



**PRIVACY POLICY**

**SPOTTEDME**

## PRIVACY POLICY

**Effective Date:** 12<sup>th</sup> of March, 2026

**Last Updated:** 12<sup>th</sup> of March, 2026

This Privacy Policy explains how **SpottedMe** (“we”, “us”, or “our”) collects, uses, stores, and protects personal data when users access or use the SpottedMe website and related services (the “Platform”).

This Policy is intended to comply with the **General Data Protection Regulation (EU) 2016/679 (“GDPR”)** and other applicable data protection laws.

By accessing or using the Platform, you acknowledge that you have read and understood this Privacy Policy.

### 1. DATA CONTROLLER

The controller responsible for processing personal data under this Privacy Policy is:

**SpottedMe**

RealiVobis LTD

HE 426863

Email: [info@spottedme.com](mailto:info@spottedme.com)

Website: [www.spottedme.com](http://www.spottedme.com)

For privacy inquiries or to exercise your rights under GDPR, you may contact us using the above email address.

### 2. SCOPE OF THIS POLICY

This Privacy Policy applies to:

- visitors to the website
- users who create accounts
- users who post content
- users who communicate through the Platform

This Policy covers all personal data processed in connection with the operation of the Platform.

### 3. PERSONAL DATA WE COLLECT

We may collect the following categories of personal data.

#### 3.1 Account Registration Data

When users create an account, we may collect:

- first name
- last name
- email address
- phone number
- date of birth
- password (stored securely in encrypted form)

This information is used to create and manage user accounts.

### **3.2 Verification Data**

To prevent misuse and ensure platform integrity, we may collect:

- phone verification data
- verification timestamps
- verification status

Verification services may be provided through third-party SMS providers.

### **3.3 User Content**

Users may voluntarily submit content including:

- posts
- replies
- comments
- messages

This content may include personal information that users choose to disclose.

Users are responsible for the information they choose to share.

### **3.4 Communication Data**

When users interact with the Platform, we may process:

- internal messages between users
- support requests
- reports of violations

Communication data may be reviewed for moderation and safety purposes.

### **3.5 Moderation and Safety Data**

To maintain platform safety, we may collect and process:

- flagged content
- moderation decisions
- user reports
- enforcement actions
- moderation logs

Moderation may involve both automated systems and human review.

### **3.6 Technical and Usage Data**

When users access the Platform, certain technical data may automatically be collected.

This may include:

- IP address
- browser type
- device information
- operating system
- pages visited
- timestamps of activity

This data helps maintain platform security and improve services.

### **3.7 Analytics Data**

We may use analytics tools to understand how users interact with the Platform.

Analytics may collect:

- usage patterns
- page interactions
- feature engagement

Analytics data is typically aggregated and used to improve the Platform.

## **4. PURPOSES OF PROCESSING**

We process personal data for the following purposes:

- providing and maintaining the Platform
- managing user accounts
- enabling anonymous user interactions
- verifying users
- moderating content and enforcing rules
- preventing abuse and fraud
- responding to user inquiries

- improving the Platform
- ensuring security and technical functionality

## **5. LEGAL BASIS FOR PROCESSING**

Under GDPR, we rely on the following legal bases.

### **Contractual Necessity**

Processing necessary to provide the Platform and manage user accounts.

### **Legitimate Interests**

Processing necessary to:

- ensure platform safety
- moderate content
- prevent abuse
- improve platform performance

### **Legal Obligations**

Processing necessary to comply with applicable laws or lawful requests from authorities.

### **User Consent**

Certain processing activities, such as optional cookies or marketing communications, may be based on user consent.

## **6. CONTENT MODERATION AND AUTOMATED SYSTEMS**

SpottedMe uses moderation systems to maintain a safe environment.

Moderation may include:

- automated keyword detection
- automated safety filters
- AI-assisted moderation tools
- human moderator review

These systems may analyze user content to detect violations of the Platform rules.

Moderation decisions may be based on automated signals and human review.

Users may contact the Platform if they believe moderation decisions were made in error.

## **7. DATA RETENTION**

Personal data is retained only for as long as necessary for the purposes described in this Policy.

Retention periods may vary depending on the type of data.

Examples include:

Account data: retained while the account remains active.

Moderation records: retained for a reasonable period to investigate violations or appeals.

Technical logs: retained for security monitoring and system maintenance.

When personal data is no longer required, it may be deleted, anonymized, or securely archived.

## **8. ACCOUNT DELETION**

Users may request deletion of their accounts at any time.

When an account is deleted:

- access to the Platform will be revoked
- personal account data will be removed where possible

Certain data may be retained for limited periods where necessary to:

- comply with legal obligations
- resolve disputes
- enforce platform rules
- maintain security records

## **9. DATA SHARING**

SpottedMe does not sell personal data.

Personal data may be shared only in limited circumstances.

### **Service Providers**

We may share data with service providers that support platform operations, including:

- SMS verification providers
- hosting providers
- analytics providers
- security services

These providers process data on our behalf and are required to protect user data.

### **Legal Requirements**

We may disclose personal data when required by law or when responding to lawful requests from authorities.

## **10. INTERNATIONAL DATA TRANSFERS**

Where personal data is transferred outside the European Economic Area, we ensure appropriate safeguards are in place.

These safeguards may include:

- Standard Contractual Clauses approved by the European Commission
- equivalent data protection mechanisms

## **11. USER RIGHTS UNDER GDPR**

Under GDPR, users have the following rights.

### **Right of Access**

Users may request a copy of their personal data.

### **Right to Rectification**

Users may request correction of inaccurate personal data.

### **Right to Erasure**

Users may request deletion of their data under certain conditions.

### **Right to Restrict Processing**

Users may request restrictions on how their data is processed.

### **Right to Data Portability**

Users may request their personal data in a structured format.

### **Right to Object**

Users may object to certain processing activities based on legitimate interests.

### **Right to Withdraw Consent**

Where processing is based on consent, users may withdraw consent at any time.

Requests can be submitted via [privacy@spottedme.com](mailto:privacy@spottedme.com).

## **12. SECURITY MEASURES**

SpottedMe implements technical and organizational measures designed to protect personal data.

These measures may include:

- secure data storage
- encryption of sensitive data

- restricted access controls
- monitoring of platform security
- protection against unauthorized access

While we take reasonable precautions, no system can guarantee absolute security.

### **13. COOKIES AND TRACKING TECHNOLOGIES**

The Platform uses cookies and similar technologies.

Cookies are small text files stored on a user's device.

Cookies may be used for:

- essential platform functionality
- authentication and login sessions
- analytics and performance monitoring
- remembering user preferences

Users may control cookies through browser settings.

Where required by law, cookie consent mechanisms may be presented to users.

### **14. TYPES OF COOKIES USED**

The Platform may use the following categories of cookies.

#### **Essential Cookies**

Necessary for the operation of the website.

#### **Functional Cookies**

Allow the Platform to remember preferences.

#### **Analytics Cookies**

Help us understand how users interact with the Platform.

These cookies collect aggregated usage information.

### **15. CHILDREN'S PRIVACY**

The Platform is intended only for users aged **18 years or older**.

SpottedMe does not knowingly collect personal data from minors.

If we become aware that personal data from a minor has been collected, it will be deleted.

## **16. CHANGES TO THIS POLICY**

We may update this Privacy Policy from time to time.

Updated versions will be published on the Platform.

Continued use of the Platform constitutes acceptance of the updated Policy.

## **17. CONTACT**

For privacy-related inquiries or requests, please contact:

[info@spottedme.com](mailto:info@spottedme.com)