

# PRIVACY POLICY

This website belongs to STARCK.APP

STARCK is concerned about your privacy and we are committed to preserving it.

Thus, in addition to accepting the Platform Terms of Use, you need to know and comply with our Privacy Policy, which has clear and complete information on the collection, use, storage, treatment and protection of your PERSONAL DATA.

Therefore, we strongly recommend that you carefully read the Privacy Policy before registering or even browsing the STARCK Platform.

If you have any questions about your information or any questions about the use of your information, please contact [support@starck.app](mailto:support@starck.app)

## Definitions

The expressions contained in the DEFINITIONS item of the Terms of Use are used in this Privacy Policy with the same meaning:

**REGISTRATION DATA:** The address (including the electronic address), and the personal qualification, understood as the User's name, first name, marital status and profession.

**PERSONAL DATA:** Data related to the natural person. It is all data that can be used directly or indirectly to identify a person, for example: name, photos, e-mail, bank details, geolocation, telephones, postings on social networks, IP address, etc.

**TREATMENT OF PERSONAL DATA:** Any operation carried out with PERSONAL DATA, such as those referring to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, disposal, evaluation or control of information, modification, communication, transfer, diffusion or extraction.

## Collection of PERSONAL DATA and Information

First, it is important to emphasize that it is essential for STARCK the collection, storage and processing of PERSONAL DATA obtained from users, in order to enable the provision of services offered through its Platform.

Thus, it is necessary that you expressly and unequivocally agree with the possibility that STARCK automatically collect, receive and store

PERSONAL DATA and information on its servers about the activities arising from the users' browser, including geolocation, IP addresses, cookies, or other strings of identifiers, as well as information about transactions made through the platform.

It is worth noting that some PERSONAL DATA is necessarily collected by STARCK in order to enable the execution of the service contract (Terms of Use) signed with Users, as well as in the legitimate interest in allowing the PLATFORM to become operational.

In addition, it is worth remembering that in order to take advantage of the tools offered by STARCK, you must register and, for that, you can inform your full name, identification document, telephone number and e-mail address, as well as create an access password that will be your exclusive knowledge.

You are aware that it is your responsibility to provide true, accurate, current and complete information when registering for access to the Platform. We remind you that the indication of incomplete or false data is a crime typified by law and can entail severe punishments to those who provide it.

### **What information do we collect?**

We may collect the following information from you when you access and use this website and register for and use any of our products and services:

- Email addresses,
- IP address,

Giving us this information is voluntary. However, if you do not give us this information, we will not be able to provide any of the products or services you request from us.

### **Control of REGISTRATION DATA by Users**

Each user has control over the REGISTRATION DATA contained in the profile created at this website, being able to access and change them using their login and password. Remember that the login and password are individual and known only to the user himself, who must ensure the confidentiality of this data. STARCK is not responsible for how this data is used by the User. Users will be able to update their REGISTRATION DATA with STARCK through the Platform.

### **What do we use your information for?**

The information we collect from you may be used in one of the following ways:

- To personalize your experience of our application and services (your information helps us to better respond to your individual needs),
- To improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from

you),

- To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs),
- To process transactions,
- To comply with our obligations under any law,
- To send periodic emails about our other products and services,
- To research matters relating to our business such as security threats and vulnerabilities.

Please note that we only collect and process your information for one or more of the above purposes and for no other purpose unless we have your consent beforehand.

### **Do we only collect information from you via our website?**

We will only collect information from you when you access our website and/or register for one or more of our products or services.

### **How long do we keep your information for?**

We will only keep your information for a limited time until the purpose for which we collected your information has been met. After that, we will then delete or destroy it, unless we need to keep it for longer for evidential reasons or to comply with other legal obligations.

We may keep user information for statistical or research purposes, provided that we have removed any unique identifiers which can be used to link that information to the relevant user.

### **How do we keep your information secure?**

We implement and maintain a variety of security safeguards to keep your information in our possession secure against internal and external risks, taking into account generally accepted information security practices and procedures. We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Payment Gateway Providers' database only to be accessible by those authorized with special access rights to such systems, and who are required to keep the information confidential.

We do not store any credit card or other sensitive financial or personal information on our servers after a transaction has been completed. If the security of our systems or our service providers' systems is ever breached, and your information is leaked or shared with someone who is not authorised to have it, we will notify you as soon as it is reasonably possible in the quickest way possible to help you avoid or reduce any potential losses.

Please note that no method of transmission over the Internet or method of electronic storage is 100% secure and we are not responsible for the security of any data which you are transmitting over the Internet, or any data you are storing, posting or providing directly to a third party's website, which is governed by that party's policies.

### **How can you access, correct and/or update the information we have in our possession?**

You have the right to ask, free of charge, whether we have a record of any of your information and the details of that information.

While we take reasonably practical steps to make sure our records containing your information are always complete, accurate and updated when necessary, you must notify us immediately if you believe any information in our possession is inaccurate or out of date. We will then investigate the matter and if any information is found to be incorrect, incomplete, inaccurate, irrelevant, excessive, out of date, misleading or was not collected according to the terms of this privacy notice, we will correct, update or delete that information within a reasonable time.

If you notify us that any of the information, we have about you is not correct or accurate, or needs to be updated, we will immediately stop using that information until we have either corrected or updated it, or we can show that the information is actually correct and up to date.

You have the general right to request the erasure of your information if the following applies:

- It is no longer necessary for the purpose we collected it for,
- You withdraw your consent to consent-based processing and no other legal justification for processing applies,
- We unlawfully processed your information,
- You object to processing for direct marketing purposes,
- Erasure is required to comply with a legal obligation that applies to us.

### **Do we share your information with anyone else?**

We share your personal information with our agents and service providers who assist us in supplying our products and services. These parties are bound by confidentiality and non-disclosure obligations when processing your personal information.

We may also release your information when we believe it is necessary to comply with the law, enforce our site policies, or protect ours or others rights, property, or safety.

We may also share certain de-identified visitors and other information with outside parties for marketing, advertising, or other uses.

We do not sell, trade, or otherwise transfer your information to outside parties without your consent.

### **Do we transfer your information to other countries?**

As an international company that does business in different countries, it may be necessary for us to transfer your information to a jurisdiction other than your own for the purposes of operating this website and/or providing you with the products and services you have requested.

When we do need to transfer your information to another country, we will only do so if that country has sufficient legal protection available to protect your information.

### **Do we use cookies?**

Yes (Cookies are small files that we use on the website which transfers to your computer's hard drive through your web browser (if you allow it) to enable us to recognize your login details, browser and capture and remember certain information about your settings and preferences.

We use cookies to make our website and our users' experience more efficient and to help us improve our services.

Our use of cookies may allow us and third parties to collect information about your browsing activities over time and across different websites following your use of our services.

### **Direct marketing**

We may contact you by mail, telephone, fax, e-mail or other electronic messaging services with offers of similar products or services or information that may be relevant and useful to you. By registering to use any of our products or services and providing us with your contact details, or the contact details of your company and other registered users, you consent to being contacted by these methods for marketing purposes.

If you don't want to receive any marketing communications from us, please contact [support@starck.app](mailto:support@starck.app) at any time.

If you have previously indicated that you do not want to receive any marketing communications, you don't have to do anything further.

If at any time you would like to unsubscribe from receiving future marketing communications, we include detailed unsubscribe instructions at the bottom of each communication.

### **Complaints**

We respect your right to privacy and undertake to only collect and use your information when it is necessary and relevant to our business needs and only according to the terms set out in this policy.

If you are not happy with anything we do in relation to your information, you may lodge an objection or complaint by emailing us at [support@starck.app](mailto:support@starck.app) or contacting our designated information officer at [support@starck.app](mailto:support@starck.app)

If your objection or complaint is not resolved to your satisfaction, you have the right to lodge a complaint with the relevant Information Regulator in your jurisdiction.

### **Changes to this notice**

This privacy notice may change and you should therefore review it regularly before accessing and using the website.

Date of last review: December 12th, 2023