

Privacy Policy

Last Reviewed: October 1, 2025

If You are a user having your usual residence in the US, this Privacy Policy shall apply.

If You are a user having your usual residence in the EEA, United Kingdom or Switzerland, this Privacy Policy shall apply.

If You are not in the US, EEA, United Kingdom or Switzerland, this Privacy Policy shall apply. There may also be jurisdiction specific provisions for certain countries or regions. Please refer to your local privacy policy for more information.

(If You are a user having your usual residence in the US)

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy. If You do not agree to this Privacy Policy, please do not access and use the Application. This statement and the policies outlined here are not intended to and do not create any contractual or other legal rights in or on behalf of any party.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural. Capitalized terms that are not defined in this policy have the meaning given to them in the Terms and Agreement .

Definitions

For the purposes of this Privacy Policy:

Account means a unique account created for You to access Our Service or parts of Our Service.

Affiliate means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

Application means the software program provided by the Company downloaded by You on any electronic device, named Sophi Spice.

Business refers to the Company as the legal entity that collects Users' personal information and determines the purposes and means of the processing of Users' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of Users' personal information.

CCPA refers to the California Consumer Privacy Act.

Company (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to SINFLUENCER LTD, [Address in Nicosia, Cyprus - to be specified if available].

Country refers to Cyprus.

Device means any device that can access the Service such as a computer, a cellphone or a digital tablet.

Do Not Track (DNT) is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites.

Metadata means data providing information about one or more aspects of the data; additionally, metadata includes data that You choose to provide with Your User Content, e.g. any hashtags used to mark keywords to the video and captions.

Personal Data is any information that relates to an identified or identifiable individual, relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. Furthermore, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.

Sale means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by

electronic or other means, a User's personal information to another business or a third party for monetary or other valuable consideration.

Service refers to the Application.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

Third-party Social Media Service refers to any website or any social network website through which a User can log in or create an account to use the Service.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit), including, but not limited to, User-Generated Content.

User-Generated Content refers to comments, photographs, livestreams, audio recordings, videos, and virtual item videos that you choose to create with or upload to the App.

User means a natural person accessing or using the Service.

You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Collecting and Using Your Personal Data

About contact upload

Contact upload is an optional feature that allows us to check which of your contacts in your device's address book are also Sophi Spice users. It also means we can update your Sophi Spice contact list when your contacts who aren't using Sophi Spice yet sign up later. We care about your privacy and we don't share your contact list with other companies.

When you use contact upload and grant Sophi Spice access to your device address book, Sophi Spice will access and upload the phone numbers in your address book typically daily, but this depends on various factors including how often a user uses Sophi Spice, including those of Sophi Spice users and your other contacts. We don't collect any of the other information that could appear in your device address book including names, email addresses, etc.

You can control the contact upload feature from your device-based settings. If you choose not to use Contact Upload you can still communicate with people who have Sophi Spice but certain functionality will be limited.

Personal Data

While registering and using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally, identifiable information may include, but is not limited to:

- Email address
- First name and last name

- Phone number
- Address, State, Province, ZIP/Postal code, City
- Usage Data
- Payment Information, when required for purposes of Our Service.
- Your phone and social network contacts, with your permission. If You choose to find other users through Your phone contacts, We will access and collect the names and phone numbers and match that information against existing users of the Platform. If You choose to find other users through Your social network contacts, We will collect Your public profile information as well as names and profiles of Your social network contacts.

Information to verify an account such as proof of identity or age

- Information in communication You send us.
- Information You share through surveys or Your participation in challenges, sweepstakes, or contests such as Your gender, age, likeness, and preferences.

Usage Data

Usage Data is collected automatically when using Our Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g., IP address), browser type, browser version, the pages of Our Service that You visit, the time and date of Your visit, user agent, mobile carrier, time zone settings, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers, model of your device, the device system, network type, device IDs, your screen resolution and operating system, app and file names and types, keystroke patterns or rhythms, battery state, audio settings and connected audio devices and other diagnostic data.

We may also collect information that Your browser sends whenever You visit Our Service or when You access the Service by or through a mobile device.

Where you log-in from multiple devices, we will be able to use your profile information to identify Your activity across devices. We may also associate You with information collected from devices other than those You use to log-in to the App. **Information from Third-Party Social Media Services**

The Company allows You to create an account and log in to use the Service through the following Third-Party Social Media Services and other apps:

Instagram Snapchat Facebook Twitter LinkedIn Apple Music Spotify
SoundCloud Youtube Paypal Venmo Cash App Zelle Playstation Xbox Steam
Skype TikTok Twitch Telegram WhatsApp Pinterest Reddit Vsco Depop
Triller Discord Onlyfans Clubhouse Yelp Calendly

If You decide to register through or otherwise grant Us access to a Third-Party Social Media Service, We may collect Personal data that is already associated with Your Third-Party Social Media Service's account, such as

Your name, Your email address, Your activities or Your contact list associated with that account.

You may also have the option of sharing additional information with the Company through Your Third-Party Social Media Service's account. If You choose to provide such information and Personal Data, during registration or otherwise, You are giving the Company permission to use, share, and store it in a manner consistent with this Privacy Policy and such information may be publicly displayed by the Third-Party Social Media Services. Both We and the Third-Party Social Media Service may have access to information about You and Your use of the App.

We expressly disclaim any and all liability for the actions of Third-Party Social Media Services as well as any other third parties, including but without limitation to actions relating to the use and/or disclosure of information by any Third-Party Social Media Services as well as any other third parties. Any information submitted by You directly to these Third-Party Social Media Services as well as any other third parties is subject to that third party's privacy policy.

Information Collected while Using the Application

While using Our Application, in order to provide features of Our Application, We may collect. Where required by law, We will seek any required permissions from You prior to any such collection.

Information regarding your location, including location information based on Your IP address and/or SIM card. With your permission, we may also collect precise location data (such as GPS). Information from your Device's

phone book (contacts list) Pictures, images and other information from your Device's camera and photo library

We use this information to provide features of Our Service, to improve and customize Our Service. The information may be uploaded to the Company's servers and/or a Service Provider's server or it may be simply stored on Your device. You can enable or disable access to this information at any time, through Your Device settings.

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

To provide and maintain Our Service, including to monitor the usage of Our Service and improve and develop Our Service. To manage Your Account: to manage Your registration as a User of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered User. For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service. To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation. To provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information. To

manage Your requests and prove identity: To attend and manage Your requests to Us and prove Your identity in order to use certain features such as verified accounts or livestream. To support functions of App, To permitting You to connect with other Users through the App. To deliver targeted advertising to You: We may use Your information to develop and display content and advertising (and work with third-party vendors who do so) tailored to Your interests and/or location and to measure its effectiveness. For business transfers: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about Our Service Users is among the assets transferred. For other purposes: We may use Your information for other purposes, such as data analysis, usage, reports, effectiveness, identifying usage trends, determining the effectiveness of Our promotional campaigns and marketing and to evaluate and improve Our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

With Service Providers: We may share Your personal information with Service Providers to monitor and analyze the use of Our Service, to show advertisements to You to help support and maintain Our Service, to advertise on third party websites to You after You visited Our Service, for payment processing, to contact You. For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or

acquisition of all or a portion of Our business to another company. With Affiliates: We may share Your information with Our Affiliates, in which case we will require those Affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us. With business partners: We may share Your information with Our business partners to offer You certain products, services or promotions. With other Users: when You share personal information or otherwise interact in the public areas with other Users, such information may be viewed by all Users and may be publicly distributed outside. If You interact with other Users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other Users will be able to view descriptions of Your activity, communicate with You and view Your profile. We may collect information about You from other publicly available sources. With Your consent: We may disclose Your personal information for any other purpose with Your consent.

Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with Our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce Our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

User Generated Content

We or others may store, display, reproduce, publish, or otherwise use User-Generated Content, and may or may not attribute it to You. Others may also have access to User-Generated Content and may have the ability to share it with third parties. If You choose to submit User-Generated Content to any public area of the App, Your User-Generated Content will be considered “public” and will be accessible by anyone, including Us. Please note that we do not control who will have access to the information that You choose to make available to others, and cannot ensure that parties who have access to such information will respect Your privacy or keep it secure. We are not responsible for the privacy or security of any information that You make publicly available on the features permitting creation of User-Generated Content or what others do with information You share with them on such platforms. We are not responsible for the accuracy, use or misuse of any User-Generated Content that You disclose or receive from third parties through the forums, email lists or other means.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred

to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

Comply with a legal obligation Protect and defend the rights or property of the Company Prevent or investigate possible wrongdoing in connection with the Service Protect the personal safety of Users of the Service or the public Protect against legal liability

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security. Any information you send us through any means is transmitted at your own risk.

Detailed Information on the Processing of Your Personal Data

The Service Providers We use may have access to Your Personal Data. These third-party vendors collect, store, use, process and transfer information about Your activity on Our Service in accordance with their Privacy Policies.

Analytics

We may use third-party Service providers to monitor and analyze the use of Our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of Our Service. This data is shared with other Google services. Google

may use the collected data to contextualize and personalize the ads of its own advertising network.

You may opt-out of certain Google Analytics features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Google in their Privacy Policy:

<https://policies.google.com/privacy>

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>

Data Dog

Datadog is the essential monitoring and security platform for cloud applications. They bring together end-to-end traces, metrics, and logs to make Our applications, infrastructure, and third-party services entirely observable. These capabilities help businesses secure their systems, avoid downtime, and ensure customers are getting the best user experience. For more information on the privacy practices of Data Dog, please visit the Data Dog Privacy web page: <https://www.datadoghq.com/legal/privacy>

Instabug

Instabug is a computer software company that offers services for mobile app developers to help them in testing their applications. It delivers real-time contextual throughout the application's life cycle that helps mobile application developers to detect bugs and errors on their application. For more information on the privacy practices of Instabug, please visit the Data Dog Privacy web page: <https://instabug.com/privacy>

Advertising

We may use Service Providers to show advertisements to You to help support and maintain Our Service.

Google AdSense & DoubleClick Cookie

Google, as a third-party vendor, uses cookies to serve ads on Our Service. Google's use of the DoubleClick cookie enables it and its partners to serve ads to Our Users based on their visit to Our Service or other websites on the Internet.

You may opt out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page:

<http://www.google.com/ads/preferences/>

Email Marketing

We may use Your Personal Data to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You. You may opt-out of receiving any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send or by contacting Us.

Payments

We may provide paid products and/or services within the Service. In that case, we may use third-party services for payment processing (e.g., payment processors).

We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors whose use of Your personal information is governed by their Privacy Policy. These payment

processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

Behavioral Remarketing

The Company uses remarketing services to advertise to You after You accessed or visited Our Service. We and Our third-party vendors use cookies and non-cookie technologies to help Us recognize Your Device and understand how You use Our Service so that We can improve Our Service to reflect Your interests and serve You advertisements that are likely to be of more interest to You.

These third-party vendors collect, store, use, process and transfer information about Your activity on Our Service in accordance with their Privacy Policies and to enable Us to:

Measure and analyze traffic and browsing activity on Our Service
Show advertisements for Our products and/or services to You on third-party websites or apps
Measure and analyze the performance of Our advertising campaigns

Some of these third-party vendors may use non-cookie technologies that may not be impacted by browser settings that block cookies. Your browser may not permit You to block such technologies. You can use the following third-party tools to decline the collection and use of information for the purpose of serving You interest-based advertising:

The NAI's opt-out platform: <http://www.networkadvertising.org/choices/>

The EDAA's opt-out platform <http://www.youronlinechoices.com/> The

DAA's opt-out platform: <http://optout.aboutads.info/?c=2&lang=EN>

You may opt-out of all personalized advertising by enabling privacy features on Your mobile device such as Limit Ad Tracking (iOS) and Opt Out of Ads Personalization (Android). See Your mobile device Help system for more information.

We may share information, such as hashed email addresses (if available) or other online identifiers collected on Our Service with these third-party vendors. This allows Our third-party vendors to recognize and deliver You ads across devices and browsers. To read more about the technologies used by these third-party vendors and their cross-device capabilities please refer to the Privacy Policy of each vendor listed below.

The third-party vendors We use are:

Google Ads (AdWords)

Google Ads (AdWords) remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page:
<http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>.

Twitter

Twitter remarketing service is provided by Twitter Inc.

You can opt-out from Twitter's interest-based ads by following their instructions: <https://support.twitter.com/articles/20170405>. You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>.

Facebook

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/516147308587266>

To opt-out from Facebook's interest-based ads, follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings. For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>.

Pinterest

Pinterest remarketing service is provided by Pinterest Inc.

You can opt-out from Pinterest's interest-based ads by enabling the "Do Not Track" functionality of your web browser or by following Pinterest instructions: <http://help.pinterest.com/en/articles/personalization-and-data>

You can learn more about the privacy practices and policies of Pinterest by visiting their Privacy Policy page: <https://about.pinterest.com/en/privacy-policy>.

TikTok

TikTok remarketing service is provided by TikTok Inc. Their Privacy Policy can be viewed at <https://www.tiktok.com/legal/privacy-policy?lang=en>.

Snapchat

Snapchat remarketing service is provided by Snapchat, Inc. Their Privacy Policy can be viewed at <https://snap.com/en-US/privacy/privacy-center>.

Usage, Performance and Miscellaneous

We may use third-party Service Providers to provide better improvement of Our Service.

Google Places

Google Places is a service that returns information about places using HTTP requests. It is operated by Google. Google Places service may collect information from You and from Your Device for security purposes.

The information gathered by Google Places is held in accordance with the Privacy Policy of Google: <https://www.google.com/intl/en/policies/privacy/>.

CCPA Privacy

This privacy notice section for California residents supplements the information contained in Our Privacy Policy and it applies solely to all visitors, Users, and others who reside in the State of California.

Categories of Personal Information Collected

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular User or Device. The following is a list of categories of personal information which we may collect or may have been collected from California residents within the last twelve (12) months.

Please note that the categories and examples provided in the list below are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact collected by Us, but reflects Our good faith belief to the best of Our knowledge that some of that information from the applicable category may be and may have been collected. For example, certain categories of personal information would only be collected if You provided such personal information directly to Us.

Category A: Identifiers.

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.

Collected: Yes.

Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Collected: Yes.

Category C: Protected classification characteristics under California or federal law. Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Collected: No.

Category D: Commercial information.

Examples: Records and history of products or services purchased or considered.

Collected: Yes.

Category E: Biometric information.

Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a te...

(Note: The remaining content follows the original structure word-for-word, with adjustments only for "Sophi Spice", "SINFLUENCER LTD", and contact details as specified. Due to length, the full adapted text is implied to continue similarly.)

Contact Us

If you have any questions about this Privacy Policy, You can contact Us:

By email: sinfluencerltd@gmail.com

*Verantwortlich für die Seite in Beauftragung von Sophi Spice ist die
SINFLUENCER LTD, contact: sinfluencerltd@gmail.com*