

# KOMI – CREATOR PRIVACY POLICY

Last updated: April 2025

## 1. INTRODUCTION

1.1 This privacy policy explains how personal data of visitors to this Komi site, including users and purchasers of any of the content, products, events, experiences, tickets, gift capabilities, subscription offering services, or other materials or services through this Komi site (“Services”), will be processed by the Creator who operates this site (the “Creator”)

1.2 This policy explains how personal data collected from you will be processed in accordance with the General Data Protection Regulation (“GDPR”), privacy laws of US States including the California Consumer Privacy Act (“CCPA”), and other relevant global data protection laws, as well as your legal rights under those laws.

## 2. THE CREATOR’S ROLE IN PERSONAL DATA PROCESSING

2.1 When you interact with this Creator site, the Creator decides the purposes and means for the processing of your personal data. This makes the Creator the “controller” of your data or “business” for the purposes of applicable privacy laws.

2.2 This policy addresses the processing of personal data that the Creator undertakes as a controller or business and how Komi may process certain data on behalf of, and on the instructions of the Creator. This policy does not explain how personal data may be processed separately by Komi on Komi’s own behalf. This is detailed in Komi’s privacy policy available here: <https://komi.io/privacy-policy.pdf>. Komi takes no responsibility for the Creator’s processing of personal data.

2.3 The Services may contain hyperlinks to websites owned and operated by third parties. These third-party websites may have their own privacy policies, and it is recommended that you review them. The Creator and Komi do not accept any responsibility or liability for the privacy practices of such third parties, and your use of their services is at your own risk.

## 3. WHAT INFORMATION WILL BE COLLECTED ABOUT ME?

3.1 The table below explains what data may be collected, how it is used, and how it may be shared:

Your data	How it is used	Recipients
Service purchase information (information provided by you when purchasing Services): <ul style="list-style-type: none"><li>• Full name</li><li>• Shipping address</li><li>• Contact details including email, address, and phone number</li><li>• Billing information including card details, and details relating to your payment for Services</li></ul>	This information is processed in order to fulfill your orders for the Services.  Legal basis: The Creator processes this information for the performance of the Creator’s Services contract with you. For example, the Creator needs your shipping address details to ensure your order is sent to you.	Your personal data may be shared with the Creator’s payment service providers, including Rye Pay and Stripe, or other vendors such as order fulfillment partners (i.e. those who help package and deliver physical or digital goods).  This information may also be shared with Komi for the purpose of provision of the Komi services.

Your data	How it is used	Recipients
<ul style="list-style-type: none"> <li>• Order details relating to the Services you purchase including, for example, sizes ordered, and quantity.</li> </ul>		
<p>Service analytics (<i>collected from your device and interaction with the Services</i>)</p> <ul style="list-style-type: none"> <li>• How often you use the Services,</li> <li>• The purchases you make through the Services.</li> <li>• Which content, pages and application screens you go to, and which Service features you use</li> <li>• Which website/service you came from to use the Services</li> <li>• Technical information from your device such as IP address, device IDs, device and browser operating system, version, make and model.</li> </ul>	<p>This information may be processed (on its own or together with your Service purchase information) for: (a) better understanding of the usage of the Services and improvement of the Services; (b) the marketing of Services to you; (c) identification and solving of problems with the Services; and (d) development of new Services or content based on interest and engagement levels.</p> <p><u>Legal basis</u> This processing will be undertaken on the basis of your prior consent.</p>	<p>The Creator may make use of analytics service providers in order to collect and process this information, such as Google Analytics.</p> <p>Komi may also process or receive this information on the Creator's behalf.</p>
<p>Marketing information (<i>information provided by you when signing up to newsletter or marketing communications</i>)</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Mobile number</li> <li>• Other information you provide when signing up to newsletter, marketing or feature update communications</li> </ul>	<p>The Creator processes your data to send you: (a) news and updates relating to the Creator, and the Creator's partners, products, services and content; (b) content, goods, services, experiences and other offerings available from the Creator; and (c) other promotional activity and events the Creator thinks may be of interest.</p> <p><u>Legal basis:</u> For existing customers who have not opted out, the law may permit the Creator to process your personal data in order to send marketing information to you that the Creator thinks are of interest for you on the basis of the Creator's legitimate interests in promoting the Creator's activities and expanding and developing the Creator's business, content, products</p>	<p>The Creator may also share this information with vendors who assist with mailings or email list management.</p> <p>Komi may process or receive this information on the Creator's behalf.</p>

Your data	How it is used	Recipients
	<p>and services. In other cases, the Creator will send this information where you have consented to receive it.</p> <p>If the information is not of interest for you, you can opt-out at any time by contacting the Creator using the details outlined in each communication or through this Creator site.</p>	
<p>Support / enquiry information (<i>information received when you get in touch for support</i>)</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details (email, address, phone number)</li> <li>• Other personal data you choose send to the Creator</li> <li>• Mailing preferences</li> </ul>	<p>This information is processed in order to respond to your support requests and other enquiries.</p> <p>Legal basis: This information may be processed:</p> <ul style="list-style-type: none"> <li>• for the performance of the Creator's contract with you where this information is required to provide the Services to you;</li> <li>• in pursuit of the Creator's legitimate interests in responding to your enquiry including: (a) interest in responding to enquiries to ensure smooth operation of the Creator's business and Services; and (b) interest in understanding your use of the Services and improving the Services, by taking onboard your feedback.</li> </ul>	<p>The Creator may share this information with vendors who assist with managing customer service enquiries.</p> <p>Komi may also process or receive this information on the Creator's behalf.</p>
<p>Competition and promotion entry information (information received when you enter a competition / prize promotion via this Komi Site):</p> <ul style="list-style-type: none"> <li>• Name (and/or your social media unique user name)</li> <li>• Contact details for entry processing (such as email, address, phone number if required to send you a prize)</li> <li>• Information submitted as</li> </ul>	<p>This information is processed for the purposes of managing and fulfilling the competition and promotion.</p> <p>Legal basis: This information will be processed for the performance of the contract governing the competition / promotion.</p>	<p>The Creator may share this information with relevant partners who are assisting with the competition or promotion delivery.</p> <p>Komi may also process or receive this information on the Creator's behalf.</p>

<b>Your data</b>	<b>How it is used</b>	<b>Recipients</b>
part of your entry		
<p>Service monitoring information</p> <p>All information listed above</p>	<p>This information may be processed for the prevention of harassment, fraud and other unacceptable or illegal activity.</p> <p>Where the Creator suspects that you have engaged in unlawful or fraudulent activity, the Creator may investigate and keep a record of such investigation, its conclusion and the implementation of any consequences.</p> <p>Where the Creator reasonably believes that you are or may be in breach of any of the applicable laws or regulations, the Creator may use your personal data to inform relevant third parties, your email/internet provider or law enforcement agencies about the content.</p> <p>Legal basis: Your information may be processed for the legitimate interests of ensuring that use of the Services is lawful and non-fraudulent, does not disrupt the operation of the Services, does not harass the Creator, the Creator's personnel, other users or other individuals, and to enforce the Creator's legal rights and comply with legal and regulatory obligations, including compliance with anti-money laundering regulations (if and where applicable).</p> <p>The Creator may also process this information for these purposes in order to comply with applicable laws</p>	<p>The Creator may share this information with law enforcement agencies, regulators and/or Komi where necessary.</p>

<b>Your data</b>	<b>How it is used</b>	<b>Recipients</b>
	such as recordkeeping for tax and accounting purposes.	

#### **4. CHILDREN**

4.1 The Services are not directed to, and the Creator does not knowingly collect personal data from, children under the age of 13. If the Creator becomes aware that personal data from a child under 13 has been collected without parental consent, that information will be deleted.

4.2 If you believe that the Creator might have any information from or about a child under 13, please contact the Creator immediately.

#### **5. DATA SHARING**

5.1 Other than as set out under 'Recipients' in Section 3 above, the Creator may disclose your personal data to:

5.1.1 Creator Management, Group Companies, and Subcontractors: Personal data may be disclosed to the Creator's management, corporate group members, personnel, or subcontractors for the purposes set out in this policy.

5.1.2 Suppliers and Service Providers: the Creator may share your personal data with suppliers and service providers, such as Komi, order fulfillment partners, payment processors, IT service providers, and professional advisers.

5.1.3 Enforcement: Personal data may be disclosed to third parties to enforce the Creator's agreements, investigate potential breaches, or protect rights and safety.

5.1.4 Government Authorities: Your personal data may be disclosed to government bodies and law enforcement agencies if the Creator receives an official request.

5.1.5 Potential Acquirers or Investors: In the event of a merger, acquisition, or sale of business assets, personal data may be shared with potential acquirers or investors.

#### **6. INTERNATIONAL DATA TRANSFERS**

The Creator may store and process your personal data in various jurisdictions, which may include locations outside of your home country or region, including the EEA, UK, and the United States. When transferring your personal data to a different jurisdiction, the Creator will comply with applicable data protection laws and ensure that appropriate safeguards are in place to protect your data (which for transfers from the EEA or the UK may include standard contractual clauses approved by the applicable authorities). If the Creator receives a valid request, further information on these safeguards can be provided.

#### **7. YOUR RIGHTS IN RELATION TO PERSONAL DATA**

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

- To ask for access to the personal data the Creator is processing about you;
- To ask for inaccuracies in your personal data to be corrected;

- To ask for erasure or deletion of your personal data;
- If not erased, then to ask for restriction of 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 the Creator relies 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 the Creator has 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 12);
- 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 the Creator would not deny you service, charge you a different price, or provide you a different quality of service for doing so).

7.2 To make a request in relation to any of these rights, you (or your authorized agent) can contact the Creator as indicated on the Creator's Komi site. If you make such a request, including through an authorized agent, the Creator reserves the right to verify your identity and the agent's authorization. However, the Creator may not be able to respond to your request if it is not permitted or foreseen under applicable laws.

## **8. DATA RETENTION**

8.1 The Creator will hold your personal data for as long as is necessary for the relevant purpose, also taking into account legal, tax, and regulatory requirements.

8.2 Anonymized data may be retained indefinitely for research or statistical purposes.

## **9. DATA SECURITY**

9.1 Reasonable technical and organizational precautions will be taken to prevent the unauthorized access, disclosure, alteration, or destruction of your personal data including as required under applicable privacy laws. However, transmission of information via the internet is not completely secure, and the Creator cannot guarantee the security of data transmitted through the Services.

## **10. DO I NEED TO PROVIDE PERSONAL DATA TO THE CREATOR?**

10.1 You may be required to provide the Creator with certain information for the Creator to provide you with Services you request. This information is required for the performance of the Creator's Services contracts with you, so generally the Creator will not be able to provide some or all Services unless you provide all necessary information.

10.2 Where the legal basis for our processing of your data is the Creator's legitimate interests, you are not required to provide the Creator with this information but, if you do not, the Creator may not be able to provide you with particular parts of the Services, information of interest, or other benefits such as competition entries.

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

## 11. GENERAL

11.1 If you follow a link from this Komi Site to any third party websites, please be aware that those websites may have their own privacy policies. The Creator does not accept any responsibility or liability for those websites. Please check the policies of any third party websites before submitting any personal data to those websites.

11.2 The Creator may make changes to this Policy in the future. You should check this Komi Site from time to time to ensure you are aware of any changes. Where appropriate you may also be notified of changes through any contact details for you that the Creator holds.

11.3 The Creator may choose to promote YouTube content on this Komi Site. In such cases YouTube API services are used to ensure YouTube content is properly displayed. Please review Google's privacy policy [here](#) to understand how YouTube may process your data.

## 12. ADDITIONAL INFORMATION FOR CALIFORNIA CONSUMERS

### 12.1 Personal Information Collected in the past 12 months

Category	Examples	Source	Business or Commercial Purpose	Categories of third parties disclosed to
(A) Identifiers	Real name, alias, unique personal identifier, online identifier, Internet Protocol address, email address, account name, picture, biography	Directly from you	Providing the Services, fulfilling purchases or subscriptions, providing customer service.	- Komi and other technical service providers (for purposes such as purchase fulfillment, shipping, customer support, analytics, email delivery, database management, or payment processors) - The Creator's professional advisers (such as security, insurance, legal, and accounting service providers)
(A) Identifiers	Unique personal identifier, online identifier, Internet Protocol address	Directly from you	Managing and improving the Services, improving the browsing experience for returning users,	- The Creator's cloud storage service providers - The Creator's technical service providers (for purposes such as customer

			and responding to your inquiries or requests	support, analytics, email communications, database management)
(A) Identifiers	Unique personal identifier, online identifier, Internet Protocol address	Directly from you	Sharing for the purpose of cross-context behavioral advertising	- The Creator's cloud storage service providers - The Creator's advertising technology partners and customers
(B) Individual Records	Name, social security number, address, telephone number, other financial information	Directly from you	Collecting payments for the 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 you	Providing and improving the Services, providing customer service.	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 the Creator's site)	Directly from you	Providing and improving the Services, providing customer service.	As above
(K) Inferences	Inferences drawn from any of the information above	From you and processed by the Creator and Creator's partners	Providing content or advertising tailored to your inferred interests and preferences	As above

## 12.2 Personal Information Sold or Shared in the past 12 months

In the past 12 months, The Creator has sold or shared the following categories of personal information relating to site visitors: (A) Identifiers; (F) Internet or other electronic network activity information; and (K) Inferences.

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

The Creator has 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, (K) Inferences.

These business purposes comprise:

- short-term, transient use, in relation to your interaction with the Services;
- performing services on the Creator's behalf, including maintaining or servicing accounts, providing customer service, processing transactions, verifying customer



information, processing payments, providing analytic services, providing storage, or similar services.