

# **Starflow Token Sale Privacy Policy**

Last Updated: 23 March 2018

**Please read this Privacy Policy carefully. By registering your interest to participate in the sale of STAR tokens (the “Token Sale”) through any channel or method, by accessing or using the <https://ico.starflow.com/> website (or any successor website) (the “Token Sale Site”), by communicating with Starflow Technology Pte. Ltd. and its worldwide affiliated group companies (collectively, “Starflow”, “we”, “us” or “our”) regarding the Token Sale and/or by accepting the STAR Token Sale Terms and Conditions (the “Terms”) (collectively, “Token Sale Activities”), you consent to the collection, use, sharing and other processing of your data by Starflow under this Privacy Policy. If you do not agree to this Privacy Policy, do not participate in any Token Sale Activity.**

## **1. Scope of this Privacy Policy**

### **1. This Privacy Policy explains:**

- What information we collect.
- How we use, share and otherwise process personal data.
- How we store personal data.
- Your rights and choices in respect of your personal data.
- How you can contact us if you have questions about this Privacy Policy.

### **2. This Privacy Policy applies when you participate in any Token Sale Activity.**

### **3. This Privacy Policy does not apply to the access or use of the Starflow platform or to websites, applications or other services operated by third parties. We encourage you to review the privacy policies posted on those websites, applications and other services.**

### **4. We may engage certain third-party vendors to assist us with certain Token Sale Activities. This Privacy Policy applies to your personal data collected by those vendors in connection with Token Sale Activities. However, this Privacy Policy does not apply to personal data collected by those vendors for their own purposes that is not also shared with us. For example, if you submit personal data to create an account to access a**

website operated by the vendor, that personal data will be subject to the privacy policy of the vendor and not this Privacy Policy.

5. Ethereum is a publicly accessible, decentralised blockchain platform. STAR tokens will be standard Ethereum tokens that can be viewed by anyone who knows how to inspect the Ethereum blockchain. Starflow does not control access to information on the Ethereum blockchain that may relate to your holdings of, transactions in and other activities related to STAR tokens (collectively, “**Personal Blockchain Information**”). It may be possible, through an analysis of data about you that is publicly available or that is otherwise available to persons doing the analysis, to know your Personal Blockchain Information. If you are unwilling to accept the risk of your Personal Blockchain Information possibly being known by others, you must not participate in any Token Sale Activity.

## 2. **Information We Collect**

We collect information from you in the following ways:

- *Information provided by you:* The types of information we collect from you include the following information you provide when you participate in any Token Sale Activity:
  - full name;
  - identification card/passport number;
  - photograph;
  - email address;
  - telephone number;
  - residential address;
  - citizenship;
  - date of birth;
  - occupation and employer;
  - employer address, phone number and date employed;
  - source of funds;
  - any personal information you may include in communications with the company or in social media forums operated by or on behalf of Starflow;
  - digital wallet information;
  - username and password; and

- information we collect to satisfy our obligations under applicable laws and regulations (including those relating to anti-money laundering or countering the financing of terrorism or otherwise requiring us to vet the parties we transact with) (“**Compliance Checks**”).

If you refuse to provide any of the information listed above that we identify as being required to participate in a Token Sale Activity, or other information that we may request for applicable law and compliance checks, you will be unable to participate in that Token Sale Activity.

- *Information collected automatically through your participation in any Token Sale Activity:* We automatically collect certain information regarding your participation in any Token Sale Activity, including (as applicable) your:
  - device and connection information, such as unique device identifier, operating system version, hardware model, browser type and version, mobile platform and mobile network information;
  - log information, such as internet protocol address, uniform resource locator, clickstream data, search queries and visited pages; and
  - location information.
- *Information collected through cookies or similar technologies:* Cookies are small data files stored on your computer or other device to help a website remember things about you. We use cookies and similar technologies in several ways to improve your experience of using the Token Sale Site, including for authentication and log-in purposes, to remember your preferences, to enable and support security features and to collect information to help us improve our services. You may refuse the use of cookies by selecting the appropriate settings on your browser; however please note that if you do this you may not be able to use the full functionality of the Token Sale Site or participate in any Token Sale Activity.

### **3. Use of Personal Data**

1. We may use your personal data for any and all of the following purposes:

- to register your interest in participating in the Token Sale;
- to process and complete any order you might place for STAR tokens, including to conduct Compliance Checks;
- to collect and manage the proceeds of the Token Sale;

- to contact you and send you promotional and marketing information by telephone call, SMS, fax, post and email regarding (a) the Token Sale and any future sale of STAR tokens and/or (b) the Starflow platform, STAR tokens or other Starflow events, products and services;
  - to notify you about updates or changes to this Privacy Policy or the Terms, or any aspect of the Token Sale Activities (including to inform you about any terms and conditions applicable to the Token Sale);
  - to respond to your communications to us;
  - to detect, diagnose and fix problems affecting the Token Sale Site;
  - to personalise your experience on the Token Sale Site;
  - for internal business purposes, including research, analysis, testing and auditing;
  - to comply with applicable legal obligations and other rules, regulations, codes of practice and orders and directions of competent governmental authorities that we are obligated to follow;
  - to prevent, detect, investigate and prosecute threats, fraud, misconduct or other unlawful or malicious activity;
  - to enforce our agreements and resolve disputes; and
  - to protect our rights and property and the rights, property and safety of others.
2. We may use and disclose automatically collected information (including aggregated information), which is not personal data, for any purpose, except where we are restricted by applicable law. If we combine any automatically collected information with personal data or other information which may be used to identify an individual, the combined information will be treated by us as personal data in accordance with this Privacy Policy.

#### **4. Sharing and Cross-Border Transfer of Personal Data**

##### **4.1. We share your personal data in the following ways:**

- *Our business partners, service providers, professional advisers, vendors and agents:* Your personal data may be accessible to our business partners, service providers, professional advisers, vendors and agents that provide services to us (including those that provide compliance check, Token Sale-related, data storage, maintenance, legal, audit, insurance and marketing services) in connection with the conduct of the Token Sale.
- *Our potential investors, purchasers and commercial counterparties:* We may share your personal data with any person who wishes to invest in Starflow or the Starflow platform or whom we intend to enter into a business combination with

(such as a purchase, sale, lease, merger or amalgamation, or any other acquisition, disposal or financing).

- *Governmental and regulatory authorities:* We may share your personal data with competent governmental and regulatory agencies in Singapore, Sweden or other countries, including investigating officers and judicial authorities in the relevant jurisdictions.

Any information which we share with third parties under this paragraph 4.1 shall be used for the purposes described in this Privacy Policy, including as provided in paragraph 3 (Use of Personal Data) above.

- 4.2. We may also share your personal data with other third parties if you have separately consented to such disclosure. In such case, any information which we share with such third parties shall be used for the purposes described when we obtained your consent.
- 4.3 We may share your personal data with any other person where such disclosure is required or permitted under applicable law or regulation, and we may be prevented from obtaining your consent for, or informing you of, such disclosure. Any information which we share in this circumstance shall be used for the purposes required or permitted under applicable law or regulation.
- 4.4 Your personal data may be transferred to other countries (including Sweden and Germany) for processing, and by participating in any Token Sale Activity you consent to the transfer, use and processing of your personal data to countries outside of Singapore which may have different personal data protection rules than in Singapore. However, the level of protection that will be applied to the transferred personal information will be at least comparable to the protection provided under this Privacy Policy and the Singapore Personal Data Protection Act 2012 and its regulations.

## **5. Storing Personal Data**

1. All information collected in connection with any Token Sale Activity (including information generated by cookies about your use of the Token Sale Site) will be stored electronically on the server of our service provider in Germany with appropriate safeguards and security measures. However, there is no guarantee that information stored by us or on our behalf may not be accessed, collected, used, disclosed, copied, modified or deleted by unauthorised parties by breach of any technical or operational safeguards in place. We will not be keeping physical files of any personal data.

- 5.2 No data transmitted via the Internet can be guaranteed to be wholly secure during transmission. As such, we cannot warrant the security of any information you transmit to us or which we transmit to you before its receipt and any transmission is at your own risk.
3. You are at all times responsible for your own Internet privacy settings. We are not responsible, and accept no liability, for the functionality, privacy or security measures of any other organisation or third-party websites, applications or services.

## **6. Rights Concerning Personal Data**

1. You can manage available communications preferences when you access the Token Sale Site by updating your account preferences, or, where applicable, by using the “opt-out” or unsubscribe mechanism or other means provided within the communications that you receive from us.
2. Subject to exceptions under applicable law and regulations, you may request access to your personal data that we collected in connection with any Token Sale Activity and information about how we have used and disclosed your personal data within a year before your request. Subject to exceptions under applicable law and regulations, you may also request to review and correct any of that personal data. Additional rights may also apply under applicable laws. We reserve the right to charge a nominal fee in respect of our costs in processing your request for access to personal data.
3. You may decide at any time to withdraw your consent to our use of your personal data in any manner or for a particular purpose. However, please note that any withdrawal of your consent may have consequences, including your inability to participate in any Token Sale Activity. Please also note that notwithstanding the withdrawal of your consent, we reserve the right to retain your personal data for as long as is necessary for our legal or business purposes.
4. Any request for access to or correction of personal data or any notice for withdrawal of consent to use personal data should be addressed to us according to paragraph 8 (Contacting Us) below. To protect your privacy and security, we will take reasonable steps to verify your identity before processing any access or correction request or withdrawal notice under paragraphs 6.2 and 6.3 above.

## **7. Updates to this Privacy Policy**

We reserve the right to update, modify or otherwise make changes to this Privacy Policy at any time. Any changes to this Privacy Policy will be posted to the Token Sale Site. A notification may also be sent to your email address. Any changes to this Privacy Policy will take effect and be binding on you from the time of posting the changes to the Token Sale Site. If you continue to participate in any Token Sale Activity following any changes to this Privacy Policy, you will be deemed to have accepted the changes and the updated version of this Privacy Policy. If you do not agree with the changes, please stop participating in any Token Sale Activity. Please ensure that you refer to this Privacy Policy on a regular basis to check for any changes.

## **8. Contacting Us**

If you have any comments or questions about this Privacy Policy or our processing of your information, please contact us at:

Starflow Technology Pte. Ltd.  
Email: [legal@starflow.com](mailto:legal@starflow.com)