

# Complaint and Content Removal Policy & Procedures

## Introduction

Our platform prioritises user safety and legal compliance. We require all users to agree to our Terms of Use and Community Guidelines, which include documented age and identity verification (18+ minimum). This policy outlines how we handle complaints regarding illegal or unauthorised content.

## Reporting Illegal/Unauthorised Content

Users can report content directly through our website's "Report Content" link in the footer. This allows reporting of complaints, Illegal content and content depicting individuals without their consent.

## Complaint Review and Resolution

- **Timeline:** All complaints are reviewed and addressed within 7 business days, with a response explaining the action taken.
- **Immediate Removal:** We prioritise user safety and legal compliance by immediately arranging/requesting/executing the removal of confirmed illegal/unauthorised content.

## Procedure

1. **Initial Triage:** Upon receiving a report, a designated team member will review:
  - Reporter information (if provided)
  - Description of the content (including links)
  - Claimed rights ownership
  - Any additional information
2. **Verification:**
  - **Content Verification:** The team locates the reported content or reviews the description for streamed content.
  - **Rights Verification:** Attempts are made to verify the reporter's claim, such as:
    - Checking public copyright registrations/trademarks
    - Requesting documentation (e.g., identity of copyright holder and, when applicable, copyright registration)
3. **Action:**
  - **Illegal Content:** If verified as illegal and hosted on our servers:
    - Content is removed.
    - The case is escalated to management for potential authority involvement.

- **Unauthorised Content:** if ownership confirmed and hosted on our servers:
  - Content is removed.
  - The uploading user is notified of the removal and platform policy.
  - Repeat offenders may face warnings/account suspension or termination.
- **Unclear Verification:**
  - The reporter may be contacted for clarification.
- **Invalid Report:**
  - The reporter may be notified (if appropriate) with an explanation.

### **Appeal Process (Consent Claims):**

Individuals depicted in content can appeal our decision based on lack of consent:

Appeal Submission:

- Contact support with a clear explanation and link/reference to the content

Verification:

- We attempt to verify the appellant's identity (e.g., valid ID compared to the depicted individual).

Content Review:

- Our team reviews the content with the appeal and any evidence of prior consent.

Appeal Outcome: (within 7 business days)

- **Consent Confirmed:** The content remains live, and the appellant is notified.
- **Consent Not Established:** If we cannot establish that valid consent was obtained, or if the individual can demonstrate the consent is void under applicable law, the content will be removed immediately.
- **Disagreement on Consent Validity:** If we disagree with the claim of void consent under applicable law, we will offer to resolve the disagreement through a neutral, third-party mediator.

### **Record Keeping**

We maintain a record of reported incidents, including:

- Date and time of report
- Reporter information (if provided)
- Description of reported content
- Actions taken

## **5. Legal Considerations**

Complex situations or legal disputes are escalated to management and legal counsel. Legal counsel will determine the best course of action, including potential law enforcement involvement.

#### **6. Reporting to Payment Providers (e.g. card acquirers)**

Monthly reports are submitted to acquirers detailing flagged content (removals/take downs), illegal content, and complaints.

- **Segpay and other acquirers:** Reports are uploaded by the 5th of each month via the Merchant Portal. A "Nil Report" is submitted if no content is flagged.

This policy demonstrates our commitment to a safe and legal online environment for all users.