

# PRIVACY POLICY

## INTRODUCTION

Stella Source, Inc., a Delaware corporation and its subsidiaries and affiliates (“**Stella Source**”, “**us**”, “**our**”, or “**we**”), is committed to protecting your privacy. We created this Privacy Policy (the “**Policy**”) to inform you of our practices regarding the collection, use, and disclosure of your personal information when you visit our website, log into one of our platforms, or otherwise use our services (collectively the “**Services**”). Please read this Policy carefully to understand our policies and practices regarding your information and how we use and protect it.

## CHANGES TO THIS POLICY

The terms of this Policy may change, so please check it from time to time. We reserve the right to amend this Policy at our discretion and at any time. When we make changes to this Policy, we will post the updates on this website and update the Policy’s effective date.

## WHO DOES THIS PRIVACY POLICY APPLY TO?

This policy generally applies to all individuals from whom we collect personal information. If you are a resident of Canada, please click [here](#) to read our Privacy Disclosure for Residents of Canada.

## INFORMATION COLLECTION

We collect several types of information about you, including:

- **Information provided by you**, such as name, address, email address, telephone number, and other personally identifying information. For example, we collect information from you when you fill out a form on our website to contact us or when you sign up for an account.
- **Information collected automatically** as you navigate through our website. Information collected automatically may include usage details, IP address, internet browser, operating system, and/or session ID information.
- **Information provided by third parties** with whom you have shared your personal information.

## USE OF COOKIES

Cookies are small pieces of information that a website sends to your computer for record-keeping purposes. This information is stored in a file on your computer. Our Services may use first-party and third-party cookies and other tracking technologies to enhance your experience when you access the Services, such as for internal analytics purposes to determine how we can improve our Services. You may choose to set your web browser to refuse cookies, or to alert you when cookies are being sent. If you choose to refuse cookies, please note that some parts of the Services may not function properly as a result.

## HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us:

- to present our Services and their contents to you and to improve our Services (we continually strive to improve our offerings based on the information and feedback we receive from you);
- to provide you with information, products, or services that you request from us;
- to fulfill our obligations to you as a customer;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us;
- to notify you about changes to our Services or any products or services we offer or provide through them;
- to enable communications with you regarding our Services through email, text, and phone;
- to fulfill any other purpose for which you provide your information and in any other way we may describe when you provide the information; and
- for any other purpose with your consent .

## DISCLOSURE OF YOUR INFORMATION

We may disclose information that we collect about you, or that you provide us directly, as described in this Policy:

- to contractors, service providers, suppliers, and other third parties we use to support our business;
- to our affiliates and subsidiaries in furtherance of providing the Services, such as ensuring that the Services operate efficiently and for the intended purposes;
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our website users is among the assets transferred;
- to fulfill the purpose for which you provide it, for example: to process your request for a quote;
- for any other purpose disclosed by us when you provide the information;
- with your consent.

We may also disclose your personal information:

- to comply with any court order, law, or legal process, including to respond to any government, regulatory, or law enforcement request;
- to enforce or apply our [Terms of Use](#) and other agreements, including for billing and collection purposes; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Stella Source, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

We may disclose aggregated information about our users and deidentified data or information that does not identify an individual to third parties to describe how our customers use the Services.

## LINKS

Our websites may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of third-party websites. We encourage our users to be aware when they leave our website and to read the privacy statements of any other

website that collects your personal information.

## CHILDREN UNDER THE AGE OF 13

Our websites are not intended for children under 13 years of age. No one under age 13 may provide any information to or on this website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information to or on this website or through any of its features. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us in one of the ways provided in the Contact Information section, below.

## CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to this Policy on this page.

## CONTACTING US

If there are any questions regarding this Policy, you may contact us via email at: [legal@stellasource.com](mailto:legal@stellasource.com).

## ADDITIONAL PRIVACY DISCLOSURE FOR CANADA RESIDENTS

In addition to the information provided above in our Privacy Policy, we created this Privacy Disclosure for Canada Residents (the "**Disclosure**") to further describe our collection, use, and disclosure of personal information, and to inform you of your rights as they pertain to your personal information. This Disclosure applies only to residents of Canada.

We are committed to complying with the Personal Information, Protection and Electronics Documents Act ("**PIPEDA**"). This Disclosure details how we will comply with the ten founding principles of PIPEDA, including: accountability; identifying purposes; consent; limiting collection; limiting use, disclosure and retention; accuracy; safeguards; openness; individual access; and challenging compliance. Any terms defined in the PIPEDA have the same meaning when used in this Disclosure.

## CONSENT

Knowledge and consent are required for the collection, use, or disclosure of personal information except where required or permitted by law. Please note that the form of consent may vary, depending on the circumstances and type of information sought. Providing us with your personal information is always your choice. However, your decision not to provide certain information may limit our ability to provide you with our products or services. We will not require you to consent to the collection, use, or disclosure of information as a condition to the supply of a product or service, except as required to be able to supply the product or service. An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice.

## LIMITING COLLECTION

**Personal Information.** We collect factual or subjective information about identifiable individuals ("**Personal Information**"). However, the personal information collected will be limited to those details necessary for the purposes identified by us. Please note that business contact information such as an employee's name, title, business address, telephone number, or email address that is collected, used, or disclosed solely for the purposes of communicating with the person in relation to their employment or profession is not considered personal information under this Disclosure.

**Categories of Personal Information.** We have collected the following categories of personal information from our consumers within the last twelve (12) months:

- **Identifiers** such as name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or account name.
- **Commercial Information** such as records of products or services purchased, obtained, or considered.
- **Internet or other similar network activity** such as browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

## **LIMITING USE, DISCLOSURE, AND RETENTION**

Personal information may only be used or disclosed for the purpose for which it was collected unless you have otherwise consented, or when it is required or permitted by law. Personal information will only be retained for the period of time required to fulfill the purpose for which we collected it or as may be required by law.

In addition to the practices described in the [DISCLOSURE OF YOUR INFORMATION](#) section above, we may disclose information we collect about you to the following categories of third parties:

- **Our Companies** – Unless we stay otherwise in a contract with you, we may share the information you provide (such as information about your orders, enquiries, applications, or use of our websites) with Stella Source's subsidiaries (i.e., any organization or brand we own or control) for marketing, recruitment, and internal reporting purposes. We may further share the information you provide with our affiliates (e.g., organizations with whom we share a parent company) in furtherance of providing the Services.
- **Non-Personal Information** – We may share non-personal information, such as aggregated user statistics, demographic information, and usage information with third parties.

## **ACCURACY**

Personal information will be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

## **SAFEGUARDS**

Personal information will be protected by security safeguards that are appropriate to the sensitivity level of the information. We take all reasonable precautions to protect your personal information from any loss or unauthorized use, access or disclosure.

## **OPENNESS**

We will make information available to you about our policies and practices with respect to the management of your personal information.

## **INDIVIDUAL ACCESS**

Upon request, you will be informed of the existence, use, and disclosure of your personal information, and will be given access to it. You may verify the accuracy and completeness of your personal information and may request that it be amended, if appropriate. However, in certain circumstances permitted by law, we will not disclose certain information to you. For example, we may not disclose information relating to you if other individuals are referenced or if there are legal, security, or commercial proprietary restrictions.

## CHALLENGING COMPLIANCE

If you have any questions or comments about this Disclosure, the Privacy Policy, your choices and rights regarding your personal information, or if you wish to exercise your rights under Canada law, please do not hesitate to contact us at:

**Phone:** +1 (513) 448-0028

**Email:** [legal@stellasource.com](mailto:legal@stellasource.com)

**Address:** Stella Source, Inc.

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