

## **Privacy policy**

Your privacy is important to us. It is SNIPFEED's policy to respect your privacy and comply with any applicable law and regulation regarding any personal information we may collect about you, including across our website, [Snipfeed.co](https://snipfeed.co), [snipfeed-direct.co](https://snipfeed-direct.co) and other sites we own and operate.

Personal information is any information about you which can be used to identify you. This includes information about you as a person (such as name, address, and date of birth), your devices, payment details, and even information about how you use a website or online service.

In the event our site contains links to third-party sites and services, please be aware that those sites and services have their own privacy policies. After following a link to any third-party content, you should read their posted privacy policy information about how they collect and use personal information. This Privacy Policy does not apply to any of your activities after you leave our site.

This policy is effective as of 30 July 2022.

**Last updated: 30 July 2022**

### **1. Who are we?**

SNIPFEED is a social media website and application service which allows individuals and entities or their designees (collectively, "**SNIPFEED creators**") to create a profile, upload photos and videos onto their profile, set a monthly subscription price payable by other Users who wish to view their User Content and thereby generate revenue from Fans.

SNIPFEED Direct is a service that SNIPFEED creators can use to message with the individuals who have agreed to message with them ("**SNIPFEED Contacts**"). SNIPFEED Direct is operated by SNIPFEED. We issue unique phone numbers or other communication accounts ("**SNIPFEED Numbers**") to SNIPFEED creators. We help enhance your social media accounts but we are not guaranteeing and are not responsible for your performance using our tools.

Our services include your connections to third-party service providers such as Facebook, Instagram, YouTube API Services, Tiktok. By using SNIPFEED, you are required to comply with their privacy policies and terms and conditions that we strongly encourage you to carefully review.

SNIPFEED provides services that by nature are to be used for business purposes by individuals who are above the age of 18. Minimum age of 18 is required in our Terms of Service.

In general, SNIPFEED is acting as a Data Processor towards its clients acting as Data Controller.

However, on the edge, for the conducting of our services, we might collect and process some personal data as Data Controller.

### **2. What kind of personal information do we collect ?**

Information we collect falls into one of two categories: "voluntarily provided" information and "automatically collected" information.

- "Voluntarily provided" information refers to any information you knowingly and actively provide us when using or participating in any of our services and promotions.
- "Automatically collected" information refers to any information automatically sent by your devices in the course of accessing our products and services.

In general, we are committed to collecting only personal data that is relevant and appropriate to each of the purposes for which we process your personal data.

## **Log Data**

When you visit our website, our servers may automatically log the standard data provided by your web browser. It may include your device's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, and other details about your visit.

Additionally, if you encounter certain errors while using the site, we may automatically collect data about the error and the circumstances surrounding its occurrence. This data may include technical details about your device, what you were trying to do when the error happened, and other technical information relating to the problem. You may or may not receive notice of such errors, even in the moment they occur, that they have occurred, or what the nature of the error is.

Please be aware that while this information may not be personally identifying by itself, it may be possible to combine it with other data to personally identify individual persons.

## **Device Data**

When you visit our website or interact with our services, we may automatically collect data about your device, such as:

- Device Type;
- Operating System;
- Unique device identifiers;
- Device settings;
- Geo-location data;

Data we collect can depend on the individual settings of your device and software. We recommend checking the policies of your device manufacturer or software provider to learn what information they make available to us.

## **Personal Life and Personal Information**

We may ask for personal information, for example, when you subscribe to our newsletter or when you contact us. Which may include one or more of the following:

- Name;
- Email
- Social media profiles
- Date of birth
- Phone/mobile number
- Home/mailling address
- Company
- Job Title
- Credit card details

## **Financial and Economic Information**

Transaction data refers to data that accumulates over the normal course of operation on our platform. This may include transaction records, stored files, user profiles, analytics data and other metrics, as well as other types of information, created or generated, as users interact with our services.

We may collect personal information from you when you do any of the following on our website:

- Register for an account;
- Purchase a subscription;
- Sign up to receive updates from us via email or social media channels;
- Use a mobile device or web browser to access our content;
- Contact us via email, social media, or on any similar technologies;
- When you mention us on social media

### **3. What is your data used for?**

We may collect, hold, use, and disclose information for the following purposes, and personal information will not be further processed in a manner that is incompatible with these purposes. The processing of your data is always justified with a legal basis according to the law.

We may collect personal information from you when you do any of the following on our website:

- Register for an account;
- Purchase a subscription;
- Sign up to receive updates from us via email or social media channels;
- Use a mobile device or web browser to access our content;
- Contact us via email, social media, or on any similar technologies;
- When you mention us on social media;

We may collect, hold, use, and disclose information for the following purposes, and personal information will not be further processed in a manner that is incompatible with these purposes:

- to provide you with our platform's core features and services;
- to enable you to customize or personalize your experience of our website;
- to contact and communicate with you;
- for analytics, market research, and business development, including to operate and improve our website, associated applications, and associated social media platforms;
- for advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you;
- to consider your employment application;
- to enable you to access and use our website, associated applications, and associated social media platforms;
- for internal record keeping and administrative purposes;
- to comply with our legal obligations and resolve any disputes that we may have;
- to attribute any content (e.g. posts and comments) you submit that we publish on our website;
- for security and fraud prevention, and to ensure that our sites and apps are safe, secure, and used in line with our terms of use;
- for technical assessment, including to operate and improve our app, associated applications, and associated social media platforms;

We may combine voluntarily provided and automatically collected personal information with general information or research data we receive from other trusted sources. For example, If you provide us with your location, we may combine this with general information about currency and language to provide you with an enhanced experience of our site and service.

#### **4. How do we protect your personal Information?**

When we collect and process personal information, and while we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorized access, disclosure, copying, use, or modification. Although we will do our best to protect the personal information you provide to us, we advise that no method of electronic transmission or storage is 100% secure, and no one can guarantee absolute data security.

You are responsible for selecting any password and its overall security strength, ensuring the security of your own information within the bounds of our services.

For example, ensuring any passwords associated with accessing your personal information and accounts are secure and confidential.

#### **5. How Long We Keep Your Personal Information?**

We keep your personal information only for as long as we need to. This time period may depend on what we are using your information for, in accordance with this privacy policy. For example, if you have provided us with personal information as part of creating an account with us, we may retain this information for the duration your account exists on our system. If your personal information is no longer required for this purpose, we will delete it or make it anonymous by removing all details that identify you.

However, if necessary, we may retain your personal information for our compliance with a legal, accounting, or reporting obligation or for archiving purposes in the public interest, scientific, or historical research purposes or statistical purposes.

## **6. Children's Privacy**

Our Terms of Services restrict the use of our Services to users above 18 years old. We do not aim any of our products or services directly at children, and we do not knowingly collect personal information about children. If we become aware of a user being a child, we will take appropriate steps to remove that user's information from our account database and will restrict that individual from future access to the Service. However you remain responsible for the content you post through our Services. If you process personal information of users being children, you take responsibility for taking all steps necessary to make this processing lawful.

## **7. Who has access to your Personal Information?**

Within SNIPFEED, we ensure that only those persons who are duly authorized to process your personal data by virtue of their functions and duties are allowed to do so.

We may disclose personal information to third parties such as:

- third-party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, hosting and server providers, ad networks, analytics, error loggers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors, and payment systems operators;
- contractors, and/or related entities;
- our existing or potential agents or business partners.
- credit reporting agencies, courts, tribunals, and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise, or defend our legal rights;
- third parties, including agents or sub-contractors, who assist us in providing information, products, services, or direct marketing to you;
- third parties to collect and process data;
- an entity that buys, or to which we transfer all or substantially all of our assets and business.

Third parties we currently use include:

- Google Analytics: <http://www.google.com/intl/en/policies/privacy/>
- Google Services: <http://www.google.com/intl/en/policies/privacy/>
- Google Adsense: <https://policies.google.com/privacy?hl=en-US>
- MailChimp: <https://www.intuit.com/privacy/statement/>
- Intercom: <https://www.intercom.com/legal/privacy>
- Paypal: <https://www.paypal.com/en/webapps/mpp/ua/privacy-full>
- Stripe: <https://stripe.com/us/privacy>
- Meta / Facebook: <https://www.facebook.com/privacy/explanation>
- Instagram: [https://help.instagram.com/519522125107875/?helpref=uf\\_share](https://help.instagram.com/519522125107875/?helpref=uf_share)
- TikTok: <https://www.tiktok.com/legal/privacy-policy-eea?lang=en>
- YouTube API Services: <https://policies.google.com/privacy?hl=en-GB>
- Twilio: <https://www.twilio.com/legal/privacy>
- Bubble: <https://manual.bubble.io/core-resources/data/privacy>

You can revoke our access to your Google account, at any time, via Google's security settings page at <https://security.google.com/settings/security/permissions>.

Please note that no mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

## **8. How do we organize International Transfers of Personal Information?**

The personal information we collect is stored and/or processed in the United States, France, and Ireland, or where we or our partners, affiliates, and third-party providers maintain facilities. We use third-party service providers, such as hosting providers, credit card processors, and technology partners that are

necessary to provide the software, networking, infrastructure and other services required to operate our Services.

These third-party providers may store, process, or transfer your personal information may not have the same data protection laws as the country in which you initially provided the information. If we transfer your personal information to third parties in other countries: (i) we will perform those transfers in accordance with the requirements of applicable law; and (ii) we will protect the transferred personal information in accordance with this privacy policy.

The third-party service providers we use to help us deliver the Services and which process your Content are listed in the section 7

Intrinsically, social media data can be shared with people globally. Third-party services that you choose to integrate with our Services may collect, store, and process your information from various locations around the world according to their own terms and conditions and privacy policies.

## **9. What are your Rights on your Personal Information?**

### **Right of access**

You have the right to ask SNIPFEED to provide you with a copy of the Personal Information and informations such as:

- Purposes of the processing;
- Categories of personal information we process;
- Recipients or categories of recipients of your Personal Information;
- The retention period of your Personal Information, or criteria to determine it;
- The existence of your right to request rectification or erasure of your Personal, to request limitation of your Personal Information or the right to object to their processing;
- Right to lodge a complaint with a supervisory authority;
- Source of the data when they are not collected directly with you;
- the existence of automated decision-making, including profiling.

### **Right to rectification of your Personal Data**

You have the right to request that your Personal Information are rectified, completed whether they are inaccurate, incomplete, ambiguous or outdated.

### **Right to erasure of your Personal Information**

You have the right to request to SNIPFEED the erasure of your Personal Information where one of the following grounds applies:

- The data are no longer necessary for the purposes for which they were collected or otherwise processed;
- You have withdrawn the consent you granted;
- You object to the processing of your data if there is no compelling legitimate reason for the processing;
- The data processing does not comply with the provisions of the applicable laws and regulations. Your attention is drawn to the fact that the right to erasure of data is not an absolute right and that it can only be exercised if one of the grounds provided for in the applicable regulations is present.

### **Your right to the limitation of your Personal Information**

You have the right to request the restriction of the processing of your personal data in the cases provided for by the legislation and regulations.

### **Your right to object to the processing of your Personal Information**

You have the right to object, at any time, for reasons relating to your particular situation, to the processing of your personal data whose legal basis is the legitimate interest pursued by the controller. In that case, we ensure to no longer process your Personal Information for the concerned processing activities, unless we demonstrate that we have legitimate and compelling reasons for maintaining this

processing. These reasons must be superior to your interests and your rights and freedoms or the processing must be justified for the establishment, exercise or defence of legal claims.

Marketing permission: If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below.

### **Your right to portability of your Personal Information**

You have the right to the portability of your personal data when the legal basis for the processing is your consent or the execution of pre-contractual measures or a contract. Furthermore, not all data is portable and this right only concerns automated processing, to the exclusion of manual or paper processing.

The data on which your right to portability can be exercised are:

- Personal information, excluding anonymized data;
- Declarative personal data;
- Personal operating data.

You can request that the data is sent to a third party if it is possible for us.

In the latter case, you should indicate the exact name of the person responsible, his or her contact details and the department or person who should receive it. In order to facilitate the exercise of this right, you must inform the recipient of your request to SNIPFEED.

### **Your right to withdraw your consent**

When the processing of your Personal Information is based on your consent, you have the right to withdraw your consent at any time. The action to withdraw your consent does not affect the former processing activities you gave your consent to.

### **Your right to lodge a complaint with the CNIL**

You have the right to lodge a complaint with the CNIL (3 place de Fontenoy 75007 Paris) without prejudice to any other administrative or judicial procedure.

### **How to exercise your rights?**

These rights can be exercised by email to: [legal@snipfeed.co](mailto:legal@snipfeed.co)

### **Use of Cookies**

We use “cookies” to collect information about you and your activity across our site. A cookie is a small piece of data that our website stores on your computer, and accesses each time you visit, so we can understand how you use our site. This helps us serve you content based on preferences you have specified.

Please refer to our Cookie Policy for more information.

### **Limits of Our Policy**

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices.

### **Changes to This Policy**

At our discretion, we may change our privacy policy to reflect updates to our business processes, current acceptable practices, or legislative or regulatory changes. If we decide to change this privacy policy, we will post the changes here at the same link by which you are accessing this privacy policy.

If the changes are significant, or if required by applicable law, we will contact you (based on your selected preferences for communications from us) and all our registered users with the new details and links to the updated or changed policy.

If required by law, we will get your permission or give you the opportunity to opt in to or opt out of, as applicable, any new uses of your personal information.

## **Additional Disclosures for Australian Privacy Act Compliance (AU)**

### **International Transfers of Personal Information**

Where the disclosure of your personal information is solely subject to Australian privacy laws, you acknowledge that some third parties may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act. You acknowledge that if any such third party engages in any act or practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

## **Additional Disclosures for General Data Protection Regulation (GDPR) Compliance (EU)**

### **Data Controller / Data Processor**

The GDPR distinguishes between organizations that process personal information for their own purposes (known as “data controllers”) and organizations that process personal information on behalf of other organizations (known as “data processors”). We, SNIPFEED, located at the address provided in our Contact Us section, are a Data Controller with respect to the personal information you provide to us.

## **Legal Bases for Processing Your Personal Information**

We will only collect and use your personal information when we have a legal right to do so. In which case, we will collect and use your personal information lawfully, fairly, and in a transparent manner. Our lawful bases depend on the services you use and how you use them. This means we only collect and use your information on the following grounds:

### **Consent From You**

Where you give us consent to collect and use your personal information for a specific purpose. You may withdraw your consent at any time using the facilities we provide; however this will not affect any use of your information that has already taken place. You may consent to providing your email address for the purpose of receiving marketing emails from us. While you may unsubscribe at any time, we cannot recall any email we have already sent. If you have any further enquiries about how to withdraw your consent, please feel free to enquire using the details provided in the Contact Us section of this privacy policy.

### **Performance of a Contract or Transaction**

Where you have entered into a contract or transaction with us, or in order to take preparatory steps prior to our entering into a contract or transaction with you. For example, if you purchase a product, service, or subscription from us, we may need to use your personal and payment information in order to process and deliver your order.

### **Our Legitimate Interests**

Where we assess it is necessary for our legitimate interests, such as for us to provide, operate, improve and communicate our services. We consider our legitimate interests to include research and development, understanding our audience, marketing and promoting our services, measures taken to operate our services efficiently, marketing analysis, and measures taken to protect our legal rights and interests.

### **Compliance with Law**

In some cases, we may have a legal obligation to use or keep your personal information. Such cases may include (but are not limited to) court orders, criminal investigations, government requests, and regulatory obligations. If you have any further enquiries about how we retain personal information in order to comply with the law, please feel free to enquire using the details provided in the Contact Us section of this privacy policy.

## **International Transfers Outside of the European Economic Area (EEA)**

We will ensure that any transfer of personal information from countries in the European Economic Area (EEA) to countries outside the EEA will be protected by appropriate safeguards, for example by using standard data protection clauses approved by the European Commission, or the use of binding corporate rules or other legally accepted means.

### **Additional Disclosures for California Compliance (US)**

Under California Civil Code Section 1798.83, if you live in California and your business relationship with us is mainly for personal, family, or household purposes, you may ask us about the information we release to other organizations for their marketing purposes.

To make such a request, please contact us using the details provided in this privacy policy with "Request for California privacy information" in the subject line. You may make this type of request once every calendar year. We will email you a list of categories of personal information we revealed to other organisations for their marketing purposes in the last calendar year, along with their names and addresses. Not all personal information shared in this way is covered by Section 1798.83 of the California Civil Code.

### **Do Not Track**

Some browsers have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. At this time, we do not respond to browser "Do Not Track" signals.

We adhere to the standards outlined in this privacy policy, ensuring we collect and process personal information lawfully, fairly, transparently, and with legitimate, legal reasons for doing so.

### **Cookies and Pixels**

At all times, you may decline cookies from our site if your browser permits. Most browsers allow you to activate settings on your browser to refuse the setting of all or some cookies. Accordingly, your ability to limit cookies is based only on your browser's capabilities. Please refer to the Cookies section of this privacy policy for more information.

### **CCPA-permitted financial incentives**

In accordance with your right to non-discrimination, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels for the goods or services we provide.

Any CCPA-permitted financial incentive we offer will reasonably relate to the value of your personal information, and we will provide written terms that describe clearly the nature of such an offer. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

### **California Notice of Collection**

In the past 12 months, we have collected the following categories of personal information enumerated in the California Consumer Privacy Act:

- Identifiers, such as name, email address, phone number, account name, IP address, and an ID or number assigned to your account.
- Customer records, such as billing and shipping address, and credit or debit card data
- Commercial information, such as products or services history and purchases.
- Internet activity, such as your interactions with our service.
- Audio or visual data, such as photos or videos you share with us or post on the service.
- Geolocation data.

For more information on information we collect, including the sources we receive information from, review the "Information We Collect" section. We collect and use these categories of personal information for the business purposes described in the "Collection and Use of Information" section, including to provide and manage our Service.

### **Right to Know and Delete**



If you are a California resident, you have rights to delete your personal information we collected and know certain information about our data practices in the preceding 12 months. In particular, you have the right to request the following from us:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information was collected;
- The categories of personal information about you we disclosed for a business purpose or sold;
- The categories of third parties to whom the personal information was disclosed for a business purpose or sold;
- The business or commercial purpose for collecting or selling the personal information; and
- The specific pieces of personal information we have collected about you.
- To exercise any of these rights, please contact us using the details provided in this privacy policy.

### **Shine the Light**

If you are a California resident, in addition to the rights discussed above, you have the right to request information from us regarding the manner in which we share certain personal information as defined by California's "Shine the Light" with third parties and affiliates for their own direct marketing purposes.

To receive this information, send us a request using the contact details provided in this privacy policy. Requests must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code.

### **Contact Us**

**For any questions or concerns regarding your privacy, you may contact us using the following details:**

**Snipfeed.co**  
**538 Broadway St #2**  
**Venice, CA 90291, USA**  
[legal@snipfeed.co](mailto:legal@snipfeed.co)