

USER GENERATED CONTENT POLICY & PRIVACY POLICY

This Policy is aimed to ensure a positive experience for each user. Please join us in this effort by respecting these guidelines.

We may make exceptions to these policies based on artistic, educational, historical, documentary, or scientific considerations, or where there are other substantial benefits to the public.

By clicking the checkbox, you are acknowledging that you have read and understand this Policy, that you agree to follow these guidelines currently in effect and as updated by DIVO from time to time. If you do not agree with these guidelines, please do not click the checkbox and/or create user account in Software.

GENERAL

- Users can post content only in compliance with EULA
- Users are prohibited to post content, which is unlawful, misleading, discriminatory, fraudulent or abusive, including without limitation:
 - Sexually explicit content that features explicit sexual imagery primarily intended to cause sexual arousal;
 - Graphic violent content that incites or glorifies violence including extremely graphic or violent materials for the sake of disgusting others;
 - Hateful content that promotes violence or harassment against an individual or group based on ethnic origin, religion, disability, gender, age, veteran status, sexual orientation, or gender identity;
 - Content providing medical advice, diagnosis or treatment via this service;
 - Content promoting dangerous and illegal activities including self-harm, such as self-mutilation, eating disorders, or drug abuse. Users are prohibited to post content used to threaten or organize violence or support violent organizations;
 - Content aiming at harassment and cyberbullying.

ORIGINAL CONTENT

- User can post only content to which user has intellectual rights.
- Users are prohibited to post content that infringes anyone's intellectual property rights and will respond to clear notices of alleged copyright infringement. Repeated infringement of intellectual property rights, including copyright, will result in account termination.

ADS AND SPONSORED CONTENT

- Sponsorship, including, but not limited to, ownership or affiliate interest, payment, or material support, should be clearly disclosed to readers.
- Advertising and other paid promotional material on your pages should not exceed your content.
- We do not allow content that conceals or misrepresents sponsored content as independent, editorial content.
- The subject of sponsored content should not focus on the sponsor without clear disclosure.

PERSONAL AND CONFIDENTIAL INFORMATION

- We do not allow the sharing of a private person's confidential and personally identifiable information (e.g. medical records or financial information).

DECEPTIVE PROFILE

✘ Users are prohibited to create accounts that impersonate any person or organization, or that misrepresent or conceal their ownership or primary purpose. Users are prohibited to create accounts that engage in inauthentic or coordinated behavior activity to that misleads users.

ENFORCEMENT

✉ DIVO encourages you to report content or conduct that you believe breaches this guidelines

!! DIVO will react within 24-hours should you report any content or conduct and may take the following actions on reported content or conduct: remove content from the account, restrict sharing of content, limiting who can view content, disable access to one or more products, delete an account, report illegal materials to appropriate law enforcement authorities.

!! DIVO will remove content that doesn't comply with this Policy.

!! DIVO will disable account if user repeatedly infringe other people's intellectual property rights.

PRIVACY POLICY

DIVO FINANCE LTD (hereinafter – “**DIVO**”, “**we**”, or “**us**”) provides you with comprehensive information about the storage of DATA and PERSONAL INFORMATION of users registered in Software (hereafter – “**User**”, “**Users**”, “**you**”) within our company, which is collected in respect of your usage of DIVO mobile application (hereafter – “**Software**”).

Company Party means the DIVO and its respective past, present and future employees, officers, directors, contractors, consultants, attorneys, accountants, financial advisors, equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors and assigns.

This Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

Information collected

Personal Information you provide

1. We collect and store information, that you provide for creation of your account:
 - *your full name*
 - *phone number*
 - *email address*
 - *username and password*
 - *phone number*
 - *date of birth*
 - *gender*
 - *mailing address and country of residence*
 - *personal identification document details*
 - *payment information, such as, payment card number (credit or debit card), and the security code associated with your payment instrument, if you make a payment*
 - *information about your appearance, including height, weight, eyes & hair color, size of chest, waist, and hips, shoes size*
 - *your current location*

2. We collect and store information, that you provide using the Software: content (photos, stories), information about yourself, communications and other information.
3. We may also ask you for personally identifying information at other times, such as if you enter into a promotion, post content to the Site, communicate with us, or complete a survey.

Information about your usage of Software

We collect information about the people, pages, accounts, hashtags and groups that you are connected to and how you interact with them across our Software. We collect information about how you use our Software, such as the types of content that you view or engage with, the features you use, the actions you take, the people or accounts you interact with and the time, frequency and duration of your activities. We also receive and analyze content, communications and information that other people provide when they use our Software.

Non-Personal Information

We also collect data in a form that does not, on its own, permit direct association with any specific individual, a statistical information about our Software and visitors, such as IP addresses, browsers, pages viewed, number of visitors, services used, content submitted, etc. We need this information to improve the content and functionality of our Software. We use this information to customize your experience using our Software. We may provide statistical information to third parties, but in doing so we do not reference you by individual name, e-mail address, home address, or telephone number without your permission.

Usage of collected information

We may use your information for the following purposes:

- providing, maintaining, delivering or improving the Software;
- verifying that you are a unique individual or entity;
- to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Software, and promote safety and security on and off Software;
- analysing and tracking Personal Data to determine the usefulness or popularity of certain content, and to better understand the activity of the Software users;
- fulfilling our legal or regulatory requirements;
- providing you with the information, products or services that you have requested;
- answering your inquiry or responding to a communication from you;
- developing new products or services;
- sending you technical notices, support or administrative notifications;
- communicating with you about news, products, services, events and other information we think will be of interest to you;
- monitoring and analysing trends, usage and activities in connection with the Software;
- detecting, investigating and preventing fraudulent transactions or unauthorized or illegal activities;
- protecting the rights and property of DIVO and others;
- linking, connecting or combining information we collect from or about you with other information.

Disclosure to third parties

We will only disclose your Personal Data in the following ways:

- with your Consent or at your instruction;
- with our current or future Company Parties and with other companies under common control or ownership with us or our offices internationally;
- with third parties or service providers that perform work for us; we also impose strict restrictions on how our partners can use and disclose the data we provide;
- certain information you may choose to share may be displayed publicly, such as your username and any content you post when you use interactive areas of the Software like our online forums;
- in connection with a merger or sale of our company assets, or if we do a financing or are involved in an acquisition, or any other situation where Personal Data may be disclosed or transferred as one of our business assets;

- in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- if we believe your actions are inconsistent with our user agreements, policies or legislation, or to protect the rights, property and safety of any assets of DIVO or the other Software users or third parties;
- with third parties where aggregate Personal Data is disclosed which cannot be used to identify you.

Protection of Personal Information

We take appropriate security, administrative and technical measures to protect any Personal Information and/or User Data you provide regarding the collection, storage and processing of Personal Information and/or User Data, as well as security measures to protect your user account in Software against unauthorized access, modification, disclosure or destruction of your Personal Information and/or User Data.

We take reasonable steps to protect the security of the Personal Information communicated through the Software. However, no mobile security system is entirely fool proof and the Internet is not a secure method of transmitting information. As a result, we do not assume any responsibility for the Personal Information you submit to or receive from us through the Internet, or for any unauthorized access or use of that information, and we cannot and do not guarantee that information communicated by you to us or sent to you by us will be received, or that it will not be altered before or after its transmission to us. You agree to not hold any Company Party liable for any loss or damage of any sort incurred as a result of any misappropriation, interception, modification, deletion, destruction or use of information provided through the Software.

Your Consent

By using our Software, you consent to the collection and use of this information in the manner we describe.

You give your Consent by CLICKING a box when creating a user account in Software. In the case you click the respective box, you irrevocably and unconditionally consent and agree that the Company Parties shall be entitled to Process your Personal Information as it is indicated in your Consent.

You may always refuse to supply your Personal Information, though this may prevent you from engaging in certain Software - related activities and/or obtaining certain Services.

You have the right to withdraw your Consent at any time. You can submit such request by sending us an email to: info@divo.fashion based on Consent before its withdrawal.

Retention of Information

In accordance with applicable laws and as needed to provide the Services to our users, Company Parties may hold your Personal Information. This requirement is conditioned by a need to comply with legal obligations and resolve possible disputes.

Company Information may retain your Personal Data so long as your user account in Software is active. Moreover, your Personal Information may be held beyond the abovementioned period until it is indispensable for Company Parties to have relevant information to respond to any issues that may arise later.

EU Person's Rights

EU Persons shall acknowledge, that their rights relating to Personal Data are provided in the GDPR and other applicable laws of the member states of the European Union. In particular, EU Persons have the following rights relating to their Personal Data:

1. **right to access.** You can request access to your Personal Data and obtain a copy of such Personal Data in a format acceptable to you (e.g. PDF, DOC, DOCX, etc.). You can submit such request by sending an email to: info@divo.fashion. After your request is received, our privacy team reviews the form and conducts requestor's identity verification without undue delay. Upon successful verification, you are provided with a copy of your Personal Data;
2. **right to data portability.** You have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another service provider (controller) without hindrance from us;
3. **right to erasure ("Right to be forgotten") and right to rectification.** You are entitled to request erasure or rectification of your Personal Data by sending us a respective request to: info@divo.fashion. We will handle requests for Personal Data to be rectified or deleted, unless there is a legal requirement that prohibits such

- request to be fulfilled. When request is fulfilled, you will be informed that your Personal Data is changed or erased and is not-longer collected, however, to fulfil our legal requirements the Company Parties will store information about each requestor for the purposes of providing an evidence that a request has been fulfilled;
4. **right to object.** At all times, you are entitled to object to Processing of your Personal Data. Right to object can be exercised by sending an email to: info@divo.fashion. Upon receipt of the request, the Company Parties cease the Processing, unless there is a legal or statutory ground for such Processing;
 5. **right to be informed.** If you are inquiring about Processing activities conducted with respect to your Personal Data, the Company Parties, without undue delay, will provide information about: **(i)** purposes of Processing; **(ii)** categories and types of Personal Data; **(iii)** retention period; **(iv)** source of the relevant Personal Data; **(v)** privacy rights and information on Data portability. However, all information about the categories of Personal Data and Processing operational conducted by Company Parties is available in this Policy; and
 6. **the right to lodge a complaint with a supervisory authority.** Supervisory authority means an independent public authority which is established by an EU member state pursuant to Article 51 GDPR.

Other

Any changes to our Privacy Policy will be communicated through our Software at least twenty-four (24) hours in advance of its effective date.

We have no way of distinguishing the age of individuals who access our Software, and so we carry out the same Privacy Policy for individuals of all ages. If a child has provided us with personally identifying information without parental or guardian consent, the parent or guardian should contact us to remove the information and opt out of promotional opportunities. Anyway, children under the age of 13, or equivalent minimum age in the relevant jurisdiction, are not permitted to create their own user account in Software. If we learn that we have collected the personal information of a child under 13, or equivalent minimum age depending on jurisdiction, outside the above circumstances we will take steps to delete the information as soon as possible and disable such user account in Software.

The Company may appoint an expert on data privacy who works independently to ensure that the Company is adhering to the policies and procedures set forth in the GDPR (data protection officer). Data protection officer assists DIVO to monitor internal compliance, inform and advise on data protection obligations, provide advice regarding data protection impact assessments (DPIAs) and act as a contact point for data subjects and the supervisory authorities. In the case the DIVO appoints such data protection officer, it will publish its contact details on the Website.