PRIVACY POLICY

Data Protection & Compliance Notice

CALLINGFANS PLATFORM

www.callingfans.com

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Operator / Legal Entity:	ONLY4FEET
Registered Address:	England and Wales
Effective Date:	See Section 8 — Modifications and Updates
Jurisdiction:	Global (CCPA, GDPR, Nevada, EU/UK applicable)
Contact:	info@callingfans.com
DPO Contact:	info@callingfans.com	Subject: DATA PROTECTION OFFICER

This document is intended for compliance review by payment processors, acquiring banks, and legal/regulatory departments. It describes the personal data practices of CallingFans

in accordance with applicable data protection legislation.

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1. OVERVIEW AND GENERAL PROVISIONS

By accessing our platform at any time, you accept this Privacy Policy in its entirety. You agree that CallingFans does not and shall never own any content posted or created on the platform, and exercises no control or rights over content such as text, audio, images, and videos created or posted on the platform by its users.

IMPORTANT NOTICE: CALLINGFANS DOES NOT OWN AND HAS NO RIGHTS TO ANY CONTENT POSTED ON THE PLATFORM, NOR TO ANY DATA RELATING TO CREATORS AND USERS. UPON DELETION OF A USER PROFILE, ALL ASSOCIATED USER DATA IS REMOVED FROM THE PLATFORM'S SERVERS. BY ACCEPTING THIS POLICY, THE USER ASSUMES RESPONSIBILITY FOR THIS CONDITION.

CallingFans respects your privacy and is committed to protecting the personal data it holds about you. For any questions, comments, or concerns regarding this Privacy Notice or the processing of personal data, please contact us at: **info@callingfans.com**. CallingFans is the data controller of the personal data collected and is responsible for the processing thereof.

CallingFans operates as a social network enabling users to share and monetize content. Users who share content are referred to as **"Creators"**; users who pay to view Creators' content are referred to as **"Fans"**. This Privacy Notice governs the collection and processing of personal data across our website, services, and associated social media platforms (including Instagram), collectively referred to as the **"Services"**.

By using any of our Services — whether by visiting our website or otherwise — and/or by voluntarily providing personal data to our Selection Team, you acknowledge that you have read and understood the practices contained in this Privacy Notice. This Notice may be revised periodically; users are encouraged to review it regularly to remain fully informed.

2. PERSONAL DATA WE COLLECT

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (**"personal data"**). Aggregated or anonymized data not identifiable to any individual is not subject to this Privacy Notice, unless stored in association with personal data.

a. Categories of Personal Data We Collect

The types of personal data collected depend on your interactions with us and your use of the Services. In the past twelve (12) months, we have collected the following categories of personal data from users:

1. **Identifiers** — including real name, alias, postal address, IP address, email address, account name, government-issued identification numbers, or other similar identifiers.
2. **California Customer Records Statute Categories** — personal information as listed under California Civil Code Section 1798.80(e).
3. **Protected Classification Characteristics** — characteristics protected under California or federal law.
4. **Commercial Information** — records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories.
5. **Biometric Information** — Note: CallingFans does not directly collect biometric information. However, certain authentication service providers we use may collect biometric data subject to their own privacy

policies; we are not provided access to such data.

6. **Internet or Electronic Network Activity** — including browsing history, search history, and information regarding interaction with a website, application, or advertisement.
7. **Audio, Electronic, Visual, or Similar Information** — as submitted through the Services.
8. **Professional or Employment-Related Information** — as provided by users during account setup or use of the Services.

We will not collect additional categories of personal data beyond those listed above without providing advance notice at or before the time of collection.

b. How We Use Your Personal Data

We collect and process personal data for the following business and commercial purposes:

1. Developing, improving, operating, and providing the Services, including account maintenance, identity verification, payment processing, customer service, and transaction fulfillment.
2. Communicating with users via email, WhatsApp, and text regarding the Services, identity verification, support inquiries, and informational updates.
3. Auditing interactions and concurrent transactions with users.
4. Detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity, including prosecution of responsible parties.
5. Debugging to identify and repair errors that impair existing intended functionality.
6. Conducting internal research for technological development and demonstration.
7. Undertaking activities to verify or maintain the quality and safety of the Services.
8. Complying with applicable laws, regulations, and lawful requests from governmental and law enforcement agencies.
9. Enforcing our Terms of Service and other usage policies.
10. Protecting the rights, property, and safety of our users, the company, and other third parties.

Personal data will not be used for materially different, unrelated, or incompatible purposes without prior notice and, where required, express user consent.

c. How We Obtain Your Personal Data

We collect personal data from the following categories of sources:

- **Directly from you** — when you provide information to open an account, use the Services, or update account information.
- **Automatically or indirectly** — through your use of and access to the Services, including IP addresses and browser type data collected from your devices.
- **From our service providers** — including identity verification and payment processing partners.

d. Legal Bases for Processing

We process personal data on the following legal bases:

- **Performance of a Contract** — By using the Services, you have contracted with us through our Terms of Service; processing of certain personal data is necessary to perform under that contract.

- **Legitimate Interests** — We may process personal data for legitimate interests, including legal compliance, enforcement of our Terms of Service, and protection of rights, property, and safety.
- **Compliance with Legal Obligations and Protection of Individuals** — We process personal data to comply with legal obligations, valid legal process, and governmental requests.

e. Who We Share Your Personal Data With

We share personal data with the following categories of third parties:

- **Government agencies or regulators** — when permitted or required by law, in response to lawful requests from law enforcement or regulatory authorities, or to protect the integrity of the Services or the rights, property, or safety of our users and others.

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3. YOUR RIGHTS REGARDING PERSONAL DATA

You have certain rights regarding the collection and processing of personal data. These rights may be exercised by contacting us at the information provided at the end of this Privacy Notice, or by following the instructions contained herein.

Depending on applicable law, your rights may include:

- The right to know whether, and for what purposes, we process your personal data.
- The right to be informed about the personal data we collect and/or process about you.
- The right to learn the source of personal data we process about you.
- The right to access, modify, and correct personal data about you.
- The right — as a Creator — to delete your account at any time; or — as a Fan — to request deletion by emailing info@callingfans.com.
- The right to know with whom we have shared your personal data, and for what purposes.
- The right to withdraw consent where processing is based on consent.
- The right to lodge a complaint with a supervisory authority in the jurisdiction of your habitual residence, place of work, or where an alleged violation occurred.

a. Accessing, Modifying, Rectifying, and Correcting Collected Personal Data

We strive to maintain the accuracy of personal data collected. We ask that you ensure information provided to us is complete, accurate, and up-to-date, and that you notify us of any changes. Updates or corrections may be made through your account settings or by contacting us directly. We reserve the right to deny access as permitted or required by applicable law.

b. Your California Privacy Rights (CCPA)

California's "Shine the Light" law permits California residents to request information about personal data disclosed to third parties for direct marketing purposes in the previous calendar year. However, CallingFans does not disclose personal data to third parties for their own direct marketing purposes.

The California Consumer Privacy Act (**"CCPA"**) provides California residents with the following additional rights:

1. **Right to Know** — You have the right to request disclosure of personal data collected, used, or disclosed about you in the past 12 months. *Note: If your account has been deleted, CallingFans retains no data and has no obligation to provide information under this right.*
2. **Data Portability** — You have the right to request a copy of personal data collected and maintained about you in the past 12 months.
3. **Right to Deletion** — You have the right to request deletion of your personal data, subject to certain exceptions set forth by the CCPA, including legal obligation, security, fraud prevention, and contract performance.
4. **Right to Opt-Out/In** — You have the right to opt out of the sale of your personal data. CallingFans does not sell personal data.
5. **Right to Non-Discrimination** — You have the right not to receive discriminatory treatment for exercising your CCPA rights. CallingFans will not deny services, charge different rates, or provide different quality of service based on the exercise of these rights.

To exercise your California privacy rights, submit a verifiable request to: **info@callingfans.com**. Requests may also be submitted through your account profile where applicable. Only you, or a person duly authorized to act on your behalf, may make a verifiable consumer request related to your personal data.

c. Your Nevada Privacy Rights

Nevada law permits Nevada consumers to request that their personal data not be sold, even if it is not currently being sold. Such requests may be sent to: **info@callingfans.com**.

d. Your European Union and UK Privacy Rights

In addition to the rights listed above, EU and UK data protection law may provide the following enhanced rights depending on the circumstances of processing:

- The right to object to decisions based on profiling or automated decision-making that produce legal or similarly significant effects.
- The right to request restriction of processing or object to processing carried out pursuant to a legitimate interest or public task.
- The right to data portability — to request personal data in a machine-readable format.
- The right to erasure and/or the right to be forgotten, where applicable.

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4. YOUR CHOICES

You have choices about certain information we collect, how we communicate with you, and how we process certain personal data. Declining to provide certain information may limit your ability to use some Services. Browser settings may also be adjusted to limit automatic data collection.

a. Communications Opt-Out

You may opt out of receiving email communications from us at any time by following the opt-out link in any email received, by contacting us directly, or by adjusting notification preferences in your account settings. When emailing to opt out, include "Opt-Out" in the subject line, along with your name and registered email address. Automated transactional notifications (e.g., subscription confirmations) may not be subject to opt-out under applicable law.

b. Location Information

To limit location data collection, you may deny or remove location permissions for specific Services or deactivate location services on your device. Refer to your device manufacturer or operating system instructions for guidance.

c. Cookies and Web Tracking

Please consult our Cookie Notice for information about controlling and/or opting out of certain web tracking technologies.

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5. PROTECTING PERSONAL DATA

We employ reasonable and appropriate physical, technical, and organizational safeguards designed to promote the security of our systems and protect the confidentiality, integrity, availability, and resilience of personal data. These safeguards include: (i) encryption of personal data where appropriate; (ii) backup and availability measures to ensure personal data remains accessible following a security incident; and (iii) periodic testing, assessment, and evaluation of the effectiveness of our security measures.

No method of safeguarding information is completely secure. While we employ reasonable measures designed to protect personal data, we cannot guarantee that such safeguards will be fully effective. Internet data transmission is inherently not entirely secure, and we cannot warrant that information transmitted via the Services is or will be secure in all circumstances.

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6. RETENTION OF PERSONAL DATA

IMPORTANT NOTICE REGARDING DATA RETENTION: UPON REMOVAL FROM THE PLATFORM, CALLINGFANS DOES NOT RETAIN ANY DATA, CONTENT, OR ITEMS IN ITS SYSTEMS. BY ACCEPTING THIS PRIVACY POLICY AND DELETING YOUR PROFILE, YOU ACKNOWLEDGE AND ACCEPT THAT THE PLATFORM WILL NOT HOLD ANY DATA, CONTENT, OR ITEMS BELONGING TO YOU FOLLOWING DELETION. CALLINGFANS SHALL NOT BE RESPONSIBLE UNDER ANY CIRCUMSTANCES FOR INFRINGEMENT OR DISCLOSURE OF DATA OR PRIVACY VIOLATIONS ORIGINATING OUTSIDE OF OUR PLATFORM.

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7. OTHER IMPORTANT INFORMATION ABOUT PERSONAL DATA AND THE SERVICES

a. Identity Verification

CallingFans requires identity verification checks for Creators to ensure that the Services are not knowingly offered to individuals under the age of 18 or to those using a false identity. Identity verification is also offered as an optional feature for Fans.

NOTICE TO CREATORS CONTACTED VIA INSTAGRAM OR OTHER PLATFORMS: Our Selection Representatives assist solely with registration and will NEVER request documents or personal information directly. It is the Creator's obligation to submit the required identification document within the payment method section of the platform. This document confirms that the Creator is over the age of 18 and is the lawful account holder. The Representative is not responsible for false documents or incorrect information.

Failure to submit the required document within 48 hours of registration initiation will result in account closure within 7 days. CallingFans is not responsible for messages sent by unidentified parties not operating through its official Instagram profile: @callingfansofficial.

b. Payment Information

Payments made by Fans to access content are processed by third-party payment providers. When making a payment, you provide your payment details directly to the payment processor, which processes and stores such information subject to its own privacy policy and terms of service. CallingFans does not receive full credit card numbers, expiration dates, or security codes. Instead, the payment provider supplies CallingFans with a tokenized representation of your account, along with card type and partial card number. Payments to Creators are made by CallingFans using bank account information collected and stored by the platform.

c. Collection of Personal Data from Children

Our Services are not intended for, and are not accessible to, individuals under the age of 18. We do not knowingly collect personal data from minors. By using the Services, you represent and warrant that you are 18 years of age or older.

d. Third-Party Websites and Services

As a convenience, we may provide links to third-party websites and services. When accessing such third-party services, you leave our Services, and we are not responsible for — and do not control — the content, security, or privacy practices of any third-party website or service. You access such services at your own risk. This Privacy Notice does not apply to third-party services; please refer to the applicable third-party privacy policies.

e. Business Transfer

We may, in the future, sell or otherwise transfer some or all of our business, operations, or assets to a third party, whether by merger, acquisition, or otherwise. Personal data obtained through the Services may be disclosed to potential or actual third-party acquirers and may be among the assets transferred in such transactions.

f. Do Not Track

CallingFans does not currently use cross-site tracking technologies and does not process or comply with any web browser's "Do Not Track" signal or similar mechanism. Information on how to block or reject certain tracking technologies is available in our Cookie Notice.

g. International Use and Data Transfers

Your personal data may be stored and/or processed in the United States, as well as in the European Union, Canada, Hong Kong, Russia, Singapore, Switzerland, Thailand, Ukraine, and the United Kingdom. By using the Services, you acknowledge that we may transfer your data to, and store it in, the above countries, which may have different data protection rules than your country of residence. Personal data may become accessible in accordance with applicable law in those countries, including by law enforcement and/or national security authorities.

For transfers of personal data into and out of the European Economic Area, CallingFans relies on data transfer agreements incorporating EU-approved Standard Contractual Clauses pursuant to Article 46 of the General Data Protection Regulation (GDPR).

8. MODIFICATIONS AND UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice supersedes all previous disclosures made with respect to our information practices in connection with the Services. We reserve the right to modify, alter, and/or update this Privacy Notice at any time, with any such modifications effective upon posting of the revised Notice. We will use reasonable efforts to notify users of material changes, such as by posting a notice on the Services or sending an email notification. Continued use of the Services following the posting of any revised Privacy Notice constitutes acknowledgement and acceptance of the amended Notice.

9. APPLICABILITY OF THIS PRIVACY NOTICE

This Privacy Notice is subject to the Terms of Service and Acceptable Use Policy governing your use of the Services and applies regardless of the means used to access or provide information through the Services. This Privacy Notice does not apply to information collected by third-party services, applications, advertisements, or websites linked from the Services. The collection and use of your information by such third parties is governed by their own privacy policies, and CallingFans bears no responsibility or liability for third-party compliance with applicable data protection law.

10. ADDITIONAL INFORMATION AND ASSISTANCE

For any questions, concerns, or requests related to this Privacy Notice or the processing of personal data, please contact us using the information below.

Legal Entity	ONLY4FEET
Registered Address	England and Wales
General Inquiries	info@callingfans.com
CCPA / Nevada Rights Requests	info@callingfans.com
Data Deletion Requests (Fans)	info@callingfans.com
Data Protection Officer (DPO)	info@callingfans.com Subject Line: DATA PROTECTION OFFICER
Platform Website	www.callingfans.com

CallingFans — Privacy Policy & Data Protection Notice
Document prepared for compliance and underwriting review purposes.