

Privacy Policy

Last Modified: August 17, 2023

Introduction

Aylo Billing Limited (hereinafter “we”, “us”, or “our”) operate the website www.adultforce.com (hereinafter the “Website”) and is the controller of the information collected or provided via the Website.

Please read this privacy policy carefully, as your access to and use of our Website signifies that you have read and understand all terms within this privacy policy. We respect your privacy and are committed to protecting your personal data.

For greater certainty, the term “**Personal Information**” or “**Personal Data**” means any information or data regarding a person or a user which can lead to identify such person or user, directly or indirectly, in particular b reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person or user.

If you have any questions about our privacy practices, please see “*Contact Information*” below for information on how to contact us.

Scope

This privacy policy applies to information we collect:

- on the Website and your email communications with the Website.

The Data We Collect About You

We may collect different kinds of personal data about you, depending on whether you choose to create an account with us.

Persons who visit the Website without logging in or registering (“**Unregistered Users**”)

- **Contact Information:** We collect email address or any other information which you voluntarily provide to us at your direction for a specific function of the Website.
- **Website activity data:** We collect information about how you use our Website, products and services and interact with our content and advertisements, including the pages you visit in our Website, search history, and the referring web page from which you arrived at our Website. We collect browser and operating system information, devices you use to access the Website and your time zone setting. We also collect online identifiers. Specifically, we collect internet protocol (IP) address information and we set cookies as explained below in the section on Cookies and Automatic Data Collection Technologies.

Persons who visit the Website who have logged in, created, or chose to create an account (“**Registered Users**”)

- We process from Registered Users the same categories of information described above for Unregistered Users, in addition to the below-listed categories.
- **Contact Information:** We collect your username or similar identifiers, and email addresses.
- **Payment and Commercial Information:** If you make a purchase or receive payments from us, we process payment card details and related information necessary to properly process your payment. We also process details regarding payments to and from you and details of products and/or services you have purchased or received from us.
- **Identifiers and Biometric Information:** If you choose to register to certain services on the Website, we process identifiers you submit to us (including government-issued photo identification as well as other documentation) in order for us to verify your identity, age, and record checks. We also process biometric information in order to verify the authenticity of the identifiers you provide to us while registering for such services as further explained in the section “Biometric Information” below. This information is processed by trusted third party age verification service providers. This policy does not apply to the privacy practices of these third-party age verification service providers. Read the privacy terms and conditions of these service providers carefully.
- **User Submitted Personal Information:** We process information you submit in order to personalize your account or for a specific function, for example date of birth, age, gender, your interests, preferences, feedback, survey responses, and your communication preferences, as well as any other information which you voluntarily provide to us at your direction for a specific function.

We may use your data to produce and share aggregated insights that do not directly or indirectly identify you and are not associated with you. Such aggregate information is not personal information.

The Website is not directed to persons under the age of eighteen (18) and/or the applicable age of majority in the jurisdiction from which the Website is accessed (“**minors**”), and we prohibit minors from using the Website. We do not knowingly process personal information from minors. If you are the parent or legal guardian of a minor who has provided us with personal information, then please contact us at support@adultforce.com to have that minor’s personal information deleted.

The Sources from Which We Collect Personal Information

We collect Personal Information in the following ways:

- **Directly from you:** We collect the categories of information listed above directly from you.
- **Automated technologies or interactions.** As explained in the section below, *Cookies and Automatic Data Collection Technologies*, we set cookies and other automatic techniques to collect website activity data when you visit the Website or other websites owned by our corporate group.

Purposes for Which We Use Your Personal Information

We use personal information for the following purposes described below.

- **Provision of services (Unregistered Users and Registered Users):** We use website activity data, and, additionally, for Registered Users only, contact information, and payment and payment and commercial information and user submitted personal information to present our Website and their contents to you, including any interactive features on our Website, and to provide you with information, products or services that you request from us;
- **Communication:** We use contact information to communicate with you about products and services by us that may be of interest to you;
- **Customer management (Registered Users only):** We use contact information, and payment and payment and commercial information and user submitted personal information to manage a Registered Users' accounts, to provide customer support and notices to the registered user about his/her account, including expiration and renewal notices, and notices about changes to the Website or any products or services we offer or provide through it. We use identifiers and biometric information for the purpose of verifying your identity and the authenticity of the identifiers you provide to us while registering for certain services on the Website.
- **Analytics:** We use identifiers and website activity data to determine whether users of our Website are unique, or whether the same user is using the Website on multiple occasions, and to monitor aggregate metrics such as total number of visitors, pages viewed, demographic patterns.
- **Functionality and security:** We may use any of the categories of data we collect to diagnose or fix technology problems, to verify your payment information, and to detect, prevent, and respond to actual or potential fraud, illegal activities, or intellectual property infringement;
- **Compliance:** We may use any of the categories of data we collect to enforce our terms and conditions and to comply with our legal obligations;
- We will use contact information and user submitted personal information in any other way we may describe when you provide the information; or for any other purpose with your consent provided separately from this privacy policy.

Our Legal Bases Under Canadian and European Union (EU) Privacy Law

We have the following legal bases under Canadian and EU privacy law for processing your personal data for the purposes described under Section *Purposes for Which We Use Your Personal Information*:

- We process personal data for the purposes of providing the services, customer management, certain customization of content (e.g., based on your selected preferences, favorites and ratings), and functionality and security, because the processing is necessary for the performance of a contract, specifically, it is necessary to provide the services or products you have requested, or to provide our Website and services in a manner consistent with our terms and conditions and any other contract that you have with us.
- We process personal data, including identifiers, for the purpose of verifying your identity because such processing is necessary for us to comply with a legal or regulatory obligation.
- We process biometric information based upon your consent to do so.
- We process personal data for the purposes of customization of advertising, marketing and analytics for our legitimate interests.
- We process personal data for functionality and security, because it is necessary for our legitimate interests, and in certain cases because the processing is necessary for us to comply with a legal or regulatory obligation.
- We process Personal Information in specific circumstances where you have provided your consent to such processing.

Disclosure of Your Personal Information

We disclose Personal Information:

- **Within our corporate group:** We may disclose any of the categories of personal information to members of our corporate group (including affiliates and related entities) to the extent this is necessary for the purposes listed in this privacy policy.
- **Service providers:** We disclose categories of personal information we collect to our authorized service providers that perform certain services on our behalf. These services may include payment processing and fulfilling orders, identity and document authenticity verification, including biometric processing, risk and fraud detection and mitigation, customer service, marketing and advertising, customization of content, analytics, security, or hosting our Website or supporting our Website's functionality. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purposes.

- **Legal successors:** We may disclose all categories of personal information we collect to a buyer or other successor in the event of a merger, acquisition or sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding.
- **To comply with the law or protect our rights or the rights of third parties:** We access, preserve and share all of the categories of personal information with regulators, law enforcement or others, where we reasonably believe such disclosure is needed to (a) satisfy any applicable law, regulation, legal process, or governmental request, (b) enforce applicable terms of use, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address illegal or suspected illegal activities, security or technical issues, (d) protect against harm to the rights, property or safety of our company, our users, our employees, or others; or (e) to maintain and protect the security and integrity of our Website or infrastructure. In such cases, we may raise or waive any legal objection or right available to us, in our sole discretion.

Notice to Law Enforcement

The following information serves as a guideline for law enforcement officials seeking disclosure of records. You may serve us a valid court order, subpoena, search warrant or equivalent legal or official administrative document by respecting the following conditions:

- The document(s) is uploaded, and all required fields have been filed out adequately on our platform for Legal Service Process located at: <https://legalservice.aylo.com/legal/datarequest>;
- The document(s) you are serving is correctly issued by a valid court of law or equivalent legal or administrative authority to us (See Website' footer to find our operating entity);
- The document(s) is also sent by mail at the following address: 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, Cyprus 2540.

We reserve the right to refuse online service through our Website, namely in cases where the above requirements are not met and require formal legal service at the above address. In such event, you will be notified. We may raise or waive any legal objection or right available, in our sole discretion.

Cookies and Automatic Data Collection Technologies

As you navigate through and interact with our Website, we use automatic data collection technologies to collect website activity data.

We use cookies, which are small text files that are stored in your web browser or downloaded to your device when you visit a website.

We currently use the following types of cookies, which are set by the Website' domains, or by other domains we own or control:

- *Strictly necessary cookies:* These are cookies that are required for the operation of our Website. These include, for example, cookies that enable a user to log in to our Website and to check if a user is allowed access to a particular service or content.

- *Functionality cookies:* These cookies help us to personalize and enhance your online experience on our Website. This type of cookies allows us to recognize you when you return to our Website and to remember, for example, your choice of language.
- *Analytics cookies:* These cookies allow us to recognize and count the number of users and to see how users use and explore our Website. These cookies help us to improve our Website, for example by ensuring that all users are able to find what they are looking for easily. Additionally, we are using third party session recording technologies that helps us better understand our users' experience, however, the recording data is pseudonymized.
- *Targeting and Advertising cookies:* These cookies record visits of a user on our Website, the pages a user visits and the links a user follows in order to enable us to make our Website more relevant to the user's interests and to help us serve ads that might be of interest to the user. Targeting and advertising cookies are used for Unregistered Users and Registered Users.

Analytics, Functionality and Advertising / Targeting cookies can be switched off at any time by accessing the 'Manage cookies' option that is located at the footer of our website. However, if you decline to accept these cookies, some functionality on our Website may be disabled and can interrupt your access to certain parts of our Website.

Cookies can be either session cookies or persistent cookies. A session cookie expires automatically when you close your browser. A persistent cookie will remain until it expires, or you delete your cookies. Expiration dates are set in the cookies themselves; some may expire after a few minutes while others may expire after multiple years.

Do Not Track: Our systems do not recognize browser "Do Not Track" signals.

Use of Google Analytics. We use Google as a service provider to collect and analyze information about how users use the Website, including, by collecting website activity data through first-party cookies set by our domains, and third-party cookies set by Google. Because we activated IP anonymization for Google Analytics, Google will anonymize the last octet of a particular IP address and will not store your full IP address. Google will use the information only for the purpose of providing Google Analytics services to us and will not use this information for any other purposes. The information collected by Google Analytics may be transmitted to and stored by Google on servers in the United States pursuant to standard contractual clauses approved by the EU. You can learn more on how Google uses data [here](#), and you can opt-out of Google Analytics by visiting the [Google Analytics opt-out page](#) or by accepting only necessary cookies.

Your Choices About How We Collect, Use and Disclose Your Personal Information

We strive to provide you with choices regarding the Personal Information you provide to us.

- You can choose not to provide us with certain personal information, but that may result in you being unable to use of certain features of our Website because such information may be required in order for you to register as a member; purchase products or services; ask a question; or initiate other transactions on our Website.
- As explained in the section *Cookies and Automatic Data Collection Technologies*, you may set your browser to refuse some or all Cookies. In addition, you may opt out of Google Analytics by visiting the [Google Analytics opt-out page](#).
- You can opt out of receiving marketing emails from us using the opt-out link provided in our emails. If you are a Registered User, we may continue to send you other types of transactional and relationship e-mail communications, such as emails about your account or orders, administrative notices, and surveys.
- You may also delete and deactivate your account with us at any time. If you do so, your profile will no longer be accessible by you. If you later choose to have an active account with us, you will have to sign up for a new account as none of the information you previously provided or saved within your account will have been saved.

Your Rights Related to Your Personal Information

Generally, in some regions like Canada, European Economic Area (EEA), and the United States, you have certain rights regarding the Personal Information we collect, use or disclose that is related to you, including the right:

- to receive information on the personal information we hold about you and how such Personal Information is used (right to access);
- to correct inaccurate personal information concerning you (right to data rectification);
- to delete/erase your personal information (right to deletion, “right to be forgotten”);
- to receive the personal information provided by you in a structured, commonly used and machine-readable format and to transmit the personal information to another data controller (right to data portability)
- to object to the use of your personal information where such use is based on our legitimate interests or on public interests (right to object);
- in some cases, to restrict our use of your personal information (right to restriction of processing); and
- to withdraw your consent at any time where our processing is based on consent.

You may exercise your right to access and deletion using the buttons at the bottom of this page. Additionally, you may, at any time, send us an e-mail at support@adultforce.com to exercise your above rights in accordance with the applicable legal requirements and limitations. If you

are located in the European Economic Area or the UK, you have a right to lodge a complaint with your local data protection authority.

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 in a position to respond to your request. Additionally, in some cases in order to adequately verify your identity or your authorization to make the request, we may require you to provide additional information.

Note that some requests to delete certain Personal Information will require the deletion of your user account as the provision of user accounts are inextricably linked to the use of certain Personal Information (*e.g.*, your e-mail address).

California Rights and Choices

The California Consumer Privacy Act (“CCPA”) provides you certain rights in relation to your personal information:

- *Right to Know:* You have the right to request that we disclose certain information about our collection of your personal information over the past 12 months, including the specific pieces of information we collected.
- *Right to Request Deletion:* You have the right to request that we delete any of your personal information we collected from you and retained, subject to certain exceptions set forth in the CCPA.
- *Right to Non-Discrimination for the Exercise of Your Rights:* We will not discriminate against you because you have exercised any of your rights under the CCPA.

To exercise the rights described above, please use the buttons at the bottom of this page or email us at support@adultforce.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 in order for us to verify your identity. We may require you 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.

We disclose certain categories of California residents’ personal information for our business purposes, as described in the section above titled Disclosure of Your Personal Information.

Resident’s Rights – Jurisdictions in the United States, Where Applicable

We do not sell, trade, or exchange the Registered Users’ personal information with anyone for money.

Biometric Information

AdultForce employs third-party service providers to help verify your identity and age and to check the authenticity of identification documents you provide using facial recognition technology. The facial recognition technology creates a mathematical representation of your face and detects facial features from the live scan of your face, your selfie, and the government-issued ID you submit or previously submitted to us, and which is considered biometric information/identifier/data under the laws of certain states and countries, is shared by our service providers with us as further described below.

- verify you are a real, live person and to prevent the use of methods which would allow a user to identify as someone else;
- to match your selfie with your government-issued ID you submit or previously submitted to us to make sure that nobody is impersonating you;
- to help confirm your age;
- to check your criminal/background history.

We may disclose your biometric information, face scan, selfie, and government-issued ID (including any government-issued ID or selfie you previously submitted to AdultForce) with members of our corporate group, and with third-party service providers (including Yoti Limited.). These entities may be located in jurisdictions that do not offer the same level of data protection as your jurisdiction. AdultForce and any of these entities may perform facial recognition and process your biometric information from your face scan, selfie and any government-issued ID, and use your biometric information for the above purposes.

You will be asked to provide your consent to biometric processing. You may withdraw your consent to this processing at any time by using the links below. Withdrawing your consent will not affect the lawfulness of any collection, use, processing or disclosure that occurred prior to the withdrawal.

Transfers of Your Personal Information to Other Countries

Where the laws of your country allow you to do so, by using the Website you consent to the transfer of information that we collect about you, including personal information, to other countries in which we, members of our corporate group (including affiliates and related entities) or our service providers are located. When we transfer personal information to countries outside of the European Economic Area (“EEA”) or other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with the applicable laws. Where relevant, our transfers outside the EEA are made pursuant to standard contractual clauses approved for use by the European Union.

Retention of Personal Information

We will only retain your personal information for as long as your account is active, or for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider a number of factors, including what personal data we are processing, the risk of harm from any unauthorized use or disclosure of your personal data, why we are processing your personal data and whether we can achieve this outcome through other means without having to process it.

Where we no longer need to process your personal data for the purposes set out in this privacy policy, we will delete your personal data information from our systems.

Where permissible, we will also delete your personal information upon your request as explained above in the section “*Your Rights Related to Your Personal Information*”.

The period for which we keep your personal information that is necessary for compliance and legal enforcement purposes varies and depend on the nature of our legal obligations and claims in the individual case.

Third-Party Links and Sites

If you click on a link to a third-party site, you will be taken to websites we do not control. This policy does not apply to the privacy practices of these websites. Read the privacy policy of other websites carefully. We are not responsible for these third-party practices.

Changes to Our Privacy Policy

We may modify or revise our privacy policy from time to time.

If we change anything in our privacy policy, the date of change will be reflected in the “last modified date”. We may attempt to notify you of any material changes as required by law. Please also periodically review the most up-to-date version of our privacy policy, which will be posted at this location, so you are aware of any changes.

Contact Information

If you have any questions about this privacy policy or our information-handling practices, please contact us at privacy@adultforce.com.

You may also contact us at 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, Cyprus 2540, Phone: +357 22662 320, Fax: +357 22343 282.

Our Data Protection Officer can be contacted at the following email address: dpo@AdultForce.com

Manage My Data

With respect to Data Protection Laws in users' jurisdictions, AdultForce Registered Users can request a copy of their personal data as well as get AdultForce to delete their personal data.

- [Request a Copy of my Data](#)
- [Delete My Personal Data](#)

Note: AdBlocker add-ons interfere with the Manage My Data system. Please disable them.