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## **Introduction**

STATER TECHNOLOGIES LTD, registered on 20-22 Wenlock Road, London, England, N1 7GU with registration number 12401185 (“us“, “we” or “Company“) respects the privacy of our users (each, “you” or “User“) and is committed to protect the privacy of Users who access and register to our web application (the “Application“), our website or any other online services we provide (collectively: the “Services“). The Company has published this Privacy Policy to outline our practices with respect to collecting, using and disclosing your information when you use the Services. We encourage you to read the Privacy Policy carefully and use it to make informed decisions. By using the Services, you agree to the terms of this Privacy Policy and your continued use of the Services constitutes your ongoing agreement to the Privacy Policy. The Privacy Policy is a part of the Terms of Service and is incorporated there in by reference. In this Privacy Policy you will read about, among other things:

- **What type of information we collect**
- **Cookies and Google Analytics**
- **Lawful grounds for processing**
- **How we use the information**
- **With whom we share the information and for what purpose**
- **For how long we retain the information**
- **How we protect your information**
- **Right of EU Residents**
- **Advertisements**
- **Advertising ID and Advertising Identifier**
- **How to contact us**

## **What Type Of Information We Collect**

We may collect two types of data and information from our Users. The first type of information is un-identified and non-identifiable information pertaining to you, which may be made available or gathered via your use of the Services (“Non-personal Information“). We are not aware of the identity from which the Non-personal Information is collected. Non-personal Information which is collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information about your device (e.g., the device you use, the type of browser and operating system your device uses, language preference, access time and the website’s domain name from which you linked to the Services, etc.), in order to enhance the functionality of the Services. We may also collect information about your activity on the Services (e.g., pages viewed, online browsing, clicks, actions, timestamps, etc.).

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“Personal Information“). Such information may include:

**Account Information:** When you sign-up and register to the Services, you will be asked to provide us certain details about yourself.

**Registering through our website:** When you register to the Services through the Application or our website, we may collect from you the following information: full name, email address, home address, hometown, nationality, birthdate, phone number, as well as information required for our compliance with regulatory Know Your Customer requirements, such as passport or other identification number, and any other information you agreed to share with us.

**Voluntarily Information:** We may collect information which you provide us voluntarily. For instance, when you respond to communications from us, communicate with us via email or share additional information about yourself through your use of the Services. We may also collect the feedback, suggestions, complaints and reports which you send to us. Please note that we may also collect complaints about you from other Users, which may include your Personal Information.

**Device Information:** We may collect Personal Information from your device. Such information may include geolocation data, IP address, unique identifiers (e.g., MAC address and UUID) as well as other information which relates to your activity through the Services.

For the avoidance of doubt, if we combine Personal Information with Non-personal Information, the combined information will be treated as Personal Information as long as it remains combined.

### **Cookies And Google Analytics**

We may use cookies and other technologies or methods of web and mobile analysis (e.g., pixels, FullStory, Google Analytics, etc.) to gather, store, and track certain information related with your access to and activity through the Services, including when you visit our website. A “cookie” is a small piece of information that a website assigns to your device while you are viewing a website. Cookies are very helpful and may be used for various different purposes. These purposes include, among other things, allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between you and the Services quicker, easier and smoother. Our website may use the following types of cookies:

(i)Strictly Necessary Cookies: These cookies are essential to enable you to login, navigate around and use the features of a website, or to provide a service requested by you, for example by remembering items you have placed in an online shopping basket. We do not need to obtain your consent in order to use these cookies.

(ii)Functionality Cookies: These cookies allow the website to remember choices you make (such as your user name, language, or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by using a cookie to store information about the region in which you are currently located, remember changes you have made to text size, fonts, and other parts of web pages that you can customize, and provide services you have asked for such as

watching a video or commenting on a blog. The information these cookies collect remains anonymous and they cannot track your browsing activity on other websites.

(iii)Performance cookies: These cookies collect information about how you use a website, for example which pages you go to most often, and record difficulties you may experience while using the Website, for example error messages. All information collected by these cookies is aggregated and therefore anonymous. It is only used to improve the efficiency of the website.

(iv)Targeting Cookies or advertising Cookies: These cookies are used to deliver advertisements tailored to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organizations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organization. For more information about online behavioral advertising cookies and online privacy, please see the guide produced by the internet advertising industry available at [youronlinechoices.com](http://youronlinechoices.com).

You may remove the cookies by following the instructions of your device preferences. However, if you choose to disable cookies, some features of the Services may not operate properly and your online experience may be limited. We also use a tool called Google Analytics to collect information about your use of the Services. Google Analytics collects information such as how often users access the Services, what pages they visit when they do so, etc. We use the information we get from Google Analytics only to improve our Services. Google Analytics collects the IP address assigned to you on the date you visit sites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Service and the Google Privacy Policy.

### **Grounds for Processing**

Processing of Personal Information is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and to comply with our legal obligations.

### **How We Use The Information**

We use and share Personal Information in the manners described in this Privacy Policy. In addition to the purposes listed above, the information we collect, which may include your Personal Information, is used for the following purposes:

To set up your account and to provide the Services.

To identify and authenticate your access to the Services.

To authenticate your identity for the purpose of compliance with regulatory Know Your Customer requirements.

To send you relevant push notifications, which are based on different activities offered by the Services.

To communicate with you and to keep you informed of our latest updates and newsletters.

To market our website, products, and the Services.

To serve you personalized advertisements when you use the Services.

To perform a research or to conduct analytics in order to improve and customize the Services to your needs and interests.

To support and troubleshoot the Services and to respond to your queries.

To investigate and resolve disputes in connection with your use of the Services.

To detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of the Services; and

To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request.

### **With Whom We Share The Information And For What Purpose**

We do not rent, sell, or share your Personal Information with third-parties except as described in this Privacy Policy. We may share Personal Information with the following recipients: (i) our subsidiaries; (ii) affiliated companies; (iii) subcontractors and other third-party service providers; (iv) auditors or advisers of our business processes; and (v) any potential purchasers or investors in the company. In addition to the purposes listed in this Privacy Policy, we may share Personal Information with our recipients for any of the following purposes: (i) storing or processing Personal Information on our behalf (e.g., cloud computing service providers); (ii) processing such information to assist us with our business operations; (iii) performing research, technical diagnostics, personalization and analytics. We may also disclose Personal Information or any information you submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies, including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our affiliates, our Users, yourself or any third-party; (vi) for the purpose of collaborating with law enforcement agencies; and (vii) in case we find it necessary in order to enforce intellectual property or other legal rights.

### **Third-Party Collection Of Information**

Our policy only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties via the Services (e.g., by clicking on a link to any other website or location) or via other sites throughout the Internet, different rules may apply to their use or disclosure of the information you disclose to them. You acknowledge that we are not responsible for the products, services, or descriptions of products or services that you receive from third-party sites or to the content or privacy practices of those sites, and that this Privacy Policy does not apply to any such third-party products and services. You are knowingly and voluntarily assuming all risks of using third-party sites to purchase products and services. You agree that we shall have no liability whatsoever with respect to such third-party sites and your usage of them.

### **For How Long We Retain The Information**

We respect your privacy rights and therefore you may contact us at any time and request: (i) to access, delete, change or update any Personal Information relating to you (for example, if you believe that your Personal Information is incorrect, you may ask to have it corrected or deleted); or (ii) that we will cease any further use of your Personal Information (for example, you may ask that we will stop using or sharing your Personal Information with third-parties) or that we shall remove your Personal Information (subject to any other legal obligation that may require us to keep the information).

Please note that unless you instruct us otherwise we retain the information we collect for as long as needed to provide the Services and to comply with our legal obligations, resolve disputes and enforce our policies and agreements. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client personal data, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion. If you wish to raise a complaint on how we have handled your Personal Information, please contact us directly at [privacy@stater.co](mailto:privacy@stater.co). If you are not satisfied with our response or believe we are collecting or processing your Personal Information not in accordance with the laws, you can complain to the applicable data protection authority.

### **How We Protect Your Information**

We take great care in implementing and maintaining the security of the Services and your information. We employ industry standard procedures and policies to ensure the safety of your information and prevent unauthorized use of any such information. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse the Services, and we make no warranty, express, implied or otherwise, that we will prevent such access. If you feel that your privacy was treated not in accordance with our policy, or if any person attempted to abuse the Services or acted in an inappropriate manner, please contact us directly at [privacy@stater.co](mailto:privacy@stater.co)

### **Rights of residents of the EU**

If you are a resident of the European Union, please note that the following rights specifically apply regarding your personal information: (1) Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information; (2) Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format; (3) Request rectification of your personal information that is in our control; (4) Request erasure of your personal information; (5) Object to the processing of personal information by us; (6) Request to restrict processing of your personal information by us; (7) Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

To exercise such right, you may contact us at: [privacy@stater.co](mailto:privacy@stater.co)

### **Advertisements**

We may use a third-party advertising technology to serve advertisements when you use the Services. This technology uses your information with regards to your use of the Services to serve advertisements to you (e.g., by placing third-party cookies on your web browser). We may also use our third-parties and share with them Users' information to assist us in evaluating the success of our advertising campaigns and help us retargeting our Users. You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative ("NAI") and the Digital Advertising Alliance ("DAA"). For more information about this practice by NAI and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third-party ad networks operated by NAI and DAA members, please visit their respective websites: <http://optout.networkadvertising.org/#/> and <http://optout.aboutads.info/#/>.

### **Transfer of Information Outside the EEA**

Please note that some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

### **Corporate Transaction**

We may share information, including Personal Information, in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale of an asset or transfer in the operation thereof) of the Company. In the event of the above, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy.

### **Minors**

The Services are not designated to individuals under the age of 18. If you are under 18 years old, you should not download the Application, use the Services, or provide any Personal Information to us. We reserve the right to access and verify any Personal

Information collected from you. In the event that we become aware that an individual under the age of 18 has shared any information, we will discard such information. If you have any reason to believe that a minor has shared any information with us, please contact us at [privacy@stater.co](mailto:privacy@stater.co)

### **Advertising ID And Advertising Identifier**

The Google Advertising ID is an anonymous identifier, provided by Google services. If your device has an Advertising ID, we may collect and use it for advertising and user analytics purposes. We may also use Apple's Advertising Identifier (IDFA), which is a non-permanent device identifier provided by Apple, and any information obtained through the use of the Advertising Identifier, for the purpose of advertising. By downloading the Application or using the Services you explicitly agree that we may associate your Advertising ID and your Advertising Identifier with your applicable persistent device identifier. This will facilitate our ability to improve your personalized experience. Further, we may use other persistent identifiers for non-advertising purposes. If your device does not have Advertising ID or Advertising Identifier respectively, we will use other identifiers.

### **Updates Or Amendments To The Privacy Policy**

We may revise this Privacy Policy from time to time, in our sole discretion, and the most current version will always be posted on our website or Application (as reflected in the "Last Revised" heading). In the event of a material change to the Privacy Policy, we will notify you through the Services or via email, or you may be notified within the Application. We encourage you to review this Privacy Policy regularly for any changes. Your continued use of the Services, following the notification of such amendments, constitutes your acknowledgement and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

### **How To Contact Us**

If you have any general questions regarding the Services or the information that we collect about you and how we use it, please contact us at [privacy@stater.co](mailto:privacy@stater.co)