PRIVACY POLICY

Elefe Inc.

This Privacy Policy (the *"Policy"*) describes how Elefe Inc., a corporation organized under the laws of the State of Delaware, United States of America (*"Elefe," "Company," "we," "us,"* or *"our"*), collects, uses, discloses, and protects personal information obtained through the website located at *www.elefemodels.com* (the *"Site"*), together with related services, applications, and products (collectively, the *"Services"*). This Policy applies to all users of the Site, including visitors, registered users, and models who create profiles or portfolios through the Services (collectively, *"Users"* or *"you"*).

By accessing or using the Site, creating an account, or otherwise providing personal information to us, you acknowledge that you have read and understood this Policy and agree to the collection, use, and disclosure of your information as described herein. If you do not agree with the terms of this Policy, please do not access or use the Site or the Services.

Consent to the processing of personal information may be given in any manner that reliably establishes the fact of its receipt (including by ticking a box on the Site, completing a registration form, or another method permitted by applicable law), and may be withdrawn at any time by written notice or notice in electronic form sent to the contact details specified in Section 13 (*Contact Us*) below. Where permitted by applicable law, Elefe may continue to process certain personal information after withdrawal of consent where another legal basis for processing exists, until that basis ceases to apply.

1. Scope and Legal Framework

1. Elefe Inc. is a corporation organized under the laws of the State of Delaware, with a registered office at 1111b South Governors Avenue STE 28860 Dover, DE 19904 US and a business/mailing address at *elefe@elefemodels.com*. Elefe Inc. is the entity responsible for determining the purposes and means of processing the personal information described in this Policy.

2. This Policy has been prepared with reference to applicable United States federal and state privacy laws, including, where and to the extent applicable, the California Consumer Privacy Act as amended by the California Privacy Rights Act ("CCPA/CPRA"), other applicable U.S. state consumer privacy laws, and the Children's Online Privacy Protection Act ("COPPA").

3. Elefe currently operates primarily in *fashiontech*. If and to the extent Elefe processes personal information of individuals located in the European Economic Area, the United Kingdom, or other jurisdictions with comprehensive data protection laws, the relevant provisions of the General Data Protection Regulation ("GDPR"), the UK GDPR, or such

other applicable law shall apply in addition to this Policy, as further described in Section 8.

4. This Policy applies solely to the Site identified above. Elefe does not control and is not responsible for the privacy practices of third-party websites that Users may access through links provided on the Site.

2. Information We Collect

Elefe collects only the personal information that is reasonably necessary to provide the Services, perform agreements with Users, and comply with applicable legal obligations.

1. **Information provided directly by the User.** This includes information a User submits when creating an account, completing a model profile or portfolio, or using contact/feedback forms, such as name, date of birth, contact details, physical characteristics, and other profile information. Fields required for the Services are marked accordingly; provision of other information is at the User's discretion.
2. **Information collected automatically.** When Users interact with the Services, Elefe and its service providers may automatically collect technical information, including IP address, cookie data, browser and device information, operating characteristics of the equipment and software used, dates and times of access, pages requested, and similar technical data.
3. **Biometric and portfolio information.** Photographs, video recordings, and other likeness materials submitted by Users (models) for the purposes of identity verification, age verification, and creation of a profile or portfolio on the Site may constitute biometric identifiers or biometric information under certain U.S. state laws (including, where applicable, the Illinois Biometric Information Privacy Act, the Texas Capture or Use of Biometric Identifier Act, and Washington's biometric privacy law). Elefe collects and processes such materials only on the basis of the User's informed, freely given consent, obtained through the registration process or a dedicated consent mechanism, and subject to the enhanced safeguards described in Section 9.
4. Other information about the User, the processing of which is necessary for the provision of the Services.

3. Age Restriction; Children's Privacy

1. The Services are intended solely for individuals who are at least eighteen (18) years of age. Elefe does not knowingly collect, solicit, or process personal information from individuals under the age of 18, and Users are required to confirm they meet this age requirement upon registration.
2. If Elefe becomes aware that it has inadvertently collected personal information from a person under 18, it will take reasonable steps to promptly delete such information.

Parents or legal guardians who believe their child may have provided personal information to Elefe may contact us at *elefe@elefemodels.com* to request deletion.

4. Purposes of Processing

Elefe processes personal information for the following purposes:

1. identifying Users registered on the Site;
2. providing Users with access to the resources and functionality of the Site;
3. establishing communication with Users, including sending notifications and responding to inquiries, requests, and applications;
4. verifying the accuracy and completeness of personal information provided by Users, including age and identity verification;
5. creating and administering a User account where the User has elected to register;
6. providing customer and technical support in connection with use of the Site;
7. preventing fraud and ensuring the security and integrity of the Services;
8. with the User's consent, notifying Users of updates to the Site or Services;
9. complying with applicable legal, regulatory, and contractual obligations.

5. Confidentiality and Disclosure to Third Parties

1. Personal information of Users is treated as confidential, except where a User has voluntarily made such information available for general public access (for example, through a public profile), in which case the User acknowledges that the relevant portion of their information becomes publicly available.

Elefe may disclose personal information to third parties in the following circumstances:

(a) the User has consented to such disclosure;

(b) disclosure is necessary to provide a Service requested by the User or to perform an agreement with the User, including to payment processors, hosting providers, IT and analytics service providers engaged by Elefe;

(c) disclosure is required by applicable law, regulation, legal process, or governmental request;

(d) in connection with a merger, acquisition, financing, or sale of all or substantially all of Elefe's assets, in which case the acquiring entity will assume the obligations set out in this Policy with respect to the personal information it receives, and Users will be notified in accordance with Section 12.

2. Elefe does not sell personal information to third parties for monetary consideration.

6. Cross-Border Data Transfers

1. Because Elefe engages service providers that may be located outside a User's country of residence (including with respect to Site hosting, payment processing, and web analytics), personal information may be transferred to, stored, and processed in the United States and other countries whose data protection laws may differ from those of the User's home jurisdiction.

2. Elefe takes reasonable contractual, technical, and organizational measures designed to ensure that personal information transferred across borders receives a level of protection consistent with this Policy and applicable law, including, where required, by incorporating appropriate data protection terms into agreements with service providers and other counterparties.

7. Data Retention

1. Elefe retains personal information only for as long as reasonably necessary to fulfill the purposes described in this Policy, including for the duration of any agreement with the User, any applicable statute of limitations period, and any additional period required by applicable law or Elefe's internal record-keeping policies.

2. Upon expiration of the applicable retention period, or where the purpose of processing has been achieved or is no longer necessary, personal information will be deleted or de-identified, unless a longer retention period is required or permitted by applicable law.

8. Your Privacy Rights

1. Subject to applicable law and to the extent it applies to Elefe's processing activities, Users may have the right to: (a) request confirmation of, and access to, the personal information Elefe holds about them; (b) request correction of inaccurate or incomplete personal information; (c) request deletion of personal information that is no longer necessary for the purposes for which it was collected; (d) withdraw previously given consent at any time, as described above; and (e) lodge a complaint with a competent regulator or seek judicial relief.

2. **California residents.** To the extent the CCPA/CPRA applies to Elefe's processing activities, California residents may have additional rights to know the categories and specific pieces of personal information collected, to request deletion or correction of personal information, and to opt out of the "sale" or "sharing" of personal information (Elefe does not sell personal information as described in Section 5). Requests may be submitted to *elefe@elefemodels.com*. Elefe will not discriminate against a User for exercising these rights.

3. Elefe will respond to verified requests within the time period required by applicable law, and in any event within 10 days of receipt, absent an extension permitted by law.

9. Security Measures

1. Elefe implements reasonable administrative, technical, and physical safeguards designed to protect personal information against unauthorized or accidental access, destruction, modification, blocking, copying, distribution, and other unlawful processing, taking into account the nature of the information and the risks involved.
2. Enhanced safeguards apply to biometric and portfolio materials described in Section 2(c), including restricted internal access limited to authorized personnel and additional technical protective measures.
3. No method of electronic transmission or storage is completely secure, and Elefe cannot guarantee absolute security of personal information.
4. Consistent with general security best practices, Elefe does not publicly disclose the specific technical details of the security measures it employs to protect personal information

10. Cookies and Tracking Technologies

1. The Site uses cookies and similar tracking technologies, including authentication cookies, a language-preference cookie, browser local storage for display preferences, and Yandex Metrica analytics cookies and tracking pixels, to operate the Site, remember User preferences, and analyze usage of the Services.
2. Users can manage or disable cookies through their browser settings; disabling certain cookies may affect the functionality of the Site.

11. Third-Party Links

The Site may contain links to third-party websites. Elefe does not control and is not responsible for the content, privacy practices, or security of such third-party websites. Users should review the privacy policies of any third-party websites they visit.

12. Changes to this Policy

1. Elefe may amend this Policy at its discretion. The amended Policy becomes effective upon its posting on the Site, unless otherwise specified in the amended Policy.
2. Elefe will notify Users of material changes to this Policy by posting a notice on the Site no later than ten (10) calendar days before the effective date of such changes.
3. The current version of this Policy is available at https://elefemodels.com/docs/politics.pdf

13. Governing Law

This Policy is governed by the laws of the State of Delaware and applicable federal law of the United States, without regard to conflict-of-law principles, and without prejudice to any

mandatory consumer or data protection rights a User may have under the law of their country or state of residence, including, where applicable, the CCPA/CPRA or the GDPR/UK GDPR.

14. Contact Us

For questions relating to the processing of personal information, to exercise the rights described in Section 8, or to withdraw consent to processing, Users may contact Elefe using the details below:

Elefe Inc.

Registered address: 1111b South Governors Avenue STE 28860 Dover, DE 19904 US

Business/mailing address: *elefe@elefemodels.com*

EIN: 37-2179621

Privacy contact email: *elefe@elefemodels.com*

Website: www.elefemodels.com

Effective date of this version of the Policy: 01.09.2026