

Privacy Policy
for <https://polee.me>

By using the website <https://polee.me> (the “**Website**”) you unconditionally accept this Privacy Policy (the “**Policy**”), so please kindly read it to get a clear understanding of what information about you we process, why we need it, and how we protect it.

If you don’t accept this Policy, you must immediately stop using the Website.

If you only access our Website as a visitor, it is most likely that we don’t collect any of your personal data. However, our website uses cookies, so you might wish to read our [Cookies Policy](#) to know what exactly we do and how you can manage your cookies settings.

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1. Definitions

Company (also referred to as “**Polee**”, “**we**”, or “**us**”) means 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.

Website means the Internet website operated by the Company on the following domain: <https://polee.me>.

Services (also referred to as “**Platform**”) means an online platform that allows Authors to share and monetize their content while also enabling Viewers to subscribe to Authors and access their content.

User means any individual who uses the Website or the Services.

“**Auhor**” means User who publish content at the Website.

“**Viewer**” means User who subscribe to and view, the Authors’ content.

Cookies are small pieces of data sent by the Website server and stored on your device in order to optimise the performance of the Website. The use of cookies on the Website is governed by the [Cookies Policy](#).

GDPR, General Data Protection Regulation - Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

Personal data mean any information relating to an identified or identifiable natural person ('data subject'). In particular, in accordance with the applicable law the following identifiers are considered as personal data: a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, including collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2. About this Policy

This Policy explains what personal data and other personal information the Company processes, the purpose and the procedure of such processing, as well as the protective measures implemented by the Company.

This Policy applies to the personal data and other personal information collected by the Company in connection with the operating of the Website and rendering the Services.

With regard to the processing of personal data and other personal information by third parties, this Policy applies only in case they receive personal data from the Company. The Policy does not apply to personal information received by third parties directly.

This Policy has been developed in accordance with GDPR as well as other laws applicable to the activities of the Company, including the Cypriot Data Protection Act (Law 125(I)/2018).

3. What information about you do we collect?

We collect information relating to Users (both Authors and Viewers), including personal data, in order to provide and continually improve our Services. The data we collect can be categorized as follows:

3.1. Registration Data (required for creating an account)

All Users (Authors and Viewers):

- Username
- Email address
- Password
- Third-party social media handle
- Information on reaching 18 years of age

Authors:

- Full name
- Date of birth
- Country of residence

We use this information to authenticate you on the Website in order to provide you with the relevant Services in accordance with our Terms of Service.

If you do your authentication on the Website with your X (ex-Twitter), Twitch, Telegram account, you authorize us to receive your authentication data from X (ex-Twitter), Twitch, Telegram accordingly. If you delete the account that you used for registration, you cannot be authenticated on the Website and might not be able to use the Services.

3.2. Identity Verification Data (required for content creation and payment purposes)

Authors:

- residential address
- nationality
- copy of government-issued identify document (ID) or a passport.

Third-Party Verification Data: To verify your age and identity (in particular, to confirm you are over 18 years old), Authors must provide additional verification information directly to our third-party service providers. This includes:

- A photo ("selfie") of the Author holding their government-issued ID.

Authors do not provide this specific data directly to us. Instead, it is securely submitted to third-party providers (our contractors) for processing and verification. These third-party providers then verify the Author's age and identity and share the results of the verification process with us. This information includes:

- Whether the verification was **passed** or **failed**.
- The **reason for failure** (e.g., invalid ID, underage, or insufficient data).

3.3. Account Data (data collected during use of the Services)

All Users (Authors and Viewers):

- Content interactions (e.g., posts, comments, likes)
- Subscription history and referrals
- Communications between Authors and Viewers
- chat messages between you and other users
- customer support queries that you submit to us

3.4. Transaction Data:

Authors:

- **Earnings:** Records of all amounts earned by the Author through the Platform.
- **Pay-Out Requests:** Requests made by the Author to withdraw earnings.
- **Payments to Author's Account:** Payments processed and made to the Author's specified account.
- **Payments from Author's Account to Other Authors:** Payments made by the Author to other Authors within the Platform.
- **Failed Payments:** Records of any failed payments, including reasons for failure.

Viewers:

- **Payments from Viewer's Account to Authors:** Payments made by the Viewer to Authors within the Platform.
- **Failed Payments:** Records of any failed payments, including reasons for failure.

3.5. Technical Data

When you use the Platform, additional data may be collected to enhance your experience and ensure the proper functioning of the service.

All Users (Authors and Viewers):

- **Internet Protocol (IP) Address:** Including associated location data.
- **Internet Service Provider (ISP):** Information about your ISP.
- **Device and Type:** The device used to access the Platform, such as mobile, desktop, or tablet.
- **Browser Name and Version:** Information about the browser being used to access the Platform, such as your browser's language and time zone settings, etc.

3.6. Your personal information from other sources

We might receive information about you from other sources, such as:

Service providing partners. Payment processing service providers and other companies with which we work to provide Services to you, may collect your personal data. In doing so they are guided by their own privacy policies for which we are not responsible.

4. Special categories of personal data

We don't collect and don't process special categories of personal data, namely data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

5. Payment Data

Please note, that we do not process your payments for use the Platform and have no access to your credit card information. The payment providers around the world process and store your credit card details. Although we work with payment providers, they are completely independent of Polee. Please review their respective privacy policies before providing them with your data.

When you make a payment, you enter your credit card details into a form provided by the payment provider that will process the payment, and this information goes directly to the payment provider's server. Your credit card information never reaches the Polee's servers. When you save your credit card information, it is stored on the servers of the relevant payment provider, and the payment provider provides us with a token that you can reuse for future payments. Your credit card information cannot be recovered from the token.

Due to the fact that we do not process credit card data or transaction information, we are not authorized to handle complaints about these matters. Any disputed payments are the responsibility of the payment providers and banks involved in the exchange.

6. How do we use your personal information?

We process your personal information, including personal data, to operate, provide, develop, and improve the Services. These purposes include:

Functioning of the Website (Platform), including the possibility for Users to create accounts;

Provision of the Services, in accordance with the Company's contractual obligations to the registered Users pursuant to the Terms of Service;

Troubleshooting and improving the Services, namely to analyse performance, fix errors, and improve the usability and effectiveness of the Services;

Personalisation of User experience on the Website, for example, saving User's settings and authorisation status on the Website, providing User with personalized content, recommendations, and features;

Communicating with Users, in particular, informing Users about changes in Services and new opportunities related to the use of the Website, collecting feedback, providing response to Users' reports and questions, resolving disputes, etc.;

Facilitating the exercise of data subject rights by the User;

Marketing, in particular, displaying interest-based ads, sending promotional or advertising materials, including personalised ones, provided the User can at any time withdraw his or her consent to receive such marketing communications;

Preventing fraud, abuse and security incidents, in particular to prevent unauthorized or illegal activity on our Platform, to conduct security investigations and risk assessments, to prevent or take action against activities that are, or may be, in breach of our Terms of Service or applicable law.

Compliance with the mandatory legislation requirements of the country of incorporation of the Company.

We don't make decisions affecting your rights and legitimate interests on the basis of exclusively automated processing of your personal data.

7. What is our legal basis for Personal Data Processing

Our legal basis for collecting and using your personal information is dependent on the scope and the specific purpose for which we collect such information. The legal basis is one of the following:

- fulfilment of the contractual obligations to the registered Users with regard to the provision of Services pursuant to the Terms of Service;
- your consent;
- our legitimate interest improving the Website and the Services to allow our Users to have the best experience in a secure environment;
- requirements of the applicable law.

8. Do we share your personal information?

We are not in the business of selling our Users' personal information to others. We don't intentionally disclose any of your personal information, to any third party without having received your permission, except as provided for below.

Functioning of the Website. To operate the Website, we may, from time to time, need to use hosting and other technical services from third party services providers. This means that though the Company is responsible, as a data controller, for how and why the personal information is collected and processed, the actual processing might be performed by a third party services provider acting on behalf of the Company.

Provision of the Services. In order to provide the Services in accordance with our contractual obligations, we may need to share your personal information with third parties, such as payment processing service providers, Identity Verification Identity Verification, etc.

Advertising. The Website may contain third-party advertising and links to other websites and apps. Third-party advertising partners may collect information about you when you interact with their content, advertising, and services. For example, if you click on a link you may be taken to a third party website which may collect your personal information through the use of third-party

cookies. The Company is not responsible for the ways and methods of processing User's data by third parties in this case.

Analytics. We may share your information with analytics service providers for analytics services. Such analytics service providers set their own cookies or other identifiers on your computer, through which they can collect information about your usage of our Website. This helps us compile aggregated statistics about the effectiveness of our Website and Services.

Business transfers. We may also transfer your information, including personal information, in connection with a corporate merger, consolidation, the sale of business and related assets or other fundamental corporate changes.

The above mentioned third parties may be located in countries other than your own, and we may send them information we receive. When such third party service providers process your personal information on our behalf, we will assure that they comply with obligations similar to those which are set forth in this Policy. We will also assure that they will abide by our data privacy and security requirements, and will be allowed to use the personal information solely for the purposes we set. We will transfer your personal information while using appropriate and suitable safeguards, while using a variety of legal mechanisms, including contracts, to ensure your rights and protections travel with your data.

We may share your personal data with our group companies to help to provide, improve and support our Services. We take appropriate security measures to ensure that your personal data remains protected in accordance with this Policy. This includes the application of the European Commission's standard contractual clauses for the transfer of personal data. In addition, such information is transmitted exclusively through secure communication channels. Further details on the appropriate safety precautions taken are available on request.

Protection of the Company and Others. Furthermore, information about you may also be released in order to comply with any valid legal obligation or inquiry or process such as a search warrant, subpoena, statute or court order. We will also release specific information in special cases, such as if you use our Services to perform an unlawful act or omission or take any act or omission that may damage the Company, its property and goodwill, or if there is an attempted breach of the security of the Website or a physical or property threat to you or others. With respect to our data protection practices, you have the right to file a complaint to any relevant supervisory data protection authority.

9. Data storage

Your personal data and files are stored on Polee's servers and those of the companies we hire to provide services to us.

10. Data retention

We keep your personal data only for as long as necessary to meet the purposes outlined in this policy. How long we retain the data will be decided based on the specific circumstances of each case. The retention periods for personal data typically follow these guidelines:

- **Providing services:** We will hold your data for the lifetime of your account or as long as needed to deliver the services or features you use;
- **Security and compliance:** If we suspect or confirm a violation of our Terms of Service, or need to address illegal activities or ensure user safety, we will keep relevant data as long as needed to investigate, report to authorities, or take necessary actions like banning users.
- **Legal and regulatory obligations:** We will retain your data as required by laws, such as identity verification and financial reporting rules (sometimes up to 7 years). If we receive legal requests like search warrants, we will retain the data as required by law. We will delete it earlier if a shorter retention period is mandated;

- **Legal claims:** Data will be retained according to legal time limits for claims or, if necessary, for longer if we need to defend against potential legal disputes.

11. How secure are your personal data?

We design our systems with your security and privacy in mind.

We deploy industry standard measures to ensure the security, confidentiality, integrity and availability of the personal information we process. We maintain physical, technical and administrative safeguards, and test and update these periodically. We endeavour to restrict access to personal information on a 'need to know' basis for the provision of Services to you.

No such measures are perfect or impenetrable. In the event of a security breach, we will take all reasonable action to minimize any harm. Although we will do our best to protect personal information, we cannot guarantee the security of data transmitted to our Website and transmission is at the Users own risk.

It is important for you to protect against unauthorized access to your passwords and to your computers and devices. It is your responsibility to keep your authentication data safe and confidential. You shouldn't disclose your authentication data to third parties.

12. What are your rights?

Under the GDPR you have certain rights in relation to your personal data:

The right to be informed: our obligation is to inform you that we process your personal data (and that's what we're doing in this Policy);

The right of access: your right to request a copy of the personal data we hold about you;

The right of rectification: your right to request that we correct personal data about you if it is incomplete or inaccurate;

The right to erasure (also known as the '**right to be forgotten**'): under certain circumstances, you may ask us to delete the personal data we have about you (unless it remains necessary for us to continue processing your personal data for a legitimate business need or to comply with a legal obligation as permitted under the GDPR, in which case we will inform you);

The right to restrict processing: your right, under certain circumstances, to ask us to suspend our processing of your personal data;

The right to data portability: your right to ask us for a copy of your personal data in a common format (for example, a .csv file);

The right to object: your right to object to us processing your personal data (for example, if you object to us processing your data for direct marketing);

Rights in relation to automated decision-making and profiling: our obligation to be transparent about any profiling we do, or any automated decision-making.

These rights are subject to certain rules around when you can exercise them.

13. How to contact us

You may at any time send to us an inquiry, request or complaint related to the use of your personal data, or to the exercise of your rights, to the e-mail address privacy@polee.me

14. Final Provisions

We reserve the right to revise, amend, or modify this Policy at any time. When changing the policy, we will update this posting accordingly. The new version of the Policy comes into force at the moment of its publication on the Website. Users are notified about changes in the Policy at the next authorisation on the Website and will have to accept the new version of the Policy or stop using the Website. You will find the date of the "last update" at the end of this Privacy Policy.

Last update: October 2024.