## PRIVACY & COOKIES POLICY FOR FELLAS LOADED

#### INTRODUCTION

Who are we?

We are Couple Keys Limited, a company registered and incorporated in England and Wales, with our registered office located at Amelia House, Crescent Road, Worthing, West Sussex, BN11 1QR. Our company registration number is 13054703 ("we" or "us").

Where we determine how and why your personal data is processed, we act as the "data controller."

#### What is this notice about?

This notice outlines how we process your personal data as a data controller concerning the Fellas Loaded website (<u>www.fellasloaded.com</u>) or any of our Fellas Loaded branded apps ("Fellas Loaded").

Please note that websites or services not associated with Fellas Loaded are not operated by us, and you should refer to their respective privacy policies to understand how your personal data is utilised.

#### Your Rights

You possess certain rights, although they may be subject to limitations in specific situations:

- Request a copy of your personal data sent to you or someone else.
- Request the restriction, cessation of processing, or deletion of your personal data.
- Object to our processing of your personal data.
- Object to the use of your personal data for direct marketing purposes.
- Request corrections to inaccuracies in your personal data.

If we rely on your consent for data processing or marketing, you can withdraw your consent by contacting us via email using the address below.

#### Age Restrictions

We do not knowingly collect personal data from or market to individuals under the age of 16 through Fellas Loaded.

If a parent or guardian becomes aware that their child has provided us with personal data without their consent, they should contact us at: <a href="mailto:loadedsupport@fellasstudios.com">loadedsupport@fellasstudios.com</a>

We will promptly delete such information.

#### How to Contact Us

For any inquiries about this notice, including how to exercise your rights, please contact us at: <u>loadedsupport@fellasstudios.com</u>. If we are unable to address your concerns, you can also reach out to the Information Commissioner's Office: <u>https://ico.org.uk/concerns</u> (or the appropriate supervisory authority in your European country if not in the UK).

# YOUR PERSONAL DATA AND HOW WE USE IT

## **General Administration**

We process the following information about you to establish your membership account, respond to your inquiries, verify your membership, collect debts, prevent fraud, and maintain the integrity of Fellas Loaded:

- Personal details like full name, age, and gender.
- Account details including username, password, and avatar.
- Contact information such as email address.
- Discord username and related confirmation questions and responses (for cross-referencing Discord accounts with our list of Fellas Loaded members).

### How We Use It

We rely on the following legal bases to process this information:

- Our legitimate interests, which include enhancing the delivery of Fellas Loaded, promoting the success of our business, and improving customer experience and service quality.
- Compliance with the law.
- Entering or performing contracts with you.

## Sources

We collect this personal data directly from you.

## Transactions via Fellas Loaded

We process the following information about you to handle any orders made through Fellas Loaded:

- Full name.
- Order details.
- Delivery details (such as address).
- Contact information (such as email address).
- Card details.

#### How We Use It

We rely on the legal basis of entering or performing contracts with you to process this information. We collect this personal data directly from you. Competitions

We process the following information about you to host competitions on Fellas Loaded:

- Full name.
- Contact information (such as email address).
- Any information submitted as part of competition entries or submissions, or to process competition entries (such as addresses).

### How We Use It

We rely on the following legal bases to process this information:

- Our legitimate interests, including improving the delivery of Fellas Loaded, promoting our business's success, enhancing customer experience, and improving service quality.
- Entering or performing contracts with you.

## Sources

We collect this personal data directly from you.

### Marketing

We process the following information about you to provide suggestions and recommendations related to:

- News and updates regarding us, our partners, products, services, and content.
- Content, goods, and services that may interest you.
- Other promotional activities and events we believe may be of interest.
- Full name.
- Contact information (such as email address).
- Other information collected and clearly identifiable to you at the point of signing up for our marketing communications.

#### How We Use It

If required by law, we rely on your consent to process this data. You can withdraw your consent at any time by notifying us, including via email.

In certain cases (such as with some of our existing customers), the law may allow us to process your personal data for marketing communications based on our legitimate interests. This is our legitimate business interest in promoting our activities and the success of our business, website, apps, content, products, and services. If the information is not of interest to you, you can opt out at any time by notifying us, including via email.

#### Sources

We collect this personal data directly from you.

## Analytics

We process the following information about you to analyze how Fellas Loaded is used, for troubleshooting, and to make improvements:

- Viewing activity (including pages visited, videos viewed, and thumbnails clicked).
- IP address.
- Location information.
- Browser type.
- Internet service provider (ISP).
- Referring/exit pages.
- Operating system.
- Date/time stamps and related metadata.

### How We Use It

To the extent that our analytics involve storing or accessing information on your device beyond what is strictly necessary to provide Fellas Loaded, we obtain your prior consent. Otherwise, we process this information, to the extent it qualifies as personal data, based on our legitimate interests in understanding how you use Fellas Loaded.

### Sources

We use Google's services to collect this personal data when you use Fellas Loaded.

## COOKIES, ANALYTICS, AND SIMILAR TECHNOLOGIES

Cookies, pixels, and other technologies store and access data on your device to facilitate the operation of websites and apps. Below, we explain their purpose, duration, and who else may access their data. We seek your consent to use them unless they are essential for our sites, apps, or services to function.

Most browsers allow you to control cookies. For more information, please refer to:

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- Opera
- Apple Safari

Cookies/Data: \_ga, \_gat, \_gid

Duration: Up to 24 months

Purpose: To collect information about how users interact with Fellas Loaded and generate reports for identifying issues, understanding user behaviour, and improving Fellas Loaded. Access: We use Google Analytics to set these cookies. You can learn more about how Google uses data by clicking here. Information about opting out can be found here.

## STORAGE, TRANSFERS, AND DISCLOSURE

## **Data Retention**

We retain personal data for as long as necessary, considering the purpose for which it was collected. At the end of the retention period, we assess whether it is still necessary to retain information to achieve the purposes for which it was collected. In determining appropriate retention periods, we consider the quantity, nature, and sensitivity of personal data, the potential risk of unauthorized access, and legal requirements.

## Storage & Transfers

When we use data processors located outside the UK and the European Economic Area and transfer personal data to a country that does not offer adequate protection, we employ contracts or other safeguards to provide personal data with the same or equivalent level of protection it has in Europe or the UK. For further information, please contact us using the provided contact details at the beginning of this notice.

### Disclosure

Apart from the instances mentioned above, we may disclose your personal data:

- When required by law, government authorities, or the courts, or to establish, exercise, or defend our legal rights, or for the purposes of preventing crime and fraud (for example, sharing personal data with professional advisors, investigators, or credit reference agencies).
- To members of our corporate group, insurers, and advisors, as necessary for the purposes outlined in this notice.
- To our service providers, suppliers, and subcontractors, provided they use this
  personal data strictly according to our instructions and not for their independent
  purposes. For instance, we use Vimeo OTT to power Fellas Loaded and provide
  customer support. More information about how Vimeo uses your personal data can
  be found here: vimeo.com/privacy. We also use third-party payment providers, email
  service providers, and analytics companies.
- In the event of an investment, merger, acquisition, or sale of our organisation or assets, personal data we hold may be shared based on the legitimate interests of us, our shareholders, customers, and other parties to a transaction, unless such interests are outweighed by prejudicial impacts upon you.