

1. Overview

This Privacy Policy explains how **Spinoff Media Inc.** ("Spinoff", "we", or "us") collects, uses, and shares information about you when you use our mobile applications, websites, and related services (together, the "Service").

By using the Service, you agree to the collection and use of information in accordance with this Policy. If you do not agree, you must not use the Service.

This Policy is a general template and does not replace legal advice. You should have a qualified lawyer review it to ensure compliance with the laws applicable to your company and your users.

2. Information We Collect

We collect information in three main ways:

1. Information you provide directly

When you use the Service, you may give us:

- **Account information:** name, email address, username, display name, profile image, and bio
- **User Content and activity:** ratings, reviews, comments, reactions, lists, favorites, watchlists, and messages
- **Communications:** emails to us, support requests, notification preferences

2. Information from third-party sign-in providers

If you sign in using Apple, Google, or another provider, we receive information such as:

- Name
- Email address
- Profile picture

The exact data depends on your settings with the provider. We use this to create and manage your account.

3. Information collected automatically

We and our service providers may automatically collect:

- **Device information:** device model, OS version, unique device identifiers, and network info

- **Log and usage data:** IP address, browser type, app version, pages visited, buttons tapped, and time/date
- **Location info:** approximate geolocation based on IP address
- **Tracking technologies:** cookies, pixels, and mobile identifiers

3. How We Use Your Information

We use the information we collect to:

- **Provide and maintain the Service** (account management, content interaction, support)
- **Personalize your experience** (recommendations, settings)
- **Communicate with you** (account updates, service notices, marketing per your preferences)
- **Improve and develop the Service** (analytics, performance monitoring, feature testing)
- **Ensure safety and legal compliance** (fraud detection, policy enforcement, responding to legal obligations)

Where required by law, we will request your consent before using your information for specific purposes (e.g., marketing, cookies).

4. Legal Bases for Processing (EEA and Similar Regions)

If you reside in the European Economic Area (EEA), the United Kingdom, or another jurisdiction with similar laws, we process your data based on:

- **Contractual necessity** – to provide you the Service
- **Legitimate interests** – to operate, improve, and protect the Service
- **Consent** – where required, such as for certain marketing or analytics
- **Legal obligations** – where necessary to comply with the law

5. How We Share Information

We do not sell your personal information for money. We may share it as follows:

1. Service providers

We share data with trusted third parties who help us operate the Service, such as:

- Cloud hosting and infrastructure
- Analytics and crash reporting
- Notification and email services
- Customer support tools

They may only use your data as instructed by us.

2. Other users

Certain information you submit may be visible to others, such as:

- Your username and profile
- Reviews, ratings, lists, and public comments

3. Analytics and advertising partners

We may work with partners to understand usage and improve relevance. Some of this data may be collected via cookies or tracking technologies. Where required by law, you will be given a choice to opt in or opt out.

4. Business transfers

In the event of a merger, acquisition, or asset sale, your information may be transferred as part of the transaction, subject to this Policy.

5. Legal and safety disclosures

We may disclose information if necessary to:

- Comply with laws or legal requests
- Protect the safety of any person
- Prevent fraud or abuse
- Enforce our Terms of Service
- Protect our rights or property

6. International Data Transfers

We may store or process your data in countries outside your own. These countries may not offer the same level of data protection.

If you are in the EEA, UK, or another region with cross-border data restrictions, we use appropriate legal safeguards (e.g., Standard Contractual Clauses) to protect your information when transferring it internationally.

7. Data Retention

We retain personal information for as long as reasonably necessary to operate, maintain, and improve the Service, and for other legitimate business purposes, including but not limited to:

- Maintaining and administering your account while it is active

- Providing core features such as social interactions, recommendations, personalization, and content moderation
- Operating community, safety, trust, analytics, and security systems
- Improving the Service, developing new features, and conducting research and analysis
- Detecting, preventing, and addressing fraud, abuse, violations of our Terms of Service, and other harmful activity
- Complying with applicable laws, regulations, legal processes, and lawful requests from authorities
- Establishing, exercising, or defending legal claims
- Enforcing our agreements and protecting the rights, property, and safety of Spinoff Media Inc., our users, and others

Different categories of information may be retained for different periods of time depending on the nature of the data, how it is used, and applicable legal or operational requirements. For example, we may retain:

- Account information for as long as your account remains active
- User-generated content (such as reviews, ratings, comments, and lists) for as long as it is stored on our systems or displayed on the Service
- Usage, device, and analytics data for longer periods to support performance monitoring, security, fraud prevention, and product improvement
- Backup and archival copies for a limited period in accordance with our data retention and disaster recovery practices

When personal information is no longer needed for these purposes, we will take reasonable steps to delete it, de-identify it, or anonymize it so that it can no longer be associated with you, subject to any legal, regulatory, or technical limitations.

You may request deletion of your account at any time. Following account deletion, we may retain certain information for legitimate business purposes, such as legal compliance, dispute resolution, enforcement of our Terms of Service, security, fraud prevention, and backup or archival requirements, even after your account has been closed.

8. Your Rights and Choices

Depending on your location, you may have the right to:

- Access your personal data
- Correct inaccurate or incomplete data
- Request deletion of your data
- Restrict certain uses of your data
- Request portability of your data
- Object to specific data processing
- Withdraw consent at any time

To exercise your rights, contact us at privacy@spinoff.community or use in-app settings where available. We may ask you to verify your identity. We may deny a request where legally justified.

If you're in the EEA, UK, or similar jurisdiction, you also have the right to lodge a complaint with your local data protection authority.

9. Children and Minors

We do not knowingly collect personal data from children under 13 years of age.

If we discover that we have collected data from a child under 13, we will delete it as soon as reasonably possible unless legally required to retain it.

If you are between the digital age of consent in your country and 18 years old, you may only use the Service with the permission of a parent or legal guardian. We may request proof of consent where required by law.

10. Security

We use reasonable physical, technical, and organizational safeguards to protect your personal data.

However, no system is 100% secure. If you believe your account or information has been compromised, please contact us immediately.

11. Third-Party Services and Links

The Service may link to third-party sites or use integrations with other services. This Policy does not govern those third parties, and we are not responsible for their privacy practices.

Please review their privacy policies before interacting with them.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. When we do, we will change the “Last updated” date at the top and may provide additional notice via email or within the Service.

Your continued use of the Service means you accept the updated Policy.

13. Contact Us

If you have questions about this Privacy Policy or our handling of your information, please contact us at:

legal@spinoff.community
Spinoff Media Inc.