Privacy Policy

1. Introduction

This Privacy Policy describes how Early Media Productions, LLC (“Early Media,” “Twist,” “we,” “us,” or “our”) collects, uses, and shares your personal information when you use our services (“Services”) and https://twist.show and any other associated mobile or websites or applications made generally available by Twist (collectively, the “Site”). Protecting your privacy is important to us, and we are committed to ensuring that your personal information is handled responsibly and in accordance with applicable privacy laws and regulations in the United States.

We collect, use, and share your personal information only to the extent necessary for the specified purposes outlined in this Privacy Policy. Our data collection practices are designed to be minimally intrusive and limited to what is required to provide our Services effectively and efficiently. Protecting your privacy is important to us, and we are committed to ensuring that your personal information is handled responsibly and in accordance with applicable privacy laws and regulations in the United States.

By accessing or using our Services, you agree to the collection, use, and sharing of your personal information as described in this Privacy Policy. If you do not agree with our policies and practices, your choice is to not use our Services. This policy may change from time to time (see Changes to This Privacy Policy), and your continued use of our Services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

2. Information Collection

This Privacy Policy outlines the types of information that Twist (“we,” “us,” or “our”) collects from you (“User” or “you”) when you use the Site or Services. We are committed to protecting your privacy and ensuring that your personal information is collected and used in accordance with applicable laws.

We collect the following types of information:

- Contact Information: This may include your name, address, email, phone number, and age. The provision of this information is voluntary. However, please note that without providing this information, you may not be able to fully utilize the Site or Services. This information is necessary for the following specific purposes: (1) to provide our Services, (2) to send you important notifications, and (3) to respond to your inquiries about our Services.
- Activity Information: This includes information about your use of the Site, including when you accept tasks and submit them for validation.
- Feedback and Support Information: This includes information we collect when you contact us for support, or to notify us of any suspected misuse of our Services or violations of applicable law, the Terms of Service, or other applicable policies.
- Automatically Collected Information: We use tools and services commonly used on the internet, such as log files, cookies, pixel tags, and similar technologies to automatically collect personal information from your devices while you navigate the Site or interact with emails we send to you. In this context, we collect things like IP address, browser or device type, operating system, and identifiers of your devices.

- Information Collected From Third Parties: We may also collect information from third-party sources.

By using the Site or the Services, you consent to the collection, use, and sharing of your information as described in this Privacy Policy. If you have any questions about how we collect or use your information, please contact us at support@twist.show. Any new purposes for data use beyond those stated in this policy will require additional consent from you.

3. Use and Disclosure of Information

We will use the information collected from users solely for the purpose of providing the Services. The collection, use, and disclosure of information shall be conducted in a manner that is consistent with this Privacy Policy and in compliance with applicable US laws and regulations.

Twist commits to protecting the privacy and security of its users' data. In accordance with this Privacy Policy, and subject to the exceptions listed below, Twist will not sell, distribute, lease, or otherwise share any user data with third parties for marketing purposes without your explicit consent, except as necessary for providing Twist's Services or operating the Site.

Notwithstanding the foregoing, user data may be shared or disclosed in the following circumstances:

- To comply with legal obligations or to respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- In the event of a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of Twist's assets, or similar transaction, where user information may be transferred as one of the business assets of the company.
- To protect the rights, property, or safety of Twist, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and risk reduction purposes.

In addition, we may disclose your personal information for any other reason with your express consent. Any sharing or disclosure of user data will be done in compliance with applicable US laws and regulations.

Please see below for more detail on how and why we collect, disclose, and retain personal information:

How and why we use your personal information

How and why we use your personal information	Categories of personal information we may use for these purposes	Legal basis (if applicable in your jurisdiction)
Providing our Services. We process your personal information to provide our Services and to perform our contract with you for the provision of our Services and to satisfy our obligations under the Terms of Service.	Contact Information Activity Information Feedback and Support Information Automatically Collected Information Information Collected From Third Parties	Contractual Necessity

How and why we use your personal information	Categories of personal information we may use for these purposes	Legal basis (if applicable in your jurisdiction)
Operating and administering the Site. We process your personal information to operate and administer the Site and our Services and make them available to you.	Activity Information Automatically Collected Information Information Collected From Third Parties	Our legitimate interest in operating and administering the Site and/or Services, and making them available to you.
Personalizing our Services and the Site. We process information we collect and store associated with you to assess and understand your preferences and provide you personalized experiences.	Activity Information Information we collect automatically Information we collect from third parties	Our legitimate interest in providing a relevant and tailored experience for the benefit and retention of our users.
Improving our Services and the Site. We process your information to analyze Site activity and help us improve the user experience on the Site. We also use information to develop, research, and test improvements to the Site and Services.	Activity Information Feedback and Support Information Automatically Collected Information Information Collected From Third Parties	Our legitimate interest in ensuring that the Site and our Services are performing in line with your expectations, and in developing new and innovative features, products, or services, for the benefit of our users.
Promoting our Services and the Site. We process your information you have provided to us to promote our Services and the Site to you – such as with newsletters, marketing, or promotional materials and other information that may be of interest to you.	Contact Information Activity Information Automatically Collected Information Information Collected From Third Parties	Our legitimate interest in providing you product and service updates, and information on any related products you may have shown interest in before.
Protecting the Site and our Services. We process your information to promote safety, integrity, and security on the Site, including to address violations of the Terms of Service or other applicable policies; detect and prevent spam, fraudulent use, or other security matters; or to verify accounts and activity.	Contact Information Activity Information Feedback and Support Information Automatically Collected Information Information Collected From Third Parties	Our legitimate interest in promoting the safety and security on the Site and the Services and in protecting our rights and the rights of others.
To communicate with you. We use information you have provided to us to send you communications, such as e-mails, phone calls, or texts, in	Contact Information Activity Information Feedback and Support Information	Contractual necessity

How and why we use your personal information	Categories of personal information we may use for these purposes	Legal basis (if applicable in your jurisdiction)
connection with an account and to provide you notices relating to the Terms of Service. We will also use contact information to respond when you contact us.	Information Collected From Third Parties	
Complying with our legal obligations. We process your information when cooperating with regulators, courts, or public and government authorities in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of personal information to protect our rights.	Contact Information Activity Information Feedback and Support Information Automatically Collected Information Information Collected From Third Parties	Legal obligation or our legitimate interest in protecting against misuse or abuse of the Site or the Services, protecting personal safety, and protecting our, our affiliates', or other third-parties' rights, property, safety, or interests.
Performing other business operations. We process your information for our business purposes such as data analysis, internal reporting and business modeling, audits, product development, and expanding our business activities.	Contact Information Activity Information Feedback and Support Information Automatically Collected Information Information Collected From Third Parties	Our legitimate interest in managing our business operations, growing our business, and ensuring the Site and the Services are meeting the expectations of our users.
Aggregating data. We process your information for the purpose of aggregating this information to ensure that it is no longer identifying, and we may share aggregated, non-personally identifiable, or de-identified information with our affiliates, or third parties that provide services to us or perform business purposes for us.	Contact Information Activity Information Feedback and Support Information Automatically Collected Information Information Collected From Third Parties	Our legitimate interest in minimizing the amount of personal information processed as part of the relevant processing activity.
Establishment, exercise and defense of legal claims. We process your information to the extent necessary to establish relevant facts, review evidence, manage and handle claims, and exercise our legal rights.	Contact Information Activity Information Feedback and Support Information Automatically Collected Information Information Collected From Third Parties	Our legitimate interest in establishing, exercising or defending legal claims.

4. Data Security

Twist is committed to protecting the security of your personal information and ensuring compliance with legal requirements for transferring personal data across international borders. We implement appropriate safeguards, such as standard contractual clauses or other legally recognized transfer mechanisms, when transferring data to countries outside your jurisdiction. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. This includes measures such as encryption, physical access controls to our data centers, and information access authorization controls. Despite these measures, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we implement appropriate technical and organizational measures to protect your personal information, we cannot guarantee its absolute security. In the event of a data breach, we are committed to promptly notifying affected individuals and relevant authorities within 72 hours of discovering the breach, as required by applicable data protection regulations. Our notification will include the nature of the breach, potential consequences, and steps we are taking to address and mitigate the incident.

5. Your Rights

Under applicable laws, including the European Union's General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA), you may have certain rights regarding the personal information that Twist collects, uses, and shares about you. These rights may include the following:

- The right to be informed about the collection and use of your personal information.
- The right to access the personal information that Twist holds about you.
- The right to request the correction of inaccurate personal information held about you by Twist.
- The right to request the deletion of your personal information when it is no longer necessary for Twist to retain it.
- The right to object to the processing of your personal information in certain circumstances, including for marketing purposes.
- The right to request that Twist restricts the processing of your personal information in certain circumstances, such as while Twist considers another request that you have submitted (including a request that Twist make an update to your personal information).
- The right to request a copy of your personal information in a structured, commonly used, and machine-readable format and the right to request that this information be transferred to another data controller, where technically feasible.
- The right to withdraw consent at any time, where relevant. This will not affect the lawfulness of processing based on consent before its withdrawal.
- The right to lodge a complaint with a supervisory authority responsible for data protection in your jurisdiction.

Please note that these rights are not absolute and may be subject to certain conditions and exceptions under applicable law. For more information on how to exercise these rights, please contact us at support@twist.show.

6. Data Retention

Twist commits to retaining personal data collected from users only for as long as necessary to fulfill the specified purposes for which it was collected, or as required by applicable laws and regulations, whichever is longer. The retention period for personal data will vary depending on the type of data and the purposes for which it is processed. We will ensure that personal data is securely deleted or anonymized once it is no longer needed for its intended purpose or as required by law.

7. Children's Privacy

Twist recognizes the importance of protecting the privacy of children under the age of 13. This Privacy Policy is designed to address the collection, use, and disclosure of personal information from children under the age of 13 ("Children") in compliance with the Children's Online Privacy Protection Act ("COPPA").

Twist does not knowingly collect personal information from Children without obtaining verifiable parental consent in accordance with COPPA. If it is discovered that personal information has been collected from a Child without verification of parental consent, we will take immediate steps to delete that information.

Parents or guardians of Children who have provided personal information to Twist can review or request the deletion of such information and refuse to permit its further collection or use by contacting us directly at support@twist.show.

This Privacy Policy applies solely to information collected by Twist and does not apply to third party websites or applications that may be accessed through the Site. We encourage parents and guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide personal information through the internet without their permission.

8. Changes to This Privacy Policy

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on the Site.

9. Contact Information

If you have any questions or concerns regarding this Privacy Policy or the handling of your personal information, please contact Twist at support@twist.show.