

BELIEVE

Dear all at the CMA

We thank you for your update paper on the streaming market study, which we agree with a lot of your report and executive summary. We are aligned that we do not think there is an issue on the consumer side; We see a healthy ecosystem with the DSP's, with the growth of Paid Subscriptions amongst all the Top DSP's, and new Platforms and services are able to enter the market, to grow and to innovate. We see a diverse range of DSP's and platforms which are generating audiences, discovery and monetisation for the music industry, which is delivering accelerated growth to Artists and Rightsholders.

On the artist side, we wanted to highlight our position on 4 key points that are either partially addressed in your report, or have not been commented on at all.

[REDACTED]

Streaming Fraud: As you are aware, the music industry has seen a significant increase of Streaming Fraud, either being **[REDACTED]** We think there should be more transparency in this area with the DSP's, so that the rules of engagement are transparently communicated and adhered too, and that results are published on the ranking of Content providers. Streaming Fraud is reducing the content pool/payout to every artist, which is having an impact on competition, and should be seen as a priority for the CMA to address.

Transparency regarding algorithms: We agree with your comment on the paper, that it is important that transparency around algorithms is investigated further, and that the DSP's should be accountable to being transparent on the impact their algorithms are having on consumer choice, genre diversity, gender etc. We would welcome an opportunity to discuss further with the Centre for Data ethics and innovation, which we will reach out to on this subject.

Data Protection: Artists Data protection was not addressed in the paper. Currently every Artists data is being made available by certain DSP's to 3rd parties (Either through direct sharing, or through their API's not being protected.). These 3rd party companies, then make commercial models out of the data, and sell this data to the Music Industry. Artists do not get a choice if their data is made available or not, and the artist does not participate in the monetisation of their data. We think that Artist should have the choice if they make their data available, which is leading to breaches of data privacy by these 3rd party companies, by making Artists data available without the Artists consent.

We would like to have the opportunity to have another discussion with our CEO, for which we can elaborate further on these points.