

Clip Studio Content Moderation Terms of Service

1. Introduction and scope

These Clip Studio Content Moderation Terms of Service (hereinafter “**Content TOS**”) govern the moderation of content on the services CLIP STUDIO PROFILE, CLIP STUDIO ASSETS, CLIP STUDIO ASK, CLIP STUDIO TIPS, CLIP STUDIO SHARE (hereinafter the “**CELSYS Platform Services**”) and, except for Sections 3 and 4.2(ii) on the Cloud Services (together with the CELSYS Platform Services, the “**CELSYS Services**”) provided by CELSYS, Inc. (hereinafter “**CELSYS**”) under the following conditions:

- (i) You use the CELSYS Services subject to the respective Terms of Service; and
- (ii) You are established and/or located in the European Union (“**EU**”) or European Economic Area (“**EEA**”).

2. Restrictions on the use of the CELSYS Services

2.1 When your use of the CELSYS Services violates applicable law, the Terms of Service of the respective CELSYS Service or this Content TOS, in particular the “Guidelines About Posting and Behavioral Guidelines,” CELSYS may restrict such use (such measures hereinafter “**Content Restrictions**”).

2.2 Any of the following procedures may lead to Content Restrictions:

- a) Notices by other users of the CELSYS Services alleging that your use of the CELSYS Services involves illegal content, handled in accordance with the “Notice-and-Action Policy” provided in Annex A of this Content TOS;
- b) Notices by other users of the CELSYS Services alleging that your use of the CELSYS Services involves content that is incompatible with the Terms of Service of the respective CELSYS Service or this Content TOS, in particular the “Guidelines About Posting and Behavioral Guidelines,” handled in accordance with the “Notice-and-Action Policy” provided in Annex A to the extent it is applicable;
- c) CELSYS obtaining actual knowledge of the fact that your use of the CELSYS Services involves illegal content in any other manner than by another user’s notice, including by a valid order by a national judicial or administrative authority under EU/EEA or EU/EEA member state law, in which case CELSYS will act expeditiously to remove or to disable access to the illegal content, in accordance with the “Notice-and-Action Policy” provided in Annex A to the extent it is applicable;
- d) CELSYS obtaining actual knowledge of the fact that your use of the CELSYS Services involves content that is incompatible with the Terms of Service of the respective CELSYS Service or this Content TOS, in particular the “Guidelines About Posting and Behavioral Guidelines,” in any other manner than by another user’s notice, handled in accordance with the “Notice-and-Action Policy” provided in Annex A to the extent it is applicable.

2.3 Content Restrictions may include

a) “Unlisting”

Unlisting refers to the content (materials in particular) posted on CLIP STUDIO ASSETS being removed from visibility to anyone other than the user who posted it as determined at the discretion of CELSYS. For the duration that the materials remain unlisted, these materials will no longer be searchable or downloadable by other creators.

b) “Deletion”

Deletion refers to the removal of the content (materials in particular) posted on CLIP STUDIO ASSETS from the CELSYS website, after which it will no longer be searchable or downloadable by other creators.

c) “Posting feature suspension”

Posting feature suspension refers to the temporary suspension of the user’s ability to post content (materials in particular) on CLIP STUDIO ASSETS. In such cases, there is no function for this temporary suspension to be automatically lifted, and the user will only regain the ability to utilize this feature when it has been deemed appropriate at the discretion of CELSYS.

d) “Account suspension”

Account suspension refers to the suspension of the user’s account on CELSYS Services, and the user will no longer be permitted to use any CELSYS Services thereafter.

2.4 Content Restrictions are imposed based on a human review of the content and/or other usage behavior in question. Automated decision-making tools are not used.

3. Internal complaint-handling system

3.1 If CELSYS (i) takes a decision with regard to a notice you have submitted alleging that certain specific items of information on the CELSYS Platform Services is illegal content, or (ii) imposes one of the following Content Restrictions with regard to content you have provided, you are for a period of six months following this decision or imposition entitled to lodge a complaint, electronically and free of charge, against the same:

- a) unlisting, deletion or disabling of access to or restriction of visibility of the information;
- b) suspension of the provision of the CELSYS Services to you, in whole or in part;
- c) suspension of your account.

- 3.2 The period of six months referred to in Section 3.1 above shall start on the day on which you are informed about the decision or the Content Restriction, as applicable.
- 3.3 The details of the internal complaint-handling system are set out in the respective “Internal Complaint-Handling Rules of Procedure” provided in Annex B.

4. Measures and protection against misuse

- 4.1 If you frequently provide manifestly illegal content on the CELSYS Services, CELSYS will, after having issued a prior warning, suspend the provision of the CELSYS Services to you for a reasonable period of time.
- 4.2 If you frequently submit (i) manifestly unfounded notices of allegedly illegal content on the CELSYS Services or (ii) manifestly unfounded complaints within the meaning of Section 3.1 above, CELSYS will, after having issued a prior warning, suspend the processing of notices or, respectively, complaints by you for a reasonable period of time.
- 4.3 Suspensions within the meaning of Sections 4.1, 4.2 above are imposed on a case-by-case basis and in a timely, diligent and objective manner, taking into account all relevant facts and circumstances apparent from the information available to CELSYS, in particular
 - a) the absolute numbers of items of manifestly illegal content or manifestly unfounded notices or complaints, submitted within a given time frame;
 - b) the relative proportion thereof in relation to the total number of items of information provided or notices/complaints submitted within a given time frame;
 - c) the gravity of the illegal content or unfoundedness of the notices/complaints, and of its consequences; and
 - d) where it is possible to identify it, your intention in providing the illegal content or submitting the unfounded notice(s)/complaint(s).
- 4.4 The following examples serve to illustrate our policy with regard to suspensions:
 - a) If you provide content including child pornography of actual human beings even just once, the extraordinary gravity of the violation and its consequences will generally trigger a suspension for a significant, potentially indefinite, period of time, irrespective of the small number of items and the proportion to the total number of pieces of information provided. The same applies to content including credible threats of violence against human beings. An exception may apply where you can demonstrate that providing such illegal content was not your intention, in which case you will be warned once, and suspended for a significant, potentially indefinite, period of time in case of a repeat offense.
 - b) If you provide content including slander or defamation, you will be warned not to do so again. If you continue providing slanderous or defamatory content, this will trigger a suspension for a period of time that increases in (not necessarily proportionate) relation to the number of pieces of slanderous or defamatory content you provided. The suspension may be extended further if we have an indication that you only or primarily use the

CELSYS Services for providing slanderous or defamatory content, or that you specifically intend to slander or defame.

- c) If you provide manifestly unfounded notices or complaints, you will be warned not to do so again. If you provide further manifestly unfounded notices or complaints, you will be warned a second time, unless the manifestly unfounded notice or complaint pertains to the same piece of information as the notice or complaint with regard to which you were warned, in which case you will be suspended for a period of time appropriate to the degree to which the notice or complaint was unfounded. If you provide further manifestly unfounded notices or complaints after a second warning, you will be warned again, unless the manifestly unfounded notice or complaint pertains to a piece of information provided by another user, who also provided the piece of information in relation to which you were warned, in which case you will be suspended for a period of time appropriate to the degree to which your notices or complaints were unfounded. If you provide further manifestly unfounded notices or complaints after a third warning, you will be suspended for a period of time appropriate to the degree to which your notices or complaints were unfounded. In any of the cases above, the suspension may be extended further if we have an indication that your intent is to cause a nuisance to CELSYS or to harass or bully other users of the CELSYS Services.

5. Recommender system

- 5.1 CELSYS employs different recommender systems on certain CELSYS Platform Services. The algorithm for CELSYS's recommender systems is configured based on various data points, including user survey responses, user viewing frequencies, and information related to material downloads within CLIP STUDIO ASSETS.
- 5.2 In order for the user to select the items they would like to be recommended, they must log in to their CLIP Account and submit a response to the survey accessible via the banner displayed either on the top page of CLIP STUDIO START (as explained in "a" below) or within their notifications. Recommendations are refined and the order that they are shown is adjusted based on the user's responses to this survey. This survey banner is only shown to users who have not yet completed the survey, and users may modify their selected preferences for recommended items as determined based on the survey results at a later date.
 - a) CLIP STUDIO START: CLIP STUDIO START refers to the interface that functions as a portal for access to all CLIP services, and all CLIP service pages can be reached from CLIP STUDIO START. As mentioned above, the user's selected preferences for recommended items are reflected in the recommendation function of each of the CLIP services listed below based on the items selected in CLIP STUDIO START.
 - b) CLIP STUDIO TIPS: On the main interface, users are shown tips posted to the service under the following categories: (i) "Popular", showing the four most viewed tips posted to the service; (ii) "New", showing the four newest tips posted to the service; (iii) "Tips of the Month Winners", showing four tips randomly selected by CELSYS from the most recent Tips of the Month contest; (iv) "New comment(s)", showing the four most recent comments on tips and the respective tips the comments were posted on; (v) "Video TIPS", showing up to four of the most highly viewed tips posted in video format selected by CELSYS; (vi) "Official Tutorials", showing four tips in tutorial style created and selected by CELSYS; (vii) "New (Global)", showing the four newest tips posted to the service, in

all languages. Content submitted to different categories of the current Tips of the Month contest is also shown in highlighted panels on the side of the main interface, and content in tutorial style created and selected by CELSYS is shown in Official Tips & Tutorials. Featured Theme Tips shows tips that have been “liked” frequently, and Global Video Tips shows a random selection of tips that have been posted under the “With Video” category.

- c) CLIP STUDIO ASSETS: No recommender system is used on CLIP STUDIO ASSETS.
- d) CLIP STUDIO PROFILE: No recommender system is used on CLIP STUDIO PROFILE.
- e) CLIP STUDIO ASK: No recommender system is used on CLIP STUDIO ASK.
- f) CLIP STUDIO SHARE: No recommender system is used on CLIP STUDIO SHARE.

- 5.3 In general, showing you the most recent or most used content on the CELSYS Platform Services serves to provide you with content CELSYS assumes is most interesting to you.

6. Protection of minors

CELSYS is committed to upholding the rights and legitimate interests of all relevant parties, including the fundamental rights of users in addition to freedom of expression, freedom and diversity of the media, and other fundamental rights, and shall apply and enforce the restrictions set forth in this Content TOS pursuant to Article 14(1) of the Digital Services Act (DSA) in a manner that is objective and appropriate.

CELSYS confirms whether an individual wishing to use the CELSYS Services is a minor when their account is created. For users who are identified as minors during account registration, CELSYS does not show advertisements based on any form of profiling that would utilize the data of said minor to determine specific personal attributes.

In addition, CELSYS employs various appropriate measures to ensure the privacy, safety, and security of minors.

7. Prohibition of dark patterns

CELSYS strictly prohibits the use of user interface designs referred to as “dark patterns” that deceive or manipulate users into behavior that is contrary to their intentions.

Specifically, we adhere to the following policies:

- a) Provision of clear and accurate information
 - Options and the results of selecting those options for important actions such as account registration, and contracts shall be provided in an easily understandable manner.
 - Misleading and ambiguous expressions or intentionally confusing layouts shall not be used.

b) Respect for user freedom of choice

- Settings that could be detrimental or cause negative impact (e.g., subscriptions that are difficult to opt out of) shall not be engaged unless explicitly selected by the user.
- Opt-out processes (cancellation/settings changes) shall be designed to be as simple or more simple than opt-in processes (registration/purchases).

c) Fair and balanced interface design

- The design and placement of buttons to consent or decline shall not force or disproportionately emphasize specific selections.
- Interface elements such as colors, font sizes, or button dimensions shall not be used to intentionally encourage specific behaviors.

d) Continual review and improvement

The status of efforts to prevent dark patterns shall be regularly reviewed, and improvements shall be made when necessary based on user feedback and complaints.

8. Other

If any material changes are made to this Content TOS, CELSYS will notify users of these changes via the CELSYS website.

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Annex A

Notice-and-Action Policy

CELSYS has implemented a mechanism by which individuals or organizations are able to report to CELSYS the presence of certain specific items of information on this service that are believed to be illegal content.

1. When submitting a notice, the notifying party must provide the following information:
 - a) presentation or identification of illegal content (information on type of content, posted service, etc.);
 - b) reason the notifying party alleges the presence of illegal content;
 - c) other information considered sufficient to identify illegal content.
2. Notices can be submitted through CLIP STUDIO SUPPORT:
 - a) For users with a CLIP Account:
 - Please log in through the “Sign in” option and fill out your CLIP Account name or company name and the above items a) to c) in the field shown after clicking the “Report illegal content” link. Relevant images may also be attached.
 - After filling out the required information, you will be asked to consent to CELSYS’s Policy Regarding the Handling of Personal Information and pledge that there is no false information or deceptive representations in the content of your notice.
 - b) For users without a CLIP Account:

Please contact support@celsys.com with your name and a detailed description of the incident including the name of the service where the illegal content is posted, etc.

You must consent to CELSYS’s Policy Regarding the Handling of Personal Information to submit a notice. Consent is considered to be rendered upon the submission of this email.
3. When CELSYS receives a notice as described in 2. above, regardless of the notifying party or the notification route, it will employ the appropriate measures based on the following in accordance with Section 2.2 of this Content TOS:
 - a) Unlisting

CELSYS reserves the right to unlist content when revisions to the posted materials are requested, and the materials may only be republished once it is deemed appropriate for republishing following revisions, etc. by the relevant user. For the duration that the

materials remain unlisted, these materials will no longer be searchable or downloadable by other creators.

b) Deletion

CELSYS reserves the right to delete posted content under two circumstances: (1) deletion as a result of issues in relation to the policies defined by CELSYS, and (2) issues in relation to the rights associated with the posted content. In the case of the former, the removed content will remain accessible but will no longer be searchable or downloadable by other users. However, in the case of the latter, the removed content will no longer be available for continued use, and will no longer be searchable or downloadable by other users.

c) Posting feature suspension

CELSYS reserves the right to temporarily suspend a user's ability to upload materials when it has been confirmed that a serious violation of the CLIP STUDIO ASSETS Terms of Service or other policies has occurred. In such cases, there is no function for this temporary suspension to be automatically lifted, and the user will only regain the ability to utilize this feature when it has been deemed appropriate at the discretion of CELSYS.

d) Account suspension

CELSYS reserves the right to suspend a user's account when it has been confirmed that a serious violation of the CELSYS Terms of Service has occurred. There is no function for this suspension to be automatically lifted, and the user will only regain the ability to access their account when it has been deemed appropriate at the discretion of CELSYS.

Annex B

Internal Complaint-Handling Rules of Procedure

In accordance with Annex A, “Notice-and-Action Policy,” if an individual or organization reports to CELSYS the presence of certain specific items of information on this service that are believed to be illegal content, CELSYS will process the report in accordance with these Rules of Procedure.

1. Receipt and review

- (i) The CELSYS Customer Support Department (support@celsys.com) receives reports, reviews the reported content and reporting party (whether they are Trusted Flaggers), and records all relevant information in a dedicated internal Excel spreadsheet maintained by CELSYS.
- (ii) The process of confirming whether the report in (i) has been submitted by a Trusted Flagger is conducted by cross-referencing with the latest information provided by the internal legal team.
- (iii) If the report in (ii) is confirmed to have been submitted by a Trusted Flagger, the Customer Support Department will issue a response within 10 days of receiving the report, including as many details as possible regarding specific reasons, etc.
- (iv) If the report in (ii) is confirmed to not have been submitted by a Trusted Flagger, the Customer Support Department will issue a response within 14 business days of receiving the report, including as many details as possible regarding specific reasons, etc.
- (v) Following the response in (iv), any further contact or lack thereof from the reporting party and coordination with relevant departments, etc. will also be recorded in the Excel spreadsheet.

2. Sharing and disclosure

- (i) The Customer Support Department will share the Excel spreadsheet referred to in Section 1(i) with relevant departments as appropriate.
- (ii) After receiving the shared information in (i), we will disclose such information as appropriate in accordance with the provisions of the Digital Services Act (DSA).