



Privacy Policy

Effective date: January 7, 2019

Thank you for using Starflow! We take your privacy extremely seriously and would like to describe how we collect, use and protect your information when you access our website(s), products, services and applications (collectively, the “Services”).

This Privacy Policy describes therefore how Starflow (we, us or our), reg no 556991-9375, at the address Grev Turegatan 5, 114 46 Stockholm, handles user personal data.

Users of our website and Services (you, your) can provide personal data to us when visiting our website and when using our services. You can do this in your capacity of a private individual or as representative of a company. We may also obtain your personal data from third party sources. We act as the data controller of personal data obtained accordingly and of its processing in accordance with this Privacy Policy.

We safeguard your personal integrity. It is therefore important for us to protect your personal data and ensure that our processing of your personal data is correct and lawful. This Privacy Policy will help you to understand what kind of personal data about you Starflow collect and how it is used when you are using our website and services, as well as your rights as a data subject.

We ask that you read this Privacy Policy carefully and familiarize yourself with its content.

We may sometimes need to make updates or changes to this Privacy Policy. If we do so, we will inform you in an appropriate

manner and we ask you to then carefully read through the updated Privacy Policy. The date of the most recent update of this Privacy Policy is given at the top of the policy.

What Personal Data Do We Collect ?

We collect personal data about you when you provide such information directly to us, when third parties such as our business partners or service providers provide us with personal data about you, or when personal data about you is automatically collected in connection with your use of our Services.

The following personal data is collected by us:

- Personal Contact Details:** Full Name, Address, E-mail Address, Phone Number, Birthday Date, Country & City of Residence, Gender
- Other Personal Details:** Type of Browser, browser headers, page and/or feature selection, certain cookie information, pictures, Device type, Device ID, IP Address and associated Location Data

Why do we process your personal data

To provide you with our Services

We process your personal data to provide you with our Services and to communicate with you. This includes providing you access to our different features, administering your account and general information regarding our Services to you. Our processing for the purpose of providing our Services is based on our legitimate interest to do so or on your prior consent.

To improve our Services

We process your personal data to improve our Services and make them more user friendly. This includes producing statistics on and analysing how you use our Services and performing market research and customer satisfaction surveys and getting your feedback through other feedback functions. For these purposes, we also use your personal data based on your web activity and activity associated with emails we send to you, including but not limited to how you use our website and Services, your interests and similarities with other users' interests and user patterns. Our processing for the purpose of improving our Services is based on our legitimate interest to do so.

Direct marketing

We also use your personal data to communicate with you about our Services, to inform you about our terms and conditions and to send you marketing messages. You may opt-out from further marketing messages at any time by using the un-subscription link provided in every marketing message. Our processing for the purpose of direct marketing is based on our legitimate interest to promote our services or on your prior consent.

How and With Whom Do We Share Your Data?

We share personal data with our third party service providers, other clients of our Services and agents who work on our behalf and provide us with services related to the purposes described in this Privacy Policy, our Terms of Service or our Terms of Use.

In addition to those parties set forth above, we may also share personal data with:

- Other users (where you post information publicly or as otherwise necessary to effect a transaction initiated or authorized by you through the Services)
- Social media services (if you interact with them through your use of the Services)
- Third party business partners who you access through the Services (e.g. third party applications)
- Other parties authorized by you

We also share information with other third parties when you have given us consent to do so (as indicated at the point such information is collected).

We also share personal data when we believe it is necessary to:

- Comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies
- Protect us, our business or our users, for example to enforce our Terms of Service, Terms of Use, prevent spam or other unwanted communications and investigate or protect against fraud
- Maintain the security of our products and services

If we choose to buy or sell assets, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party, and we would share personal data with the party that is acquiring our assets. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your personal data as set forth in this policy.

How Long Do We Retain Your Personal data?

We retain personal data about you for as long as you have an open account with us and for 6 months after you close your account. In some cases we retain personal data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. Afterwards, we retain some information in a depersonalized or aggregated form but not in a way that would identify you personally. However, user signup data (your name, your email address, and the fact that you were a Starflow user) may be retained in third-party analytics services beyond closure of your account, unless you request that your data be deleted.

Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device which may include “cookie” information. “Cookies” are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. For more information on our cookies and their expiration times, please review our Cookie Policy at <https://starflow.com/legal/cookie-policy/>. Note that in the past, Starflow used cookies with longer expiration times. Delete your cookies to get the new cookies.

What Security Measures Do We Use?

We have taken a number of security measures to ensure that the personal data we keep is secure. We seek to protect Personal data using appropriate technical and organizational measures based on the type of Personal data and applicable processing

activity. For example, Starflow is continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction or alteration. Some of the safeguards we use to protect Personal data are firewalls, data encryption, and information access controls. We also monitor our systems to discover vulnerabilities in order to protect your personal data.

Personal data of Children

As noted in our Terms of Service and Terms of Use at <https://starflow.com/legal/terms-of-service> and <https://starflow.com/legal/terms-of-use>, we do not knowingly collect or solicit personal data from anyone under the age of 13. If you are under 13 years, please do not attempt to register for the Services or send any personal data about yourself to us. If we learn that we have collected personal data from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 years old may have provided us personal data, please contact us at legal@starflow.com.

What Rights Do You Have Regarding Your Personal data?

You have certain rights with respect to your personal data, including those set forth below. For more information about these rights, or to submit a request, please email legal@starflow.com. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need to you to provide us with additional

information, which may include personal data, if necessary to verify your identity and the nature of your request.

- Access:** You can request more information about the personal data we hold about you and request a copy of such personal data. You can also access certain of your personal data by accessing your account settings.
- Rectification:** If you believe that any personal data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this information directly by accessing your account settings.
- Erasure:** You can request that we erase some or all of your personal data from our systems. We may deny your request if we are prevented from erasing your personal data by requirements set out in applicable laws and regulations (e.g. in relation to accounting and tax legislation) or if they are needed for the establishment, exercise or defence of legal claims. If we cannot meet your request, we will instead restrict the personal data so they cannot be used for another purpose than the purpose preventing the erasure.
- Withdrawal of Consent:** If we are processing your personal data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your personal data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
- Portability:** You can ask for a copy of your personal data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.

- Objection:** You can contact us to let us know that you object to the further use or disclosure of your personal data for certain purposes.
- Restriction of Processing:** You can ask us to restrict further processing of your personal data.

Right to File Complaint: You have the right to lodge a complaint about Starflow's practices with respect to your Personal data with the supervisory authority. Please note that you are also always welcome to contact us in such event.

Transfers of Personal data

The Services are hosted and operated in Europe, specifically, hosted in Belgium and operated from Sweden, through Starflow and its service providers. By using the Services, you acknowledge that any personal data about you, regardless of whether provided by you or obtained from a third party, is being provided to Starflow in Europe and will be hosted on servers in Belgium, and you authorize Starflow to transfer, store and process your information to and in the Belgium.

When another company within the Starflow-group, our service providers, partners or any potential purchaser of our business or assets are located in or have business activities in a country outside the EU/EEA, we may transfer your personal data to such countries. In the event of such transfer it will be made in accordance with applicable data protection law, for example by ensuring that the country in which the recipient is located ensures an adequate level of data protection according to the European Commission or by use of standard contractual clauses that the European Commission has issued ensuring suitable measures to safeguard your rights and freedoms.

What If You Have Questions Regarding Your personal data?

If you have any questions about this Privacy Policy or our data practices generally, please contact us using the following information:

Name

Starflow AB

Physical address

Grev Turegatan 5
114 46, Stockholm
Sweden

Email address for contact

legal@starflow.com



Starflow AB
Grev Turegatan 5
114 46, Stockholm
Sweden

<https://starflow.com> · legal@starflow.com