

## **PRIVACY POLICY**

***Effective Date: January 29<sup>th</sup>, 2026***

CtrlAltX Studios LLC (the “Company,” “we,” “us,” or “our”) respects your privacy. This privacy policy (the “Policy”) describes how we collect, use, disclose, and protect Personal Information when you access or use our websites, applications, and related services (collectively, the “Platform”).

This Policy applies solely to individuals located in the United States and to Personal Information collected through the Platform. The Platform is intended for individuals eighteen (18) years of age or older. We do not knowingly collect Personal Information from individuals under the age of 18.

This Policy applies regardless of the device or method used to access the Platform and covers Personal Information collected, used, disclosed, stored, or otherwise processed by the Company in both electronic and paper form.

### **Overview**

This Privacy Policy explains, in straightforward terms:

- What Personal Information we collect;
- How we use cookies and similar technologies;
- How and why we use and share Personal Information; and
- The choices and rights available to you regarding your information.

We use Personal Information to operate, maintain, secure, and improve the Platform; to provide customer support; to communicate with you; to enforce our Terms of Service and other policies; to detect, prevent, and address fraud, security incidents, and misuse; and to comply with applicable legal obligations.

### **Privacy at a Glance**

- We do not sell Personal Information.
- Payments are processed through third-party payment processors; the Company does not store full payment card numbers.
- The Platform may facilitate interactions with independent third parties, but the Company operates solely as a technology provider.
- You control your privacy choices, including communication preferences, cookies, and data-rights requests.

### **Definitions**

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an identified or

identifiable individual or household. Personal Information does not include de-identified, aggregated, or publicly available information.

“Platform” means the Company’s websites, applications, and related digital services through which users may access features, content, offerings, or experiences.

“User” means any individual who accesses or uses the Platform.

“Service Provider” means a third party that processes Personal Information on the Company’s behalf to support Platform operations.

## **Information We Collect and Use**

### **Platform Role and Data Relationship**

The Company operates a digital platform that enables users to access features, content, experiences, or offerings made available through the Platform, including offerings provided by independent third parties. The Company acts as the data controller or “business” (as applicable under U.S. privacy laws) for Personal Information processed to operate, manage, and secure the Platform.

Independent third parties that offer content or experiences through the Platform may collect or process Personal Information in connection with their own services. The Company is not responsible for the privacy practices of such third parties outside the Platform.

### **Information You Provide to Us**

When you create an account, use the Platform, communicate with us, or otherwise interact with the Platform, we may collect the following categories of Personal Information:

#### **Personal Identifiers**

Identifiers such as your name, email address, username, phone number, mailing address, and account credentials. We use this information to create and manage accounts, communicate with users, provide support, send transactional or service-related communications, and operate the Platform.

#### **Communications and Submissions**

Information contained in messages, emails, support requests, reviews, feedback, surveys, or other content you submit to us or through the Platform. We use this information to respond to inquiries, provide customer support, manage user relationships, enforce our policies, and improve the Platform.

#### **Transactional Information**

Information related to purchases, subscriptions, or other transactions conducted through the Platform. Payments are processed by third-party payment processors, and the Company does not store full payment card numbers or sensitive financial credentials.

#### **User-Generated Content**

Any content you choose to upload, post, or share through the Platform, such as profile information, comments, reviews, images, or other materials.

### **Privacy Preferences**

Information reflecting your choices regarding communications, cookies, or data-rights requests.

### **Information We Collect Automatically**

When you access or use the Platform, we may automatically collect certain information, including:

- IP address and approximate location information (for example, derived from IP address)
- Device type, operating system, browser type, and device identifiers
- Pages viewed, features used, and interactions with the Platform
- Referring URLs, timestamps, and session duration

We use this information to operate and secure the Platform, analyze performance, understand usage trends, and improve user experience.

### **Cookies and Similar Technologies**

We and our Service Providers may use cookies, SDKs, web beacons, and similar technologies to:

- Enable essential Platform functionality
- Remember user preferences
- Analyze usage and performance
- Improve security and reliability

You may control cookies through your browser settings. Where required by applicable law, we provide notice and honor applicable cookie preference signals, including Global Privacy Control (“GPC”) signals where recognized.

Disabling cookies may affect the functionality of certain features of the Platform.

The Company may display a cookie or tracking notice on the Platform (such as a banner or footer link) directing users to this Privacy Policy, which describes how cookies and similar technologies are used and how users may control their preferences.

### **Information from Third Parties**

We may receive Personal Information from third parties in connection with operating the Platform, including:

- Payment processors (confirmation of transactions);
- Service Providers that support analytics, hosting, security, or customer support; and
- Other users who invite you to the Platform or share content with you.

We use such information only for the purposes for which it was provided and consistent with this Policy.

### **Aggregated and De-Identified Information**

We may aggregate or de-identify Personal Information so that it can no longer reasonably be associated with an individual. We may use and disclose such information for any lawful business purpose.

### **How We Disclose Personal Information**

The Company may disclose Personal Information as described below and solely for legitimate business purposes consistent with this Privacy Policy.

#### **1. Service Providers**

We may share Personal Information with trusted third-party service providers that perform services on our behalf, including but not limited to hosting, analytics, customer support, communications delivery, fraud prevention, security, and payment processing (collectively, "Service Providers").

Service Providers may receive access to Personal Information only as reasonably necessary to perform services for the Company and are contractually obligated to use such information solely for those purposes and to maintain appropriate confidentiality and security safeguards.

Payments and financial transactions conducted through the Platform are processed by third-party payment processors. The Company does not store full payment card numbers or sensitive financial credentials. Payment processors' use of Personal Information is governed by their own privacy policies.

#### **2. Third Parties at Your Direction**

We may disclose Personal Information to third parties when you request, authorize, or direct us to do so, including when you choose to access third-party services, features, or offerings made available through the Platform.

#### **3. Affiliates and Related Entities**

We may share Personal Information with our parent companies, subsidiaries, affiliates, or entities under common ownership or control, provided such disclosures are consistent with this Privacy Policy.

#### **4. Social Media and Third-Party Integrations**

If you interact with social media features or third-party integrations through the Platform (such as sharing content or linking accounts), certain Personal Information may be disclosed to those third parties in accordance with your settings and the applicable third party's privacy policy. The Company does not control how those third parties collect or use your information.

#### **5. Public or User-Directed Disclosures**

Any Personal Information you choose to make public through the Platform, such as through public profiles, reviews, comments, or other publicly visible content, may be accessible to other users or the public. Please exercise caution when deciding what information to disclose publicly.

The Company cannot control or prevent the use, copying, or redistribution of information that you voluntarily make public.

## **6. Promotions, Contests, and Sweepstakes**

From time to time, the Company may offer promotions, contests, or sweepstakes. Participation may require submission of Personal Information. Information collected in connection with such promotions may be disclosed to third parties as necessary to administer the promotion, distribute rewards, comply with legal requirements, or as otherwise disclosed in the applicable rules.

## **7. Business Transfers**

If the Company is involved in a merger, acquisition, financing, reorganization, bankruptcy, dissolution, or sale of all or a portion of its assets, Personal Information may be disclosed or transferred as part of that transaction, subject to applicable law and appropriate confidentiality protections.

## **8. Legal, Safety, and Compliance Purposes**

We may disclose Personal Information if we believe in good faith that such disclosure is necessary to:

- Comply with applicable law, regulation, legal process, or governmental request;
- Enforce or apply our Terms of Service or other agreements;
- Protect the rights, property, or safety of the Company, users, or others; or
- Prevent fraud, security incidents, or other harmful activity.

## **9. With Your Consent**

We may disclose Personal Information for any additional purpose disclosed to you at the time of collection or with your explicit consent.

## **Your Choices and Opt-Out Rights**

You have choices regarding the collection, use, and disclosure of your Personal Information.

### **Email Communications**

You may opt out of receiving promotional emails by following the unsubscribe instructions included in those communications or by contacting us directly. Even if you opt out of marketing communications, we may still send you non-promotional messages related to your account, transactions, or Platform operations.

### **Account Information**

You may review, update, or correct certain account information through your account settings. You may also request deletion of your account or Personal Information by contacting us. We may retain

certain information as required by law or for legitimate business purposes, such as security, fraud prevention, or compliance.

### **Targeted or Personalized Advertising**

The Company does not sell Personal Information. If we engage third-party advertising or analytics services, you may be able to control interest-based advertising through your browser settings, device settings, or industry opt-out mechanisms such as:

- The Digital Advertising Alliance (DAA) opt-out tool ([www.aboutads.info/choices](http://www.aboutads.info/choices)); and
- The Network Advertising Initiative (NAI) opt-out tool ([www.networkadvertising.org/choices](http://www.networkadvertising.org/choices)).

Opting out does not eliminate all advertising but may limit ads tailored to your interests.

### **Cookies and Tracking Controls**

You may control cookies through your browser or device settings. Where required by law, we honor applicable opt-out preference signals, including GPC signals.

### **SMS Communications**

If the Platform offers SMS or text-based communications, such messages are used solely for transactional, security, or account-related purposes. You may opt out of non-essential SMS messages at any time by replying “STOP” or request assistance by replying “HELP.”

### **California and U.S. State Privacy Rights**

#### **California Privacy Rights (CCPA / CPRA)**

If you are a California resident, you have certain rights under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, the “CCPA”), including the right to:

- Request disclosure of the categories and specific pieces of Personal Information we have collected about you, the sources of that information, the purposes for collection, and the categories of third parties with whom we have shared it;
- Request deletion of Personal Information we collected from you, subject to legal exceptions;
- Request correction of inaccurate Personal Information;
- Opt out of the sale or sharing of Personal Information and the use of Personal Information for targeted advertising, where applicable;
- Limit certain uses and disclosures of Sensitive Personal Information, where applicable; and
- Not receive discriminatory treatment for exercising your privacy rights.

The Company does not sell Personal Information for monetary consideration. Some disclosures for advertising, analytics, or measurement purposes may be considered a “sale,” “sharing,” or “targeted advertising” under California or other state privacy laws.

## **Submitting Privacy Rights Requests**

You may submit a privacy rights request by contacting us at:

Email: [privacy@ctrlaltx.studio](mailto:privacy@ctrlaltx.studio)

To protect your privacy, we may need to verify your identity before processing a request. Verification may require matching information you provide (such as name, email address, phone number, or account details) against information already in our records. We will use verification information solely to process your request.

If we cannot verify your identity, we may request additional information or deny the request as permitted by law.

## **Authorized Agents**

California residents may designate an authorized agent to submit a privacy request on their behalf. Authorized agents must provide written proof of authorization (such as a signed authorization or power of attorney). We may also require the resident to independently verify their identity directly with us.

## **Response Timing and Appeals**

We will respond to verified requests within the timeframes required by applicable law (generally 45 days, with extensions where permitted).

If we deny your request, you may appeal our decision by emailing [privacy@ctrlaltx.studio](mailto:privacy@ctrlaltx.studio) with "Privacy Appeal" in the subject line. If your appeal is denied, you may contact the appropriate state regulator.

## **Minors (California)**

If you are a California resident under the age of 18 and have posted content publicly on the Platform, you may request removal of that content by contacting us at [privacy@ctrlaltx.studio](mailto:privacy@ctrlaltx.studio). Removal does not guarantee complete or comprehensive erasure.

## **Do Not Track & Global Privacy Control**

The Platform does not respond to browser "Do Not Track" signals. However, where required by law, we honor GPC signals as valid opt-out requests for applicable data uses.

## **Nevada Privacy Rights**

Nevada residents have the right to direct a business not to sell certain covered information. The Company does not sell Personal Information as defined under Nevada law. Nevada residents may nonetheless submit a request by contacting us at [privacy@ctrlaltx.studio](mailto:privacy@ctrlaltx.studio).

## **Other U.S. State Privacy Rights**

Residents of certain U.S. states — including California, Colorado, Connecticut, Utah, Virginia, Oregon, Texas, Montana, New Jersey, and Delaware — may have additional rights under applicable state privacy laws, such as the right to:

- access, correct, or delete Personal Information;
- obtain a portable copy of Personal Information;
- opt out of targeted advertising, sale, or profiling in furtherance of decisions with legal or similarly significant effects; and
- limit certain uses of Sensitive Personal Information.

Where required, we obtain opt-in consent for the processing of sensitive data such as precise geolocation. We do not use Sensitive Personal Information to infer characteristics except as permitted by law.

Requests may be submitted using the contact information above, and we process GPC signals where legally required.

### **Information Processing, Transfers, and Retention**

The Company is a United States–based entity, and Personal Information is primarily processed and stored in the United States. We may also process Personal Information in other jurisdictions where our service providers operate.

When transferring Personal Information across borders, we implement reasonable safeguards designed to protect information consistent with this Privacy Policy and applicable law.

### **Data Security**

We maintain reasonable administrative, technical, and physical safeguards designed to protect Personal Information from unauthorized access, disclosure, alteration, or destruction. However, no system is completely secure, and we cannot guarantee absolute security. Any transmission of Personal Information is at your own risk.

If we become aware of a data security incident involving Personal Information, we will notify affected individuals and regulators as required by law.

### **Data Retention**

We retain Personal Information only for as long as reasonably necessary to fulfill the purposes described in this Policy, comply with legal obligations, resolve disputes, and enforce agreements.

While retention periods vary by context, we generally retain:

- Account and profile data: for the life of the account and up to three (3) years after closure;
- Transaction and payment records: up to seven (7) years for accounting, tax, and fraud-prevention purposes;

- Customer support communications: up to two (2) years;
- Recordings or captured media (if enabled), such as video, audio, or screenshots: up to ninety (90) days unless required longer for dispute resolution or safety review; and
- Cookie and analytics data: approximately 13–26 months depending on the tool.

Data is securely deleted or de-identified when no longer required.

### **Third-Party Links**

The Platform may contain links to third-party websites or services. If you follow such links, you will leave the Platform, and the third party's privacy practices will apply. The Company does not control or endorse third-party privacy policies or practices and is not responsible for their actions. We encourage you to review the privacy policies of any third-party services you access.

### **Children's Personal Information**

The Platform and Services are intended solely for individuals eighteen (18) years of age or older. Individuals under the age of 18 may not create accounts, access, or use the Platform, or list, offer, or participate in any offerings made available through the Platform.

The Company does not knowingly collect, use, or disclose Personal Information from individuals under the age of 18.

In addition, the Company does not knowingly collect Personal Information from children under the age of 13. If a parent or legal guardian becomes aware that a child under the age of 13 has provided Personal Information to the Company without parental consent, the parent or guardian should contact us at [privacy@ctrlaltx.studio](mailto:privacy@ctrlaltx.studio). Upon verification and as required by applicable law, we will promptly delete such information from our records.

The Company reserves the right to suspend or terminate accounts and to remove Content, Posts, or other information associated with users we reasonably believe to be under the age of 18.

### **Updates to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in applicable law, technology, industry standards, or our information-handling practices.

If we make material changes to this Privacy Policy, such as changes that affect how we collect, use, or disclose Personal Information, we will update the "Effective Date" at the top of this Policy and, where required by law, provide additional notice through the Platform, by email, or by other reasonable means.

Unless otherwise stated, updates to this Privacy Policy become effective as of the revised Effective Date. Your continued access to or use of the Platform after the Effective Date constitutes your acknowledgment of and agreement to the updated Privacy Policy. If you do not agree with the updated Policy, you must discontinue use of the Platform.

### **Additional Privacy Terms**

This Privacy Policy may be supplemented by additional privacy notices, disclosures, or terms (“Additional Terms”) that apply to specific features, services, technologies, or circumstances. Any Additional Terms will be presented to you at or before the point of collection and will govern to the extent of any conflict with this Policy for the specific context in which they apply.

### **English Language**

This Privacy Policy is written in English. Any translations are provided for convenience only. In the event of any inconsistency or conflict between a translated version and the English version, the English version shall control.

### **How to Contact Us**

If you have questions, concerns, or requests regarding this Privacy Policy or the Company’s privacy practices, please contact us at:

CtrlAltX Studios LLC

Email: [privacy@ctrlaltx.studio.com](mailto:privacy@ctrlaltx.studio.com)

To help us respond efficiently, please include “Privacy Request”, “Data Rights Request”, or “Privacy Inquiry” in the subject line of your email.

Requests to access, correct, delete, or otherwise exercise rights relating to Personal Information will be handled in accordance with applicable law and verification requirements.

### **International Users (If Applicable)**

If the Company makes the Platform available to users located outside the United States, additional data-protection terms or regional addenda may apply. Any such addenda will supplement this Privacy Policy and will control in the event of a conflict for users in those jurisdictions.