

TCL EXPRESS LLC (DBA TOECIAL)

Content Moderation & Compliance Policy

Last updated October 7, 2026

TCL Express LLC, doing business as Toecial (“Toecial,” “we,” “us,” or “our”), operates a creator-driven media platform at toecial.com. This Content Moderation & Compliance Policy (this “Policy”) describes how we verify each Artist (“creator”) and every person depicted in uploaded content, the content we prohibit, how content is reviewed before and after publication, and how complaints, removal requests, and violations are handled.

This Policy summarizes and should be read together with our Terms & Conditions, Content Provider Agreement, 18 U.S.C. § 2257 Compliance Statement, Anti-Human Trafficking & Content Compliance Policy, Complaints & Content Removal Policy, and DMCA Policy, each published on toecial.com. If this Policy conflicts with any of those documents, the more specific document controls.

1) Artist identity and age verification

Every Artist must complete document-based identity and age verification before any content the Artist uploads becomes publicly accessible. Publishing access remains locked until verification is confirmed. Verification is performed by one of the following methods:

- (a) Online verification through Didit (didit.me), a third-party identity verification provider, which may require submission of a government-issued photo ID and a real-time liveness check; or
- (b) An approved in-person verification process, including at local events, where platform-authorized staff review identity documents directly. For in-person verification, the Custodian of Records may retain a scanned wet-signed Artist release and a copy of the government ID or passport.

All persons depicted in content must be at least 18 years of age. Before uploading, each Artist must accept the current Content Provider Agreement and acknowledge that uploaded content will be displayed publicly on the website.

As required by 18 U.S.C. § 2257 and 28 C.F.R. Part 75, the following information is extracted from each verified Artist’s identity check and retained in encrypted form by the Custodian of Records: legal name and date of birth as they appear on the government-issued ID; document type and issuing country; the last four digits of the document number; and the date and outcome of the verification check.

2) Depicted persons and consent

- The uploading Artist is automatically recorded as a depicted performer on every upload.
- Every other person depicted must be tagged using their platform username. Accepting a depiction tag records that performer’s consent to depiction, public distribution, and downloading.
- Content cannot be published until every tagged performer has accepted the tag and has completed identity and age verification.
- Artists must maintain records sufficient to prove the identity, age, ownership, and written consent of every person depicted, including any required 18 U.S.C. § 2257 records and model releases, and must provide those records promptly on request for legal, compliance, payment processor, card-network, or complaint-review purposes.

3) Prohibited content

The following content is prohibited. Violations result in removal of the content and termination of the account, and may be reported to law enforcement. The complete list appears in Section 3a of our Terms & Conditions.

- Any depiction of a person under 18, and any sexual content depicting or involving minors (CSAM), including simulated or illustrated depictions.

- Rape, sexual assault, or non-consensual sexual activity, including content framed as fantasy or roleplay, and titles, descriptions, or tags using terms such as “forced” or “rape.”
- Content created or obtained without the consent of the depicted person, including voyeuristic content, and content depicting persons who are asleep, unconscious, drugged, hypnotized, or otherwise incapacitated in connection with sexual activity.
- Human trafficking, coercion, blackmail, kidnapping or confinement in a sexual context, or any exchange of money for sex, including promoting or facilitating prostitution.
- Bestiality; incest (real or simulated); necrophilia or autopsy content; snuff, gore, extreme violence, severe beating, self-mutilation, suffocation or breath restriction; and the crushing of live animals.
- Bodily excretions; alcohol-related sexual content and sexualized drug references; racist, hate-based, or sacrilegious content; and cannibalism or polygamy content.
- Content for which the uploader does not hold the necessary rights, releases, and permissions.
- Soliciting or collecting payment card information outside the authorized CCBill payment form.

4) Review before publication

Every newly uploaded photo or video, and any media file that is replaced or re-rendered, is held in a pending state and hidden from public view until an administrator approves or rejects it in the platform’s moderation queue. Hidden content is excluded from public feeds, profiles, and directories. The platform does not offer live streaming or any other real-time content publication.

5) User reporting after publication

A report function is available on Artist profiles, media items, comments, and direct messages.

- When a signed-in user reports a media item or comment, that item is immediately hidden pending administrator review.
- When a signed-in user reports another account, the reported account is immediately deactivated pending administrator review, and a notification is sent to the platform’s abuse mailbox.
- Reports submitted by visitors who are not signed in are recorded for administrator review.
- Administrators review each report in the moderation dashboard and either uphold it (removing or restricting the content or account) or dismiss it (restoring the content or account).

6) Complaints and content removal requests

- Anyone may submit a complaint about content or conduct through the Complaints & Content Removal page at toecial.com/complaints.php or by email to legal@toecial.com.
- Complaints are acknowledged promptly and reviewed and resolved within five (5) business days of receipt. Review may include examining the content and verifying consent and age-verification records.
- Outcomes may include no action, restriction of the content, removal of the content, suspension or termination of the account, or referral to law enforcement. Content found to be non-compliant or illegal is removed immediately.
- Any person depicted in content may request its removal at any time, whether or not they are a registered user. Content posted without the depicted person’s consent, or for which consent was not freely given or has been withdrawn, is removed.
- Any affected party may appeal a decision in writing to legal@toecial.com within 30 days. Appeals are answered within five (5) business days. If an appeal or consent dispute cannot be resolved, we will allow the disagreement to be resolved by a neutral third party at our expense.

Content involving the exploitation of a minor or an ongoing crime should also be reported to the NCMEC CyberTipline (1-800-843-5678), the National Human Trafficking Hotline (1-888-373-7888), Homeland Security Investigations, or the FBI.

7) Copyright

We respond expeditiously to notices of claimed copyright infringement under the Digital Millennium Copyright Act, 17 U.S.C. § 512. Notices should be sent to our designated agent at legal@toecial.com in the form described in our DMCA Policy. In appropriate circumstances we terminate the accounts of repeat infringers.

8) Enforcement

Any Artist or user found to have violated this Policy is subject to removal of the associated content, suspension or permanent termination of the account, and reporting of the violation to the relevant authorities (including NCMEC, the FBI, and HSI) and to our financial partners.

9) Artist earnings and payouts

- Artist earnings remain pending until payment processor reconciliation and the displayed risk hold are complete. Refunds and chargebacks may be deducted from pending or available earnings.
- A payout may be requested only after the available balance reaches the displayed minimum and the Artist's payout identity, tax, sanctions, and destination checks are complete.
- Payouts are made through the platform's approved payout provider, MassPay.
- We may delay, reject, reverse, or hold a payout when required for fraud review, chargeback exposure, sanctions screening, legal process, missing records, processor restrictions, or a negative balance.

10) Records

We maintain records of identity and consent verification, 18 U.S.C. § 2257 records, complaints and removal requests, and moderation decisions. Complaint and moderation records are retained for seven (7) years. Administrators can generate reports of flagged content, complaints, and moderation actions for any period, and these records are available for review by our acquiring bank and the card networks on request.

11) Contact

TCL Express LLC (dba Toecial), Custodian of Records
c/o Northwest Registered Agent LLC, 6650 Rivers Ave., STE 100, Charleston, SC 29406, United States

- Legal, complaints, content removal, 18 U.S.C. § 2257, and DMCA notices: legal@toecial.com
- Abuse reports: abuse@toecial.com
- General support: support@toecial.com