

Our promise to you

At Stringzz, your privacy is our top priority. We fully realize that with our very specific App, services and target group we will store and process very sensitive data about you and other users. Your privacy and trust are the basis on which we design and build our services and products so that you know that they are completely safe with us. We value your trust and appreciate that you entrust us with your data.

We do not compromise on your privacy. We design all our products and services with privacy in mind. We keep user experiences anonymous to other users, you are the only one who decides which users should know more about you. We involve experts from a variety of fields, including legal, security, IT and other domains, to ensure that no decision is made without respect for your privacy. We will never pass on or sell your data to others. Only if we need third parties to provide services to you and they require information from you, will we only do this after we have requested your permission. With every functionality in the app where more information is released from you, you must first give your permission. We will always let you know what the consequences are for the service offering if you do not want to give this permission. This way you always know where you stand and you have control over who can see or use which of your data for which reason.

We strive to be transparent in the way we process your data. We have therefore tried to write our privacy policy in clear language. We would like that when you read our policy you immediately understand it too! If we have not succeeded, please let us know via the email address at the bottom of this document.

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Privacy Statement

The protection of privacy is important when processing personal data. Personal data is therefore treated and secured with the utmost care, in accordance with the General Data Protection Regulation (GDPR). In this Privacy Statement we inform you about how Stringzz handles your personal data and how you can exercise your rights with regard to your personal data, where appropriate.

This Privacy Statement applies to websites, apps, events and other services that are managed and/or offered by Stringzz. Some of our services may require their own Privacy Statement based on personal data specifically required for that service. If a certain service has its own Privacy Statement, then that statement applies before the present Privacy Statement.

This Privacy Statement is valid as from July 1, 2020. The validity date is always at the bottom of every page.

Article 1: Definitions

In accordance with and in addition to the General Data Protection Regulation, in this Statement terms have the following meaning:

- **Autoriteit Persoonsgegevens (AP) (the Dutch Data Protection Authority):** the supervisory authority in the field of the protection of Personal Data;
- **Data Subject:** the person to whom Personal Data relates;
- **User:** a natural person who has opened an account in the Stringzz app
- **Data Protection Officer (DPO):** the person within Stringzz who supervises the application and compliance with the Laws;
- **Stringzz:** the company ConsumerApps B.V., Herengracht 420, 1017BZ in Amsterdam; when Stringzz is mentioned in this Privacy Statement, we mean at least the App and the website;
- **Personal data:** any data relating to an identified or identifiable natural person;
- **Processing:** any action or set of actions related to Personal Data;
- **Law:** Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95 / 46 / EC (General Data Protection Regulation) (Official Journal of the EU 2016, L 119).

Article 2: Who is responsible for the processing of data

You entrust your data to the Dutch company ConsumerApps B.V., located at Herengracht 420, 1017BZ Amsterdam, trading under the names Stringzz and Stringzz The App. The director of ConsumerApps B.V. is ultimately responsible for the processing and privacy of your personal data in the App, the services and on the Stringzz website.

Article 3: Changes to this Privacy Statement

Stringzz can change this Privacy Statement at any time. We recommend that you regularly check this page. This way you know if something has changed. We will inform you of any major changes to this Privacy Statement.

Article 4: When do we record personal data

When you have contact with us via Stringzz, via our website or via other communication channels, we record your personal data. It goes without saying that there is no matching, chatting, getting to know and control between Users of the Stringzz app without any information about you. This includes your basic information (such as identifiers such as telephone number and email address), bank or credit card details (with paid subscriptions), your preferences and the types of people you want to meet.

We also collect information when you use our website, so that we can help you more specifically, or when you purchase our services via social media, for example.

Article 5: What personal data do we collect

Stringzz collects and processes personal data from you.

Information you provide to us:

When you create an account, you provide us with at least your credentials, as well as some of the basic information needed to run our service, such as your gender and basic BDSM preference (Dominant or submissive).

As you complete your profile, you can share additional information with us such as:

- details about your personality, lifestyle, interests and other details about you, as well as content such as photos and videos.
- To add visual content, such as pictures or videos, you will have to permit us access to the mobile phone's camera or photo album first.
- Some of the information you provide to us may be considered very "special" or "sensitive" from GDPR perspective (called 'special category data'). For example, you can indicate your sexual orientation and sexual areas of interest within the App. By choosing to provide this information, you consent to our processing of that information. You will need to give explicit permission to us each time you complete updating your BDSM profile.
- When you subscribe to a paid service or purchase products or services directly from us, you provide us or our payment service provider with information such as your bank account number, debit or credit card number, or other financial information. We need this to receive/collect your payment (whether or not repeatedly).
- If you want products or services delivered by us to your home address, you will have to provide us with your address details. We need these to deliver the products or services to your home address.
- When you participate in surveys or focus groups, you provide us with your insights into our products and services, answers to our questions and testimonials.
- When you choose to participate in our promotions or events, we collect the information you use to register or enter.
- When you contact our customer service, we collect the information you give us during this contact. We use this information to answer your question or to resolve your complaint or problem.
- Sometimes we monitor or record contact moments with our customer service for training purposes and to optimize our quality of service.
- If you ask us to communicate with other people through the App (for example, if you ask us to send something to one of your Connected Users on your behalf), we will use the information about others to fulfil your request. Conversely, we use the information you have provided to let others reach you.
- Of course, we also process your chats with other users and the content you publish as part of the operation of our App and services.
- Only in exceptional cases may we decide to monitor the content of interaction, in cases where we suspect a violation of our regulations, where a user is reported by another user or where we have reason to believe that the safety of a user or a third is at stake. We have a procedure for this that concerns a small circle of trusted Stringzz employees and for which the director must give permission.

Information we receive from others:

In addition to the information you give us directly, we receive information about you from others, including:

- Other users may provide information about you while using our App. For example, we may collect information about you from other users if they contact us about you.
- We may receive information about you from our partners, for example when Stringzz publishes advertisements on a partner's website or App.

Information collected when you use our services:

- When you use our App, we collect information about what features you used, how you used them, and the devices you use to access them. See below for more details:

Usage data

- We collect information about your activities in our App, for example how you use it (date and time you logged in, features you used or used frequently, search queries, clicks and pages shown to you, any ads

you click on) and how you interact with other users (for example, users you connect to and communicate with, time and date of your exchanges, number of messages you send and receive, without seeing the content).

Phone data

We collect information from and about the device you use to use our App, including:

- hardware and software information, such as IP address, device ID and type, device-specific and apps settings and attributes, app crashes, browser type, version and language, operating system, time zones, IDs associated with cookies or other technologies that can uniquely identify your device or browser (for example, IMEI/UDID and MAC address);
- information about your wireless and cellular network connection, such as your service provider and signal strength;
- information about and/or control of device sensors such as microphone, sound/speakers, image, accelerometer, gyroscope, compass, etc., but with each application only after your prior explicit permission, and after explaining why we want to use these functions in our services to you .

Device data

We collect information from and about (the connection and operation of) paired devices that you may purchase and will use to pair through our App (often via Wi-Fi or Bluetooth connection), including:

- so-called remote controlled "sex toys" such as electric vibrators, electrical locks, electrically operated chastity belts and cages, etc.
- cameras, and other home automation devices.

Other information with your permission

- If you give us permission, we can collect your accurate geolocation (latitude and longitude) in different ways depending on the service and the device you use, including GPS, Bluetooth or Wi-Fi connections. Collection of your geolocation may take place in the background, even if you do not use the App if the permission you have given us specifically allows such collection. If you refuse permission for us to collect your geolocation, we will not collect it. You will then miss certain experiences in the App that are explained there.
- If you agree, we may collect your photos and videos (for example, if you want to publish a photo, video or streaming through the App).

Article 6: Legal basis and processing purposes

An important principle for the protection of personal data is that a legal basis is required for the processing of your personal data. Below you can see the legal bases on which Stringzz processes your personal data:

- Offering our services to you: Usually the reason is that we process your data in order to fulfil the contract you have with us. For example, if you use our App to establish valuable relationships, we will use your information to track your account and profile so that it is visible to other users and recommend other users to you. If you and your connected partner in Stringzz find it exciting that she can see where you are on her phone at any time, you will need to authorize the use of your geolocation for this, and we can enable this service.
- Legitimate Interests: We may use your information when we have a legitimate interest to do so. For example, we analyse the behaviour of users of our App to continuously improve our offer and the quality of our service, we propose offers that we think may interest you, and we process information for administrative, fraud detection and other legal purposes.
- Consent: From time to time, we may ask for your consent to use your information for certain specific reasons. You can refuse this consent at any time, or withdraw it later by a function in the App or by contacting us at the address indicated at the end of this Privacy Statement.

The primary reason we use your information is to provide and improve our services. In addition, we use your information to protect you and show you advertisements that may be of interest to you. Read on for a more detailed explanation, along with practical examples, of the various reasons we use your information.

To manage your account and provide our services to you

- Create and manage your account
- Provide you with support and answer your questions
- Communicate with you about our services, including order management and billing

To help you connect with other users

- Analyse your profile, your activity on the App and your preferences to recommend contacts that may be valuable to you and to recommend you to others; think of gender, age, preferences, etc.
- Show user profiles to each other

To provide you with relevant offers and advertisements

- Manage discounts or other offers
- Develop, display and track content and advertising tailored to your interests

To improve our services and develop new ones

- Expand functionalities and/or services based on your own feedback and that of other users
- Conduct research and analysis of user behaviour to improve our App and content (for example, we may decide to change the appearance or significantly change a particular feature based on user behaviour)
- Develop new features and services (for example, we may decide to build a new interest-based feature based on requests received from users)
- Based on your use of the App and our services, offering functionalities and/or services that we think may interest you

To view, prevent and fight fraud or other illegal or unauthorized activities

- Address persistent or suspected misconduct in and outside the App
- Conduct analyses to better understand possible fraudulent activities and take countermeasures if necessary
- Retain data related to fraudulent activities to prevent recurrence
- Conduct analyses to protect the safety of our users, our staff and our partners

To ensure legal compliance

- Meet legal requirements
- Serve law enforcement
- To enforce or exercise our rights, for example our Terms and Conditions and Terms of Use

Article 7: Cookies and other data collection technologies

We use and may allow others to use cookies and similar technologies (such as pixels) to recognize you and/or your device(s). You can read our Cookie Policy to learn more about why we use them and how to better manage their use through your browser settings and other tools.

Article 8: How we share the information

Since our goal is to help you match, chat, interact, get to know others and be in control of others/controlled by others, user information is of course mainly shared with other users. For some users, we also share information with service providers and partners who assist us in using the App and in some cases with judicial authorities. Read on to learn more about how your information is shared with others.

With other users

- You share information with other users when you voluntarily disclose information on Stringzz (including your public profile). Please be careful with your information and make sure that the content you share is not a problem for it to be publicly visible, as neither you nor we can control what others do with your data once you share it. You can strongly influence what users see of you. For starters, we advise you to use a nickname in the App for users, a made-up name instead of your real name. While Stringzz needs information from you to provide you with our services, it is not the information needed to communicate with other users. Stringzz will NEVER give your actual details (name, address, telephone number, etc.) to

other users. Also consider what you share in photos or videos, and whether or not you are clearly identifiable and identifiable.

- If you choose to restrict the audience to all or part of your profile or to certain content or information about you, it will be visible according to your settings. The App supports three levels of data sharing: private (the data is present in the app but is not shared with other users), my connections (the data is only shared with users you have connected to, probably because you have gained more trust in these users) and public (the data will be shown to anyone who can visit and view your profile).

With our service providers and partners

- We use third parties to help us run and improve our App and related services. These third parties assist us with a variety of tasks, including data hosting and maintenance, analytics, customer service, marketing, advertising, payment processing, and security operations.
- We may also share information with partners who distribute advertisements and help us advertise our services. For example, we may share limited and encrypted information about you to advertising partners.
- We follow strict screening before engaging a service provider or working with a partner. All our service providers and partners must agree to strict confidentiality obligations.
- In some cases it is also possible that you purchase products and services from partners of ours, and that we therefore need to pass on your details to such a partner, for example your home address for the supply of goods or services. Before we do this, we will always ask your permission per partner or supplier, or propose an alternative method of delivery.

For business transactions

- We may transfer your information if we are, in whole or in part, involved in a merger, sale, acquisition, disposal, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control.

When required by law

- We may disclose your information if reasonably necessary:
 - o to comply with legal process such as a court order, subpoena or search warrant, government / law enforcement investigation, or other legal requirements;
 - o to help prevent or detect crime (in both cases depending on applicable law); or
 - o to protect the safety of a person.

To enforce legal rights

- We can also share information:
 - o if disclosure would limit our liability in a factual or threatened lawsuit;
 - o if necessary to protect our legal rights and those of our users, business partners or other interested parties;
 - o to enforce our agreements with you; and
 - o to investigate, prevent or take other measures related to illegal activities, suspected fraud or other wrongdoing.

With your permission or at your request

- We may ask for your permission to share your information with third parties. In such a case, we will explain why we want to share this information.
- We may use and share personal information that is not personal (this means information that by itself does not identify who you are, such as information about the device, general demographics, general behavioural data, geographic location in an unidentifiable form), as well as personal information in a non-human readable form, under any of the above conditions. We may also share this information with third parties (especially advertisers) to develop and deliver targeted advertising on our services and on third party websites or applications, and to analyse and report the advertising you see. We may combine this information with additional information that is not personal or personal information in truncated, non-human readable form collected from other sources.

Article 9: Cross-border data transfer

Information sharing as set out in Section 7 sometimes includes cross-border data transfers, for example to the United States and other jurisdictions. For example, if the service allows users to be located in the European Economic Area ("EEA"), their personal information will be transferred to countries outside the EEA. We use standard contractual clauses approved by the European Commission or other appropriate security to enable data transfers from the EEA to other countries. Standard contractual clauses are commitments between companies that transfer personal data, binding them to protect the privacy and security of your data.

Article 10: Your rights

You have various rights with regard to your personal data under laws and regulations.

Below you will find information about these rights. You can exercise your rights by sending an email to privacy@stringzztheapp.com.

State in your e-mail what right you want to exercise. Also put in your e-mail your App nickname and the telephone number with which you maintain the services of the App (the mobile telephone number is an important carrier and identifier for Stringzz). Stringzz will respond within one month after receiving your request.

We want you to keep control over your information, so we offer you the following tools:

- Access/update functions in the App. Tools and account settings that assist you in accessing, correcting or removing information that you have provided to us that is directly linked to your account within the service. If you have any questions about these tools and settings, please contact our customer service at members@stringzztheapp.com for assistance.
- Permissions on the device. Mobile platforms have authorization systems for specific types of data and notifications from devices, such as phone book and location services, as well as push notifications. You can change your settings on your device to allow or deny the collection of the corresponding information or the display of the associated notifications. Of course, certain services may lose full functionality if you do that. If you would like to know what functionality you are missing by denying permission, please contact our customer service at members@stringzztheapp.com for an explanation if it is not properly documented in the App.

Right of inspection

You have the right to view your personal data. You can therefore request from us which personal data we have about you and what we use your personal data for. Please realize that in first instance this concerns no more data than the data entered by yourself in the App, which can be viewed and changed via the App.

Right to rectification of personal data

You also have the right to have your personal data corrected if it is processed incorrectly or incompletely. If you would like to exercise this right, please indicate in your email to members@stringzztheapp.com which of your personal data needs to be corrected or completed and for what reason.

Right to delete personal data

Uninstall. You can stop an app from continuing collecting information by removing it using the standard uninstall process for your device. If you delete the app from your mobile device, the unique ID associated with your device will be saved. If you reinstall the application on the same mobile device, we may re-associate this ID with previous transactions and activities. WITH THE REMOVAL OF THE APP FROM YOUR PHONE, YOU DO NOT DELETE YOUR PERSONAL DATA AT STRINGZZ. ONLY WHEN YOU TERMINATE YOUR ACCOUNT AT STRINGZZ, YOU INITIATE THE DELETION OF YOUR DATA ACCORDING TO OUR RETENTION PERIODS.

You have the right to request the removal of your personal data to the extent that it is no longer needed for the purpose for which it was collected. We may not or not fully comply with your request for removal, because Stringzz is obliged under, for example, tax legislation to keep certain data.

Right to restriction of processing

You also have the right to restrict the processing of your personal data. This means that Stringzz temporarily stops processing your personal data in certain situations. You can invoke this right in the following situations:

- pending the assessment of a request for rectification or objection;
- if your personal data should actually be deleted, but you do not wish it to be deleted;
- if Stringzz no longer needs the personal data, while you still need this data, for example for the preparation of a lawsuit.

Right to data portability

You have the right to receive the personal data you provide to Stringzz in a common digital form. In this form, you can reuse the data or pass it on to another company of your choice. It is also possible for another company to exercise this right on your behalf. For this we need an authorization from you, so that we can be sure that this company will request this on your behalf.

This right only applies to the personal data that we process about you on the basis of your permission or on the basis of an agreement concluded with you.

Withdrawal of permission

For certain purposes we ask for your consent. You can withdraw your consent at any time. The respective processing will then be stopped by us. The processing of your personal data that has already taken place remains lawful. If we need your permission, we will ask you for it.

Right to object

The right to object means that you can object to certain processing of your personal data by Stringzz because of your specific situation. You have this right in the following cases:

- the processing that takes place on the basis of legitimate interest;
- when we use your data for profiling;
- the use of your personal data for direct marketing purposes.

If you object to these processing operations, we will assess whether we can accommodate your objection. In that case, it is up to Stringzz to demonstrate that, despite your objection, we still have a legitimate interest to continue to process the personal data. If this balancing of interests is in your favour, we will stop processing this personal data.

If you object to receiving commercial messages and profiling based on them, you can request us to stop using your personal data for these purposes. We will then stop immediately. In some cases, this means that we can no longer continue to provide certain specific services to you. This is often especially the case when a free membership exists and revenues are covered through advertising costs. We will always explain the consequences of stopping processing of certain personal data before you make your decision.

Article 11: How we protect your data

We are constantly working very hard to protect you from unauthorized access to or alteration, disclosure or destruction of your personal information. As with all technology companies, although we take steps to protect your information, we can never promise that your personal information, chats, and other communications will always be secured.

We regularly monitor our systems for potential vulnerabilities and attacks and regularly review our procedures for collecting, storing and processing information to update our physical, technical and organizational security measures.

We may suspend your use of all or part of our services without notice if we suspect or detect a security breach. If you believe that your account or information is no longer secure, you must notify us without delay.

Article 12: How long we keep your data

We only keep personal information for as long as we need it for legitimate business purposes (as set out in Section 6) and as permitted by applicable law. To protect the safety of our users inside and outside our service, we maintain a secure three-month window after account deletion. During this period, account information is kept, although of course the account is no longer visible in the services, by users and by third parties. If you change your mind within three months, we still have your data, history, etc. available, so you don't have to create a new account and start making contacts again. After these three months, all but obligatory preserved data (see below) is deleted and we can no longer be of service to you with this information, and your possible account/membership at Stringzz will start again completely from scratch.

In practice, we will delete or anonymize your data when you terminate your account (after the retention window) or after one year of continuous inactivity (after two warnings), unless:

- we must keep them to comply with applicable law (for example, some "traffic data" is retained for one year to comply with the legal data retention obligation);
- we must keep them to demonstrate compliance with applicable law (for example, records of permissions to our terms, privacy policy and other similar permissions are retained for five years);
- there is an outstanding issue, claim or dispute that requires us to keep the relevant information until resolved; or
- the information must be retained for our legitimate business interests, such as fraud prevention and improving the safety and security of users. For example, information may need to be kept to prevent a user who has been banned for unsafe behaviour or security incidents from opening a new account, or whether data is needed for detecting suspects, for example in cases of abuse.

Article 13: Children's privacy

Our services are limited to users aged 18 or over. We do not allow users under the age of 18 on our platform and we do not knowingly collect personal information from anyone under the age of 18. If you suspect that a user is under the age of 18, you must notify us immediately.

Article 14: changes to this Privacy Statement

Because we are always looking for new and innovative ways to match, let you communicate, meet and control, this statement may change over time. We will notify you before essential changes take effect, so you have time to review the changes.

Article 15: contacting us

If you have any questions about this Privacy Statement, you can reach us in the following manners:

By email, at privacy@stringzztheapp.com

By regular mail:

ConsumerApps B.V. for Stringzz
Herengracht 420
1017BZ Amsterdam
The Netherlands