

COMPLAINTS POLICY AND PROCEDURE

GENERAL PROVISIONS

We, DC DIGITAL CRAFT LTD, a legal entity registered in Cyprus (HE 458938) having its postal address at: Kyriakou Matsi, 18, VICTORY TOWER, Floor 1, 1082, Nicosia, Cyprus (hereinafter referred to as the **Platform**), prioritize the safety and legality of the content published at the Platform. This Policy establishes a mechanism for processing notifications and complaints (hereinafter jointly referred to as **complaints**) from users and other parties regarding illegal and harmful content as well as the procedures for submitting complaints concerning such content.

We highly appreciate protection of the fundamental rights and legitimate interests of our users and other parties involved, such as: the right to freedom of expression and information, the right to protection of personal data, the right to non-discrimination, and the right to an effective remedy; for parties affected by illegal content, the right to human dignity, the right to protect intellectual property.

We operate in accordance with Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services, amending Directive 2000/31/EC (Digital Services Act).

We do not have an obligation to monitor or actively fact-find illegal, harmful, or intellectual property-infringing content. But if you believe that your rights have been violated by posted content, please promptly file a complaint in accordance with the procedure established by this Policy.

GROUNDS FOR COMPLAINTS

To make it easier for you to understand grounds for your complaints, below you may find definitions:

“Illegal Content” within the meaning of this Policy should be interpreted broadly as information related to illegal content, products, services, and activities; specifically, this term refers to:

1. Information that under the applicable law is either itself illegal, such as illegal hate speech or terrorist content and unlawful discriminatory content;
2. Information that the applicable rules render illegal in view of the fact that it relates to illegal activities, for example, sharing of images depicting child sexual abuse, the unlawful non-consensual sharing of private images, online stalking, the sale of items or the provision of services in infringement of law;
3. Content that infringes copyright or other intellectual property rights;
4. Content that violates the fundamental rights or legitimate interests of the complainant or the person represented by the complainant for any reason.

“Harmful content” refers to information and materials that violate the Platform's Terms and Conditions or other Platform's policies for any reason.

If you find out that any of the published materials falls into one of the categories described above, we ask you to notify us via complaint@polee.me. If you are unable to contact us by email, please write to us at the following address: Kyriakou Matsi, 18, VICTORY TOWER, Floor 1, 1082, Nicosia, Cyprus.

Your complaint should contain the following information that is necessary for us to investigate the case and take adequate actions:

1. reasons why you find certain publication illegal or harmful;

2. electronic location of that information, such as the exact URL or URLs, and, where necessary, additional information enabling its identification
3. your name and email address;
4. confirmation of the following: “I confirm that the information and allegations contained therein are accurate and complete”.

You can put in one complaint several cases of illegal or harmful content.

Please note that your complaint must be sufficiently precise and substantiated.

OUR REACTION TO COMPLAINTS

Once we receive your complaint, we will inform you. Generally, we need up to 30 days to analyze the materials and make a decision, whether the item is illegal or harmful.

If we deem the content **illegal**, we will impose one or more of the following measures:

- (a) restrict the visibility of specific items of information provided, including removal of content, disabling access to content, or demoting content;
- (b) suspend or terminate or restrict in other way monetary payments linking with the violating content;
- (c) suspend or terminate the provision of the service, in whole or in part to the intruder;
- (d) suspend or terminate the intruder's account.

If we deem the content **harmful**, we reserve the right to take any measures necessary at our discretion to effectively protect the rights and legitimate interests of our users and third parties, including, but not limited to, measures against illegal content.

If necessary to protect the rights or legitimate interests of any involved party or to comply with a decision of a public authority, we may take additional measures, provided that these do not infringe upon the rights or legitimate interests of other parties.

We inform both the complainer and the author of the content on our decision and the reasons for its decision as well as the available possibilities for redress to contest the decision.

APPEALING THE DECISIONS

Internal complaint mechanism

If you are an author whose content has been removed due to a complaint and you want to contest the removal, or if you are otherwise unsatisfied with the adopted decision, you can submit an appeal via complaint@polee.me within 6 months from the date you receive it.

Please include following information in your appeal:

1. your name
2. details of the decision you are appealing
3. reasons for overturning our decision and, where applicable, evidence of the rights violation.

Once we receive your appeal we will notify you. If we need additional information to ensure a fair and impartial resolution of the dispute we can ask the involved parties to provide us with more details.

Generally, we need up to 30 days to decide whether to overturn or uphold the previous decision based on the information provided in the appeal. We will notify all involved parties of the outcome of the appeal review.

Out of court dispute settlement

At the same time you may choose out-of-court dispute settlement held by the certified body to contest the decision of the Platform or the appeal decision of the Platform.

The Digital Services Act mandates that Member States establish independent bodies with the means and expertise to address the issues brought before them. As of the date of publication of this Policy, no out-of-court settlement bodies have been certified.

Digital Services Coordinator

You can also lodge any complaint related to compliance with the obligations with the Digital Services Coordinator in the territory where you received the service.

Please be aware that you can choose between the internal complaint mechanism, an out-of-court dispute settlement, a complaint to the Digital Services Coordinator, and the possibility to initiate, at any stage, judicial proceedings.

SUSPICIOUS OF CRIMINAL OFFENCES

In case we were notified by a third party or discovered through our own voluntary measures that a user provides certain types of illegal content, that gives rise to suspicion that the user may have committed, may be committing or is likely to commit a criminal offence involving a threat to the life or safety of person(s), we inform without delay the competent law enforcement authorities of such suspicion.

SINGLE POINT FOR REGULATORS AND OTHER GOVERNMENT OFFICIALS

Regulators and government officials can contact us by emailing government@polee.me. We kindly ask regulators and government officials to provide us with the following information:

- a. Full name
- b. Name of the Regulatory agency
- c. Official email address
- d. Country/Jurisdiction
- e. Description of regulatory concern
- f. Specific links to content in question
- g. Copy of the order and/or other important information (where applicable)

All non-legal concerns should be submitted in accordance with this Policy to the email complaint@polee.me. Misuse of the email address serving as a single point of contact for regulators and government officials under the EU Digital Services Act is strictly prohibited and may lead to investigation and/or account action.