# PRIVACY POLICY

Effective February 16, 2022

Your Privacy is of Vital Importance to us.

## **INTRODUCTION**

Welcome to the service provided by Cinder LLC, (hereinafter referred to as "Owner/Developer", "Licensor", "we", "us", and/or "our"). Our aim is to update the global connection of social persons by adding new features to social media. This privacy policy has been created to provide information about our company, our website or mobile application (hereinafter referred to as the "platform" or the "Cinder platform") and the services we provide (collectively, the "Services") to our users ("you" and/or "your"). Our commitment towards being authentic about the data we gather regarding individuals, how it is utilized, and with whom it is disclosed is essential to this goal.

This privacy statement has been created to better help people who are concerned about how their personal information is being used online. It outlines Cinder's policy on information, including personally identifiable data ("Personal Data"), acquired from users of the Services.

When you use our Services, you agree to the terms of this Privacy Statement (described below). As explained in our Privacy Statement, Cookie Policy, Preferences, and our Support Centre, we provide our users with choices regarding the information that we collect, use, and disclose.

Cinder reserves the right at any time, without further notice, to change and modify this privacy policy. You should check this privacy policy periodically for updates and changes that affect the use of the App. By using the Cinder Platform you are agreeing to our privacy policy, which applies to the use of the App. If you do not agree with any portion of this Policy, you should desist from using the app.

When it pertains to our management and use of your information, we think you should feel simultaneously enlightened and supported. As a result, this notification helps explain:

- What information we collect when using the Cinder website or social app, or when you communicate with or contact us;
- How we use the Information;
- How the information shared;
- Data Retention Policy;
- Your Choices & Obligations;
- Other Information.

You acknowledge that by visiting and using the Site, its associated & affiliated Services, you agree to our Terms of Service and the Privacy Policy (collectively referred to as the "Cinder Terms") included within, as amended from time to time. The Cinder Terms are integrated into and apply to this Privacy Policy. The Terms define the principles of using the platform as well as such things as limitations on damages, how disputes are to be addressed, and mode of terminations for not abiding by the terms.

## AMENDMENT TO THIS PRIVACY POLICY

WE HAVE THE DISCRETION TO REVISE THIS PRIVACY POLICY AT ANY TIME. WHEN WE DO, WE WILL REVISE THE UPDATED DATE AT THE BOTTOM OF THIS PAGE. WE ENCOURAGE USERS TO FREQUENTLY CHECK THIS PAGE FOR ANY CHANGES TO STAY INFORMED ABOUT HOW WE ARE HELPING TO PROTECT THE PERSONAL INFORMATION WE COLLECT. YOU ACKNOWLEDGE AND AGREE THAT IT IS YOUR RESPONSIBILITY TO REVIEW THIS PRIVACY POLICY PERIODICALLY AND BECOME AWARE OF MODIFICATIONS.

YOUR CONTINUAL USE OF THE PLATFORM AND RELATED AND/OR ASSOCIATED SERVICES INDICATES YOUR APPROVAL, UNDERSTANDING, AND AGREEMENT TO THE REVISED PRIVACY POLICY.

Never reveal any personal information to other participants or visitors in any forum or in any other way that might be used to locate you or others in the real, off-line world - For instance, your complete name, postal or home address, phone numbers, actual email address, and other contact information ("contact information"), including the names and contact information of other Members, friends, family, or others.

Cinder accepts no responsibility for any event that occurs as a result of your revealing of personal information to other Members or Users, whether directly, through our forum, or other web pages.

## ADDITIONAL TERMS

Personal Data: Personal Data, as described in various privacy laws and information security standards, means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession), either on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context.

**Usage Data:** Usage Data is 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).

**Cookies:** Cookies are small pieces of data stored on your device (computer or mobile device).

Data Controller: Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

Data Processors (or Service Providers): Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User): Data Subject is any living individual who is using our Service and is the subject of Personal Data.

#### INFORMATION WE COLLECT / GATHER

To provide the Cinder Platform, we must process information about you. The type of information that we collect depends on how you use the services on the platform. The information we may collect can be classified into two Personally Identifiable Information (PII) and Non Personally Identifiable Information (NPII). 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, etc; while Non Personally identifiable information includes statistical and analytical information collected on an aggregate basis of all visitors to our platform and it comprises information that cannot be used to identify or contact you, such as demography, device type, and other anonymous statistical data involving the use of our platform.

You provide information to us when you:

- look for information about our services;
- Sign up for Cinder Services;
- stream, view, or consume content on a device or through a device-based service or application;
- disclose information in your user account (you may have multiple if you utilized more than one e-mail address when using our Services) or on your Profile;
- add professional contacts to your profile
- Configure your settings, provide data access permissions, or connect with our Services;
- provide content (e.g., story summaries and movie reviews);
- Email us;
- fill out a survey or a promotional entry form;
- Participate in a poll;
- upload photos or videos;
- on the platform, review movies;

- publish casting notices or respond to casting notices on our platform;
- Make use of our services such as Showtimes and Tickets.
- create Watchlists or Lists
- take part in on-site forums;
- monitor pages on our platform; or
- Make use of our notification services.

We may also collect information from other sources based on your movie or film preferences. Other sources of information include: filmography, such as film and TV credits; biographical information; photographs and videos provided to Cinder Services; reviews; and press interviews and media articles.

The following are some of the information that Cinder collects as you use the platform:

# Information you provide to Cinder

This is the information that you provide to us during registration to become a Member or during your use of the Site. In order to create an account on the Cinder platform, it is mandatory that you provide data such as your name, email address and/or mobile number, a password, and your present location. When you use our Services, we gather information on the content, communications, as well as other information you provide, such as shared materials, messages, or connect with others and metadata like the location of a photo or the date a file was created.

# Information you provide through Communication

The platform provides links or forms that can be used to contact us so you can comment, make a complaint, make suggestions and ask questions. Your name, email address, address, and phone number are requested on these forms so we can address our answer in a mannerly way. Cinder may store information from email on file but does not currently sell or license this information with third parties without express authorization from you.

Other information we may collect is those you provide to us in connection with your use of the Cinder Platform such as your consents, preferences and feedback, and technical and bug fixing information.

## Usage Details

We gather information on how you use our platform and services, such as the contents you see or interact with, the different features you access, the activities you undertake, the individuals or profiles with whom you communicate, and the timing, regularity, and length of your activities.

We also pull together information about the people and accounts connected to you, groups that you are connected to, and how you interact with them across the Cinder platform.

# Analytics, Cookies, and Related Technologies

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with a small amount of data that may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. If you wish so, you can easily disable cookies on your web browsing software by following the step-by-step guides located at www.allaboutcookies.org and at www.youronlinechoices.com.

By agreeing to accept our use of cookies, you are giving us, and the third parties we partner with, permission to place, store, and access some or all the cookies described below on your device.

We use cookies to improve users' experience, by saving users' preferences and login information, and to provide personalized functionality. We may use cookies to collect, store, and sometimes track information for statistical purposes to improve the products and services we provide and to manage our telecommunications networks. Users may choose to set their web browser to refuse cookies or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

However, upon blocking cookies, you may not be able to use all functions of the Cinder Platform. We use cookies to:

- Help remember and process the items in movies or films review instances.
- Understand and save users' preferences for future visits.
- Keep track of advertisements.
- Compile aggregate data about app traffic and site interactions in order to offer better site and app experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

# Examples of Cookies we use:

- 1. Session Cookies: We use Session Cookies to operate our Service.
- 2. **Preference Cookies:** We use Preference Cookies to remember your preferences and various settings.

- 3. Security Cookies: We use Security Cookies for security purposes.
- 4. **Necessary Cookies:** These cookies are necessary for the proper functioning of our Services, such as displaying content, logging in, validating your session, responding to your request for services, and other functions.
- 5. **Functional Cookies:** These cookies enable the Site to remember a user's choices such as their language, user name, and other personal choices while using our Services. They can also be used to deliver services, such as letting a user make a blog post, listen to audio, or watch videos on the Site.

We may also utilize web beacon to display images on web pages and applications, but can also be used to transfer your unique user identification to a database and associate you with previously acquired information about you in our database which allows Cinder to track certain websites and platforms that you visit.

Efficiency Cookies: These cookies collect information about how you use Cinder (e.g. which pages you visit, and if you experience any errors). This helps us to improve the way our Services work, understand the interests of our users and measure the effectiveness of our advertising. Some of our efficient cookies are managed for us by third parties, and these cookies do not collect information that could identify you.

Demographics and Interests Reporting Cookies: These cookies allow websites to link the actions of a user during a browser session. They may be used for a variety of purposes, such as remembering what a user has put in their shopping cart as they browse a website. Session cookies also permit users to be recognized as they navigate a website so that any item or page changes they make are remembered from page to page. Session cookies expire after a browser session; thus, they are not stored long term.

Persistent Cookies: These cookies are stored on a user's device in between browser sessions, which allows the user's preferences or actions across a website (or, in some cases, across different sites) to be remembered. Persistent cookies may be used for a variety of purposes, including remembering users' choices and preferences when using a website or targeting advertising to them.

We may also collect and use the data contained in log files, which may include your IP address, your ISP, the browser you used to visit our platform, the time you visited our platform, and which sections you visited.

When you access our platform via a mobile device, we may use your mobile device ID (i.e. the unique identifier assigned to a mobile device by the manufacturer) and/or Advertising ID (for Apple iOS) instead of cookies in

order to recognize you and track displayed web pages, along with their performance. For the latest versions of Apple iOS, your device would request you one or more times for your express consent for advertising tracking.

## Your Device and Location

We also collect information about your network and device (for example, IP address, proxy server, operating system, web browser and add-ons, device identification, and features, cookie IDs, and/or ISP or mobile carrier). If you use our Services from a mobile device or from a PC, that device will give us information about your location based on the settings on the device. We will ask for your permission before using GPS or other technologies to pinpoint your exact position.

## **Transaction Information**

We collect information about your purchase or transaction when you utilize our e-commerce services or make any financial transactions. Payment information, such as your credit or debit card number and other card information, other account and authentication information, and billing, shipping, and contact information are all included.

# Information from Third Party

We may collect information from third parties that are provided about your activities off the Cinder platform, including information about your device, the websites you visit, purchases you make, the ads you see, and how you use their services. We sometimes get information about your online and offline activities and transactions from third-party data suppliers who have the legal authority to provide us with this information.

Collected Personal Data from such third parties will include, but will not be limited to, friend lists, email, image gallery, likes, and other information. If you close your account, or if you deauthorize our access, your access to our websites may be suspended. For more information, please read the terms and policies of such third-party platforms. Please take into account that such third-party social media platforms may disclose and share your personal information according to their own rules, guidelines, and policies.

For our users who are creators of content that is sold to end customers, the social media integrations may allow you to access, treat and use Personal Data according to their own terms, conditions, guidelines, policies, and advertising rules. For more information, you ought to be familiar with such documents, which are not enforced by Cinder. Any changes in such functionalities will be the sole and final responsibility of the social media network.

# HOW WE USE COLLECTED INFORMATION

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.

We may collect the information and content that you post, upload, use, exploit, sell, subscribe to, or otherwise exploit when using Cinder, including any user-generated content. Your content, date and time stamps, and all associated comments are publicly viewable on Cinder. This also may be indexed by search engines and be republished elsewhere on the Internet in accordance with our Terms.

We may also collect information that cannot be used to personally identify an individual person, such as anonymous usage data, general demographic information that we may collect, such as the number of clicks, platform types, preferences you submit, and preferences that are generated based on the data you submit.

In general, we may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To personalize user's experience and to allow us to deliver the type of content and product offerings in which you are most interested;
- To keep you updated with information on the platform and notify you about changes to our Service;
- To improve our website in order to serve you better;
- To allow you to participate in interactive features of our Service when you choose to do so;
- To communicate with you in order to enable us to better service you in responding to your customer service requests;
- To provide customer support, follow up after correspondence (live chat, email, or phone inquiries);
- To administer adverts, a contest, promotion, survey, or other site feature;
- To quickly process your transactions;
- To promote safety, integrity, and security;
- To ask for ratings and reviews of services or products;
- Other uses may include: to analyze trends, gather demographic information, comply with applicable law, and cooperate with law enforcement activities;
- To monitor the usage of our Service

- To detect, prevent and address technical issues
- To provide you with news, special offers, and general information about other goods, services, and events that we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

When personal information is collected, we will inform you at the point of collection including the purpose for the collection. Cinder does not intend to transfer your personal information to third parties without your consent, except under the limited conditions described under the discussion entitled Information Sharing and Disclosure below. If you choose to provide us with your personal information, we may transfer that information, within http://www.Cinder.com/ or to our third-party service providers.

# LEGAL BASIS FOR PROCESSING PERSONAL DATA UNDER GENERAL DATA PROTECTION REGULATION (GDPR)

If you are from the European Economic Area (EEA), Cinder's legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Cinder may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

# DISCLOSURES AND EXTERNAL USE OF INFORMATION

Except as described in this Privacy Policy, personal information you provide to us will not be shared with or used by third parties without your permission. Below are parties that we are likely to share your information with:

**Business Transaction:** If Cinder 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.

**Disclosure to Affiliates and Partners:** We will need to share your data with third-party vendors, service providers, contractors, or agents who perform services for us or on our behalf and require access to such information to do that work. This information may be used to, among other things, analyze

and track data, determine the popularity of certain content, pages, or features, and better understand online activity.

**Public Domain:** In addition, any of your submitted user-generated content may be indexed by search engines. In some cases, we may charge for access to your content and public information on our platform.

**Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

**Disclosure for Law Enforcement:** Under certain circumstances, Cinder 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).

# Disclosure of Non-Personally Identifiable Information

We may disclose or share Non-Personally Identifiable Information with Partners, Affiliates, and Advertisers. For example, we may share aggregated demographic information (which does not include any Personally Identifiable Information) with "Third Party Advertisers" or "Third Party Advertising Companies" and other parties as provided below: We use Third Party Advertising Companies to serve ads when you visit our Website. These companies may use Non-Personally Identifiable Information about your visits to this and other websites in order to provide, through the use of network tags, advertisements about goods and services that may be of interest to you. We also use Third Party Service Providers to track and analyze Non-Personally Identifiable usage and volume statistical information from our Users to administer our Website and constantly improve its quality. We may also publish this information for promotional purposes or as a representative audience for Advertisers. Please note that this is not Personally Identifiable Information, only general summaries of activities of our Users. Such data is collected on our behalf and is owned and used by us.

# **LEGAL REQUIREMENTS**

Cinder may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Cinder
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public

To protect against legal liability

## LINKS TO OTHER WEBSITES / THIRD PARTIES

Our Site and Platform may contain links to enable you to visit other websites of interest, including user blogs and feeds. We do not have any control over those other websites and are not responsible for the protection and privacy of any information which you provide on those websites. You should become familiar with looking at the privacy statement applicable to each website you visit.

#### DATA SECURITY

The security of your Personal Data is important to us, please 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.

You can be assured that personal information collected through the Site is secure and is maintained in a manner consistent with current industry standards. The importance of security for all personal information associated with our subscribers is of utmost concern to us. Your personal information is protected in several ways. We protect inputted information by undertaking reasonable technical and administrative security measures (e.g. firewalls, data encryption, physical & administrative access controls to the data and servers) that limit the risk of loss, abuse, unauthorized access, disclosure, and alteration.

Please 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 information, we cannot guarantee its absolute security.

#### ACCOUNT CLOSURE

If you choose to terminate your Cinder account, your personal data will usually be removed from public view on our Services within 24 hours. Except as shown below, we usually remove closed account information within 30 days of account closure.

We maintain your personal information even after you delete your membership account if it is fairly in compliance with our legal responsibilities (including law enforcement requests), comply with regulations, settle disputes, ensure security, hinder fraud and waste, implement our Terms, or accomplish your request. We will keep de-personalized information once your account is terminated.

You acknowledge that information shared with others via the platform messenger or chat, updates, or group posts will remain accessible after you

delete your account or remove content from your own profile or inbox, and we have no control over the information that other Members have replicated out of our platform. The source of group material and ratings or review information connected with closed accounts will be an unknown individual.

## AGE POLICY/CHILDREN'S PRIVACY

In agreement with the Children's Online Privacy Protection Act, 15 U.S.C. §§ 6501-06 and 16 C.F.R. §§ 312.1-312.12, we do not seek or knowingly collect any personal information about children under 16 years of age.

We understand the importance of protecting children's privacy, especially in an online environment. The Site is not designed for or directed at children. This Platform is not intended for children living who are under 16 years of age. No one under the age of 16 may provide any information to or on the Platform. Under no circumstances shall we allow the use of our services by minors without prior consent or authorization by a parent or legal guardian. We do not knowingly collect Personal Information from minors.

If we determine that we have collected or received any information from any child under the age of 16, we will delete that information immediately. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us using the contact details below or, contact us at matt@cindermovieapp.com. to provide additional information or to request the removal of the relevant information from our database.

If you feel that we are not abiding by this Privacy Notice, you should contact us immediately via email at matt@cindermovieapp.com.

#### DATA RETENTION

Cinder will retain your Personal Data only for as long as is necessary for the purposes set out in this 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.

Cinder 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.

## TRANSFER OF DATA

Your information, including Personal Data, 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 from those from your jurisdiction.

If you choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States of America and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Cinder 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.

If you are located in the European Economic Area (EEA) or other regions with laws governing data collection and use that may differ from United States of America law, please note that we may transfer information to a country or jurisdiction that does not have the same data protection laws as your jurisdiction, as disclosed in this Privacy Notice. It may also be processed by staff operating outside the EEA who work for us or for one of the Service Providers, also as disclosed.

## YOUR RIGHTS ACCORDING TO GDPR LAW

The Cinder Team seeks to ensure all individuals are provided with the rights mandated by their governing jurisdiction. Not all of the rights discussed herein will apply to each individual data subject and may not apply to you depending upon your jurisdiction.

You may benefit from a number of rights in relation to the information that we process. Some rights apply only in certain limited cases, depending on your location. If you would like to manage, change, limit, or delete your personal information, you can do so by contacting us. Upon request, we will provide you with information about whether we hold any of your personal information. In certain cases where we process your information, you may also have a right to restrict or limit the ways in which we use your personal information. In certain circumstances, you also have the right to request the deletion of your personal information, and to obtain a copy of your personal information in an easily accessible format.

To the extent that such rights are mandated by the laws applicable to the individual data subject, such as all data subjects residing in the European Union ("EU"), the following rights may apply: the right to access (GDPR, Article 15); the right to rectification (GDPR, Article16); the right to erasure (GDPR, Article 17); the right to restrict processing (GDPR, Article 18); the right of object (GDPR, Article 21); and if applicable, the right to data portability (GDPR, Article 20). You may also have a right to lodge a complaint with an appropriate data privacy regulatory authority (GDPR, Article 77).

If we process your information based on our legitimate interests as explained in this Privacy Notice, or in the public interest, you can object to this processing in certain circumstances. In such cases, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons. Where we use your data for direct marketing purposes, you can always object using the unsubscribe link in such communications or changing your account settings if you have registered or scheduled an appointment with the Cinder Team. However, please note you may not opt-out of Platform-related communications, such as account verification, changes or updates to features of the Platform, or technical and security notices.

Where you have provided consent to certain data processing, you have the right to withdraw that consent at any time. A withdrawal of consent will not affect the validity of our use of your personal data up until the point you have withdrawn your consent.

# You may request to:

- 1. Receive confirmation as to whether or not personal information concerning you is being processed and access your stored personal information, together with supplementary information.
- 2. Receive a copy of personal information you directly volunteer to us in a structured, commonly used, and machine-readable format.
- 3. Request rectification of your personal information that is in our control.
- 4. Request erasure of your personal information.
- 5. Object to the processing of personal information by us.
- 6. Request to restrict the processing of your personal information by us.
- 7. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute and may be subject to our own legitimate interests and regulatory requirements. If you wish to exercise any of the above rights or receive more information, please contact our Data Protection Officer ("DPO") using matt@cindermovieapp.com.

# ACCESS TO THE INFORMATION WE HAVE COLLECTED ABOUT YOU

Cinder implores you to contact us regarding the information we have collected about you, including regarding the nature and accuracy of the data that has been collected about you, to request an update, modification, or deletion of your information, to opt-out of certain Platform uses of your information, or to withdraw any consent you may have granted to us. You can change, correct, request the deletion or removal of, and express any concerns relating to the collection, use, or disclosure of your personal information by e-mailing matt@cindermovieapp.com. We may not accommodate a

request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Past payments; subscription status; personally identifiable information (such as a user's name, e-mail address, and password); methods of payment; e-mail notification preferences; your contributions to material (for example, story summaries and movie reviews); Profile data related with your Cinder accounts (including reviews, ratings, and Watchlists); details about your profile (such as acting experience, physical characteristics, educational background, and professional training); Images have been posted to Cinder Services and other information are examples of what you can obtain through Cinder Services.

We may retain the information we receive about you for as long as necessary to fulfill our contractual and legal obligations, consistent with our data retention schedules, or indefinitely, but information generally will be retained only for as long as necessary to fulfill the purposes for which the information was collected, or as otherwise required by law. In addition, we may delete your personal data from our systems as part of a data retention plan. Following termination or deactivation of Cinder Profile, then we may retain your information and content for a commercially reasonable time for backup, archival, and audit purposes.

Please note requests to delete or remove your information do not necessarily ensure complete or comprehensive removal of the content or information posted and removed information may persist in backup copies indefinitely. Please note that if you choose to delete your information or opt-out of the collection and use of your information, you understand that certain features, including but not limited to access to the Platform, may no longer be available to you.

You also have the right to ask to see what information we hold about you, and what we are doing with it. This is known as a Subject Access Request and must be made in writing to matt@cindermovieapp.com.

You also have a right to request your information in a format that supports its portability. Please contact matt@cindermovieapp.com should you wish to exercise this right.

## FAIR INFORMATION PRACTICES

The Fair Information Practices Principles form the backbone of privacy law around the world and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should

be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur, we will notify you via email and in-app notification within 7 business days.

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have here. We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

# "DO NOT TRACK" SIGNALS

Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized, and therefore, we do not support Do Not Track ("DNT").

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

Users may opt out of the use of the DART cookie by visiting the Google Ad and Content Network web page.

Users can set preferences for how Google advertises to you using the Google Ad Settings web page. Alternatively, you can opt-out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add-on.

## COMMERCIAL MESSAGE COMMUNICATIONS

Occasionally, we will ask you for express permission and approval to receive electronic messages in electronic format which are then sent to an electronic address and that contains a message asking recipients to

participate in commercial activities such as newsletters, purchase of products, services, and invitations to participate in surveys.

We will send you service-related announcements on occasions when it is necessary to do so. For instance, if our Service is temporarily suspended for maintenance, or a new enhancement is released, which will affect the way you use our services, we might send you an email. Generally, you may not opt-out of these communications, which are neither commercial nor promotional in nature.

Generally, you have the right to object to the processing of your personal data if the grounds for this objection is direct marketing.

You have the right to opt-out of receiving promotional communications at any time by (i) contacting us; (ii) when we may ask you to confirm or update your marketing preferences if you instruct us to provide further the features and functionality of websites in the future; (iii) if there are changes in the law, regulation, or the structure of our business.

## OPT-OUT CHOICE / THIRD-PARTY AD NETWORKS

As discussed above, you can always choose not to provide information, although it may be required to engage in a certain activity on the Website. We will send you information regarding updates about our products and promotional offers. You cannot opt out of Administrative Emails.

"Administrative Emails" relate to a User's activity on the Website, and include emails regarding a particular User's account and requests or inquiries. If you do not wish to receive them, you have the option to deactivate your account. In contrast to Administrative Emails, however, you do have a choice with respect to Promotional Emails. Promotional Emails advertise our products and services, and/or the products and services of our Advertisers and Affiliates. If you do not want to receive Promotional Emails from us, you may select to opt-out of receiving Promotional Emails at any time after registering by hitting the "unsubscribe" button at the bottom of any of our e-mails. When contacting us, please indicate your name, address, email address, and what Promotional Emails you do not want to receive.

For information about and to opt-out of interest-based ads from many ad networks, go to:

**U.S.:** Digital Advertising Alliance's Consumer Choice webpage and the Network Advertising Initiative Consumer Opt-Out webpage.

Canada: Digital Advertising Alliance of Canada's Opt-Out Tool.

European Union: European Interactive Digital Advertising Alliance webpage.

#### ADVERTISING POLICY

We, along with third-party vendors such as Google and Facebook, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie). These third parties may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs, and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you.

From time to time, we may use Google Analytics, Ad Words, Double Click and/or Ad Sense tracking codes, and other third-party software tools (such as remarketing codes) in order to collect information and marketing analytics about the manner in which you browse our platform and services.

The served ads will be targeted based on your previous browsing history and may include retargeting codes. For example, third-party vendors may show you ads on certain websites across the Internet, even after you leave our platform. The collected information is anonymized, meaning it cannot be tracked back to individuals. Using such tools, we learn how to optimize, and serve ads based on a user's past visits, providing you with a better user experience.

We also may report aggregated or de-identified information about the number of users that saw a particular ad or content and related audience engagement information to users of our Services and to publishers of content on Cinder.

Advertisers who are integrated with our Services may, likewise, provide us with information as part of their ad campaigns, including customer information (e.g., email addresses, phone numbers, or other contact information, demographic or interest data) in order to create custom audiences for personalizing their ad campaigns or for measuring the effectiveness of their ads; we only use this information to facilitate the particular advertiser's campaign (including ad metrics and reporting to that advertiser), and we do not disclose this information to third parties (other than our service providers) unless required by law. Also, we do not disclose to the advertisers who use our Services the names or contact information of their customers.

Google's advertising requirements can be summed up by Google's Advertising Principles. Google, as a third-party vendor, uses cookies to serve ads on our Site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our Site, third-party vendor's websites, and other websites on the Internet.

Unlike cookies, device IDs cannot be deleted, but you can select to reset your Advertising IDs in the "Settings" section of your mobile device.

You can learn more about how to opt-out by browsing Google's opting-out and privacy pages located at www.google.com, or the Network Advertising Initiative website located at www.networkadvertising.org.

## **AGREEMENT**

We agree to the following:

- Users can visit our site anonymously.
- Once this privacy policy is created, we will add a link to it on our home page or as a minimum on the first significant page after entering our website.
- Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above.
- Users will be notified of any privacy policy changes on our Privacy Policy Page

## COPYRIGHT AND TRADEMARK NOTICE

The contents of this site are the exclusive property of Cinder and may not be copied, distributed, displayed, altered or modified, or reproduced or transmitted, in any form or by any means including, but not limited to, electronic, photocopy, or otherwise, without the prior written permission of Cinder. The corporate and product names, slogans, logos, and other content contained on this site are the registered or unregistered trademarks or service marks of Cinder or are used by Cinder with the permission of their owners. The use, copying, or alteration of any Trademark without the express prior written consent of Cinder or, where applicable, the registered owner's express prior written consent is strictly prohibited. The Trademarks are protected under the Trademark Act and by state or common law.

# **CAN SPAM ACT**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to send information, respond to inquiries, and/or other requests or questions.

To be in accordance with CANSPAM we agree to the following:

- NOT use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honour opt-out/unsubscribe requests quickly.

• Allow users to unsubscribe by using the link at the bottom of each email.

## ACCEPTANCE OF POLICY

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

# AMENDMENTS/ UPDATES

Cinder reserves the right to revise, amend, or modify this Privacy Policy from time to time in any manner. However, prior notification will be sent to you or the revised policy date will be updated at the bottom or top of this page. Therefore we encourage users to continually visit this page for any changes or amendments. We also, encourage you to periodically review this page for the latest information on our privacy practices.

## **CONTACT US**

We hope this policy responds to your questions about our collection, use and disclosure of your personal data. If you have questions or complaints regarding this Policy, please ensure to contact Cinder first online via our support page. You can as well reach us with Emails: We will respond to your inquiry at our earliest matt@cindermovieapp.com. opportunity.

We appreciate your concerns and will seek to resolve any concerns and disputes. Thanks for reading. Hope we made you feel a little more comfortable about using our website.

Revised & Updated: 16th February, 2022.