

# PRIVACY POLICY

## 1. WHO WE ARE

The controller i.e. an entity that determines means and purposes of processing of your personal data is ST Development Limited (hereinafter “we”, “us”, “StarTerra”), a company existing and incorporated.

We are a blockchain technology company that operates a launchpad platform which enables its users to obtain tokens at early stages of development of the crypto projects.

We are devoted to protecting the privacy and personal data of all of our users and business partners. This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. We will process your data in accordance with the data protection laws of British Virgin Islands (Data Protection Act, 2021) as well as the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter “GDPR”) to the extent it is applicable to our activities.

## 2. HOW DO WE COLLECT AND PROCESS YOUR PERSONAL DATA?

Depending on how you will interact with us, we may process different categories of your personal data for different purposes. We may collect data from you directly on this website (e.g. newsletter submission) or outside this digital property (e.g. via forms, surveys, mailbox).

We may process your personal data in the following situations:

### **SELECTION FOR PUBLIC SALE OF \$STT TOKENS - archived**

If you choose to take part in the process of selection of users who take part in the public sale of \$STT tokens, we will collect personal data about you via a dedicated form available on [sweepwidget.com](https://sweepwidget.com).

We will process the following categories of personal data: your name, email address and information about your progress with regard to the tasks enlisted in the form.

## PURPOSE OF PROCESSING AND LEGAL BASIS FOR PROCESSING

We will process your data in order to select persons who will qualify for the chance to take part in the public sale of \$STT Tokens.

The legal basis for the processing of personal data is your consent. You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing which was carried out on the basis of consent before its withdrawal.

## RECIPIENTS OF YOUR PERSONAL DATA

Your data will be processed only by authorized staff. Your personal data may be processed by or shared with data processors engaged by StarTerra, i.e., IT service providers, cloud computing service providers and social media contest tool providers.

Your personal data may be processed in the EEA and may be transferred to countries from outside the European Economic Area ("third countries"), in particular the US. In case of data transfer to third countries, we will take measures to ensure the transfer is in compliance with applicable laws (such as transferring the personal data to a recipient that entered into data protection clauses referred to in article the 46(2)(c) GDPR or other measures provided by the GDPR.)

## RETENTION PERIOD

Your personal data that you provided us with via sweepwidget will be processed by us for no longer than **6 months** since the day of its collection.

## **SELECTION FOR "AIRDROP" OF \$STT TOKENS - archived**

If you choose to take part in the process of selection of users who acquire \$STT in the course of the "airdrop" distribution, we will collect personal data about you via a dedicated form available on [sweepwidget.com](https://sweepwidget.com).

We will process the following categories of personal data: your name, email address and information about your progress with regard to the tasks enlisted in the form.

## PURPOSE OF PROCESSING AND LEGAL BASIS FOR PROCESSING

We will process your data in order to select persons who will qualify for "airdrop" distribution of \$STT tokens.

The legal basis for the processing of personal data is your consent. You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing which was carried out on the basis of consent before its withdrawal.

## RECIPIENTS OF YOUR PERSONAL DATA

Your data will be processed only by authorized staff. Your personal data may be processed by or shared with data processors engaged by StarTerra, i.e., IT service providers, cloud computing service providers and social media contest tool providers.

Your personal data may be processed in the EEA and may be transferred to countries from outside the European Economic Area ("third countries"), in particular the US. In case of data transfer to third countries, we will take measures to ensure the transfer is in compliance with applicable laws (such as transferring the personal data to a recipient that entered into data protection clauses referred to in article 46(2)(c) GDPR or other measures provided by the GDPR.)

## RETENTION PERIOD

Your personal data that you provided us with via sweepwidget will be processed by us for no longer than **6 months** since the day of its collection.

## **"KNOW YOUR CUSTOMER" PROCEDURE**

In order to enable you the possibility to take part in IDO or to allow you to take part in the public sale of \$STT Token, we will need to get to know your identity to reduce the risk of fraud and other illegal intentions such as identity theft, money laundering or financing of terrorism.

We will process the following categories of personal data: your name, your image, date of birth, place of birth, place of residence, any other personal data included in the picture of your document ID, proof of residence, your terra wallet address, results of KYC procedure.

## PURPOSE OF PROCESSING AND LEGAL BASIS FOR PROCESSING

We will process your personal data in order to conduct a KYC procedure for you to reduce the risk of fraud and other illegal intentions such as identity theft, money laundering or financing of terrorism

The legal basis for the processing of personal data is your consent which you give by taking part in the IDO. You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing which was carried out on the basis of consent before its withdrawal.

## RECIPIENTS OF PERSONAL DATA

Your data will be processed only by authorized staff. Your personal data may be processed by or shared with data processors engaged by StarTerra, i.e. IT service providers, computing cloud service providers and KYC solution providers.

Your personal data may be processed in the EEA and may be transferred to countries from outside the European Economic Area ("third countries"). In case of data transfer to third countries, we will take measures to ensure the transfer is in compliance with applicable laws (such as transferring the personal data to a recipient that entered into data protection clauses referred to in article the 46(2)(c) GDPR or other measures provided by the GDPR.)

#### RETENTION PERIOD

Your data will be stored for no longer than is necessary for the above indicated purpose and/or as long as required by applicable laws (5 years)..

#### **SUBMISSION FOR OUR NEWSLETTER AND OTHER COMMERCIAL INFORMATION**

If you would like to receive commercial information from StarTerra, in particular our newsletter you may submit your email in a dedicated text input field on our website or in a dedicated form on a third party's digital property (e.g. sweepwidget).

We will process the following categories of personal data: your email.

#### PURPOSE OF PROCESSING AND LEGAL BASIS FOR PROCESSING

We will process your data for our marketing purposes i.e. to send you our commercial information and promote our platform.

The legal basis for the processing of personal data is your consent for receiving commercial information from us, in particular StarTerra newsletters. You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing which was carried out on the basis of consent before its withdrawal.

#### RECIPIENTS OF YOUR PERSONAL DATA

Your data will be processed only by authorized staff. Your personal data may be processed by or shared with data processors i.e. IT service providers, cloud computing service providers and online marketing service providers.

Your personal data may be processed in the EEA and may be transferred to countries from outside European Economic Area ("third countries"), in particular the US. In case of data transfer to third countries, we will take measures to ensure the transfer is in compliance with applicable laws (such as transferring the personal data to a recipient that entered into data protection clauses referred to in article the 46(2)(c) GDPR or other measures provided by the GDPR.)

## RETENTION PERIOD

Your data will be processed for 3 year since the day of its collection.

## 3. DATA SECURITY MEASURES

You acknowledge that no data transmission over the internet is totally secure. Accordingly, we cannot warrant the security of any information which you transmit to us. We have implemented organizational and technical measures to assure an appropriate level of security of your data to be in line with the standards laid down in Article 32 of the GDPR. We have deployed procedures regarding every aspect of data processing, and we carefully select technologies used for such processing and any data recipients.

Your data is protected against human interactions, equipment malfunctions, internal or external attacks, losses, or misuses. To maintain data integrity we have designed our systems and internal procedures to keep at all times consistency, accuracy, and trustworthiness of data over its entire life cycle. Furthermore, our information systems are developed and maintained to ensure data availability at high level, making it consistently accessible to authorized end users and applications, when and where they need it. Our systems and procedures also comply with the principles of personal data processing established by GDPR, i.e. data minimization, limited retention, purpose limitation, data accuracy, lawfulness and transparency.

We make sure that all our contractors maintain high standards in relation to data security.

You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account (for example, by logging out after you have finished accessing your account). You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use. While we seek to protect your personal data to ensure that it is kept confidential, we cannot absolutely guarantee its security. However, we do not store any passwords as an added layer of security.

Please be aware that no security measures are perfect or impenetrable and thus we cannot and do not guarantee the security of your data. While we strive to protect your Personal Data, we cannot ensure or warrant the security and privacy of your Personal Data or other content you transmit using the service, and you do so at your own risk. It is important that you maintain the security and control of your account credentials, and not share your password with anyone. In addition, we offer our users two-factor authentication which is designed to protect their account.

## **4. CHILDREN'S PRIVACY**

We do not knowingly collect or solicit any information from anyone under the age of 18. This website is not directed at children under the age of 18. In the event that we learn that we have collected personal information from a child under age 16 without verification of parental consent, we will delete that information as quickly as possible.

## **5. EXERCISING YOUR PRIVACY RIGHTS**

To the extent provided by the applicable data protection laws you have the right to:

- Right to express and withdraw your consent

If we ask for consent to process your personal data, you can always choose to give it or not. We inform you about the right to withdraw your consent before giving consent. If the processing is based on your consent, you may withdraw your consent by contacting us at [legal@starterra.io](mailto:legal@starterra.io) or in case a commercial email from us by clicking "unsubscribe" in the email you received.

- Right of access

You have the right to obtain confirmation if we process your Personal Data. If we do, you have the right to access your personal data and receive a copy of your Data.

The first copy of your personal data is free of charge. For any further copies you request, we may charge you a reasonable fee based on the administrative costs resulting from preparing this information.

- Right to rectification

You have the right to rectify and complete the personal data you provide.

- Right to erasure ("right to be forgotten")

To the extent permitted by the applicable laws you have the right to have us erase your personal data.

We will keep some of your personal data despite the demand to erase it if it's necessary for performing our legal duties or establishing, pursuing, or defending a claim.

- Right to restriction of processing

You have the right to have us restrict the processing of your personal data when one of the following applies: you contest the accuracy of your personal data; the processing

of your personal data is unlawful, and you request the restriction of its use instead of erasing it; we no longer need your personal data to process it, but you require it to establish, exercise, or defend legal claims; you object to the processing of your personal data.

- **Right to object**

You have the right to object, on grounds relating to your specific situation, at any time, to the processing of your personal data, providing that we are processing your personal data based on our legitimate interests.

Regarding the processing for legitimate interests as pointed out above, if your objection turns out to be legitimate and we don't have any other legal grounds for processing your Data, we will remove the Data you don't want us to process.

- **Right to lodge a complaint with a supervisory authority**

You have the right to lodge a complaint with a competent supervisory authority in the country you reside.

To find out more about your rights concerning processing of your personal data and how to exercise them, please contact us at: [legal@starterra.io](mailto:legal@starterra.io)

## **6. COOKIES**

On our website we do not use cookies.

## **7. PRIVACY POLICY CHANGES**

In order to develop the privacy protection, we may deem it fit or necessary to update this Privacy Policy at any time. Please follow our website where we will inform you about any material changes to our Privacy Policy.

## **8. CONTACT DETAILS**

If you have any further questions related to your privacy or you would like to get acquainted with previous version of this privacy policy, please do not hesitate to contact [legal@starterra.io](mailto:legal@starterra.io)

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