



PRIVACY & COOKIES POLICY

Privacy, data protection and website technologies

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AQUILA CREATOR FORCE LLC

1021 E Lincolnway, 10157, Cheyenne, WY 82001, Laramie County, United States of America

Controller	AQUILA CREATOR FORCE LLC
Business address	1021 E Lincolnway, 10157, Cheyenne, WY 82001, Laramie County, United States of America
Scope	Website visitors, creators, brand and agency contacts, prospective partners and campaign-related contacts
Effective date	August 22, 2026

Aquila respects the privacy of creators, brand representatives, agency partners, business contacts and visitors to our website. This Privacy & Cookies Policy explains how Aquila collects, uses, shares, stores and protects personal information when you visit the website, submit a creator profile, present a campaign, contact our team or otherwise interact with us.

PLAIN-LANGUAGE SUMMARY

We collect only information that is reasonably connected to operating our website, evaluating creator and brand opportunities, managing professional relationships and campaigns, and protecting our business. The website is not intended to operate as a consumer marketplace or an automated contracting platform.

1. Who We Are

AQUILA CREATOR FORCE LLC (“Aquila”, “we”, “us” or “our”) is the entity responsible for the processing described in this Policy when it determines why and how personal information is used. Aquila operates an influencer and creator representation and campaign-management business, connecting creators, brands, agencies and platforms across multiple markets.

Depending on the context and applicable law, Aquila may act as a controller/business with respect to its own professional network and website activities, or process information on behalf of a client under a separate commercial arrangement.

2. Scope of This Policy

This Policy applies to personal information processed through the Aquila website and through interactions that originate from or are directly connected with the website, including creator submissions, campaign inquiries, contact forms and related business communications.

Separate contracts, campaign terms, creator representation agreements or client instructions may contain additional privacy provisions. Where such provisions apply to a specific commercial relationship, they supplement this Policy and may govern the relevant processing in greater detail.

3. Information We May Collect

3.1 Contact and business information

Name, professional e-mail address, telephone number, company, role, country or market, preferred contact channel and information included in messages or inquiries.

3.2 Creator and professional profile information

Creator name or professional name, social media handles, profile URLs, portfolio materials, content category, language, geographic market, professional interests, media kit, audience information, follower or engagement metrics, commercial preferences and information relevant to potential representation or campaigns.

3.3 Brand, agency and campaign information

Company or agency details, representative contact information, campaign objectives, target audience, markets, platforms, timelines, expected deliverables, budget or commercial parameters where voluntarily provided, and other information contained in a briefing or inquiry.

3.4 Publicly available professional information

Where relevant to legitimate creator discovery, representation, curation or campaign activities, Aquila may review professional information that creators or businesses have made public, such as social media profiles, professional websites, portfolios and public business pages. Public availability does not eliminate privacy obligations; such information is used only where reasonably connected to Aquila's activities and applicable law permits the processing.

3.5 Website and device information

Technical information may include IP address, browser and device information, pages viewed, date and time of access, referral source, approximate location derived from IP address, cookie identifiers and security or diagnostic logs.

3.6 Sensitive information

Please do not submit sensitive or special-category personal information unless it is genuinely necessary for a specific relationship and Aquila has requested it or another lawful basis clearly applies. Aquila does not seek to collect sensitive information through ordinary website forms.

4. How We Collect Information

- Directly from you, including through contact forms, creator submissions, campaign inquiries, e-mail, messaging applications and business communications.
- From creators, brands, agencies, platforms or other business partners involved in an opportunity or campaign.
- From public professional sources where relevant and lawful.
- Automatically through the website and its hosting, security, analytics or similar technologies.

5. Why We Use Personal Information

Aquila may use personal information for the following purposes, subject to the legal basis required in the relevant jurisdiction:

- i. responding to inquiries and maintaining professional communications;
- ii. reviewing creator profiles and assessing potential representation, development or commercial opportunities;
- iii. identifying, evaluating and curating creators for brand, agency or platform opportunities;
- iv. preparing creator shortlists, proposals, campaign plans and commercial recommendations;
- v. managing prospective and existing business relationships, negotiations, contracting, campaign execution, approvals, deliverables and reporting;
- vi. maintaining and improving Aquila's professional creator network and business records;
- vii. operating, securing, diagnosing and improving the website and its forms;
- viii. measuring website performance and understanding how the website is used, where permitted;
- ix. preventing fraud, abuse, unauthorized access and security incidents;
- x. complying with legal, tax, accounting, regulatory and contractual obligations; and
- xi. establishing, exercising or defending legal rights and resolving disputes.

Submitting a creator profile, campaign inquiry or other information does not guarantee representation, selection, engagement, campaign participation or the conclusion of any commercial agreement.

6. Legal Bases

Where applicable law requires a legal basis, Aquila may rely on one or more of the following, depending on the activity:

- i. steps requested before entering into a contract and performance of a contract;
- ii. legitimate interests, including professional networking, creator curation, business development, relationship management, security and the administration of Aquila's services, subject to applicable balancing requirements;
- iii. consent, where consent is required or is the appropriate basis, including for certain non-essential cookies or optional marketing communications;
- iv. compliance with legal or regulatory obligations; and
- v. the establishment, exercise or defense of legal claims, where permitted by law.

Where Brazilian law applies, processing is carried out under an appropriate legal basis recognized by the Brazilian General Data Protection Law (LGPD). Where the GDPR, UK GDPR or another privacy regime applies, Aquila will use the corresponding lawful basis required by that regime.

7. Creator Profiles, Curation and Commercial Opportunities

Creator information may be organized, reviewed and compared against campaign criteria such as content category, market, audience profile, language, platform, creative style, availability and commercial fit. Aquila may present relevant professional profile information to prospective brands, agencies, platforms or campaign partners for legitimate opportunities.

Aquila does not authorize indiscriminate harvesting or reuse of creator information. The disclosure of non-public creator contact information should be limited to legitimate commercial purposes, appropriate recipients and applicable contractual or legal safeguards.

Creators may request correction or updating of inaccurate profile information and, where applicable law allows, removal or restriction of information maintained about them.

8. Sharing of Information

Aquila may disclose personal information only where reasonably necessary for the purposes described in this Policy, including to:

- i. brands, agencies, platforms, creators and other commercial counterparties involved in a relevant opportunity or campaign;
- ii. hosting, cloud, communications, analytics, website, security and business-service providers acting under appropriate instructions;
- iii. professional advisers, including legal, accounting, tax and compliance advisers;
- iv. affiliated or operational entities involved in Aquila's services, subject to appropriate safeguards; and
- v. courts, regulators, governmental bodies or law-enforcement authorities where disclosure is legally required or reasonably necessary to protect legal rights.

Service providers that process information on Aquila's behalf should be subject to confidentiality, security and purpose-limitation obligations appropriate to the services they provide.

9. International Data Transfers

Aquila operates across multiple markets. Personal information may therefore be accessed, stored or processed in a country different from the country where it was collected.

Where a transfer is subject to the LGPD, Aquila will use a valid mechanism permitted by Brazilian law and applicable ANPD regulations, including, where appropriate, recognized adequacy mechanisms, standard contractual clauses or another lawful transfer mechanism. Where the GDPR, UK GDPR or another international-transfer regime applies, Aquila will implement the transfer safeguards required by that regime.

International transfers should be limited to information reasonably necessary for the relevant purpose and supported by proportionate contractual, organizational and technical safeguards.

10. Cookies and Similar Technologies

The website may use cookies, tags, pixels, local storage or similar technologies for technical operation, security, preferences and measurement. The exact technologies in use may change as the website and its service providers evolve.

10.1 Strictly necessary technologies

These technologies support functions such as page delivery, security, load management, form operation and other functionality required for the website to work. Where the law permits, they may operate without optional consent because they are necessary for the requested service or website functionality.

10.2 Analytics and performance technologies

Where enabled, analytics tools may help Aquila understand aggregate website usage, traffic sources, page performance and technical issues. Google Analytics or equivalent measurement tools may be configured on the website. Where applicable law requires prior consent for these technologies, they should remain disabled until the visitor has made the relevant choice.

10.3 Cookie choices

Where required by applicable law, the website should provide a preference mechanism that allows visitors to accept or reject non-essential technologies and to revisit their choices. Browser settings may also allow users to block or delete cookies, although disabling necessary technologies can affect website functionality.

11. Direct Marketing

Aquila may send business communications where permitted by law and appropriate to the existing relationship, inquiry or professional context. Where consent or a specific opt-in is required, Aquila will seek it separately. Recipients may opt out of non-essential marketing communications using the mechanism provided in the message or by contacting Aquila.

Operational, contractual or campaign communications are not treated as optional marketing when they are necessary to administer an existing relationship or requested service.

12. Retention

Aquila retains personal information only for as long as reasonably necessary for the purpose for which it was collected, taking into account the duration of the relevant professional relationship or opportunity, the need to maintain accurate creator and business records, applicable limitation periods, contractual requirements and legal, tax, accounting or regulatory obligations.

Where practical, creator and business-contact information should be reviewed, updated or removed when it is no longer reasonably relevant. Backup or archival copies may remain for a limited period where deletion is not immediately technically feasible, subject to appropriate restrictions.

13. Security

Aquila uses reasonable administrative, organizational and technical safeguards designed to reduce the risk of unauthorized access, disclosure, alteration, destruction or misuse of personal information. Safeguards may include access controls, credential management, provider due diligence, secure hosting practices and internal confidentiality requirements, as appropriate to the information and risk involved.

No method of Internet transmission or electronic storage can be guaranteed to be completely secure. Where a personal-data incident triggers a legal notification obligation, Aquila will follow the requirements applicable to the incident and affected jurisdiction.

14. Minors

Aquila may work with creators of different ages, but the website is not designed to circumvent parental, guardian or age-related legal requirements. Where a creator is below the age required to independently enter into the relevant relationship, Aquila will require the involvement and authorization of a parent or legal guardian as applicable.

Campaigns involving minors or audiences composed substantially of children may be subject to additional privacy, advertising, image-rights and child-protection requirements.

15. Your Privacy Rights

Depending on where you are located and which law applies, you may have rights concerning your personal information, including rights to:

- i. receive information about the processing of your personal information;

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- ii. obtain confirmation and access to personal information held about you;
 - iii. request correction of inaccurate or incomplete information;
 - iv. request deletion, anonymization, restriction or blocking where the legal conditions are met;
 - v. object to certain processing activities or request review where applicable;
 - vi. withdraw consent for future processing where consent is the legal basis;
 - vii. request portability where recognized by applicable law;
 - viii. receive information about relevant sharing or international-transfer arrangements where required; and
 - ix. submit a complaint to a competent privacy or data-protection authority.

Aquila may need to verify the identity and authority of the requester before fulfilling a request. Legal exceptions may apply, including where information must be retained to comply with law, protect third-party rights or establish, exercise or defend legal claims.

16. Automated Processing

Aquila may use data, metrics or digital tools to support creator discovery, campaign planning, performance analysis or operational decisions. If Aquila introduces solely automated decision-making that produces legal or similarly significant effects and applicable law grants specific rights in that context, Aquila will provide the required notice and safeguards.

17. Third-Party Platforms and Links

The website may link to social networks, creator profiles, external websites or third-party services. Those third parties determine their own privacy practices and are governed by their own terms and policies. Aquila is not responsible for the independent privacy practices or security of third-party services.

18. Changes to This Policy

Aquila may update this Policy to reflect changes in the website, business practices, technologies or legal requirements. The current version will be published on the website with its effective or last-updated date. Material changes may be communicated through additional notice where required by law.

19. Contact and Privacy Requests

AQUILA CREATOR FORCE LLC
1021 E Lincolnway, 10157, Cheyenne, WY 82001, Laramie County, United States of America

Data Protection Officer (DPO): Daniel Cruz Fonseca.

Privacy requests and communications concerning personal data may be addressed to the DPO through the Contact Us channel available on the Aquila website. Please identify the communication as “Privacy Request” and provide enough information for Aquila to understand and appropriately verify the request.