

## **DRIVEX STUDIOS SL – CSAM & ILLEGAL CONTENT PREVENTION POLICY**

### **1. Zero-Tolerance Commitment**

DriveX Studios SL maintains a strict zero-tolerance policy towards any form of illegal, harmful, exploitative or non-consensual content, including Child Sexual Abuse Material (“CSAM”), child exploitation, sexual exploitation, trafficking-related content, coercive content, content involving minors, or any content created, supplied, distributed or made available without valid consent.

DriveX Studios SL operates as a professional adult audiovisual content platform. The platform is intended exclusively for adult audiovisual content produced by, licensed from, or involving verified professionals, producers, studios, distributors, performers, rights holders or other authorised participants in the adult audiovisual industry.

DriveX Studios SL does not permit amateur, casual or non-professional user-generated adult content.

This policy shall be interpreted and applied in accordance with applicable Spanish law, European Union law and any mandatory requirements imposed by competent authorities, payment processors, acquiring banks or other financial institutions involved in the processing of online payments, card networks or other relevant service providers.

### **2. Professional Content and Supplier Responsibilities**

All content made available through DriveX Studios SL must be produced, supplied, licensed or otherwise provided by professional adult industry participants acting within the scope of their professional activity.

Each professional content supplier, including any producer, studio, distributor, rights holder, performer representative or authorised commercial partner, is responsible for ensuring that the content it provides complies with applicable Spanish and European laws, contractual obligations, industry standards and DriveX Studios SL policies.

In particular, professional content suppliers must implement and maintain their own appropriate compliance procedures, including:

- verification that all performers were at least 18 years old at the time of production;
- collection and retention of valid age verification documentation;
- collection and retention of valid performer consent, release forms and image rights authorisations;
- verification that all performers participated freely, voluntarily and without coercion, exploitation, intimidation, abuse, trafficking or unlawful pressure;
- verification that all necessary intellectual property rights, image rights, neighbouring rights, licences, releases and distribution authorisations have been obtained;
- maintenance of production, performer, consent, rights, age-verification and compliance records;

- compliance with applicable Spanish criminal, civil, data protection, audiovisual, e-commerce, consumer protection and payment compliance requirements;
- compliance with payment processor, acquiring bank or other financial institutions involved in the processing of online payments, and card network requirements applicable to adult content; and
- prompt cooperation with DriveX Studios SL in any compliance review, investigation, takedown request, authority request, rights complaint or payment processor inquiry.

DriveX Studios SL may request supporting documentation or additional verification from any professional content supplier at any time where reasonably necessary for compliance or regulatory purposes.

The review, approval, publication or moderation of content by DriveX Studios SL does not waive, reduce or replace the independent legal and contractual obligations of the relevant professional content supplier.

### **3. Scope of Strictly Prohibited Content**

The following content is strictly prohibited on DriveX Studios SL:

- any content involving minors or persons under the age of 18;
- any content depicting, suggesting, simulating, promoting or sexualising minors or persons presented as minors;
- any Child Sexual Abuse Material or material that may reasonably be understood as CSAM;
- any content involving sexual exploitation, abuse, coercion, intimidation, trafficking, forced prostitution or exploitation of vulnerable persons;
- any non-consensual sexual content;
- any content produced where a performer lacked legal capacity to consent;
- any content produced, uploaded, supplied or distributed without the necessary rights, licences, releases or authorisations;
- hidden camera, voyeuristic, revenge pornography, blackmail, extortion, doxxing or unlawfully obtained intimate material;
- content involving real or threatened sexual violence, unlawful restraint, torture, degradation, abuse or serious harm;
- content that infringes privacy, honour, image rights, intellectual property rights or data protection rights;
- content that violates Spanish criminal law, including offences relating to minors, sexual freedom, sexual integrity, trafficking, coercion, threats, privacy or image rights;

- content that breaches applicable payment processor, acquiring bank or other financial institutions involved in the processing of online payments or card network rules; and
- any content that DriveX Studios SL reasonably considers to create legal, regulatory, reputational, payment compliance, performer safety or platform integrity risk.

For the avoidance of doubt, DriveX Studios SL prohibits any attempt to evade this policy through titles, descriptions, tags, metadata, thumbnails, role-play references, fictional labels, AI-generated content, edited content, simulated content or any other presentation suggesting the involvement or sexualisation of minors.

#### **4. Preventive Measures**

DriveX Studios SL implements preventive measures designed to reduce the risk of illegal, exploitative, non-consensual or non-compliant content appearing on the platform.

These measures may include:

- mandatory KYC, KYB or professional verification of content suppliers;
- verification of the professional status, legitimacy or authorisation of producers, studios, distributors, rights holders or other content suppliers;
- pre-publication moderation or review of content;
- review of titles, descriptions, tags, thumbnails, metadata and account information;
- automated detection technologies, hashing, matching tools or AI-assisted review systems;
- manual compliance review by trained personnel where appropriate;
- behavioural, transactional and pattern analysis;
- restrictions on upload, publication, indexing, promotion or monetisation pending compliance review;
- periodic audits of accounts, content libraries and supplier documentation;
- review of user reports, performer complaints, rights-holder notices, chargebacks, refund patterns and payment processor alerts; and
- escalation procedures for suspected CSAM, illegality, exploitation, non-consent, trafficking, fraud, rights infringement or payment compliance concerns.

DriveX Studios SL's preventive measures are complementary to, and do not replace, the obligations of professional content suppliers to verify and document the legality, consent, age, rights clearance and compliance of the content they provide.

#### **5. Detection and Monitoring**

DriveX Studios SL may monitor content, accounts, transactions and platform activity to identify potential illegal content, suspicious conduct or compliance risks.

Detection and monitoring measures may include:

- AI-assisted content detection tools;
- image, video, metadata and pattern analysis;
- duplicate, hash or similarity matching;
- keyword, title, description and tag review;
- user reports and trusted notices;
- performer or rights-holder complaints;
- payment processor, acquiring bank or other financial institutions involved in the processing of online payments, or card network alerts;
- chargeback, refund, fraud or abuse indicators;
- manual review by moderation or compliance personnel; and
- urgent escalation channels for high-risk matters.

Monitoring and review activities shall be carried out in accordance with applicable law, including applicable data protection requirements and principles of necessity, proportionality and minimisation.

## **6. Immediate Response Procedures**

Where DriveX Studios SL detects, receives notice of, or reasonably suspects the presence of CSAM, illegal content, non-consensual content, trafficking-related content, exploitation, fraud, rights infringement or other serious policy violations, it may take immediate action.

Such action may include:

- immediate removal, disabling or blocking of the relevant content;
- restriction, suspension or termination of the associated account;
- suspension of publication, promotion, monetisation or access to the relevant content library;
- request for additional documentation, verification or explanation from the relevant professional content supplier;
- preservation of relevant evidence, logs, metadata, communications, account data and transaction records;
- internal escalation to compliance, legal or senior management teams;

- notification or cooperation with payment processors, acquiring banks or other financial institutions involved in the processing of online payments, and, card networks or other relevant service providers where necessary for compliance, investigation or risk mitigation; and
- reporting or referral to competent Spanish, European or other applicable authorities where required or permitted by law.

DriveX Studios SL may act on a precautionary basis where the seriousness of the suspected violation requires immediate intervention to protect performers, rights holders, users, minors, the public, payment systems or the integrity of the platform.

## **7. Cooperation with Authorities**

DriveX Studios SL cooperates with competent authorities, regulators and law enforcement agencies in accordance with applicable law.

DriveX Studios SL may:

- report illegal content where legally required or otherwise permitted;
- provide relevant data, records or documentation in response to lawful requests;
- preserve evidence, logs, access data, metadata and transaction records where necessary for investigation or legal compliance;
- assist investigations relating to CSAM, exploitation, trafficking, non-consensual content, fraud, rights infringement or other illegal activity;
- respond to judicial, police, prosecutorial, administrative or regulatory requests in accordance with applicable procedural and data protection requirements; and
- cooperate with payment processors, acquiring banks or other financial institutions involved in the processing of online payments, and, card networks and other service providers where necessary to address payment compliance, fraud, abuse, illegality or platform integrity concerns.

Any disclosure of personal data shall be handled in accordance with applicable data protection laws, including Regulation (EU) 2016/679, the General Data Protection Regulation, and Spanish data protection legislation, including Ley Orgánica 3/2018, de Protección de Datos Personales y garantía de los derechos digitales, subject to an appropriate legal basis and the principles of necessity, proportionality and minimisation.

## **8. Data Retention and Evidence Preservation**

DriveX Studios SL retains relevant records securely for compliance, moderation, investigation, dispute resolution, payment compliance and legal purposes.

Such records may include, where applicable:

- account registration and verification data;

- KYC, KYB or professional verification records;
- content metadata and publication history;
- moderation decisions and audit logs;
- reports, complaints and escalation records;
- access logs, technical logs and security records;
- transaction, payment, chargeback and refund records;
- communications with content suppliers, users, performers, rights holders, authorities or service providers; and
- evidence or documentation relating to suspected illegal or prohibited content.

Retention shall be carried out in accordance with applicable law and for no longer than necessary for the relevant legal, compliance, investigation, security, contractual or dispute-resolution purpose, unless a longer retention period is required or permitted by law.

Where DriveX Studios SL reasonably suspects CSAM, exploitation, trafficking, non-consensual content or other serious unlawful conduct, it may preserve relevant evidence and records as necessary to support investigation, reporting, legal defence, regulatory compliance or cooperation with competent authorities.

## **9. Reporting System**

DriveX Studios SL provides reporting mechanisms that allow users, performers, rights holders, professionals, authorities and other relevant parties to report illegal, suspicious, non-consensual, unauthorised or otherwise prohibited content.

DriveX Studios SL will review reports with appropriate priority based on their seriousness, urgency and potential harm. High-risk reports, including suspected CSAM, exploitation, trafficking or non-consensual content, may be escalated immediately to internal compliance teams, competent authorities or relevant service providers where required or permitted by law.

Where required under applicable digital services legislation, DriveX Studios SL shall provide appropriate mechanisms for notice, review and action in relation to illegal content and platform misuse.

## **10. Spanish and EU Compliance Framework**

This policy is designed to support compliance with applicable Spanish and European legal, regulatory, contractual and industry requirements, including where relevant:

- Spanish criminal law, including the Ley Orgánica 10/1995, de 23 de noviembre, del Código Penal, as amended, particularly in relation to minors, sexual freedom, sexual integrity, exploitation, trafficking, coercion, threats, privacy and image rights;
- Ley Orgánica 10/2022, de garantía integral de la libertad sexual, where applicable;

- Regulation (EU) 2016/679, the General Data Protection Regulation;
- Ley Orgánica 3/2018, de Protección de Datos Personales y garantía de los derechos digitales;
- Regulation (EU) 2022/2065 on a Single Market for Digital Services, commonly known as the Digital Services Act, where applicable;
- Spanish information society services and e-commerce rules, where applicable;
- Spanish audiovisual, consumer protection, intellectual property, privacy and image rights rules, where applicable;
- payment processor, acquiring bank or other financial institutions involved in the processing of online payments, and card network requirements;
- professional adult industry documentation, performer consent and rights-clearance standards; and
- DriveX Studios SL's own Terms, content policies, moderation rules and compliance procedures.

DriveX Studios SL may update this policy from time to time to reflect legal developments, regulatory guidance, payment processor requirements, industry standards, operational needs or changes to platform risk.

## **11. Enforcement**

Any violation or suspected violation of this policy may result in immediate enforcement action.

Enforcement measures may include, without limitation:

- removal, disabling or restriction of content;
- rejection or withdrawal of content from publication;
- temporary or permanent suspension of account access;
- termination of the relevant account or contractual relationship;
- suspension or restriction of publication, promotion, distribution or platform features;
- request for additional professional, consent, rights, age-verification or compliance documentation;
- restriction, refund, reversal, hold or review of relevant online payments, transaction amounts, credits, account balances or related revenues, where permitted by applicable terms and law;
- preservation of relevant records and evidence;

- notification to, or cooperation with, payment processors, acquiring banks, or other financial institutions involved in the processing of online payments, and card networks or other service providers;
- referral or reporting to competent authorities where required or permitted by law; and
- permanent ban from the platform.

DriveX Studios SL may determine the appropriate enforcement measure at its discretion, acting reasonably and proportionately in light of the seriousness of the violation, the risk of harm, recurrence, available evidence, applicable legal obligations, payment compliance requirements and the need to protect performers, rights holders, users, minors, service providers and the integrity of the platform.

Professional content suppliers remain responsible for their own acts, omissions, production practices, documentation, rights clearance, age verification, consent verification and legal compliance. The publication, review or moderation of content by DriveX Studios SL does not waive, reduce or replace those obligations.