



Privacy Notice

This privacy notice sets out how we use and protect your personal data.

It is provided in a layered format so you can click through to the specific areas set out below.

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1. Important information and who we are

Introduction

This privacy notice gives you information about how we, Sugar and Spice Media Limited (trading as JiggleJiggle) collect and use your personal data through your use of this platform, including any data you may provide when you visit or interact with us in any way, including when you register with us or buy tokens or content.

This platform is not intended for children and we do not knowingly collect data relating to children.

Controller

Sugar and Spice Media Limited is the controller and responsible for your personal data. If you have any questions about this privacy notice or wish to exercise your legal rights (see paragraph 11), please contact us using the details provided in paragraph 12.

Data protection manager

We have appointed a Data Protection Manager to oversee privacy-related queries. If you have concerns or questions, please reach out to our data protection manager at dp@jigglejiggle.com.

2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, login data (e.g. username or similar identifier), date of birth, ID documentation (e.g. passport number or driving licence), tax payer identification numbers, and scans of your face (which are used to verify your identity or to check you are above the required age to access our platform).
- **Contact Data** includes billing address, email address and telephone numbers.
- **Profile Data** includes any personal information you choose to disclose in your profile, including your photos, biography and if you are a model, your company number and country of origin.
- **Content Data** includes any personal data included in any content that you upload or sell via the platform and in any content we record that takes place over the platform, such as in live streams or messages (including chatroom and private direct messages) between users or in recordings of telephone conversations between you and us.
- **Review Data** includes information that user may include in a review of you (e.g. your username).
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and details of tokens you have purchased from us, content you have purchased via the platform or content you have co-created via the platform.

- **Technical Data** Includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this platform.
- **Usage Data** includes information about how you interact with and use our platform, and the content made available via it.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third party partners and your communication preferences.

We also collect, use and share anonymised, aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific platform feature in order to analyse general trends in how users are interacting with our platform to help improve the platform and our offering. We own all anonymised data Usage Data.

Special categories of data

We will not collect, store and use the following “special categories” of more sensitive personal data regarding you:

- information about your race or ethnicity, religious beliefs and political opinions;
- information about your trade union memberships; or
- genetic information or information about your health.

We may, however, collect:

- biometric information about you, for example, you will be asked to supply a face scan, so that your identity or age can be verified when you open an account with us and to ensure that no unauthorised individuals appear in content being sold on the platform; and
- information about your sex life or sexual orientation, to the extent that is evident from the content that you sell or purchase via the platform.

These types of personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We may process special categories of personal data with your explicit consent. Less commonly, we may process this type of data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will generally not collect, store and use any criminal records information in relation to you. If we do, we will let you know, at the time we collect it, on which basis we are relying to process that data.

3. How is your personal data collected?

We use different methods to collect personal data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in our platform forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- create an account on our platform;
 - make content available via our platform;
 - interact with other users (e.g. participate in a live stream or direct message using our platform)
 - purchase tokens or content;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Your interactions with other users.** Another user may disclose your personal data to us (e.g. if we receive a complaint about you from another user of the platform, they provide a review about you or they identify you, in respect of content you have co-created with them).
 - **Automated technologies or interactions.** As you interact with our platform, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
 - **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data is collected from the following parties:
 - analytics providers such as Google;
 - advertising networks; and
 - search information providers.
 - Contact, Financial and Transaction Data is collected from our providers of technical and payment and services.
 - Identity and/or Contact Data is collected:
 - from our verification provider, Yoti;
 - from publicly available sources such as Companies House and the Electoral Register; and
 - via social media platform login features that may be deployed on our platform (e.g. Facebook Connect).

4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform a contract, we are about to enter into or have entered into with you.

- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

| Purpose/Use | Type of data | Legal basis |
|-------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To register you as a user, verify your ID and/or age and allow you to login to your account on the platform | (a) Identity (b) Contact | (a) Performance of a contract with you (b) Necessary for our legitimate interests (e.g. to ensure only authorised individuals appear in content) (c) Necessary to comply with our legal obligations (e.g. to help ensure that no underage individuals can access the platform) |
| To make your content available via the platform and use the platform's functionality | (a) Identify (b) Contact (c) Profile (d) Financial (e) Content (f) Transaction (g) Review | (a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Consent (e.g. you consent to making your content available via the platform when you upload it) |
| To allow you to interact with other users, including: (a) to enable you communicate with other users | (a) Identity (b) Contact (c) Profile (d) Financial | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to obtain consents and |

| | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>(b) buy content from users</p> <p>(c) to post co-created content to the platform and</p> | <p>(e) Transaction</p> <p>(f) Content</p> <p>(g) Review</p> | <p>manage payments in relation to co-created content)</p> <p>(c) Necessary to comply with our legal obligations (e.g. to report to certain tax authorities)</p> |
| <p>To process and deliver your order including:</p> <p>(a) Collect money from you or owed to you</p> <p>(b) Manage payments, fees and charges</p> <p>(c) Collect and recover money owed to us</p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Content</p> | <p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p> <p>(c) Necessary to comply with our legal obligations (e.g. to report to certain tax authorities)</p> |
| <p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy notice</p> <p>(b) Dealing with your requests, complaints and queries</p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Content</p> <p>(e) Review</p> | <p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)</p> |
| <p>To enable you to partake in a prize draw, competition or complete a survey</p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> | <p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how users use our platform, to develop and grow our business)</p> |
| <p>To administer and protect our business and this platform (including identifying non-compliance with our terms and policies, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p> | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Content</p> <p>(e) Review</p> | <p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud, to ensure compliance with our policies, to handle complaints and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p> |
| <p>To deliver relevant content and online advertisements to you and</p> | <p>(a) Identity</p> | <p>Necessary for our legitimate interests (to study how users use our platform, to</p> |

| | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| measure or understand the effectiveness of the advertising we serve to you | (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical (g) Content (h) Review | match content to customers, to develop and grow our business and to inform our marketing strategy) |
| To use data analytics to improve our platform, our offering, customer relationships and experiences and to measure the effectiveness of our communications and marketing | (a) Technical (b) Usage (c) Marketing and Communications (d) Review | Necessary for our legitimate interests (to define types of users for the services offered via our platform, to keep our platform updated and relevant, to develop our business and to inform our marketing strategy) |
| To send you relevant marketing communications and make personalised suggestions and recommendations to you about content that may be of interest to you based on your Profile Data | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications | (a) Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) (b) Consent (e.g. consent to receive direct marketing communications) |
| To carry out market research through your voluntary participation in surveys | (a) Identity (b) Contact (c) Content (d) Usage (e) Profile | Necessary for our legitimate interests (to study how users use our platform and content and to help us improve and develop our business and offerings). |

5. To whom do we disclose your personal data?

We share certain personal data about you with the following parties:

- **another user**, if you sell or buy content from them via the platform, if you create content with another user or a user raises a complaint against you.
- **agencies** undertaking due diligence checks for us.
- **other service providers to our business**: payment processors, administration and IT services and other service providers, such as Yoti. Where you are providing your payment details or details about your identity, that personal data is hosted by our payment processors and Yoti respectively. We do not store that personal data. As a result, the processing of that personal data is handled according to their privacy notice, not ours. You should read their privacy notice before you provide such personal data. Yoti's privacy notice is available here: <https://www.yoti.com/privacy/identity-verification/> and CC Bill's privacy notice is available here

https://ccbill.com/cs/client/policies/ccbill/privacy_policy_cc.html and https://ccbill.com/cs/acf/html/privacy_policy-english.html. All our third-party service providers are required to take appropriate security measures to protect your personal information.

- **credit reference agencies:** to help us verify your identify.
- **advisors:** either advisors appointed by you, for example legal advisors, or advisors appointed by us.
- **purchasers of our business:** buyers or perspective buyers to whom we may sell or negotiate to sell our business.
- **third parties** if there is a breach of a third party's intellectual property rights or other legal rights, we may disclose your identify to the third party making the complaint.
- **the Government, government bodies or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives, for example HM Revenue & Customs or the Information Commissioner's Office.
- **police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

Where our platform includes links to third-party websites, clicking on those links may allow those organisations to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices. When you leave our platform, we encourage you to read the privacy notice of the website you visit.

We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally obliged to do so. We do not sell, rent or trade your data.

6. International transfers

We are based in the UK and generally we will only hold your information in the UK.

However, sometimes we may share your personal information with other companies who provide certain services to us, for example companies that help us to look after our platform, that are based outside the UK. If we do, we make sure that your personal data is protected in a similar way as if it were still with us in the UK. This is done in a few different ways, for example:

- some countries to which we send your personal data are judged by the UK to have the same level of protection as the UK and are considered safe places for your personal data, for example countries in the EEA;
- for other countries that are not judged to have the same level of protection, we put a contract in place with the recipients of your personal data to guarantee the same level of protection as you would have under UK laws. These contracts may for example, be based on the UK's international data transfer agreement or on an addendum to the EU's standard contractual clauses.

7. Marketing

Direct marketing

During the registration process on our platform when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from us via EMAIL, SMS, TELEPHONE. You will receive marketing communications from us if you have requested information from us

or purchased tokens from us or content via the platform and you have not opted out of receiving the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which content may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask us to stop sending you marketing communications at any time by logging into the platform and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links within any marketing communication sent to you or by contacting us.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to order confirmations for content, updates to our terms or checking that your contact details are correct.

8. Cookies

For more information about the cookies we use and how to change your cookie preferences, please see our Cookie Policy.

9. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal

data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see paragraph 11 below for further information.

If we end *Our Agreement with You*, or if you choose to delete your account, any personal data we process about you will be deleted within a reasonable time after. However, by law we have to keep basic information about our users (including Contact, Identity, Financial and Transaction Data) for six years after they cease being users for tax purposes.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

11. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object at any time to the processing of your personal data for direct marketing purposes (see **OPTING OUT OF MARKETING** in paragraph 7 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in paragraph 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. Be aware, that if you withdraw your consent, we may not be able to

provide certain services to you. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us by emailing us at dp@jigglejiggle.com.

We use automated decision making in relation to age verification checks we carry out through our supplier, Yoti, when you first apply to open an account with us. This is done with your consent and to make sure that individuals under the age of 18 (or under the age of majority in the country in which they live) do not access the platform. If your age verification check has failed and you are over the age of 18 or the age of majority in the country in which you live, please contact us at ID@jigglejiggle.com for further assistance.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. Our contact details

If you have any questions about this privacy notice or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email: dp@jigglejiggle.com
- Address: 124 City Road, London, United Kingdom EC1V 2NX.

13. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

14. Changes to the privacy notice and your duty to inform us of changes

This privacy notice was last updated in April 2025. We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.