

Aylo Freesites Ltd ("Thumbzilla")

## ACCESSIBILITY STATEMENT

Prepared in accordance with the *European Accessibility Act (EAA)*

(Directive (EU) 2019/882)

Submission Date: June 28, 2025

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## Commitment to Accessibility

Thumbzilla is committed to making our digital platforms inclusive and accessible to all individuals, including those with disabilities. This Accessibility Statement outlines the current status of accessibility across our user-facing web and mobile platforms and our ongoing efforts to meet the requirements of the European Accessibility Act (Directive (EU) 2019/882).

We acknowledge the diversity of user needs and are actively working to identify, prevent, and eliminate barriers that may hinder interaction with our digital products and services. Our goal is to create safe, welcoming, and enjoyable online spaces for everyone, regardless of ability.

This statement applies to Aylo Freesites Ltd public-facing platforms within the European Union, including websites, mobile applications, and web-based services related to video streaming and digital subscriptions.

It does not apply to internal enterprise systems, corporate facilities, or non-consumer-facing communication channels.

## Declaration of Accessibility

Thumbzilla is working towards full compliance with the European Accessibility Act and applicable harmonized standards such as the Web Content Accessibility Guidelines (WCAG) 2.1, Level AA.

As of the date of this statement, our platforms are: Partially Compliant

We are continuing to address identified accessibility issues through targeted product updates, testing efforts, and internal training.

## Accessibility Features

To support an inclusive user experience, Thumbzilla digital platforms have or will incorporate the following accessibility features:

- Fully operable via keyboard navigation
- Compatibility with screen readers using ARIA roles and semantic HTML
- Adaptable text display according to user device/browser preferences
- Alternative content support (e.g., subtitles, transcripts, and captions where available)
- Structured, responsive layouts with clear page navigation
- Tagged and labeled form inputs for clarity and error prevention

These features are reinforced by our ongoing commitment to universal design principles and continuous accessibility evaluation.

## Known Limitations

We are aware of some current limitations in platform accessibility that we are actively addressing:

- Older multimedia content may not have complete captioning or transcripts
- Certain dynamic elements and overlays may have incomplete tagging for screen reader compatibility
- Keyboard navigation may present challenges in certain flows
- Certain imaging may be missing alt-text

Thumbzilla is systematically identifying and remediating these issues to ensure full conformance across all public-facing digital products.

## Measures Taken to Ensure Compliance

Thumbzilla is implementing the following steps to align our user-facing platforms with EU accessibility regulations:

- Conduct usability testing with assistive technologies (screen readers, keyboard-only navigation, screen magnifiers)
- Integrate WCAG 2.1 Level AA compliance checks into our product development lifecycle
- Provide specialized training to product, trust & safety, and engineering teams

Monitoring and improvement are continuous, and accessibility is treated as a core product quality metric.

## Feedback and Support

We encourage users to notify us of any accessibility barriers they encounter or adjustments they may require to access content effectively. Feedback is critical to our improvement processes and will be treated confidentially and respectfully.

You can provide feedback or request alternative content through any of the following channels:

- Email: [accessibilityfeedback@thumbzilla.com](mailto:accessibilityfeedback@thumbzilla.com)
- Web Form: Available through the “Accessibility” footer link on each platform: <https://www.thumbzilla.com/information#accessibility>

Response time: We aim to address all accessibility-related queries and support requests within 14 business days.

## Complaint and Escalation Procedure

If you are unsatisfied with our response to an accessibility request or concern, you may submit a formal complaint to the regulatory enforcement body designated in your country under the European Accessibility Act.

### **AT Austria**

Federal Ministry of Social Affairs, Health, Care and Consumer Protection

Website: <https://www.sozialministerium.gv.at/>

Email: [information@sozialministerium.at](mailto:information@sozialministerium.at)

Jurisdiction: Accessibility rights, anti-discrimination (including digital and physical accessibility)

### **BE Belgium**

Equal Opportunities Commission (Institute for the Equality of Women and Men)

Website: <https://igvm-iefh.belgium.be>

Unia (interfederal equality body)

Website: <https://www.unia.be>

Email: [info@unia.be](mailto:info@unia.be)

Jurisdiction: Equality and anti-discrimination, including disability rights and digital accessibility

### **BG Bulgaria**

Commission for Protection against Discrimination

Website: <https://www.kzd-nondiscrimination.com/>

Email: [kzd@kzd.bg](mailto:kzd@kzd.bg)

Jurisdiction: Accessibility and anti-discrimination, including web accessibility

### **HR Croatia**

Ombudswoman for Persons with Disabilities

Website: <https://www.posi.hr/>

Email: [ured@posi.hr](mailto:ured@posi.hr)

Jurisdiction: Accessibility complaints and rights protection for persons with disabilities

## **CY Cyprus**

Cyprus Commissioner for Administration and the Protection of Human Rights (Ombudsperson)

Website: <http://www.ombudsman.gov.cy>

Email: [ombudswoman@ombudsman.gov.cy](mailto:ombudswoman@ombudsman.gov.cy)

Jurisdiction: Human rights, non-discrimination, including accessibility

## **CZ Czech Republic**

Czech Trade Inspection Authority (Enforcement under EAA)

Website: <https://www.coi.cz/>

Email: [coi@coi.cz](mailto:coi@coi.cz)

Jurisdiction: Market surveillance and accessibility enforcement

Office for People with Disabilities (for policy support)

Website: <https://www.vlada.cz/en/ppov/vvzpo/uvod-892/>

## **DK Denmark**

Agency for Digital Government

Website: <https://digst.dk/>

Email: [digst@digst.dk](mailto:digst@digst.dk)

Jurisdiction: Digital accessibility (public sector websites/apps)

Danish Board of Equal Treatment

Website: <https://www.ligebehandlingsnaevnet.dk/>

Jurisdiction: Anti-discrimination, general accessibility

## **EE Estonia**

Estonian Consumer Protection and Technical Regulatory Authority (TTJA)

Website: <https://ttja.ee/>

Email: [info@ttja.ee](mailto:info@ttja.ee)

Jurisdiction: Digital accessibility complaints for public sector

## **FI Finland**

Regional State Administrative Agency (AVI) for Southern Finland

Website: <https://www.saavutettavuusvaatimukset.fi>

Email: [saavutettavuus@avi.fi](mailto:saavutettavuus@avi.fi)

Jurisdiction: Monitoring and enforcement of digital accessibility

Non-Discrimination Ombudsman

Website: <https://www.syrjinta.fi>

Email: [yvv@oikeus.fi](mailto:yvv@oikeus.fi)

## **FR France**

Direction Interministérielle du Numérique (DINUM)

Website: <https://www.numerique.gouv.fr>

Enforcement: Accessibility of digital services

Defender of Rights (Défenseur des droits)

Website: <https://www.defenseurdesdroits.fr>

Email: [contact@defenseurdesdroits.fr](mailto:contact@defenseurdesdroits.fr)

Jurisdiction: Accessibility and discrimination (physical and digital)

## **DE Germany**

Federal Monitoring Agency for Accessibility of Information Technology (BFIT-Bund)

Website: <https://www.bfit-bund.de/>

Email: [kontakt@bfit-bund.de](mailto:kontakt@bfit-bund.de)

Federal Government Commissioner for Matters relating to Persons with Disabilities

Website: <https://www.behindertenbeauftragter.de>

Jurisdiction: Accessibility rights and compliance (digital and physical)

## **GR Greece**

Ministry of Digital Governance

Website: <https://mindigital.gr/>

General Secretariat for Digital Governance and Simplification of Procedures

Ministry of Labour and Social Affairs (for disability rights)

Website: <https://ypakp.gr>

## **HU Hungary**

Kék Vonal (complaint support), but formal enforcement via:

National Authority for Data Protection and Freedom of Information

Website: <https://www.naih.hu/>

Jurisdiction: Accessibility of public sector websites/apps

Equal Treatment Authority (merged under Commissioner for Fundamental Rights)

Website: <https://www.ajbh.hu>

## **IS Iceland**

The Ministry of Social Affairs and the Labour Market

Website: <https://www.stjornarradid.is/verkefni/felagsmal/>

Icelandic Consumer Agency

Website: <https://www.neytendastofa.is/>

## **IE Ireland**

National Disability Authority (NDA) – for monitoring

Website: <https://nda.ie>

Email: [nda@nda.ie](mailto:nda@nda.ie)

Enforcement: The Commission for Communications Regulation (ComReg)

Website: <https://www.comreg.ie>

Office of the Ombudsman (also accepts accessibility complaints)

Website: <https://www.ombudsman.ie>

## **IT Italy**

Agenzia per l'Italia Digitale (AgID)

Website: <https://www.agid.gov.it>

Jurisdiction: Digital accessibility for public sector

Ministro per le Disabilità



Website: <https://www.governo.it/it/disabilita/>

## **LV Latvia**

Ministry of Environmental Protection and Regional Development

Website: <https://www.varam.gov.lv>

Digital accessibility enforcement: Latvian State Regional Development Agency

Website: <https://www.vraa.gov.lv>

## **LT Lithuania**

Communications Regulatory Authority (RRT)

Website: <https://www.rrt.lt>

Email: [rrt@rrt.lt](mailto:rrt@rrt.lt)

Jurisdiction: Digital accessibility enforcement

## **LU Luxembourg**

Information and Press Service of the Government

Website: <https://sip.gouvernement.lu>

Jurisdiction: Accessibility monitoring authority (including for digital accessibility)

## **MT Malta**

Commission for the Rights of Persons with Disability (CRPD)

Website: <https://www.crpdp.org.mt>

Email: [helpdesk@crpd.org.mt](mailto:helpdesk@crpd.org.mt)

Jurisdiction: All accessibility rights and disability complaints

## **NL Netherlands**

Ministry of the Interior and Kingdom Relations (BZK), Program “Digitoegankelijk”

Website: <https://www.digitoegankelijk.nl>

General enforcement: Dutch Data Protection Authority (for complaints)

Email: [info@autoriteitpersoonsgegevens.nl](mailto:info@autoriteitpersoonsgegevens.nl)

## **NO Norway**

The Norwegian Digitalisation Agency (Digdir)

Website: <https://www.digdir.no>

Email: [post@digdir.no](mailto:post@digdir.no)

## **PL Poland**

Ministry of Digital Affairs – digital accessibility

Website: <https://www.gov.pl/cyfryzacja>

Office of the Ombudsman for Persons with Disabilities

Website: <https://www.niepelnosprawni.gov.pl>

## **PT Portugal**

Agência para a Modernização Administrativa (AMA)

Website: <https://www.ama.gov.pt>

Disability rights/body: Instituto Nacional para a Reabilitação

Website: <https://www.inr.pt>

## **RO Romania**

National Authority for the Rights of Persons with Disabilities, Children and Adoptions (ANDPDCA)

Website: <https://andpdca.gov.ro>

## **SK Slovakia**

Ministry of Investment, Regional Development and Informatization of the Slovak Republic (MIRDI SR)

Website: <https://www.mirri.gov.sk>

Contact: [info@mirri.gov.sk](mailto:info@mirri.gov.sk)

Slovak National Centre for Human Rights (SNCHR) – anti-discrimination enforcement

## **SI Slovenia**

Ministry of Digital Transformation

Website: <https://www.gov.si/en/state-authorities/ministries/ministry-of-digital-transformation/>

Equal Opportunities Ombudsman

Website: <https://www.zagovornik.si>

## **ES Spain**

Ministry of Economic Affairs and Digital Transformation – Directorate for Digital Public Services (SGAD)

Website: <https://administracionelectronica.gob.es>

Email: [accesibilidadweb@correo.gob.es](mailto:accesibilidadweb@correo.gob.es)

Disability Rights: Real Patronato sobre Discapacidad

Website: <https://www.rpd.gob.es>

## **SE Sweden**

Agency for Digital Government (DIGG)

Website: <https://www.digg.se>

Email: [info@digg.se](mailto:info@digg.se)

Jurisdiction: Monitoring and enforcement of digital accessibility

## **Statement Metadata**

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This Accessibility Statement is reviewed and updated annually or whenever significant changes affecting digital accessibility occur.