

Komi Privacy and Cookie Policy

Last updated: June 2025

Welcome to Komi

We are committed to respecting your privacy and protecting your personal data. This Komi Privacy and Cookie policy ("**Policy**") sets out the basis on which any personal data we collect from you, or that you provide to us through our website or applications (<https://komi.io/>) (together, "**Komi**") or otherwise in connection with our business will be processed by us. This Policy applies to all users of Komi, including "**Creators**" who use Komi to offer their content, products, events, tickets, experiences, subscriptions, gifting capabilities and other services ("**Creator Services**"), general visitors to Komi ("**Fans**"), as well as staff of our business partners (e.g. suppliers or customers). Please read the following carefully to understand our views and practices regarding your personal data and how we will handle it.

We will only collect and process information about you in accordance with this Policy and in accordance with applicable data protection laws, including the General Data Protection Regulation ("GDPR"), the UK Data Protection Act, the EU Privacy and Electronic Communications Directive, local laws implementing these laws, and the privacy laws of US States, including the California Consumer Privacy Act ("CCPA").

This Policy also sets out the various rights you may have in connection with the processing of your personal data under these laws.

1. WHO IS KOMI & WHAT IS OUR ROLE WHEN PROCESSING PERSONAL DATA?

1.1 Komi and the Komi services are provided by Komi App Limited, a private company incorporated and registered in England with company number 12268875 whose registered office is at 35 Ballards Lane, London N3 1XW, United Kingdom ("**we**", "**us**" or "**our**").

1.2 Where we decide the purposes and means for the processing of your personal data, we are the "controller" or a "business" for the purposes of applicable privacy laws. This means we are generally a controller or business for the processing of:

1.2.1 Creator personal data in connection with the operation, hosting and management of Creators' Komi accounts and provision of Komi's services to Creators;

1.2.2 personal data of people who contact us via our support email address, sign up for the Komi waiting list or Komi newsletter / marketing / update communications, or use the Komi website (<https://komi.io/>);

1.2.3 personal data of staff of our business partners and contacts; and

1.2.4 personal data of Fans who visit Komi, where we do so on our own behalf and not on behalf of a Creator.

1.3 If you are a Fan, then there will be many instances where Creators decide the purposes and means for the processing of your personal data (e.g. when you sign up to a Creator newsletter, click on links to purchase Creator Services, or interact with a Creator on their page), and we simply process your personal data according to the Creator's instructions and on the Creator's behalf. In such circumstances we are the "processor" or "service provider" and the Creator is the "controller" or "business".

1.4 On the other hand, we may also process Fans' personal data when they visit any Komi page. We may use this data for our own purposes, e.g. improvement and development of Komi services, analysis of and insights into trends, behaviours, preferences, attitudes and sentiment, and tailoring of advertising according to what we infer may be your interests and preferences. In this case we are a controller/business and

fully responsible for our processing of your data.

1.5 This Policy primarily addresses the processing of personal data that we undertake as a **controller or business**. Please refer to each Creator's own privacy policy – available from within the Creator's profile page – for further details of the processing of your personal data by that Creator as a controller/business.

1.6 While we contractually oblige Creators to comply with all applicable data protection laws, each Creator as a controller/business is solely responsible for their handling of personal data, and we do not accept any responsibility or liability regarding how they do so.

2. How we collect and use your personal data

2.1 The table below explains what data we may collect, how we use it, and how it may be shared:

Your data	How we use it	Recipients
Creators: Contact information (<i>information provided by you when creating and using an account on Komi</i>) • Full name • Age • Gender • Country • Company (if applicable) • Username and password • Contact details (email, address, phone number) • Billing information including card details and details relating to your payment for Komi services (including subscriptions where relevant) • Komi services you make use of • Social media and website usernames, URLs and/or handles • Information you include on your Komi account profile including the Creator Services you make available on your account, the third party links you add to your account, the qualifications, experience and biographical information you choose to provide to us, and pictures and audiovisual material you upload into Komi, such as your account profile picture • Participation in surveys or provision of feedback	We process this information to provide our services to you, and to facilitate your access to Komi, for example to: • register your account; • manage your account; • send service-related emails (e.g. password reset links or information re service incidents); • ensure our services function properly and deliver the agreed features. Provided we have the right to do so, we may also process certain of this information (such as your name, and the Creator Services you make available on Komi) in Komi marketing and promotional materials. Finally, we may process such information in order to monitor and enforce compliance with our Creator terms and usage rules, and to investigate potential breaches or infringements of our usage rules. <u>Legal basis</u> We process this information for the performance of our contracts with you. For example, we need your contact details to create your account and to process payments you make for Komi services. Additionally, we rely upon our legitimate interests for this	The information that you upload to your Creator profile on Komi will be publicly available to view. Similarly, to the extent we use certain of your (limited) personal data in our marketing and promotional activity, this will be publicly available to view. Information also needs to be provided to service providers who assist us in the provision of our services – please see Section 4 below.

Your data	How we use it	Recipients
Preferred language	processing activity, in promoting the success of our business by: (a) providing you with a quality service, (b) understanding the users of our services; and (c) (in the case of processing in connection with our marketing and promotional activity) attracting new Creator users to our business. Where we process this information to monitor and enforce compliance with, and investigate breaches of, our Creator terms and usage rules, we do so on the basis of our legitimate interests of ensuring that Komi remains a safe and friendly environment for all users. We may also need to process information in order to comply with our legal obligations, e.g. in relation to tax, accounting, and recordkeeping.	
Creators: Newsletter, SMS and marketing messages <i>(information provided by you if you have signed up to Komi newsletters or commercial communications)</i> - Name - Email address - Mobile number - Other information you provide when signing up to our newsletter, marketing or feature update communications	We process your data to make suggestions and recommendations to you and other users of Komi about: (a) news and updates relating to us, our partners, Creators, products, services and content; (b) content, goods, services, experiences and other offerings available in or from Komi; and (c) other promotional activity and events we think may be of interest. <u>Legal basis:</u> In some instances (such as with our existing Creators who have not opted out, or where Creators are incorporated as a business) the law may permit us to process your personal data in order to send marketing information to you that we think are of interest for you and/or your business on the basis of our legitimate interests in promoting our activities and expanding and developing our business and Komi, content, products and services. In other cases, we send this information where you have consented to	We may share your data with email and marketing message vendors to assist us in sending marketing communications and newsletters.

Your data	How we use it	Recipients
	receive it. If the information is not of interest to you, you can opt-out at any time by contacting us using the details outlined in each communication or the 'Contact Us' section below.	
Creators: Support / enquiry information (<i>information we receive when you get in touch with us for support</i>) - Name - Contact details (email, address, phone number) - Other personal data you choose to provide to us - Mailing preferences	We process this information to respond to your support requests and other enquiries. <u>Legal basis</u> We process this information: - for the performance of our contract with you for provision of our services; - in pursuit of our legitimate interests including: (a) our interest in responding to enquiries to ensure smooth operation of our business and Services; and (b) our interest in understanding our users and improving our services, by taking onboard your feedback.	We may share this information with vendors who assist us with managing customer services enquiries.
Creators, Fans, and Komi visitors: Website Analytics (<i>collected from your device and interaction with Komi</i>) - How often you use Komi - Which content, pages and application screens you go to and which features you use, - Your IP address, and device identifiers communicated by your device or browser - Device and browser operating system, version, make and model Please note that in addition to our processing, Creators may process your personal data using analytics tools they place on your devices via their Komi homepage. Please refer to the Creator's own privacy or cookie policies for further information. Komi does not control such Creator analytics tools or access information collected by each Creator as a controller/business.	We may process this information (on its own or together with your account information) so that we can: (a) understand usage of our services and improve our services; (b) identify and solve problems or bugs; and (c) develop new services or content we think will be of greatest interest. <u>Legal basis</u> Where required by applicable laws, we will obtain your prior consent before undertaking this processing. Otherwise, we will process this data based on our legitimate interests in understanding use of and improving our services.	We use: Google Analytics (https://support.google.com/analytics/answer/6004245?hl=en) to help us understand how our services are used. We may share this information with our service partners as required for the provision of our services, and with Creators in an aggregated and non-personally identifiable form. Please see our Cookie Policy for more information about our use of cookies and similar technologies.
Creators, Fans: purchase and	We may process this information	We may share this

Your data	How we use it	Recipients
engagement information (<i>collected from your device and interaction with Komi</i>) - Purchases of or subscriptions to content, merchandise and Creator services through Creator pages - Payment status and processing information Please note that in addition to our processing, Creators may process your personal data using analytics tools they place on your devices via their Komi homepage. Please refer to the Creator's own privacy policies for further information. Komi does not control such Creator analytics tools or access information collected by them as a controller/business.	(on its own or together with your account information) so that we can: (a) provide the Komi services which include supporting Creators with sales of merchandize or other Creator Services; and (b) permit Creators to view, evaluate and create reports on Creator Services. <u>Legal basis</u> For the performance of our contracts with Creators; or for our legitimate interests in understanding how our services are used and relevant trends and preferences.	information with our service partners as required for the provision of our services, and with Creators.
Fans and Komi visitors: marketing-related information (<i>collected from your device and interaction with Komi</i>) - How often you visit Komi - Which content, pages and application screens you go to and which features you use, - Your IP address, and device identifiers communicated by your device - Device and browser operating system, version, make and model.	We may process this information (on its own or together with your account information) and share it with our advertising technology partners and other third parties in order to provide advertising tailored to what are inferred to be your interests and preferences. <u>Legal basis</u> Where required by applicable laws, we will obtain your prior consent before undertaking this processing. Otherwise, we will process this data based on our legitimate interests in undertaking marketing and advertising activities.	We may share this information with our service partners and customers in order to provide targeted advertising services. Please see our Cookie Policy for more information about our use of cookies and similar technologies.
Creators: Account Analytics (<i>collected from your device and from you when you interact with your Komi account</i>) - Your use of your account: when you are active on your account, devices used to access your account, country from which you access your account. - Conversion analytics: whether you signed up for your	We process all other account analytics data so that we can: (a) understand and improve usage of our services and marketing; (b) identify and solve problems or bugs; and (c) develop new services and marketing content we think will be of greatest interest. <u>Legal basis</u> Where required by applicable laws, we will obtain your prior consent before undertaking this	We use: - Google Analytics (https://support.google.com/analytics/answer/6004245?hl=en) - Segment (Privacy Tools Overview Segment Documentation https://segment.com/docs/privacy/)

Your data	How we use it	Recipients
account having seen a Komi advertisement, whether you convert your free trial of Komi into paid subscription	processing. Otherwise, we will process this data based on our legitimate interests in understanding use of and improving our services.	Mixpanel (Mixpanel: Event Analytics for Mobile, Web & More https://mixpanel.com/home/) to help us understand how our services are used.
Creators / Fans: Competition and promotion related entry information (<i>information we receive when you enter a competition / prize promotion with us such as over email or over social media</i>): - Name (and/or your social media unique user name) - Contact details so we can process your entry (such as email, address, phone number if we need to send you a prize) - Information submitted as part of your entry	We process this information for the purposes of managing and fulfilling the purposes of the competition and promotion. <u>Legal basis</u> The processing is necessary for the performance of the contract with participants governing the competition / promotion.	Information also needs to be provided to service providers who assist us in the provision of our services – please see Section 4 below.
Creators: Push notifications (<i>when your device sends you a notification of an activity in Komi applications, such as about new functionality available for use on your profile</i>) - Device identifiers communicated by your device - Push notification preferences	Where required by law, we will obtain your prior consent before sending you push notifications through our applications. In some cases, you may provide the foregoing consent at a 'device level' and/or the option for you to consent to the notifications may be prompted through your device rather than our application. For most mobile and tablet devices, push notifications can be disabled in your device settings.	Information also needs to be provided to service providers who assist us in the provision of our services – please see Section 4 below.
Representatives of customers or suppliers (or potential customers or suppliers) and/or media, PR or other business contacts: Business contact information, e.g.: - name - employer - work address - work email - work phone	To provide customers with information, products and support To evaluate, obtain and pay for supplies To carry out our obligations and enforce our rights arising from our customer or supplier contracts To invoice and collect accounts payable	Information also needs to be provided to service providers who assist us in the provision of our services – please see Section 4 below.

Your data	How we use it	Recipients
• title • qualifications / business interests • contractual information	To promote and develop our business To notify interested parties about changes to our services To keep records for accounting, tax, or legal compliance purposes <u>Legal basis</u> For the performance of our contracts with our customers and suppliers That it is necessary for our legitimate interests in managing our business To comply with our legal obligations	

3. Your Rights In Relation To Your personal data

3.1 You have the following rights in respect of your personal data:

- To ask us for access to the personal data we are processing about you;
- To ask us to correct inaccuracies in your personal data;
- To ask us to erase or delete your personal data;
- If not erased, then to ask us to restrict its processing;
- To object to its processing for specific purposes, e.g. for direct marketing;
- To ask for a copy to take to another service provider.
- (Where we rely on your consent to process your personal data) to withdraw your consent at any time;
- To make a complaint to a data protection regulator or Supervisory Authority;
- To know what personal data we have collected about you, whether it is sold or shared, and to access a copy of it;
- To opt out of sales or sharing of that personal data (please also see Section 11);
- To limit the use or disclosure of your sensitive personal data;
- Not to be discriminated against for exercising any of your rights under applicable privacy legislation (for example we would not deny you service, charge you a different price, or provide you a different quality of service for doing so).

3.2 To make a request in relation to any of the aforementioned rights, you (or your authorized agent) can send your request to us here: support@komi.io. If you make such a request, including through an authorized agent, we reserve the right to verify your identity and the agent's authorization. However, we may not be able to respond to your request if it is not permitted or foreseen under applicable laws. We aim to comply without undue delay, and at the latest within the time periods set by applicable privacy laws, in

response to any requests submitted by you to us in connection with your rights.

4. Disclosure Of Your Personal Data

4.1 We sometimes need to provide information to different service providers who assist us in the provision of our services, some of which are identified in Section 2 above. We may also disclose your personal data to:

4.1.1 Our group. We keep your personal data confidential, but may disclose it to any member of our corporate group, our personnel, or contractors insofar as it is reasonably necessary for the purposes set out in this Policy.

4.1.2 Suppliers and service providers. We may use a range of suppliers and service providers to operate our business, including technical service providers (for purposes such as customer support, analytics, email and targeted advertising delivery, or database management), and professional services providers (such as payment service providers and security, insurance, legal, and accounting services), that require access to data for these purposes.

4.1.3 Enforcement. We may also disclose your personal data to third parties in order to enforce or apply the terms of our agreements, to investigate potential breaches, collect fees, or to protect the rights, property or safety of us, our personnel or customers, or others.

4.1.4 Law enforcement / government authorities. In addition, we may disclose your personal data where we receive an official request (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

4.1.5 Potential acquirers or investors. If we are involved in a merger, acquisition, or sale of all or a portion of our business or assets, personal data we hold may be shared.

5. INTERNATIONAL DATA TRANSFERS

5.1 We use servers and service providers located in multiple jurisdictions, including our main cloud servers in the USA.

5.2 Where we use service providers which are outside the United Kingdom, the EU and the European Economic Area, or outside other places that are officially considered to have adequate data protection laws, we have agreements in place to ensure that personal data is processed using appropriate safeguards that meet the requirements of data protection laws. Such appropriate safeguards may include standard data protection clauses adopted by a data protection regulator and approved by the UK Data Protection Regulator and/or European Commission.

5.3 If you would like to find out more about these safeguards or if you have any other queries or comments in relation to this Policy, please let us know by contacting us by email: support@komi.io.

6. DATA RETENTION

6.1 We will only hold data about you for as long as necessary, bearing in mind the purpose for which that data was collected, or as otherwise described in this Policy.

6.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means,

and the applicable legal requirements.

7. SECURITY

7.1 We will take commercially reasonable, appropriate technical and organizational measures to ensure a level of security appropriate to the risk that could be encountered via the use of Komi taking into account the likelihood and severity those risks might pose to the rights and freedoms of Komi users.

7.2 In particular, we will take precautions to protect against the accidental or unlawful destruction, loss or alteration, and unauthorized disclosure of or access to the personal data transmitted, stored or otherwise processed by us.

8. DO I NEED TO PROVIDE PERSONAL DATA TO KOMI?

8.1 You may be required to provide us with certain information for us to register your account with us. You cannot use Komi as a Creator user without an account. If the information is required for the performance of our services contracts with you, then generally we will not be able to provide some or all services unless you provide all necessary information.

8.2 Where the legal basis for our processing of your data is our legitimate interests, you are not required to provide us with this information but, if you do not, we may not be able to work with you or to provide you with particular parts of the Komi services, information of interest or other benefits such as competition entries.

8.3 Where our legal basis for processing your data is your consent, then you can freely withhold or withdraw such consent at any time.

9. GENERAL

9.1 Komi may contain links to third party functionality, apps or websites. These third party functions, apps or websites may have their own privacy policies and we recommend that you review them. We do not accept any responsibility or liability for the privacy practices of such third parties and your use of their services and any transactions with them are at your own risk.

9.2 We may make changes to this Policy in the future, which will be posted on this page. You should check this page from time to time to ensure you are aware of any changes. Where appropriate we may notify you of changes by email or pop-up message in your Komi account.

9.3 Creators may choose to promote YouTube content when using Komi. In such cases YouTube API services are used to ensure YouTube content is properly displayed. We recommend you review Google's privacy policy available in the latest version [here](#) to understand how YouTube may process your data.

10. CONTACT US

All questions, comments or enquiries should be directed to us by email: support@komi.io

11. ADDITIONAL INFORMATION FOR CALIFORNIA CONSUMERS

11.1 Personal Information Collected in the past 12 months

Category	Examples	Source	Business or Commercial Purpose	Categories of third parties disclosed to
(A) Identifiers (Creators)	Real name, alias, unique personal identifier, online	Directly from Creators	Providing the Komi services	- Our cloud storage service providers

	identifier, Internet Protocol address, email address, account name, picture, biography		and setting up and managing Creator accounts on Komi, permitting and controlling access to your account, providing customer service.	- Our technical service providers (for purposes such as customer support, analytics, email delivery, database management, or payment processors) - Our professional advisers (such as security, insurance, legal, and accounting service providers)
(A) Identifiers (Fans, Komi visitors)	Unique personal identifier, online identifier, Internet Protocol address	Directly from Fans and Komi visitors	Managing and improving Komi, improving the browsing experience for returning users, and responding to your inquiries or requests	- Our cloud storage service providers - Our technical service providers (for purposes such as customer support, analytics, email communications, database management)
(A) Identifiers (Fans, Komi visitors)	Unique personal identifier, online identifier, Internet Protocol address	Directly from Fans and Komi visitors	Sharing for the purpose of cross-context behavioral advertising	- Our cloud storage service providers - Our advertising technology partners and customers
(B) Individual Records	Name, social security number, address, telephone number, other financial information	Directly from Creators	Collecting payments for Komi services	As above
(D) Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Directly from Creators, Fans	Providing the Komi services which include supporting Creators with sales of merchandize or other Creator Services; and permitting Creators to view, evaluate and create reports on Creator Services	As above
(F) Internet or other electronic network activity information	Information regarding your interaction with internet website applications (e.g. visits to, interactions with, or purchases from Creator Pages)	Directly from Fans	Providing the Komi services which include supporting Creators with sales of merchandize or	As above

			other Creator Services; and permitting Creators to view, evaluate and create reports on Creator Services	
(I) Professional or employment-related information (Creators and other business contacts)	Name, title, business email, business phone numbers, business address, business interests, employment information and education or qualifications information	Directly from Creators or you, or from your employer	Managing provision of the Komi Services, permitting and controlling access to your account, providing customer service	As above
(I) Professional or employment-related information (potential Creators, potential customers or suppliers)	Name, title, business email, business phone numbers, business address, business interests, employment information and education or qualifications information	Directly from potential Creators or you, or from your employer; or from networking, or other public sources (e.g. trade shows, professional websites)	Growing and managing our business	As above
(K) Inferences	Inferences drawn from any of the information above	From Creators, Fans, and processed by Komi and our partners	Providing content or advertising tailored to your inferred interests and preferences	As above

11.2 Personal Information Sold or Shared in the past 12 months

We have not sold or shared any personal information in the past 12 months.

In future we intend to sell or share the following categories of personal information relating to Fans or Komi visitors: (A) Identifiers; (F) Internet or other electronic network activity information; and (K) Inferences.

11.3 Personal Information disclosed for a business purpose in the past 12 months

We have disclosed the following categories of Personal Information for a business purpose in the past 12 months:

(A) Identifiers, (B) Individual Records, (D) Commercial information, (F) Internet or other electronic network activity information, (I) Professional or employment-related information, (K) Inferences.

These business purposes comprise:

- short-term, transient use, in relation to your interaction with Komi;
- performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing transactions, verifying customer information, processing payments, providing analytic services, providing storage, or similar services.

COOKIE POLICY

Last updated: April 2025

"Cookies" are data files that are placed on your device or computer by websites that you visit or applications you use and often include an anonymous unique identifier.

They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site or enable recognition of returning visitors or serving of more relevant advertising. The table below explains the cookies and analytics tools we use and why.

For more information about cookies, and how to remove or disable cookies, visit <http://www.allaboutcookies.org>.

Please note that Creators may place their own cookies, trackers or analytics tools on your devices via their Komi page. Such cookies and tools will process your personal data, and may be used to (amongst other things) serve advertising to you in third party services, and/or infer details relating to you from your behaviour across channels where they link to the Creator's Komi page. Please refer to the Creator's own privacy policies for further information on their practices in this regard. Komi does not control such Creator cookies or access information collected by them as a controller or business (see Komi's privacy policy above for further detail as to when Komi acts as a controller/business or processor/service provider).

Cookie	Duration	Purpose/ Third Party Access
Google Analytics	180 Days	This cookie is used to collect information about how users use Komi. We use the information to compile reports and to help us improve our services. The cookie collects information on the number of users, where users have come to the website/Komi from and the webpages or app screens they visited. We do not facilitate the merging of personally-identifiable information with non-personally identifiable information. We collect the following information through Google Analytics: Bounce Rate, Sessions, Average Pages per sessions, where our users come from (is it organic, social, referral, email), Device usage, Age range, User interests, what else are the users interested in, Time of day that website is used, Location, Page Views, Entrances, Exits, Average time on page, Returning visitors vs New Downloads, Social Share. Read Google's overview of privacy and safeguarding data here .
Cookie Control	Persistent	This cookie will be set on your device for the purpose of remembering your cookie consent preference. This cookie will be set even where you reject all cookies in the cookie consent tool, so that we know not to place any other cookies on your device on your visits to Komi.
Preferences	One month	To remember information about you such as your preferred language and configuration.
Facebook Connect		

Segment.io		
Ketch Cloud		
Google Tag Manager		
Amazon Cloudfront		
Amazon Web Services		

HOW DO I CHANGE MY COOKIE SETTINGS?

Most web browsers allow some control of most cookies through the browser settings. Find out how to manage cookies on popular browsers:

- [Microsoft Edge cookies information](#)
- [Internet Explorer cookies information](#)
- [Chrome cookies information](#)
- [Firefox cookies information](#)
- Safari cookies information – [mobile devices](#) and [desktops](#)
- [Opera cookies information](#)

To find information relating to other browsers, visit the browser developer's website. For information on how to opt out of the collection and use of information for ad targeting visit <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>.