

Introduction and Data Processing Responsibility

Welcome to COMICROLE. In compliance with the European Union's General Data Protection Regulation (GDPR) and various US state privacy laws, such as the CCPA and CPRA, we inform you that the data controller of your personal data is COMICROLE S.A.S., based in Bogotá, Colombia. Our priority is to ensure the transparency and security of your information, which is why we have appointed a Data Protection Officer whom you can contact directly through our contact section for any questions related to your rights and the management of your privacy.

Data Collection in the Social Environment and Marketplace

When you use our platform, we collect information that you provide directly when creating your profile, such as your username, biography, and multimedia content. However, due to the functions of our Marketplace, we also process transactional data such as purchase history and, in the case of professional sellers operating in Europe under the Digital Services Act (DSA), identity documentation required for the Know Your Customer (KYC) verification process. Our systems also automatically record technical data such as your IP address, unique advertising identifiers, and geolocation data, the latter being processed only if you have given explicit consent through your device settings.

Legal Basis and International Transfers

For our users in the European Union, data processing is based on strict legal grounds: the performance of the contract to manage your sales, legitimate interest in network security, and prior consent for any targeted marketing activity. Since we operate globally, your data may be transferred to and stored on servers located in the United States. To ensure this transfer complies with international standards, we use Standard Contractual Clauses and robust privacy frameworks that guarantee your personal information receives the same level of protection regardless of geographical boundaries.

User Rights and Information Control

Regardless of your location, we give you full control over your personal information. You have the right to access, rectify, or request the deletion of your data, as well as to obtain a copy of it in a portable and readable format. Users in the United States specifically have the option to opt out of the sale or sharing of their information for advertising purposes, while users in Europe can opt out of algorithmic profiling, allowing them to enjoy a Marketplace and social feed not based on their past behavior. To exercise any of these rights, you can access our privacy panel within the app or send us a formal request.

Financial Security and Child Protection

The security of your transactions is paramount; therefore, all payment information is managed exclusively by providers certified under the PCI-DSS standard. This means our social network never stores your full card numbers in its databases. Finally, our platform maintains a strict commitment to child protection, prohibiting the use of the service by individuals who do not meet the minimum legal age in their jurisdiction (generally 13 years in the US and between 13

and 16 years in the EU) and strictly limiting the use of adolescent data for commercial or advertising profiling purposes.