



## Privacy Policy

*Effective date: May 23, 2018*

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”).

### **What does this Privacy Policy cover?**

This Privacy Policy covers our treatment of personally identifiable information (“**Personal Information**”) that we gather when you are accessing or using our Services. We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information in order to make our Services available to you, to contact you, and to better understand how you use the Services. In certain cases, we may also share some Personal Information with third parties, but only as described below.

We do not knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at [legal@starflow.com](mailto:legal@starflow.com).

# **Will Starflow ever change this Privacy Policy?**

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well, but if we do, we will bring it to your attention by placing a notice in the Services, and/or by sending you an email, and/or by some other means. Your use of the Services after any changes to the Privacy Policy have been posted will be considered to indicate your acceptance of the changes.

## **What Information does Starflow Collect?**

### **Information You Provide to Us**

We receive and store any information you knowingly provide to us. When you create a new account to use the Services we will solicit your consent to provide information including but not limited to your Full Name, Username, Email, Description, Link to your Social Media Channels and Link to Website.

With regard to each of your visits to our Site (“<https://starflow.com>”) we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, download errors,

length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number;

In addition, we collect Personal Information you submit to us, for example by completing a form on [www.starflow.com](http://www.starflow.com). In that case, we may communicate with you, for example by calling you at the phone number you provide, sending you promotional email offers, or emailing you about your use of the Services. Also, we may receive a confirmation when you open an email from us. This confirmation helps enhance our engagement with you and generally improve our Services. If you do not want to receive communications from us, please indicate your preference by sending an email to [legal@starflow.com](mailto:legal@starflow.com).

## **Information Collected Automatically**

Whenever you interact with our Services, we automatically receive and record information on our server logs from your browser or device, which may include your IP address, “cookie” information, the type of browser and/or device you’re using to access our Services, and the page or feature you requested. “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. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features. We may use this data to customize content for you that we think you might like, based on your usage patterns, and generally to improve the Services. For more information, please visit our Cookie Policy here: <https://starflow.com/legal/cookie-policy>

## **Information Collected From Other Websites and Do Not Track Policy**

Through cookies we place on your browser or device, we may collect information about your online activity after you leave our Services. Just like any other usage information we collect, this information allows us to improve the Services and customize your online experience. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time, which means that we may collect information about your online activity both while you are using the Services and after you leave our Services. Do Not Track signals are set on a browser-by-browser basis, so you must set them on every browser you use if you do not wish to be tracked.

## **Third Party Analytics Services**

We use third party analytics services in order to better understand user engagement with the Services. When a user browses or uses the Services, these third party analytics services may collect the user’s IP address, browser type, and approximate location (based on the IP address). They may also use web logs or web beacons and may set and access cookies on your computer or other device. In order to refine our understanding of user engagement, we provide these services with a user’s name and email address (which we collected as part of the user’s account registration process).

# Does Starflow Share Personal Information?

We neither rent nor sell your Personal Information to anyone. However, we may share your Personal Information with third parties as described in this section:

**Agents and vendors:** We employ other companies and people to perform tasks on our behalf and need to share your information with them, including in some cases the Personal Information you have provided to us, in order to make the Services available to you. For example, we may use third party hosting providers or software developers to help implement and maintain the Services. However, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

**Business Transfers:** If we are involved in a reorganization, merger, acquisition or sale of our assets, your information may be transferred as part of that deal. We will notify you (for example, via a message to the email address associated with your account) of any such deal and outline your choices in that event.

**Protection of Starflow and Others:** We reserve the right to access, read, preserve, and disclose any information that we believe is necessary to comply with law or court order; enforce or apply our applicable terms of use and other agreements; or protect the rights, property, or safety of Starflow, our employees, our users, or others.

## Is Personal Information about me secure?

We will use very diligent efforts to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security.

Unauthorized entry or use, hardware or software failure, and other

factors, may compromise the security of user information at any time.

## **What Personal Information can I access?**

If you want to modify the Personal Information you provided up upon registration of the Services, you can do so by changing the information in the Services.

Alternatively, you can email [legal@starflow.com](mailto:legal@starflow.com) for access to, or to update or delete, your Personal Information that Starflow has collected.

## **Transfer to the U.S. or Other Countries**

We currently use datacenter facilities located exclusively in Europe, specifically in Belgium. Your information will be stored and processed in Belgium or other countries where we decide to maintain datacenter facilities in the future. By using the Services, you consent to the transfer of information outside of your country, even if your country has more rigorous data protection standards. For any Personal Information that may be transferred from the European Economic Area, please see the EU Residents section below, including details about our Privacy Shield certification.

## **EU Residents**

If you are a resident of the European Union (“EU”), United Kingdom, Lichtenstein, Norway, or Iceland, you may have additional rights under the EU General Data Protection Regulation (the “GDPR”). Please see our EU Privacy Policy available here: <https://starflow.com/legal/privacy-policy-eu>

# California Code Notice

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Information to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at [legal@starflow.com](mailto:legal@starflow.com).

## What if I have questions about this policy?

If you have any questions or concerns regarding our privacy policies, please don't hesitate to contact us at [legal@starflow.com](mailto:legal@starflow.com), and we will try to resolve your concerns.



Starflow AB  
Grev Turegatan 5  
114 46, Stockholm  
Sweden

<https://starflow.com> · [legal@starflow.com](mailto:legal@starflow.com)