

Cookie and Privacy Policy

HOT MIRROR MAGAZINE

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1. Who we are

Hot Mirror is published at www.hotmirror-magazine.com (the "Site"). Hot Mirror is a project of Visual Storytellers Fund ("VSF"), a US legal entity, which is fiscally sponsored by FJC, a US 501(c)(3) public charity. As a result of this arrangement, donations made in support of Visual Storytellers Fund and its projects, including Hot Mirror, are tax-deductible to the extent allowed by law.

VSF is the data controller responsible for personal data collected through the Site. Because VSF is a US entity, this policy is primarily governed by US law (see Section 15, Governing Law). Where the Site is accessed by visitors in the UK or EU, certain UK GDPR, EU GDPR, and PECR obligations may also apply to us on an extraterritorial basis - in particular the cookie-consent rules in Section 9 - even though VSF has no UK or EU establishment.

 hello@visualstorytellersfund.com  20th Floor, 45 Rockefeller Plaza, NY10111

This policy explains what personal data we collect, why, how we protect it, who we share it with, your rights, and how we use cookies and similar technologies.

2. What data we collect

When you visit the Site

- IP address and browser/device information, collected automatically by the Site's platform. (see Section 9, Cookies).

When you subscribe to the newsletter

- Email address, and name and area of practice if provided, via our Subscribe page. Subscriber details are stored securely on the Site and provided to Mailchimp, our email marketing platform, which sends newsletter editions on our behalf. The form on our Subscribe page captures email, first name, last name, area of practice, source page and timestamp.

When you donate

- Donations are processed by our fiscal sponsor, FJC, and/or its designated payment processor. We do not directly store your payment card details. See Section 8.

3. Why we collect it and our lawful basis

Purpose	Lawful basis	Data involve
Sending newsletter editions	Consent	Email, name
Processing donations	Contract / Legal obligation (via FJC)	Billing/donation records

4. How we store and protect your data

We use a small number of carefully selected service providers to operate the Site:

- Cloudflare (hosting and delivery): the Site is served from Cloudflare's global edge network, which may process technical request data (such as IP addresses) transiently in order to deliver pages.
- Supabase (database, authentication and file storage): subscriber records, site content, images, and generated audio files are stored in a managed database and storage service operated by Supabase, hosted in the United States. Data is encrypted in transit and at rest, and access is controlled by row-level security policies so that records are only accessible to authorised accounts.
- Mailchimp: subscriber email storage and newsletter delivery.
- ElevenLabs (audio generation): article text is processed by ElevenLabs to generate the audio narration offered on magazine articles. No visitor personal data is shared with ElevenLabs.
- Google (AI translation): article text is processed using Google's Gemini models to produce translations of the audio narration. No visitor personal data is shared.
- The AI Element LTD: the agency that built and maintains the Site. The AI Element LTD retains administrative access for technical support and maintenance, under a signed Data Processing Agreement with Visual Storytellers Fund dated.
- All systems we use are protected by reasonable technical safeguards, including encryption in transit and at rest and role-based access controls. Administrative access is limited to named individuals.

5. Who we share data with

We do not sell personal data. We share data only with:

Third party	Purpose	Location
Cloudflare	Site hosting and delivery	Global edge network
Supabase	Database, authentication, image and audio storage	US
Mailchimp	Newsletter storage and delivery	US
ElevenLabs	AI audio narration of articles	US
Google (Gemini)	AI translation of article audio	US
FJC (fiscal sponsor)	Donation processing, gift acknowledgment, compliance	US
The AI Element LTD	Platform build and ongoing maintenance	UK

This list reflects our current primary service providers and is not necessarily exhaustive. A complete, up-to-date list is available on request.

6. How long we keep your data

Data type	Retention
Newsletter subscriber data (Mailchimp)	Data remains in Mailchimp and the Site's backend system for as long as you remain subscribed, or until you ask us to delete it. Deletion on our Site is a manual process.
Enquiry/correspondence data	A reasonable period after last contact
Donation and financial records	As required by FJC's policies and applicable law

7. Your rights

Depending on where you live, you may have rights to:

- access your data
- request correction of inaccurate data
- request erasure
- restrict or object to processing
- data portability

- withdraw consent (e.g., unsubscribe) at any time

If you are in the UK or EU, these rights arise under UK/EU GDPR, and we aim to honour them even though VSF has no UK/EU establishment, on the basis described in Section 1.

If you are a California resident, you may have additional rights under the California Consumer Privacy Act (CCPA/CPRA), including the right to know what personal information we collect and to request deletion.

Contact IT@visualstorytellersfund.com to exercise any of these rights. We will respond within 30 days (or sooner where required by applicable law).

8. Donations and tax-deductibility

Because Visual Storytellers Fund is fiscally sponsored by FJC, a 501(c)(3) public charity, donations made in support of Hot Mirror/Visual Storytellers Fund are tax-deductible to the extent allowed by law. Donation transactions, receipts, and related personal and payment data are handled by FJC and/or its payment processor in accordance with their own privacy and security practices, which we encourage you to review where applicable.

9. Cookies

Cookies are small text files placed on your device when you visit a website. They help a website function properly, remember your preferences, and provide information about how visitors use the site. Similar technologies include tracking pixels, web storage ([localStorage](#) and [sessionStorage](#)), and scripts that access information on your device.

Hot Mirror is a project of Visual Storytellers Fund, a US entity, and our use of cookies is primarily governed by US law. However, because the Site is publicly accessible to and read by visitors in the UK and EU, we also apply the UK's Privacy and Electronic Communications Regulations 2003 (PECR), as amended by the Data (Use and Access) Act 2025 (DUAA), and equivalent EU ePrivacy rules, to visitors from those regions - consistent with the extraterritorial approach described in Section 1.

9.1 Cookies and local storage we use

Item	Tech	Purpose	Consent
hm:theme	localStorage	Remembers light/dark preference	Not required

hm:textSize	localStorage	Remembers reading text size	Not required
hm:reading	localStorage	Remembers reading mode	Not required
hm:audioLang	localStorage	Remembers chosen listening language	Not required
hm:audioHintSeenAt hm:audioUsed hm:audioHintSession	local/sessionStorage	Suppresses the "listen in 32 languages" prompt once seen	Not required
Auth session token	localStorage/cookie	Only for logged-in CMS editors, not public visitors	Strictly necessary

9.2 Categories explained

Essential (local storage) - No consent required. Strictly necessary for remembering your cookie preference and, where applicable, core site functionality (such as maintaining your session). No personal data is stored in the consent item itself - only your accept/decline choice. Under PECR, this is exempt from the consent requirement because it is strictly necessary to provide a service you've requested.

9.3 Managing your preferences

Cookie banner - We set no non-essential cookies, so no banner is needed.

Browser settings - You can manage cookies through your browser settings. Most browsers let you block or delete cookies, though blocking essential cookies may affect how the Site works.

9.4 Do Not Track

Some browsers offer a "Do Not Track" (DNT) signal. There is no industry standard for how websites should respond to DNT signals, and we do not currently respond to them - but we do honour the cookie consent choices described above.

9.5 Legal basis for cookies

- **Essential cookies/local storage:** set under the "strictly necessary" exemption in Regulation 6 of PECR (as amended by DUAA 2025). No consent required.

10. International visitors

VSF is a US entity, and the Site's data is primarily processed in the United States, where most of our service providers, Cloudflare, Supabase, Mailchimp, ElevenLabs, Google (Gemini), FJC (fiscal sponsor) and The AI Element ITD, are based. If you are located outside the US - including in the UK or EU - your information will be transferred to and processed in the United States. Where relevant safeguards are required for such transfers under UK/EU law (for example, in respect of UK/EU visitors' data), we rely on Standard Contractual Clauses, the UK-US Data Bridge, or equivalent mechanisms offered by our service providers, as applicable.

11. Children's privacy

The Site is not directed at children, and we do not knowingly collect personal data from children under 13 (or the relevant minimum age in your jurisdiction). If you believe a child has provided us with personal data, contact us so we can remove it.

12. Data protection complaints

To raise a complaint about how we handle your data, contact IT@visulastorytellersfund.com. We will acknowledge your complaint within 30 days and investigate without undue delay.

As VSF is a US entity, there is no single federal US regulator equivalent to the UK's ICO that we register with or that oversees this process by default. **If you are in the UK or EU** and remain unsatisfied after contacting us, you may still lodge a complaint with your local supervisory authority - in the UK, the Information Commissioner's Office: ico.org.uk/make-a-complaint

Helpline: 0303 123 1113. **If you are a California resident**, you may contact the California Attorney General's office regarding CCPA rights.

13. Changes to this policy

We may update this policy from time to time to reflect changes in our practices, our use of cookies, or for legal reasons. The "Last updated" date above shows when it was last revised. If we introduce new categories of cookies, we will ask for your consent again via the cookie banner (where one is in use).

14. Governing law

This policy, and any dispute arising from it, is governed by the laws of Delaware, USA, without regard to conflict-of-law principles, except where UK/EU law applies on the extraterritorial basis described in Sections 1, 9, and 10 for visitors located there.

15. Contact us

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