, information already stored in their electronic communications terminal equipment or entering information into this equipment and (ii) of the means available to oppose it. Such access or entries can only take place if the subscriber or user has expressed their consent after receiving this information. Data Subjects can withdraw their consent to the use of these trackers by clicking here: <https://shotgun.live/>.

It is also provided that these rules do not apply if access to information stored on the user's terminal equipment or the entry of information into the user's terminal equipment (i) either has the exclusive purpose of enabling or facilitating electronic communication, (ii) or is strictly necessary for the provision of an online communication service at the express request of the user.

Within the scope of this exception, Shotgun uses the following cookies:

- Audience tracking cookies to measure the activity and traffic on the Website. These cookies are stored for indefinite period.
- Cookies storing language preferences of Visitors. These cookies are stored for an indefinite period.
- Cookies storing cookies consent preferences of Visitors. These cookies are stored for an indefinite period.

9. SECURITY PROCEDURES

Shotgun takes all physical, logical, and organizational security measures to ensure a high level of protection of personal data, and notably to prevent these data from being altered damaged or disclosed to unauthorized parties. Security procedures include, but are not limited to:

- Protection of access to databases where the personal data of Data Subjects are stored with strong passwords;
- Use of advanced password security solutions by all Shotgun employees;
- Implementation of physical security measures to prevent intrusions in company premises.

10. MODIFICATION OF THE POLICY

Shotgun may from time to time update this Policy, to reflect changes in data processing purposes and methods due to the development of the Platform, the Services and the Additional Services, or due to the introduction of new regulations.

Data Subjects will be informed of changes to the Policy either by email or by a communication on the Platform at least 15 days before any material change to the Policy.