

PRIVACY POLICY

Last update: 28th of April 2023

Starzz (“Starzz” “Us”, “We”, and “Our”) understand that Your privacy is important to You and is committed to being transparent about the technologies it uses.

This Privacy Policy (“Privacy Policy”) explains what kind of Personal Data we collect about You and how We use Your Personal Data through Our Website or through Your use of Our Service. It also describes the choices available to You regarding Our use of Your Personal Data and how You can access the information. We respect Your privacy and We take protecting it seriously.

This Privacy Policy should be read together with Our **Terms and Conditions**.

1. GENERAL INFORMATION

1.1. This Privacy Policy applies to persons who use Our Website and hence provide Personal Data to Starzz.

1.2. **We do not sell Your Personal Data to third parties.** A “sale” of Personal Data under the [CCPA](#) is defined broadly to include the **“selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means”** the Personal Data of a Consumer to another business or third party “for monetary or other valuable consideration”. If We decide to sell the Service, We will inform You about this, so You can forbid Us to transfer Your Personal Data together with Our business. If so, We will delete Our Data from the databases prior to a business transfer.

1.3. **If You do not carefully read, do not fully understand, or disagree with the Privacy Policy, You must immediately stop using Our Website.**

2. TERMS AND DEFINITIONS

2.1. The following terms shall have the following meaning:

2.1.1. **“Cookies”** — Cookies are small data files, usually consisting of letters and numbers, that are stored on Your device when You visit the Website, which enables Us to collect information about Your device identifiers, IP address, web browsers used to visit the Website, pages or features viewed, time spent on the Website, and links clicked.

2.1.2. **“Data”** — is all data provided by You and/or collected by Us including, but not limited to, Your Personal Data and User Data.

2.1.3. **“Data Controller”** — a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and how any Personal Data are or are to be, processed.

2.1.4. **“Data Processors (or Service Providers)”** — any natural or legal person who processes the data on behalf of the Data Controller. We may use the Service of various Service Providers to process Your Data more effectively.

2.1.5. **“Personal Data”** — data about a living individual who can be identified from that data (or from that and other information either in Our possession or likely to come into Our possession).

2.1.6. **“Service”** — the Service offered by Starzz through the website <https://starzz.eu> (hereinafter **“Website”**).

2.1.7. **“Usage Data”** — is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

2.1.8. **“User”** — any person or entity by its authorized representative visiting Our Website and/or using Our Service; or anyone connecting Us for any reason through email or “Register

for ICO” form. The User corresponds to the Data Subject, who is the subject of Personal Data.

3. DATA CONTROLLER

3.1. **Starzz LLC, (Griffith Corporate Center, Beachmont, 784 Kingstown, St.Vincent and the Grenadines)** is the Data Controller that is responsible for the Personal Data collected and used within the scope of this Privacy Policy.

4. PRINCIPLES OF DATA PROCESSING

4.1. We adhere to the following principles to protect Your privacy:

- 4.1.1. **principle of lawfulness, fairness, and transparency** - We process Personal Data lawfully, fairly, and transparently concerning the data subject;
- 4.1.2. **principle of purpose limitation** - We collected Personal Data for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- 4.1.3. **principle of data minimization** - We collect adequate Personal Data, relevant and limited to what is necessary concerning the purposes for which We are processed Personal Data;
- 4.1.4. **principle of data accuracy** - We accurate Personal Data and, where necessary, keep up to date. We take every reasonable step to ensure that inaccurate Personal Data, having regard to the purposes for which they are processed, are erased or rectified without delay;
- 4.1.5. **principle of storage limitation** - We keep Personal Data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the Personal Data are processed;
- 4.1.6. **principle of integrity and confidentiality** - We process Personal Data in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage, using appropriate technical or

organizational measures.

5. PERSONAL DATA THAT WE COLLECT AND PROCESS

5.1. We need Your Personal Data to provide Our Service to you. Without providing such Personal Data, We are not able to provide You the Service You wish to receive. Our Website is designed in a way that it is possible for the Users to visit and use Our Website without exposing any Personal Data about themselves. However, You may choose to provide Us with Personal Data when You contact Us via our Website. In that case We commit ourselves to process any Personal Data that You may provide Us in full accordance with all applicable data privacy laws. You may provide Us with Your Personal Data when signing up or participating in surveys, campaigns, competitions or other activities organized by Us. The categories of Personal Data about You that We may process depend upon Your business relationship with Us and may include (but not limited to):

- 5.1.1. **Personal details (name, gender, date of birth, age, nationality, passport number or national ID number)**
- 5.1.2. **Contact details (address, e-mail address, and social media account details)**
- 5.1.3. **Corporate details (name, registration number, registered address, transparency register number, details with respect to articles of association and other similar documents / certificates, details with respect to shareholders and/or beneficial owners including their personal and contact details)**
- 5.1.4. **Technical information of Your devices (e.g. IP address) which You use for communications, or transactions (cell phone, tablet, notebook, personal computer, etc.; and details concerning Your transfers of cryptocurrency tokens, including SRZ tokens, insofar as these are publicly viewable on the cryptocurrency platform concerned)**
- 5.1.5. **Transaction Personal Data including details about payments to and from You and other details of any transactions You enter into using products and/or Service You have purchased from Us.**

5.2. Furthermore, We are entitled to request from You information that We need in connection with the holding and using of Starzz tokens (\$SRZ):

- 5.2.1. **Holding in wallets**
- 5.2.2. **Wallet address.**

5.3. Additionally, We may collect **Marketing and Communications Data** that include Your preferences in receiving marketing from Us and Our third parties and Your communication preferences.

5.4. We may collect Personal Data from You in a variety of ways and circumstances, including, but not limited to, access to the **Starzz**, a subscription to a newsletter, filling out a „Register to ICO“ form, and providing Us with feedback. We shall be entitled to combine Personal Data collected in the course of Your interaction with different sections of the Service with any other relevant available information.

6. PERSONAL DATA, COLLECTED IN AN AUTOMATIC WAY

6.1. We may also automatically collect User Data about the devices You use to interact with Our Service. The User Data automatically collected by or transmitted to Us in the course of accessing, interacting, and operating the Service may include, without limitation, the following the User Data:

- 6.1.1. **device information**, which may include (but is not limited to) information about the personal computer or laptop You use to access the Service including the hardware model, operating system and version, the Service You use, and other device identifiers;

6.1.2. **server log information**, which may include (but is not limited to) Your login details, the date and time of visits, the pages viewed, Your IP address, time spent at the Service, and the name and version of the Browser;

6.1.3. **information collected by Cookies and other similar technologies.** We and Our service providers, as well as contractors, use various technologies to collect information when You interact with **Starzz**, including Cookies and other similar technologies. We utilize Cookies as part of Our efforts to enhance Your experience of using Our Website. To the extent that information processed in connection with Cookies should qualify as Personal Data, the legal ground for that processing is Your **consent** (for the EU resident — according to Art. 6 (1) lit. (a) GDPR), except the usage of the strictly necessary Cookies that usually may be essential for the website functioning and can be processed without consent. We do not use strictly necessary Cookies at this stage. Please find the list of Cookies We use below:

| NAME | PURPOSE | EXPIRY | TYPE | FIRST-PARTY or THIRD-PARTY cookies? |
|-------------|---|----------------------|-------------|--|
| 1P_JAR | Used for collecting the Website usage statistics and personalizing ad experiences across Google platforms | Persistent (30 days) | Performance | Third-party |

7. USE OF PERSONAL DATA

- 7.1. Starzz uses the collected Data for various purposes including, but not limited to:
- 7.1.1. to provide and maintain Our Service;
 - 7.1.2. to notify You about changes to Our Service;
 - 7.1.3. to identify and verify the User;
 - 7.1.4. to achieve KYC and AML compliance according to Our AML/KYC Policy;
 - 7.1.5. to allow You to participate in interactive features of Our Service when You choose to do so;
 - 7.1.6. to provide customer support and respond to inquiries You have made, evaluate job Websites, funding requests or for other normal business activities;
 - 7.1.7. to gather analysis or valuable information so that We can improve Our Service;
 - 7.1.8. to monitor the usage of Our Service;
 - 7.1.9. to detect, prevent and address technical issues;
 - 7.1.10. to fulfill any other purpose for which You provide it;
 - 7.1.11. to carry out Our obligations and enforce Our rights arising from any contracts entered into between You and Us, including for billing and collection;
 - 7.1.12. to provide You with notices about Your account and the Service;
 - 7.1.13. to provide You with news, special offers, and general information about other goods, Service, and events which We offer that are similar to those that You have already purchased or enquired about unless You have opted not to receive such information;
 - 7.1.14. in any other way We may describe when You provide the information;
 - 7.1.15. for any other purpose as We determine, in Our sole discretion, to be necessary or required to ensure the safety and/or integrity of Our users, employees, third parties, public, and/or Our Service, or to comply with requirements of any applicable law.
- 7.2. If You do not want Us to use Your Personal Data in any of these ways, please let Us know by contacting Us at the email address dataprotection@starzz.eu.

8. CONSENT TO PERSONAL DATA PROCESSING

8.1. Consent to Personal Data Processing

- 8.1.1. By accepting this Privacy Policy, You approve to have reached the age of majority or the legal age in Your jurisdiction (generally 18 or older), are solely responsible for all Your actions, and fully understand the statements outlined in this Privacy Policy.

8.2. EU Persons Consent to Personal Data processing

- 8.2.1. If You are an EU Person and to process Your Personal Data We need to receive Your consent, as it is prescribed by GDPR, We will process Your Personal Data only in the case We

have received from You a freely given, specific, informed, and unambiguous indication of Your wishes by which You signify agreement to the processing of Your Personal Data («**Consent**»).

8.2.2. We only collect the location information where Users have granted Us permission to do so through the obtaining permission system used by their device platforms. Within Your consent to the inclusion of background location in Our Website.

8.2.3. Your Consent covers all processing activities with Your Personal Data carried out for the same purpose or purposes. When the processing has multiple purposes, Your Consent should be deemed given for all of them.

8.3. Non-EU Persons Consent to Personal Data processing

8.3.1. If You are not an EU Person, by transferring to Us Your Personal Data via the Website, or otherwise, You irrevocably and unconditionally consent and agree that We shall be entitled, in accordance with this Privacy Policy:

8.3.1.1. to process in any manner, including to collect, store, use, disclose, share and transfer (including cross-border), Your Personal Data so provided to Us, as well as Your Personal Data

collected from Your use of the Service (i.e. Your Personal Data which We collect automatically and); and

8.3.1.2. to use Cookies and similar technologies to collect Your Personal Data.

9. COMPLIANCE WITH GENERAL DATA PROTECTION REGULATION (GDPR), CALIFORNIA CONSUMER PRIVACY ACT (CCPA), AND OTHER LAWS

9.1. Your Personal Data is processed in accordance with the generally recognized norms of international law and laws of St. Vincent & The Grenadines, as well as the norms applicable to You, including but not limited to:

9.1.1. All processing of Personal Data is performed in accordance with regulations and rules following the St. Vincent and the Grenadines Act No. 18 of 2003 ("Privacy Act 2003").

9.1.1.9.1.2. If You are located in California, all processing of Personal Data, is performed in accordance with regulations and rules following the [California Consumer Privacy Act](#), Cal. Civ. Code § 1798.100 *et seq.* ("CCPA").

9.1.2.9.1.3. If You are located in the European Economic Area (EEA) privacy rights are granted and all processing of Personal Data is performed by regulations and rules following the [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons concerning the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation \(«GDPR»\).](#)

9.1.3.9.1.4. If You are located in Canada, all processing of Personal Data is performed in accordance with regulations and rules following [Personal Information Protection and Electronic Documents Act](#) (S.C. 2000, c. 5) («PIPEDA»).

10. THE RIGHTS OF USERS

10.1. Subject to possible restrictions under national law, as a data subject under the GDPR, You may have certain rights regarding the Personal Data that We collect on You.

10.2. Under Chapter 3 of the General Data Protection Regulation (GDPR), the rights of the data subjects include the following:

10.2.1. **Right to access.** You may contact Us to get confirmation as to whether or not We are processing Your Personal Data. When We process Your Personal Data, We will inform You of what categories of Personal Data We process regarding You, the processing purposes, the categories of recipients to whom Personal Data have been or will be disclosed, and the envisaged storage period or criteria to determine that period;

10.2.2. **Right to withdraw consent.** In case Our processing is based on the consent granted, You may withdraw the consent at any time by contacting Us or by using the functionalities of the Website. You can withdraw Your consent at any time by replying to the email with Your withdrawal and Your Personal Data will be deleted immediately. Withdrawing consent may lead to fewer possibilities to use the Service;

10.2.3. **Right to object.** In case Our processing is based on a legitimate interest to run, maintain and develop Our business, You have the right to object at any time to Our processing. We shall then no longer process Your Personal Data unless for the provision of Our Service or if We demonstrate other compelling legitimate grounds for Our processing that override Your interests, rights, and freedoms or for legal claims. Notwithstanding any consent granted beforehand for direct marketing purposes, You have the right to prohibit Us from using Personal Data for direct marketing purposes, by contacting Us or by using the functionalities of the Website, or unsubscribing possibilities in connection with Our direct marketing messages;

10.2.4. **Right to restriction of the processing.** You have the right to obtain from Us restriction of processing of Your Personal Data, as foreseen by applicable data protection law, e.g. to allow Our verification of the accuracy of Personal Data after You contest the accuracy or to prevent Us from erasing Personal Data when Personal Data are no longer necessary for the purposes but still required for Your legal claims or when Our processing is unlawful. Restriction of processing may lead to fewer possibilities to use the Website;

10.2.5. **Right to data portability.** You have the right to receive Your Personal Data from Us in a structured, commonly used, and machine-readable format and to independently transmit those Personal Data to a third party, in case Our processing is based on Your consent and carried out by automated means;

10.2.6. **Right to complain.** You have the right to complain to any relevant Data Protection Authority, in particular in the Member State of Your residence, place of work, or the place of processing Your Personal Data. If You wish to exercise any of the aforementioned rights, please Contact Us via dataprotection@starzz.eu.

10.3. **How to use these rights.** To exercise any of the above-mentioned rights, You should primarily use the functions offered by the Website. If such functions are however not sufficient for exercising such rights, You shall send Us a letter or email to the address set out below under the Privacy Policy, including the following information: name, address, phone number, email address, and a copy of a valid proof of identity. We may request additional information necessary to confirm Your identity. We may reject requests that are unreasonably repetitive, excessive, or manifestly unfounded.

10.4. **You may have other rights under the law applicable in Your jurisdiction.**

11. DATA STORING AND DELETION

11.1. We store Your Personal Data for as long as needed to provide You with Our Service. We may store Personal Data longer, but only in a way that it cannot be tracked back to You. When Personal Data is no longer needed, We delete it using reasonable measures to protect the Personal Data from unauthorized access or use.

11.2. **EU Territory.** We store Personal Data as long as it is needed for the provision of Our Service. Traffic information is erased or made anonymous when it is no longer needed for the transmission or, in the case of payable Service, up to the end of the period during which the bill may lawfully be challenged or payment pursued. Direct marketing and provision of value-added Service information (including traffic information used for these purposes) are stored as long as the same is necessary for the provision of these activities, or up to the time when a User opts out from such use under this Privacy Policy. Other information is stored for as long as We consider it to be necessary for the provision of Our Service. This Section shall not prevent any technical storage or access to information for the sole purpose of carrying out the transmission of a communication or as strictly necessary for Us to provide the Service You requested.

11.3. As explained in the GDPR statement, We strive to anonymize the Data when possible. If You decide to exercise Your right to erasure, We will also inform Our providers to delete all Your data.

11.4. **US Territory.** We will retain collected information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by applicable legislation.

11.5. Storing might be different depending on the territory of collecting the information and the applicable legislation, but We always strive to store the information only as long as it is needed to provide, improve, or personalize Our Service.

11.6. The information which You provide to Us will be erased within one hundred and eighty (180) days. If You request the deletion of Your Personal Data within 180 days, We will delete it immediately. Within 180 days You can restore Your account by starting to use it, and this period automatically ends.

11.7. We do not intentionally collect or maintain information from persons under the age of 13. If We become aware that We have unknowingly collected personally identifiable information from a child under the age of 13, We will make reasonable efforts to delete such information from Our records. If You believe that We may have any information about children under the age of 13, please contact Our Support Service at dataprotection@starzz.eu.

12. TRANSFER OF DATA

- 12.1. Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of Your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those of Your jurisdiction.
- 12.2. If You are located outside the European Union and the USA and choose to provide information to Us, please note that We may transfer the Data, including Personal Data, to the European Union and the USA and process it there.
- 12.3. Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.
- 12.4. Starzz will take all the steps reasonably necessary to ensure that Your Data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your Personal Data and other personal information.

13. DO NOT TRACK SIGNALS

- 13.1. “Do Not Track” (“DNT”) is a preference You can set in Your web browser to let the websites You visit know that You do not want them collecting Data about You. At this time, this Website does not respond to DNT or similar signals.

14. DATA SECURITY

- 14.1. We care to ensure the security of Personal Data. We follow generally accepted industry standards to protect the information submitted to Us, both during transmission and once We receive it. We maintain technical, physical, and administrative security measures to provide reasonable protection for Your Personal Data. When We or Our contractors process Your information, We also make sure that Your information is protected from unauthorized access, loss, manipulation, falsification, destruction, or unauthorized disclosure. This is done through appropriate administrative, technical, and physical measures.
- 14.2. There is no 100% secure method of transmission over the Internet or method of electronic storage. Therefore, We cannot guarantee its absolute security.
- 14.3. We never process any kind of sensitive data or criminal offense data. Also, We never undertake to profile Personal Data.

15. CONTRACTORS

- 15.1. We work with third-party Service providers, who provide the Website, Website development, hosting, maintenance, and other Service for Us. These contractors may have access to, or process Personal Data on behalf of Us as part of providing those Service for Us. We limit the information provided to these Service providers to that which is reasonably necessary for them to perform their functions.
- 15.2. All data transfers are performed in accordance with the highest security regulations.
- 15.3. All Data processed by Us is stored exclusively in secure facilities provided by [Mailchimp](#) (Atlanta, United States), Web Server [IONOS](#) (Frankfurt, Germany), and, mainly, by our hosting provider – [DigitalOcean](#) (the USA).
- 15.4. We also use Mailchimp for email automations and CRM purposes. For more information on the privacy practices of Mailchimp, please visit their Privacy Policy: <https://www.intuit.com/privacy/statement/>.

16. LINKS TO THIRD-PARTY WEBSITES

- 16.1. This Website may contain hyperlinks to third-party websites. We are not responsible for the content of such websites, or for how those websites collect, hold, use, and distribute any personal information You provide.

16.2. When visiting a third-party website from hyperlinks displayed on this Website, We encourage You to review the Privacy Policies of those websites so that You can understand how the personal information You provide will be collected, held, used, and distributed.

17. USE OF THIS SERVICE BY MINORS

17.1. We understand the importance of protecting the privacy of minors, especially in the online environment. This Service is not designed for or intentionally targeted at minors under the age of 18, and We request that minors not use this Service. We do not knowingly collect data from minors on this Service. If We become aware that We have received Data from a person under the age of 18, We will take reasonable steps to delete such Data from Our records.

18. APPLICATION OF THIS PRIVACY POLICY

18.1. This Privacy Policy applies to the Website and the Service. Once redirected to another service, website, or app, this Policy is no longer applicable.

19. ACCEPTANCE OF THIS PRIVACY POLICY

19.1. By accepting the checkbox while signing up through filling out a “Register to ICO” form, You agree with the uploaded Privacy Policy and Terms and Conditions.

19.2. We assume that all Users have carefully read this document and agree to its content. If one does not agree with this Privacy policy, they should not use this Website.

20. CHANGES AND UPDATES TO OUR PRIVACY POLICY

20.1. This Policy may be changed or updated from time to time and We encourage You to read this Policy carefully so that You always will know what data We collect, how We use it, and with whom We share it. Your continued use of Our Service or the Website constitutes Your agreement to this Policy. To let You know when We make changes to this Privacy Policy, You can check the date of last changes at the bottom of this page. We will not officially notify You about such changes, and it is therefore in Your own interest to check this Privacy Policy page from time to time.

21. CONTACT US!

21.1. Any questions relating to this Privacy Policy can be addressed to Us at dataprotection@starzz.eu .