

DRIVEX STUDIOS SL – AGE VERIFICATION AND IDENTITY VERIFICATION POLICY

1. Purpose and Scope

DriveX Studios SL operates an adult audiovisual content platform intended exclusively for adult users and for content supplied by verified professional participants in the adult audiovisual industry.

This policy sets out DriveX Studios SL's age verification, identity verification, professional verification, fraud prevention and access control framework. It is designed to ensure that:

- access to adult content is restricted to individuals who are at least 18 years old;
- professional content suppliers are properly identified and verified before being allowed to supply, publish, license or distribute content through the platform;
- DriveX Studios SL can comply with applicable Spanish and European legal requirements;
- DriveX Studios SL can meet applicable payment processor, acquiring bank or other financial institutions involved in the processing of online payments, and card network requirements for adult content platforms; and
- the platform is protected against minors' access, identity fraud, payment fraud, account misuse, illegal content and other compliance risks.

DriveX Studios SL receives online payments from users of the platform in connection with access to adult audiovisual content and related services. This policy supports the integrity, safety and compliance of those online payment flows.

2. Legal and Regulatory Compliance

DriveX Studios SL applies this policy in accordance with applicable Spanish and European legal requirements, including, where relevant:

- Regulation (EU) 2016/679, the General Data Protection Regulation;
- Spanish data protection legislation, including Ley Orgánica 3/2018, de Protección de Datos Personales y garantía de los derechos digitales;
- Spanish information society and e-commerce rules, including Ley 34/2002, de servicios de la sociedad de la información y de comercio electrónico;
- Spanish criminal law, including provisions relating to minors, sexual freedom, sexual integrity, exploitation, fraud, identity misuse and illegal content under the Spanish Criminal Code;
- Spanish child protection rules, including Ley Orgánica 1/1996, de Protección Jurídica del Menor;
- Regulation (EU) 2022/2065 on a Single Market for Digital Services, commonly known as the Digital Services Act, where applicable;

- applicable consumer protection, audiovisual, intellectual property, privacy and image rights rules; and
- applicable payment processors, acquiring banks or other financial institutions involved in the processing of online payments, and card networks requirements for platforms involving adult content

Access to adult content on DriveX Studios SL is strictly limited to persons aged 18 or older.

3. Professional Adult Content Platform

DriveX Studios SL is not an open amateur creator platform and does not permit casual, amateur or non-professional user-generated adult content.

Content available through the platform must be produced, supplied, licensed or otherwise made available by verified professional participants in the adult audiovisual industry, including, where applicable:

- professional producers;
- adult content studios;
- distributors;
- authorised rights holders;
- professional performers;
- talent agencies or representatives;
- production companies; and
- other authorised commercial partners.

Professional content suppliers are responsible for maintaining their own compliance procedures, including performer age verification, valid consent, rights clearance, image rights authorisations, performer releases, production documentation and lawful distribution rights.

DriveX Studios SL may require professional content suppliers to provide evidence of such procedures and documentation before or after publication, and at any time in connection with compliance reviews, payment processor inquiries, complaints, investigations or legal requests.

4. Risk-Based Verification Framework

DriveX Studios SL applies a risk-based identity and age verification framework.

Verification requirements may vary depending on:

- the role of the person or entity using the platform;
- whether the person is a user, paying user, professional content supplier, rights holder, performer, distributor or commercial partner;

- the jurisdiction from which the platform is accessed;
- applicable legal requirements;
- payment activity;
- risk indicators;
- attempted access to adult content;
- attempted publication or supply of content;
- suspected fraud, impersonation, account misuse or identity manipulation; and
- requests from payment processors, acquiring banks or other financial institutions involved in the processing of online payments, card networks, competent authorities or other relevant service providers.

DriveX Studios SL may apply stronger verification measures where required by law, where required by payment compliance obligations, or where the activity or risk profile justifies enhanced controls.

5. Age Verification for Users

Access to adult content on DriveX Studios SL is restricted to individuals aged 18 or older.

DriveX Studios SL may apply age verification and access control mechanisms including, where appropriate:

- age declaration;
- age gates;
- identity or age verification through a third-party provider;
- age estimation technology;
- payment-based risk checks;
- account activity review;
- IP, device, location or behavioural risk analysis;
- additional verification before access to sensitive features;
- additional verification before or after online payment activity; and
- account restriction where age eligibility cannot be confirmed.

DriveX Studios SL may deny, suspend or restrict access where a user fails age verification, provides false information, attempts to bypass access controls, uses another person's identity or payment method without authorisation, or is suspected of being under 18.

6. Identity and Professional Verification for Content Suppliers

All professional content suppliers must complete identity verification and, where applicable, business verification before being authorised to supply, publish, license or distribute content through DriveX Studios SL.

Verification may include:

- individual identity verification;
- business or corporate verification;
- verification of authorised representatives;
- document validation;
- biometric or facial verification where lawful and necessary;
- liveness checks;
- sanctions, fraud or risk screening where appropriate;
- verification of professional status or commercial legitimacy;
- verification of rights-holder status or contractual authority;
- review of content supply agreements, licences, performer releases or other supporting documentation; and
- additional checks required by payment processors, acquiring banks or other financial institutions involved in the processing of online payments or card networks.

DriveX Studios SL may refuse onboarding, suspend access, withhold publication, reject content or terminate the relationship where a professional content supplier fails verification or presents unacceptable legal, fraud, payment compliance, reputational or platform safety risk.

7. Third-Party Verification Provider

DriveX Studios SL may use Yoti or another reputable third-party identity, age verification or fraud prevention provider to support its verification framework.

Such providers may support, depending on the relevant workflow:

- identity document validation;
- age verification;
- age estimation;
- facial matching;
- biometric or liveness checks;

- fraud prevention checks;
- verification audit logs; and
- compliance reporting.

Any third-party verification provider must process personal data in accordance with applicable data protection laws, including GDPR and Spanish data protection law.

Where biometric data or special categories of personal data are involved, DriveX Studios SL will ensure that processing is subject to an appropriate legal basis, necessity assessment, proportionality safeguards, data minimisation, appropriate transparency information and applicable security measures.

DriveX Studios SL shall define, through appropriate contractual arrangements, whether the verification provider acts as processor, independent controller or joint controller, depending on the specific service and data processing model.

8. User Access Controls and Payment-Related Checks

Because DriveX Studios SL receives online payments from users of the platform, payment activity may be used as a risk signal within DriveX Studios SL's verification and fraud prevention framework.

DriveX Studios SL may require additional verification or authentication where there are indicators such as:

- unusual payment activity;
- repeated failed payment attempts;
- chargebacks;
- refund abuse;
- suspected use of stolen or unauthorised payment credentials;
- mismatch between account information and payment information;
- suspicious location, IP, device or behavioural patterns;
- attempted access from restricted jurisdictions;
- suspected minor access;
- use of VPNs, proxies or other tools to bypass access controls;
- account sharing;
- multiple accounts linked to the same payment instrument; or
- payment processor, acquiring bank or other financial institutions involved in the processing of online payments, or card network alerts.

DriveX Studios SL may suspend, block, reverse, refund, review, hold or restrict the processing or availability of relevant online payments, transaction amounts, credits, account balances or related revenues where permitted by applicable terms and law, and where necessary to address suspected fraud, underage access, policy violations, chargebacks, illegal activity or payment compliance concerns.

9. Enhanced Authentication and Ongoing Monitoring

DriveX Studios SL may apply enhanced authentication and ongoing monitoring measures to protect the platform and its payment flows.

These measures may include:

- multi-factor authentication;
- repeated or periodic identity checks;
- re-verification following account changes;
- device fingerprinting or device risk analysis;
- IP and geolocation checks;
- behavioural analysis;
- account activity monitoring;
- transaction monitoring;
- fraud scoring;
- manual compliance review;
- payment processor alerts;
- unusual access pattern detection; and
- enhanced review of accounts or transactions presenting higher risk.

DriveX Studios SL may require re-verification where there is a material change in account information, suspicious activity, suspected identity fraud, suspected underage access, change of control of a professional account, payment irregularities or a request from a payment processor, acquiring bank or other financial institutions involved in the processing of online payments, card network or competent authority.

10. Fraud Prevention and Platform Integrity

DriveX Studios SL operates fraud prevention controls to detect, prevent and mitigate:

- underage access;
- identity fraud;

- impersonation;
- use of forged, stolen or manipulated identity documents;
- use of unauthorised payment methods;
- account takeover;
- account sharing;
- payment fraud;
- chargeback abuse;
- refund abuse;
- professional credential misrepresentation;
- unauthorised content supply;
- rights-holder impersonation;
- attempts to bypass age gates or verification procedures; and
- other activity that may compromise the safety, legality or integrity of the platform.

Where suspicious activity is detected, DriveX Studios SL may take appropriate action, including additional verification, content restriction, account suspension, transaction review, payment restriction, evidence preservation, service provider notification or reporting to competent authorities where required or permitted by law.

11. Data Protection and Security

DriveX Studios SL processes personal data in accordance with GDPR and Spanish data protection law.

Personal data processed for age verification, identity verification, fraud prevention, payment compliance and platform safety purposes may include, where applicable:

- account registration data;
- age confirmation data;
- identity verification data;
- business verification data;
- professional verification data;
- identity document information;
- biometric verification results or facial matching data where lawfully used;

- device, IP, access and security logs;
- payment-related risk indicators;
- verification status;
- audit logs;
- fraud prevention signals; and
- communications and compliance records.

DriveX Studios SL applies appropriate technical and organisational measures to protect verification data against unauthorised access, loss, misuse, alteration or disclosure.

DriveX Studios SL will apply the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality.

Verification data will be retained only for as long as necessary for the relevant legal, contractual, compliance, fraud prevention, payment processing, dispute resolution, platform safety or regulatory purpose, unless a longer retention period is required or permitted by law.

12. Information Sharing with Payment Service Providers

DriveX Studios SL may provide relevant compliance, verification, fraud prevention, transaction, account or risk information to payment processors, acquiring banks, card networks and other relevant payment service providers where necessary to:

- support merchant onboarding or ongoing monitoring;
- demonstrate compliance with adult content requirements;
- prevent or investigate fraud;
- address chargebacks or refund abuse;
- investigate suspicious payment activity;
- respond to payment processor inquiries;
- comply with card network or acquiring bank or other financial institutions involved in the processing of online payments requirements;
- address suspected underage access;
- address suspected illegal content or platform misuse;
- protect payment system integrity; or
- comply with applicable law or lawful requests.

Any information sharing will be limited to what is necessary and proportionate for the relevant compliance, payment, fraud prevention, investigation or legal purpose.

13. Zero-Tolerance Policy for Minors and Identity Fraud

DriveX Studios SL enforces a zero-tolerance policy against:

- minors accessing adult content;
- attempts to bypass age verification;
- false age declarations;
- use of another person's identity;
- use of forged or manipulated identity documents;
- unauthorised use of payment methods;
- identity fraud;
- impersonation of professional content suppliers, performers or rights holders; and
- any attempt to deceive DriveX Studios SL, its verification providers or payment service providers.

Violations may result in immediate access restriction, account suspension, account termination, transaction review, payment restriction, permanent ban, preservation of evidence and reporting to competent authorities where required or permitted by law.

14. Enforcement Measures

DriveX Studios SL may adopt enforcement measures where a user, professional content supplier, account, transaction or activity fails verification, presents unacceptable risk, breaches this policy or is suspected of violating applicable law, platform terms, payment processor rules or card network requirements.

DriveX Studios SL will determine appropriate enforcement measures acting reasonably and proportionately, taking into account the seriousness of the issue, risk to minors, payment risk, fraud indicators, recurrence, available evidence, applicable legal obligations and the need to protect users, performers, rights holders, payment systems and the integrity of the platform.

15. Review and Updates

DriveX Studios SL may review and update this policy periodically to reflect changes in:

- Spanish or European law;
- regulatory guidance;
- payment processor requirements;
- acquiring bank or other financial institutions involved in the processing of online payments, or card network rules;
- age verification technology;

- fraud prevention practices;
- adult content compliance standards; and
- DriveX Studios SL's operational or risk profile.