

# Privacy Policy

This Privacy Policy (the "**Privacy Policy**" or the "**Policy**") provides our policies on the collection, storage, processing, use, and disclosure of information about users established by Startender, Inc. ("**Startender**", "**we**", "**our**" or "**us**") regarding the information that we collect through the website [startenderapp.com](http://startenderapp.com) (the "**Website**") and through the mobile application Startender (the "**Application**"), through e-mail and/or other electronic communication between you and us.

Before using the Website and the Application, you need to consent to our collection, use, and disclosure of information about you as described in this Policy.

## **Minimum Required Age.**

The Website and the Application are not intended for use by users under 14 years of age. No one under age 14 may provide any personal information through the Website and the Application. If we learn we have collected or received personal information from a user under 14, we will delete it immediately.

## **Information we collect.**

### **1. Personal information and Non-personally identifiable information defined.**

*Personal information* is any information that can be used to identify you as an individual.

*Non-personally identifiable information* - information that cannot be used to identify you as an individual, such as personal interests, dietary requirements, special requests and others.

We collect both personal and non-personally identifiable information through the Website and the Application.

**2. Account information.** In order to create an account, you will be asked to provide personal information, such as your first and last name (optional), your e-mail address and a personal photograph. If you choose to use Facebook or Instagram to log into our Website or Application, we will have access to and may collect information that you have provided on your Facebook and Instagram accounts. Upon your account creation you will be prompted to create a screen name, which depending on the name, may or may not be used to identify you as an individual. Professionals will also provide place of work, including location.

**3. Transactions.** While you use/ navigate through our Website and Application, we may automatically collect certain information about your equipment, browsing actions and patterns, including but not limited to: details of your visits to our Website and Application, including traffic data, location data, logs and other; your search queries; communication data; information about your device and internet connection, including your IP address and location, operating system and browser type.

**4. Publicly available content.** Some of the contributions you submit to our Website and Application, are intended for public use and are therefore viewable by the public, this may include your photos (if you have provided such), leaderboards, ratings, reviews, tips, lists, promotions, business listing information, etc. You may limit the public nature of some of these activities through your account settings, however you will not be able to completely remove them.

**5. Contacts.** Our Website and Application allow users (service providers) to invite others to join or become their

followers on Startender by providing their contact information, or by allowing users to access their contacts details, photos, location, business establishment, etc. If you allow us to access your contacts, we may transmit that information to our servers long enough to process your invitations.

6. **Activity.** While you use the services provide by our Website and Application, we may store information about your use of our services, such as your search activity, the pages you view, the date and time of your visit, businesses you call using our mobile applications, and reservations, purchases, or transactions you make through the Service. We may also store information that your computer or mobile device may provide to us in connection with your use of our services, WiFi information such as SSID, mobile carrier, phone number and unique device identifier.

### **Cookies and other tracking technologies**

We do not use cookies and tracking technologies and we do not collect any data from you through cookies and tracking technologies.

### **How we collect your personal information.**

Startender collects information upon your subscription to our services and also when you interact with us electronically or in person, when you access and use our Website and Application and when we provide our services to you.

### **Why we collect and process your personal information.**

We collect your personal information based on your explicit consent you have provided for the processing of you personal data and for the purpose of providing you with our services.

Additionally when you buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us. In order to carry out our obligations under that contract we must process the information you give us. We process this information on the basis the contract between us. We will continue to processing this information until the contract between us ends or is terminated by either party. We may also process person information where such processing is in our legitimate interests and is not overridden by your data protection interests or fundamental rights and freedoms.

### **How we use your information**

(1) We will use your personal information:

- to respond to your queries;
- to provide you with our services and products;
- to administer your account with us;
- to notify you about changes to our Website and Application, including this privacy policy, our Terms of Service;
- to evaluate and improve the quality of our services;
- to detect and prevent fraud and investigate, or identify possible wrongdoing;

(2) We will use the non-personally identifiable information:

- to customize our services for you and to personalize and improve your experience with our Application and Website.
- to analyze and understand how the visitors use the Website and the Application and estimate their usage patterns.
- to recognize the visitors when they return to our Website;

### **How long we keep your information.**

We will retain your personal information for as long as you use our Website and Application. You have the right to request that your personal information is permanently removed from our system and database at any time. We will accommodate such requests within 5 (five) days.

### **Information Sharing**

We do not share personal information collected via this Website with other companies or individuals. We may disclose personal and non-personally identifiable information with third parties service providers, engaged by us to provide technical support, hosting services, testing, network security or statistical services, any such disclosure will be subject to confidentiality obligations.

We reserve the right to disclose information from or about you if we have a good faith belief that such investigation or disclosure: (a) is reasonably necessary to comply with legal processes and law enforcement instructions and orders, such as a search warrant, subpoena, statute, judicial proceeding, or other legal process or law enforcement requests served on us; (b) is helpful to prevent, investigate, or identify possible wrongdoing in connection with the Website and the Application and the services we provide; or (c) protects our rights, reputation, property, or that of our users, affiliates, or the public. If you complain to us about content submitted through the Website or the Application, we may share the substance of your complaint with the contributor of that content in order to provide an opportunity for the contributor to respond.

### **Security**

We take reasonable measures and precautions designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on our secure servers behind firewalls. We restrict access to personal information to employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination, if they fail to meet these obligations. However, we are unable to guarantee that the security measures we take will not be penetrated or compromised or that your information will remain secure under all circumstances.

In addition we use google firebase to store our data and subsequently implement all security features provided by firebase such as encryption of data and security practices such as restricting the access to personal data to employees who have a business purpose to use the personal data.

The safety and security of your information also depends on you. If you have a password for access to certain parts of our Website or Application, you are responsible for keeping this password confidential and not sharing it with anyone. We urge you to be careful about giving out information in public areas of the Website and Application like message boards. The information you share in public areas may be viewed by other users of Startender.

Although we do our best to protect your personal information, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk.

### **Right to Access and Control Your Data**

We provide you with many choices about the collection, use and sharing of your data, from deleting or

correcting data you include in your profile and controlling the visibility of your posts and communication controls. We will provide you with access to your personal information that we store and allow you to:

- 1) Delete your data - you can request that we erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Services to you);
- 2) Change or correct your data - you have the option to edit some of your personal data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate;
- 3) Object to, or limit or restrict, use of data - you can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held);
- 4) Right to access and/or take your data - you can ask us for a copy of your personal data and can ask for a copy of personal data you provided in machine readable form.

You may send us an e-mail at [hey@startenderapp.com](mailto:hey@startenderapp.com) to request any or all of the above.

### **California Resident's Privacy Rights**

California Civil Code Section § 1798.83 permits the users of this Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [hey@startenderapp.com](mailto:hey@startenderapp.com) or write us at: Startender, Inc., 30 Mission Street, # 8H, San Francisco, CA, 94105, United States

### **Linking to other websites and services**

Our Website may provide links to other websites and services. Please be aware that if you access a website or a service through a link we provide, you will be subject to the privacy policy of that site and we will not be responsible for the practices and policies adopted by those websites and services and we do not endorse their products and services.

### **International Users**

Startender is a U.S. company and all information that we collect is hosted in the United States. If you access the Website from the European Union, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure that differ from the United States laws, please be advised that through your continued use of the Website or our services, you may be transferring your personal information to the United States and you consent to that transfer. Additionally, you understand that your personal information may be processed in countries (including the United States) where laws regarding processing personal information may be less stringent than the data protection laws in your country. We will protect your personal information according to the terms of this Privacy Policy, regardless of where it is collected, processed and stored.

### **Changes to this Privacy Policy**

Please note that this privacy policy may change from time to time. We will keep you informed of any amendments that we make to this privacy policy. We will post any changes that we make to our privacy policy on the Website home page with a notice that the privacy policy has been updated.

If we make material changes to how we treat our users' personal information, we will notify you by e-mail to the

primary e-mail address specified in your account and/or through a notice on the website home page. It is your responsibility to provide us with an up-to-date e-mail address for you, and for periodically visiting our website and this privacy policy to check for any changes.

#### **Contact information**

If you have any additional questions or concerns about this privacy policy, please feel free to contact us any time through this Website or by writing to us at the following address:

Startender, Inc.

30 Mission Street, # 8H,

San Francisco, CA, 94105

United States

Last Updated: July 9, 2019