

LEGITAM P.S.A.

CHILD SAFETY STANDARDS (CSAE)

for the Legitam Mobile Application (Android and iOS)

Provider: Legitam Prosta Spółka Akcyjna (a Polish simple joint-stock company, "Legitam P.S.A."), with its registered office at ul. Weselna 5, 46-300 Świercze, Poland.

Application: Legitam Mobile Application (iOS / Android).

Document version: 1.0 / 2026

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Language Versions and Interpretation

These documents are provided in English, Italian, French, Polish, and German for your convenience.

For Consumers: In the event of any material discrepancy between the language versions, the version in the official language of your country of residence (or the language in which you concluded the agreement) shall prevail for the purpose of interpretation, ensuring that your rights under mandatory local consumer protection laws are fully preserved.

For Non-Consumers (B2B): The English version shall be the sole governing and legally binding version for the purpose of interpretation.

In all cases, nothing in this clause shall limit or exclude any mandatory rights granted to you by the applicable law of your country of residence.

If a child is in immediate danger, call 112 (EU) or your local emergency number. Do not wait for our response.

Child safety reports concerning the Application: safety@legit.am — with CSAE in the subject line — or the in-app "Report" function.

Relationship to other documents: These Standards supplement the [Terms of Service](#) as regards content moderation and reporting of violations (§7 of the Terms of Service), and the [Privacy Policy — Mobile Application](#) as regards the processing of personal data connected with child safety. The age requirements described in this document mirror those set out in §3.1 of the Terms of Service and in the End-User License Agreement ([EULA](#)). In the event of any discrepancy between this document and the Terms of Service regarding prohibited content, the provision stricter towards the offender applies.

§1. SCOPE AND WHO WE ARE

1.1. These Standards apply to the Legitam Mobile Application (the "Application") and related online services provided by Legitam P.S.A., ul. Weselna 5, 46-300 Świercze, Poland ("Legitam", "we").

1.2. Legitam is an NFC-based product authenticity and Digital Product Passport (DPP) service, supplemented with social features: publishing amLook posts, maintaining a Digital Closet, and building AmRank status. Because the Application allows Users to publish content and interact with one another, the standards below apply.

1.3. These Standards apply to every User, in every country where the Application is available, regardless of distribution channel (Google Play, the App Store, or direct distribution).

§2. DEFINITIONS

Term	Meaning
Child / minor	Any person under 18 years of age, regardless of the local age of sexual consent and regardless of the age a person has declared in the Application.
CSAE	Child sexual abuse and exploitation — content or behaviour that sexually exploits, abuses or endangers a child, including grooming, sextortion, trafficking a child for sex, sexualising a child, and any other sexual exploitation of a child.
CSAM	Child sexual abuse material — any visual depiction (photograph, video, computer-generated or AI-generated imagery) involving a minor engaging in sexually explicit conduct. Producing, possessing, storing or distributing CSAM is a criminal offence.
Grooming	Building a relationship with a child, directly or through a third party, in order to sexually exploit them, obtain sexual material, or arrange a meeting.
Sextortion	Coercing a child into providing sexual material, money or other benefits under threat of exposing material or information about them.
amLook, Digital Closet, AmRank	As defined in §1 of the Terms of Service .

§3. ZERO TOLERANCE

3.1. Legitam operates a zero-tolerance policy on CSAE and CSAM. In practice:

- we remove CSAM as soon as we obtain actual knowledge of it;
- we permanently ban the Account of anyone who publishes, distributes or seeks such material, without prior warning and without the option to re-register;
- we report suspected offences to the competent authorities;
- we do not condition action on the number of reports received, or on whether the report came from the victim;
- these Standards apply whether or not minors are in fact present in the Application — they govern content and conduct, not the age profile of our community.

§4. PROHIBITED CONTENT AND CONDUCT

4.1. The following are strictly prohibited in the Application:

- posting, transmitting, storing, sharing, promoting or soliciting CSAM, including drawn, animated, realistically edited and AI-generated material;
- sexualising children, including posting images of children with sexual commentary, or cropping or framing a child's body in a sexual manner, even where the underlying image is innocuous;
- grooming, including directing sexual content, meeting requests or requests for material to a child;

- sextortion of a child;
- human trafficking, including child trafficking, and offering or seeking sexual services involving minors;
- promoting, glorifying or normalising paedophilia or sexual conduct towards children, including the use of associated codes, symbols and signalling terms;
- directing other Users — through links, usernames, profile descriptions, comments or text visible in images — to CSAM or to services and communities used to trade it;
- impersonating a child, or creating an Account in a child's name in order to contact others;
- any other conduct falling within the definition of CSAE in §2.

4.2. These prohibitions apply across the entire Application: amLook posts, comments, Account names and descriptions, profile images, User group names, and material submitted to us through the reporting process. They give further detail to the prohibition in §6.2 of the Terms of Service regarding content depicting the sexual exploitation of minors.

§5. AGE REQUIREMENTS

5.1. Creating an Account requires a minimum age of 16, in accordance with §3.1 of the Terms of Service, confirmed by the User at registration.

5.2. Where local law sets a higher minimum age for social media services or for consent to the processing of personal data, the higher threshold applies.

5.3. Where we receive credible information that an Account belongs to a person below the required age, we disable it and delete the associated data in accordance with the Privacy Policy. Such Accounts can be reported to privacy@legit.am.

5.4. The Application is not directed at children, contains no child-directed content, and we do not serve profiling-based advertising to Users we know or reasonably believe to be minors.

§6. SAFETY BY DESIGN

6.1. We reduce CSAE risk primarily through how the Application is built, not only through moderation after the fact. The Application:

- has no private messaging — there is no chat, no direct messages, and no way to send images or files to another User;
- does not pair Users randomly or anonymously — there is no random chat, no matchmaking, and no video calling;
- has no live streaming;
- requires every amLook to be linked to verified products in the author's Digital Closet — content in the Application is about products, not people;
- does not allow anonymous publishing: posting, commenting and following require a signed-in Account, in accordance with §4.1–4.2 of the Terms of Service;
- does not expose an author's precise location to other Users;
- treats User groups purely as audience lists for a post — they are not chat rooms or private communication spaces.

6.2. Before launching any new social feature — in particular any form of direct communication — we carry out a child safety risk assessment and update this document.

§7. CONTENT MODERATION

7.1. We combine automated tooling with human review, in accordance with the general rules set out in §7 of the Terms of Service:

- images uploaded to the Application are classified automatically for sexual content and nudity before publication; flagged content is held for human review;
- we use hash-matching against recognised databases of known CSAM; a match results in immediate blocking and escalation;
- text — comments, descriptions, Account and group names — is filtered for CSAE-related terms and coded language;
- User reports enter a moderation queue in which child safety cases take top priority;
- non-obvious cases are decided by a human moderator, not an automated system.

7.2. Moderation is carried out in line with Regulation (EU) 2022/2065 (Digital Services Act), including its requirements on statements of reasons and redress information.

§8. IN-APP REPORTING

8.1. The Application provides the reporting mechanism referred to in §7.1 of the Terms of Service, which can be used without leaving the Application:

- a "Report" action on every amLook post, every comment and every User profile;
- a dedicated "Child safety / CSAE" report category that flags the case as urgent;
- a free-text field for additional context;
- a contact form in the Application settings, plus safety@legit.am for concerns that cannot be tied to specific content.

8.2. Reports can also be submitted anonymously and without an Account by writing to safety@legit.am. Where a reporter provides contact details, we acknowledge the report and inform them of the outcome.

Response times

Stage	Target
Acknowledgement of report	without undue delay, no later than 24 hours
Review of a CSAE report	prioritised, ordinarily within 24 hours
Removal of confirmed CSAM	immediately upon confirmation
Notification of law enforcement	without undue delay after confirmation
Outcome notice to the reporter	on completion of review

8.3. Misuse of the reporting mechanism — in particular manifestly unfounded reports submitted to harass other Users — is a breach of the Terms of Service, in accordance with §7.6.

§9. BLOCKING AND USER CONTROLS

Every signed-in User can:

- block another User, which prevents them from following the Account, commenting on its posts and viewing its content;
- hide an individual post;
- delete comments on their own posts;
- limit the audience for their content using User groups;
- delete their content and their entire Account, either in the Application or via privacy.legit.am, in accordance with §3.3 of the Terms of Service.

§10. ENFORCEMENT AND APPEALS

10.1. Depending on the violation, we apply the measures described in §12 of the Terms of Service: removal or restriction of the visibility of content, a warning, temporary suspension of an Account, restriction of access to social and monetisation features, or permanent closure of an Account.

10.2. For CSAE and CSAM we apply only the strongest measure: immediate removal, permanent Account closure, and notification of law enforcement. We also take reasonable technical steps to prevent the same person from re-registering.

10.3. We inform the User of the decision and its basis, unless law or the interests of a criminal investigation prevent us from doing so. Decisions can be appealed to support@legit.am and are reviewed by someone other than the original decision-maker, in accordance with the procedure described in §7.4 of the Terms of Service. Users in the European Union additionally have the remedies provided under Articles 20 and 21 of the Digital Services Act, including out-of-court dispute settlement referred to in §7.5 of the Terms of Service.

§11. HANDLING CSAM

Once content is confirmed as CSAM, we:

1. immediately make it inaccessible to all Users;
2. preserve the material and associated data (Account identifiers, IP addresses, timestamps, metadata) in a restricted-access environment, solely for the purpose of reporting to law enforcement and as required by law;
3. limit access to named personnel and log every access;
4. never download, copy or transmit such material outside this procedure;
5. permanently delete preserved material once the retention period required by law enforcement or by law has expired.

§12. REPORTING TO AUTHORITIES

12.1. We report suspected offences against children without undue delay to:

- the Polish Police or public prosecutor, and the 112 emergency number in urgent cases;
- Dyżurnet.pl (NASK), the Polish INHOPE hotline for illegal online content;
- law enforcement in the relevant jurisdiction where the case is cross-border, via Europol where appropriate;

- NCMEC CyberTipline where the case has a United States nexus.

12.2. We comply with Article 18 of the Digital Services Act (notification of suspicions of criminal offences threatening the life or safety of persons) and with reporting duties under Polish law, including Article 240 of the Criminal Code and Article 304 of the Code of Criminal Procedure.

12.3. On lawful request from competent authorities, we disclose data in our possession and preserve evidence.

§13. CHILD SAFETY POINT OF CONTACT

We have designated an individual responsible for overseeing compliance with these Standards and for liaising with law enforcement, app distribution platforms and child protection organisations.

Point of contact:	Legitam P.S.A. — Child safety point of contact (CSAE / CSAM)
Address:	ul. Weselna 5, 46-300 Świercze, Poland
E-mail:	safety@legit.am (subject: <i>Child Safety</i>)

The name of the individual holding this role is provided to app store operators and to law enforcement on request.

§14. TEAM, TRAINING AND OVERSIGHT

- moderation staff are trained to recognise CSAE, grooming and sextortion and to follow the escalation procedure, with refresher training at least annually;
- the escalation procedure is documented and available to the designated team at all times;
- staff exposed to distressing material receive support, and exposure is limited by policy;
- moderation effectiveness and response times are reviewed periodically by management;
- hiring for moderation roles includes screening against the Polish sex offender register to the extent permitted by law.

§15. TRANSPARENCY

We keep records of child safety reports, actions taken and response times. Aggregate figures are published in an annual transparency report at privacy.legit.am, to the extent required by the Digital Services Act and without disclosing information that could prejudice ongoing investigations.

§16. LEGAL FRAMEWORK AND INDUSTRY STANDARDS

- Directive 2011/93/EU on combating the sexual abuse and sexual exploitation of children and child pornography;
- Regulation (EU) 2022/2065 — Digital Services Act, in particular Articles 16, 17, 18, 20, 21 and 28;
- Regulation (EU) 2016/679 (GDPR), in particular Article 8;
- the Polish Criminal Code, in particular Articles 200, 200a, 200b and 202 §§ 3–4c, together with Article 240 of the Criminal Code and Article 304 of the Code of Criminal Procedure;
- the Polish Act of 13 May 2016 on counteracting the threat of sexual offences and on the protection of minors;

- the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention);
- the UN Convention on the Rights of the Child;
- Google Play Child Safety Standards policy;
- Apple App Store App Review Guidelines, in particular guidelines 1.1.1, 1.2 and 1.7;
- Tech Coalition Child Safety Standards and best practices for combating online CSEA.

§17. UPDATES TO THIS DOCUMENT

This document is reviewed at least annually, and in addition before the launch of any new social feature and whenever legal requirements or distribution platform requirements change. The current version is always available at legal.legit.am/child-safety-standards.html.

§18. CONTACT DETAILS

- Legitam P.S.A., ul. Weselna 5, 46-300 Świercze, Poland
- Child safety, CSAE, CSAM: safety@legit.am
- General enquiries, moderation appeals: support@legit.am
- Personal data, Accounts, account deletion: privacy@legit.am
- Terms of Service: legal.legit.am/terms-of-service.html
- Privacy Policy — Mobile Application: legal.legit.am/privacy-policy.html
- Account deletion request: privacy.legit.am
- Website: legit.am

These Standards are effective as of 19 September 2026 | Available in English, Italian, French, Polish and German. | Legitam P.S.A.