

Privacy Policy

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(last updated August 2024)

MVVERSE Inc. and its affiliates or assigns (“**MV**”) operate and manage the Website Platform accessible at www.manyvids.com, inclusive of all its subdomains (hereinafter referred to as the “**Platform**”). On this Platform, independent Content Uploaders can upload, publish, Broadcast, share, license, and sell their original videos, offer services such as live stream sessions or tangible goods to users, and facilitate interactions between Uploaders and users (collectively, our “**Services**”).

By using our Services, you confirm your consent to the collection, use, and dissemination of your Personal Information in alignment with this Privacy Policy and its iterations. Should you, for any reason, withhold consent or disagree with any of our terms, kindly abstain from using our Services and consider deleting your account(s).

IMPORTANT NOTICE The Platform is strictly for ADULTS AGED 18 YEARS AND ABOVE or those who've reached the AGE OF MAJORITY in their jurisdiction. Individuals not meeting these criteria are PROHIBITED from accessing or viewing the Platform's contents. Engaging with the Platform is considered null and void where legally prohibited. MV does not intentionally collect data or personal information from individuals below the age of majority. Any such information, once detected, will be immediately deleted.

DEFINITIONS: To ensure clarity and understanding, the following terms used in this Privacy Policy are defined as:

- **Broadcast:** Encompasses the actions to upload, publish, share, offer, and Broadcast Content, which includes Live Streams.
- **Communication Data:** Communication Data pertains to all data stemming from interactions between Users (including Members and Uploaders) and MV. This data is primarily generated through communications channels facilitated by the Platform.
- **Content:** Refers to original Uploader-generated or Member-generated Content, or both, as the context demands. This includes, but isn't limited to, photographs, videos (whether pre-recorded or live-streamed), and other materials such as text, images, graphics, data, audio, messages (including online chats), Live Streams, comments, memberships, gratuities, contests, sweepstakes, crowdfunding initiatives, and tangible goods presented, sold, offered, or posted by Uploaders or Members on the Platform.
- **Cookies:** Small text files stored on a user's device, typically containing information about the user's interactions with a website, which can be accessed by the web server or the client's computer.

- **Data Protection Officer (DPO):** An appointed individual responsible for ensuring that an organization processes the personal data of its staff, customers, providers, or any other individuals (also referred to as data subjects) in compliance with data protection laws.
- **GDPR (General Data Protection Regulation):** A regulation introduced by the European Union to regulate how personal data of its citizens is used and processed. It emphasizes the protection of personal data and the rights of individuals.
- **Live Streams:** Represents sessions held by Uploaders where Content undergoes live streaming, either privately, semi-privately, or publicly. These streams may feature live chats and two-way camera sessions or might exclude them.
- **Member(s):** Denotes registered individuals who leverage the Platform for personal utility, also termed "MV Member(s)." Uploaders are excluded from this category. To elucidate, while all Members are Users, the inverse doesn't hold true.
- **MV:** Pertain to MVERSE Inc., located at 4815 Van Horne St., PO Box: 63527 151, Montreal, Quebec, H3W1J0, Canada, or its associated entities or assignees. MV oversees the Platform, serving as the conduit between Uploaders and Platform users, facilitating interactions between Uploaders and Members.
- **Personal Information:** Information that can identify an individual, either directly or indirectly, such as name, email address, IP address, or date of birth.
- **PIPEDA (Personal Information Protection and Electronic Documents Act):** Canada's primary privacy law for private-sector organizations. It lays out the ground rules for how businesses must handle personal information in the course of commercial activity.
- **Platform:** The web hosting service managed by MV, accessible via www.manyvids.com and its subdomains, facilitating interactions between Uploaders and Users and hosting various Content.
- **Québec's LAW 25 (formerly Bill 64):** Québec's "Act Respecting The Protection Of Personal Information In The Private Sector," emphasizing stringent requirements for data privacy and protection for Québec residents.
- **Transaction Data:** Transaction Data encompasses detailed records of transactions that Members or Users have conducted through the Platform. This data is essential for processing purchases, subscriptions, or any other types of financial interactions facilitated by the Platform.
- **Uploader(s) or Creator:** Allude to independent entities like models, performers, Content creators, studios, etc., registered as such on MV. They Broadcast their unique Content on the Platform for Users' private consumption.
- **Usage Data:** Usage Data refers to data automatically collected about a User's interaction with the Platform. This data is instrumental in understanding User behavior, enhancing User experience, and ensuring the optimal functioning of the Platform.

- **User(s):** Signifies individuals harnessing the Platform for personal indulgence, excluding Uploaders.

1. WHAT INFORMATION WE COLLECT: The term “Personal Information” refers to information that identifies an individual, either directly (like a name or email address) or indirectly (like an IP address or date of birth).

Whether you navigate the Platform as an Uploader, a User, or a registered Member, we underscore that all Members are essentially Users, but the reverse doesn't hold true.

MV might collect Personal Information that you voluntarily share, such as when making inquiries, notifying us of specific requests, or reporting Platform-related issues.

Users: As a User, the system automatically logs details including your device's OS, unique ID, IP address, access times, MAC address, geographic location, and language. Such data might be stored on your device and could be shared with MV to ensure the Platform's optimal performance, for statistical analysis, and to enhance Platform functionality.

Members: When you use the Platform as a Member, you will be prompted to supply information to establish an account and associated profile. The details could encompass your name, birth date, email, physical address, and any other data deemed pertinent under laws governing personal information.

We also capture data about your Content preferences to personalize your experience and discern the Content type favored by our Members.

Your interactions on the Platform, including engagements with other Users or Creators Content, are recorded via server log files. This data, potentially linked to your account, profile, IP, or device ID, aids in improving your user experience and delivering our Services.

Participation in private or semi-private Live Streams may entail monitoring or recording by MV to verify adherence to relevant laws, our User and Member Terms and Conditions, and the Uploader's Terms of Service. Such participation is linked with your account, profile, IP address, and device ID to optimize our Service provision.

Purchase-related data, including your payment methods, are collected and archived. This information primarily facilitates interactions and deters fraudulent activities on the Platform.

Uploaders/Creators: For Uploaders, initial Platform usage requires additional data submission:

- A photo displaying both your face and government-issued ID ensures age and identity verification.
- Banking details allow for transaction processing under the Uploader's Terms of Service.

- Your U.S. citizenship status informs us about tax compliance obligations in our partnership.

2. WHY WE COLLECT THIS INFORMATION: We collect and use your information for the subsequent purposes:

- Creation and management of your account and profile for service provision.
- Sending relevant service communications, including confirmations, invoices, updates, technical notices, security alerts, administrative, and support messages.
- Ensuring optimal performance and functionality of the Platform.
- Guaranteeing compliance with our User and Member Terms and Conditions, along with the Terms of Service for Uploaders.
- Addressing and resolving reported issues.
- Monitoring, analyzing, and evaluating the usage and trends of our Services.
- Gaining insights into interactions to improve Content, features, and potentially develop new offerings, including through data analytics or machine learning.
- Offering customer support and addressing feedback and queries.
- Personalizing your user experience on the Platform.
- Conducting surveys, contests, and sweepstakes.
- Enhancing overall user experience and satisfaction with our Services.
- Communicating about site news, updates, promotions, and user experiences.
- Marketing our Services and other offerings.
- Safeguarding the integrity, safety, and security of our Services.
- Protecting our legal interests and rights, and ensuring adherence to our legal obligations, such as fraud prevention and Platform misuse.
- Realizing any other purpose to which you've consented.
- Should you consent to our data usage for specific purposes, you retain the right to revoke this consent anytime. However, this won't influence prior data processing. When we process your data due to our legitimate interests or those of a third party, you have the right to object. However, this might lead to discontinuation of Service usage.

3. HOW IS THE INFORMATION STORED, COMMUNICATED, AND TRANSFERRED INTERNATIONALLY: MV retains your Personal Information only as required to fulfill the objectives detailed in this Privacy Policy or as mandated by legal stipulations. Upon the expiry

of the necessary retention duration, we'll either eliminate or de-personalize your Personal Information, ensuring it cannot be linked to any specific individual.

We vouch not to share your Personal Information beyond MV's purview without obtaining your explicit consent, except in the following circumstances:

- In the event of a business sale, your Personal Information may be disclosed, as required, during a due diligence process involving potential buyers. Such disclosures will include clauses in the sales contract, ensuring the buyer's compliance with prevailing data protection laws.
- MV may disclose your Personal Information to public authorities without prior consent when mandated or permitted by law, such as for safeguarding our rights, fraud prevention, or other legal compliance.

During our operations, your personal data might be transferred to and processed in regions outside the European Economic Area (EEA), Canada, and more precisely, the province of Quebec. Each of these regions may have data protection standards that vary. Recognizing the importance of safeguarding your data, MV has implemented stringent safeguards compliant with the GDPR, PIPEDA, and Quebec's LAW 25:

- **Data Processing, Sovereignty, and Transfer Solutions:** MV has formalized Data Processing Agreements (DPAs) with our third-party processors to delineate roles, responsibilities, and secure data management standards. We prioritize storage solutions that localize data within specific regions, ensuring compliance with each territory's data protection regulations.
- **Data Security and Management Practices:** MV employs advanced cryptographic techniques to encrypt all transferred personal data, ensuring its protection even if intercepted. Our routine audits validate the robustness of our data safeguards, ensuring continual compliance with GDPR, PIPEDA, and LAW 25. Access to this data is strictly limited to essential personnel, enforced by role-based access controls and multi-factor authentication. In line with minimizing data exposure, we transfer only the necessary data pertinent to its purpose, retain it strictly for its intended duration, and subsequently ensure its secure deletion.
- **Incident Response Plans:** In the event of a data breach or unauthorized access, MV has a swift incident response plan, ensuring that all affected parties, including regulatory bodies, are informed as mandated by GDPR, PIPEDA, and LAW 25.

These safeguards not only comply with regulations but also exemplify MV's commitment to upholding the privacy and security of its users' personal data.

Additionally, MV is committed to primarily transferring personal data to countries and provinces that maintain an adequate level of data protection, as acknowledged by the European Commission and in line with Canadian federal and Quebec provincial standards.

In cases where there isn't an established legal foundation for transferring your data outside the EEA or Quebec, MV will always seek your informed and explicit consent beforehand, in adherence to GDPR, PIPEDA, and LAW 25 stipulations.

For any queries regarding our data transfer practices or the protective measures we've instituted, feel free to contact our Data Protection Officer at DPO@manyvids.com. Our officer is tasked with ensuring our unwavering compliance with European GDPR, Canada's PIPEDA, and Quebec's LAW 25.

4. CALIFORNIA RIGHTS AND CHOICES

The California Consumer Privacy Act ("CCPA"), as amended, requires us to provide California residents with some additional information, which we address in this section.

- **Opt-out of the sale of their personal information**, should we sell their personal information;
- **Be informed of certain information** concerning our collection and use of their personal information;
- **Request that we delete certain personal information** we collected from them;
- **Appoint an agent** to exercise their rights provided for by the CCPA, provided that a duly executed notarized power of attorney is presented and provided that the agent has information deemed sufficient to allow us to verify the identity of the Consumer in question and to locate his/her information in our systems;
- **Not be subjected to discrimination** for the exercise of these rights. We will not deny California residents the use of our service, nor will we provide a different level or quality of services for exercising any of their CCPA rights, unless as permitted under the CCPA.

MV does not sell, nor has it sold in the past twelve (12) months, personal information to third parties for monetary or other valuable consideration. We may, however, disclose certain personal information with third parties, service providers, and entities within our corporate group to enable them to perform certain services on our behalf, and namely to make MV function properly, as further described in the section above titled "Disclosure of Your Personal Information."

We respect California residents' right to exclude personal information from such sharing arrangements and grant them the option to opt-out of any future sale of their personal information. If you are a Registered User and the CCPA is applicable to you and you would like to exercise your rights, please use the buttons at the bottom of this page or email us at support@Manyvids.com with the email subject line "CCPA Request."

In either case, you will need to provide the following information to verify your identity and enable us to locate your information in our systems: your username and email address that

you used to create an account with us, as well as any other information which we may reasonably request for us to verify your identity. We may require you to verify that you have access to your account and/or email account that you used to register with us.

You can designate an agent to make a request by executing a notarized power of attorney to have that person act on your behalf and providing that person with the information listed above that allows us to verify your identity and locate your information. Alternatively, you will need to directly confirm your identity with us using the methods described above, sign an authorization for the agent to act on your behalf, and provide us with confirmation that you have done so.

5. IDENTIFICATION: Members and Uploaders are identified in public by the alias they employ on the Platform. All Content they upload (including videos, images, or photos) is accessible to every User and can be viewed, collected, copied, or used without explicit consent. We urge not to disclose personal details when contributing Content or interacting on the Platform, be it in chat rooms, blogs, comments, reviews, or any similar functionalities. Information disclosed in these scenarios is deemed public, hence devoid of expectations of privacy or confidentiality.

You retain full control over the data displayed or shared on your profile and throughout the Platform. We bear no responsibility for the Personal Information you opt to disclose. You alone are liable for any ramifications stemming from such disclosures, including potential identification from posted Content.

6. SECURITY: We employ stringent security measures on our servers to safeguard data against misuse and unauthorized access, which includes but is not limited to password protection, data encryption, and restricted-access zones. However, given the inherent vulnerabilities of the Internet, we cannot guarantee absolute protection during data transmission or storage. Should a data breach occur that may risk your rights and freedoms, we will promptly notify you and the relevant supervisory authority within the stipulated timeframe as required by GDPR and Law 25.

Use of the Platform may involve transferring, storing, and processing your data in different countries globally, including the United States where our primary servers and databases are located. It's essential to understand that these locations might have different privacy protection standards than your resident country. By accessing the Platform, you provide your informed consent to such international transfers, in alignment with the safeguards detailed in this Privacy Policy.

7. HYPERLINKS AND THIRD-PARTY SITES : Our Platform may embed hyperlinks directing to external sites or resources, encompassing third-party social media Platforms. Clicking these redirects you away from our Platform. Personal Information shared on these sites is governed by their distinct privacy policies. MV lacks authority over these third-party sites, and inclusion on our Platform doesn't signify endorsement, affiliation, or liability on our part. MV remains absolved of accountability regarding third-party actions, site Content, data handling practices, or their offerings.

When executing payments on the Platform, you'll be rerouted to our payment service provider's domain. Personal Information furnished there will bypass MV and go straight to this provider. We advocate acquainting yourself with their privacy stipulations to grasp how they manage your data.

8. COOKIES AND SIMILAR TECHNOLOGIES: We utilize cookies and similar technologies to collect non-identifiable information, such as device type, browser version, and pages visited. This is done to enhance your experience, streamline navigation, and offer relevant content recommendations.

Consent & Compliance: In compliance with the General Data Protection Regulation (GDPR) and Québec's Bill 64, we will always request your clear and explicit consent before activating any non-essential cookies or trackers. Essential cookies, vital to our Platform's primary operation, are deployed based on our legitimate interests and don't require prior consent.

Managing Cookies: You have the right to manage your cookie settings, which includes accepting, declining, or removing them, through your browser. Please be aware that modifying these settings might alter the performance and user experience of our Platform.

Third-Party Services: Our platform may integrate third-party services that employ their own cookies. These are subject to their individual privacy policies, which we recommend reviewing for clarity on their practices.

9. YOUR RIGHTS & COMPLIANCE WITH QUÉBEC'S LAW 25 AND GDPR: At MV, our users' rights to data privacy are paramount. We're dedicated to respecting and upholding the principles outlined in Québec's LAW 25, PIPEDA and GDPR. The following enumerates your rights and our commitment to ensuring they're maintained:

Data Protection Officer (DPO): In our commitment to uphold the highest standards of data protection, we've designated a Data Protection Officer (DPO). This individual ensures that our operations remain compliant and serves as the primary contact for data protection-related inquiries. If you have questions or concerns about how we handle your data, reach out directly to our DPO:

Name: Gianfranco Salerno
Email: DPO@manyvids.com

a. Express Consent: Your trust is vital. Before we gather or process your information, we guarantee explicit, informed, and clear consent. We obtain specific permissions for various data activities and always facilitate an easy mechanism for you to withdraw this consent.

b. Transparency, Access, and Rectification: You deserve clarity. We ensure that users can easily access their stored data, and if inaccuracies arise, they can be promptly rectified. We're transparent about where data comes from, how long it's kept, and its purposes. We partner with select third parties to elevate our platform, and data shared with them is done cautiously and transparently.

c. Data Portability: Your data, your control. You can request your personal data in a universally accessible and machine-readable format, empowering you to shift it elsewhere if desired.

d. Right to Deletion, Withdrawal, and Opt-out: Should you wish to move on, you can delete your account, halt specific data processes, or opt-out of promotional communications. Essential notifications persist to maintain your experience.

e. Automated Decision Accountability: We leverage technology, but with a human touch. When automated processes could substantially impact you, we provide detailed explanations and allow users to challenge these decisions or request human review. You also have an option to opt-out entirely.

f. Data Breach Notification: Your data's safety is critical. If breaches arise:

- **Identification & Investigation:** We promptly probe the extent and nature.
- **Notification to Users:** Affected users are informed without delay, ideally within 72 hours of awareness.
- **Notification to Authorities:** We alert relevant data protection bodies within required timeframes.
- **Documentation:** Every breach is recorded, ensuring continual refinement of our protective measures.

g. Data Protection Responsibility: To remain compliant with LAW 25 and GDPR, we've appointed a dedicated individual to oversee personal information protection, distinct from our Data Protection Officer. They shape our data protection strategy and are a resource for our users.

h. Additional Rights and Inquiries: For further autonomy, whether it's adjusting cookie settings, addressing data process concerns, or limiting data processing, we're here. Should issues persist, official data protection entities can be approached. For clarity, the English version of this policy is primary.

To exercise any of these rights or seek clarity on our alignment with LAW 25 and GDPR, contact our Data Protection Officer at the above email address .

10. RIGHT TO ERASURE/RIGHT TO BE FORGOTTEN: In compliance with certain data privacy legislation, you may have the right to request the deletion of your Personal Information. Upon receiving such a request, we will review your request and determine whether it meets the criteria for erasure under applicable data protection laws in your jurisdiction. While verifying your identity to ensure that the request is legitimate. Please note that unless you have created an account with us, we may not have sufficient information to identify you and therefore may not be able to respond to your request. Additionally, in some cases, we may ask you to provide additional information or documentation for verification purposes.

If your request is approved and deemed legitimate, we will immediately start the process of removing your data from our systems. First, we aim to immediately remove it from public view, and the data may no longer be used to personalize your experience.

Deleting your account will render all your personal data and account-related information, including but not limited to user profile data, sharing data, and any content specifically associated with your account, inaccessible. If you wish to rejoin our platform, you will need to fill out any required information as if you are a first-time user. Your new account will not be subject to the pending deletion request; if you wish to delete the new account, a new request must be submitted.

We then begin a process designed to safely and completely delete the data from our storage systems. Safe deletion is important to protect our users and customers from accidental data loss. Complete deletion of data from our servers is equally important for users' peace of mind. This process generally takes around 2 months from the time of deletion. This often includes up to a month-long recovery period in case the data was removed unintentionally.

Each MV storage system from which data gets deleted has its own detailed process for safe and complete deletion. This might involve repeated passes through the system to confirm all data has been deleted, or brief delays to allow for recovery from mistakes. As a result, deletion could sometimes take longer when extra time is needed to safely and completely delete the data.

Our services also use encrypted backup storage as another layer of protection to help recover from potential disasters. Data can remain on these systems for up to 6 months.

As with any deletion process, things like routine maintenance, unexpected outages, bugs, or failures in our protocols may cause delays in the processes and timeframes defined in this article. We maintain systems designed to detect and remediate such issues.

Sometimes business and legal requirements oblige us to retain certain information, for specific purposes, for an extended period of time, please refer to the DATA RETENTION section in this privacy policy for further information.

To request the deletion of your personal data, please follow the procedure below:

Submission of Request:

- You can submit your deletion request by contacting our Data Protection Officer (DPO).
- Include the following information in your request:
 - Full name
 - Email address associated with your account
 - Username
 - Detailed description of the data you wish to have deleted

11. DATA RETENTION: MV adheres to the principle of retaining personal data only for the period necessary to fulfill the purposes for which it was collected. However, sometimes

business and legal requirements oblige us to retain certain information for specific purposes for an extended period of time that we deem necessary to carry out the processing activities set out in this Policy. For example:

- **Financial record-keeping/Complying with legal or regulatory requirements:** When MV processes a payment for you, or when you make a payment to MV, or where it is necessary to comply with laws and regulatory obligations that are applicable to us (e.g., adhering to record-keeping/maintenance requirements in certain locations and financial/tax reporting requirements, which in some cases is up to 10 years, and if we receive a valid legal request, such as a preservation order or search warrant, related to your account).
- **Security, fraud, and abuse prevention:** For the purposes of identifying and reporting illegal activity, protecting the safety of our users and third parties, or otherwise protecting the rights and property of our users, us, and other third parties (e.g., where you have, or we have reason to believe that you have, violated our Terms of Service, and in circumstances where users are banned from further access to the Website)..
- **Dispute resolutions, to protect ourselves, including our rights, property, or products:** For purposes of legal proceedings (e.g., to defend ourselves in litigation about a claim related to you).
- **A legal request or obligation:** For the purposes of responding to requests from third parties in relation to your account, such as requests received from, or investigations by, law enforcement authorities, relevant governmental authorities (e.g., tax authorities and regulatory authorities), and non-governmental organizations (e.g., NCMEC).

The retention of personal data and the duration for which it is kept will be determined on a case-by-case basis, taking into account the specific circumstances, in compliance with applicable privacy legislation, but typically ranges from three to ten years.

12. UPDATES TO THIS POLICY: In alignment with the dynamic nature of privacy requirements and our commitment to transparency, we may update this Privacy Policy in response to evolving best practices. For Users or Uploaders, following any modifications, your next login will prompt an acknowledgment of these updates.