

Privacy Policy

Effective October 18, 2019

Our Commitment to Privacy

Please carefully read the Privacy Policy (the “**Privacy Policy**”) as they apply to the website owned, operated and controlled by Brighter Financial, Inc., doing business as Starship (“**Starship**”), at [www.starshiphsa.com] (the “**Website**”). The Privacy Policy also applies to Your use of the mobile application [Starship] (the “**Application**”) and the account management, savings, investment, and other services (collectively, “**Services**”) provided through the Website or Application. Other capitalized terms not defined in this Privacy Policy will have the meanings given to them in the Starship Terms of Use.

This Privacy Policy identifies and describes the types of personally identifiable information we may collect from or about You when You visit the Website or the Application, how we use and safeguard this information, and when we share this information with companies or individuals outside of Starship (“**Third Parties**”). This Privacy Policy is designed to assist You in making informed decisions when using the Website or the Application.

1. Your Consent

By visiting and using the Website or the Application or registering for a Starship Account or Service, You consent to our collection and use of Your personal information as described in this Privacy Policy. Please read this Privacy Policy in its entirety. We reserve the right to modify, alter, or otherwise update this Privacy Policy at any time to address changing legal obligations, technologies, business practices and our Users’ needs, and we encourage You to check back periodically so that You are always aware of the most current policies and practices that Starship has in place to protect Your personally identifiable information.

2. What Information Do We Collect?

When You visit the Website or the Application, You may provide us with two types of information: personal information You knowingly choose to disclose that is collected on an individual basis, and Website or Application use information that is aggregated as You and others use the Website or the Application.

Neither the Website nor the Application are designed for or directed at children under 18 years of age, and all Users of the Website or the Application are required to be at least 18 years old. It is Starship’s policy never to knowingly collect or maintain personally-identifiable information about anyone under the age of 13.

3. Personal Information You Choose to Provide

Account Information. When You subscribe to a Starship Service or Account, or purchase any other products or services from us or our partners, You may need to give personal information necessary to establish Your account and provide the Service and to authorize us to obtain information from various credit services in order to maintain Your account. For example, You may need to provide the following information:

- Email
- First name
- Last name
- Phone number
- Social security number

- Citizenship
- Date of birth
- Gender
- Home address
- Mailing address
- Linked bank account
- Annual income
- Total net worth
- Liquid net worth
- Health insurance plan
- Health plan status
- Health plan start date

In all instances, Starship will use commercially-reasonable and appropriate methods to protect this information from unlawful disclosure, unauthorized access, or other breaches of confidentiality.

Service Profile Information. Some of Starship’s Services may provide You the option of customizing Your use of the Services. If You choose to take advantage of these features, it may be necessary to provide additional information necessary for the Service to provide the content according to Your preferences. These preferences will not be shared with third parties.

Correspondence with Starship. If You choose to correspond further with us via email, online chat, or telephone we may retain the content of Your email messages (including your email address), your online chat, or a recording of your telephone call together with our responses.

4. Website and Application Use Information; Use of Cookies and other Use-Tracking Devices

We automatically collect Website and Application usage information from You when You visit our Website or Application. Similar to other commercial websites and applications, our Website uses “cookies”, “web beacons”, and web server logs and Web Traffic Analytic Services to collect information about how our Website is used. The information gathered may include the date and time of visits and page views. We collect specific data about User use of our Services, including the pages accessed by the User and when they are accessed. This information is collected to ensure individual and corporate compliance with the Starship Terms of Use, and to allow You to customize Your use of the Website and Application. We may collect information about specific searches with the intention of identifying what features of the Website and Application are frequently accessed but do not correlate it to a specific individual. This ensures we can continue to develop our Website to meet the needs of our Users. In addition, we do not track the websites visited by an individual just before our Website or Application but may track a link to an external website referenced in our Services to better understand our Users’ interests. The usage information we collect may be compiled into aggregated usage information to manage and improve the Website and Application.

Our Website and Application do not respond to “do not track” signals or similar mechanisms that may be provided by web browsers or otherwise. We may also permit third parties to collect aggregate usage information regarding Your activities on our Website and Application, and those third parties may also not respond to “do not track” signals.

5. Use of Cookies

Some pages of our Website, and some features of our Application, use cookies. A cookie is a small file containing a string of characters that is sent to Your computer or device when You visit a website or use an application. When You visit the website again, the cookie allows that site to recognize Your browser. Cookies may store user preferences and other information. You can reset Your browser to refuse all cookies or to indicate when a cookie is being sent. However, some Website or Application features or functionality may not function properly without cookies. By using the Website or Application You consent to our use of cookies as explained in this Privacy Policy. We recommend that when You complete Your online transactions, You log off completely before visiting other websites or using other applications and/or restart Your personal computer or mobile device. This may clear Your cookies. We also

recommend that You do not visit other websites or use other applications during Your online session with us.

- Most of our cookies are necessary for the operation of the Website or Application—or a Service that You request as a User of the Website or Application—such as to remember login information, or text You may have entered when You navigate back to a page in the same session. We also use cookies to provide optional features and functionality that You may access on the Website or Application. We use cookies to customize and personalize the Website and Application based on preferences You may have expressed either directly by selecting an option or setting or indirectly by Your prior use. We also use cookies that collect information about how You use the Website and Application to analyze and optimize the performance of the Website and Application in order to give You a better User experience. In some cases, particularly with respect to measuring and analyzing performance of the Website and Application, cookies may be placed by our Third Party service providers.
- We and our Third Party partners may also employ web beacons, also known as clear GIFs or pixel tags, to help better manage content on the Website. Web beacons are tiny, clear graphics that are embedded invisibly on web pages. They are used to understand and monitor online movements of Users so that we may better understand and improve their experiences on the Website. In contrast to cookies, which are stored on a User's computer hard drive, web beacons are not stored on a User's computer or device.
- We may partner with a Third Party ad network to manage our advertising on other sites. Our ad network partner may use cookies, scripts, web beacons, or other technology to collect information about Your activities on the Website and the Application, as well as on other websites, to provide You targeted advertising based upon Your interests.
- We may analyze and share information collected through cookies with third parties, such as Starship's affiliates, business partners, service providers, and in marketing materials.
- Most web browsers automatically accept cookies but, if You prefer, You may take certain steps to control the use of cookies by modifying Your browser to reject cookies or to notify You whenever a cookie is sent to Your hard drive. You can learn more about cookies and ways to manage them at <http://www.allaboutcookies.org/>. Please be aware that restricting cookies on the Website or the Application may impair the functionality and performance of the Website or the Application.

6. How Do We Use the Information That You Provide to Us?

Broadly speaking, we use personal information for purposes of administering our business activities, providing customer service and making available other products and services to our customers and prospective customers. Our uses of personal information may include the following:

- To enable us to process, validate, verify and deliver Services that You have ordered.
- To allow us or You to personalize the Services that You obtain based on personal characteristics or preferences.
- To provide Service Notices to You about important changes to the Website or the Application.
- To provide information about new or existing products, services or special offers from us or from other companies we believe will be of interest to You or otherwise to contact You.
- To improve Starship's Services.
- To monitor Your compliance with the terms of the Starship Terms of Use. For example, we automatically collect IP address information from You when You visit our Website, and we may use this information to monitor Your compliance with the restrictions in our Terms of Use regarding sharing access to Services.
- To comply with the law.

7. Do We Disclose Information to Outside Parties?

Starship only shares personal information with third parties in the following limited circumstances:

- We have Your consent for a specific purpose, such as to establish an account or process a transaction.
- You have registered to participate in an event where we are an organizer in conjunction with a partner or a Third Party event manager.
- We provide such information to our subsidiaries, affiliated companies, or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
- If Starship becomes involved in a merger, acquisition or any form of sale of a substantial portion of its assets, we will provide notice before Your personal information is transferred and becomes subject to a different privacy policy.
- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce the terms or conditions of the Starship Terms of Use including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of Starship, its customers or the public as required or permitted by applicable law.

Your personal information is not otherwise sold or traded or distributed outside of Starship.

8. Sharing Information with Strategic Partners

We may enter into strategic alliances or partnerships with third parties for the purposes of jointly providing additional services. To do so, it may be necessary to share with such third parties limited personal information such as Your name, address, telephone number, and email addresses for the purpose of providing You information regarding such products and services. If You choose to provide personal information or consent to the use of existing personal information for the purposes of subscribing to such additional products or services, both we and our partner may share ownership of this personal information. In any case, we will require that the privacy policies of such partners provide substantially similar protections to those provided by Starship.

9. Third Party and Corporate Subscriptions

If Your access to Starship's Services is provided by Your employer or a Third Party, Your employer or that Third Party may provide us with limited amounts of personal information about You to enable Your access to the Services. In addition, Your employer or the Third Party may require us to provide information about Your access to the Services, for example to verify that You are using the Services they have purchased on Your behalf. In addition, we may be required to provide Your employer or Third Party with personally identifiable information in order to enforce compliance with the Starship Terms of Use.

10. Choice/Opt Out

Starship offers You the choices and means to limit use and disclosure of Your personally identifiable information. As such, You will be provided with an opportunity to opt-out of the following situations: (a) having Your personally identifiable information disclosed to third parties, other than to the extent legally required or as needed to provide the Services for which You have subscribed or to enable You to attend the events for which You have registered, (b) having Your personally identifiable information used by us for a purpose which is incompatible with the purpose for which it was originally collected or subsequently authorized by You, (c) having Your personally identifiable information shared, sold to third

parties, or used or transferred in other ways, (d) having complementary goods and services marketed to You.

Starship will provide You with a clear, conspicuous, readily available mechanism to exercise this choice. We will take all reasonable steps to honor Your request. You may exercise this opt out choice by contacting us support@starshiphsa.com or in writing enumerating Your opt out choices to Starship, 54 King Street, New York, NY 10014.

If You choose to limit the use and disclosure of Your personally identifiable information, Starship may not be able to:

- Provide service notices regarding Website or Application changes, new or existing products, services, special offers, or otherwise contact You.
- Share Your information for participation in an event with a partner or Third Party manager.

11. Children's Privacy Online

We do not knowingly solicit, collect or use personal information from children under 13. For information concerning the Children's Online Privacy Protection Act ("COPPA"), visit the Federal Trade Commission's website at www.ftc.gov.

12. Transfer to U.S. or Other Countries

Your information may be stored and processed in the United States or any other country where Starship has facilities, and by subscribing to our Services You consent to the transfer of information outside of the United States.

If Starship becomes involved in a merger, acquisition or any form of sale of a substantial portion of its assets, we will provide notice before personal information is transferred and becomes subject to a different privacy policy.

13. Your Disclosures to Third Parties

From time to time Starship's Services, Website, or Application may publish notices about events conducted by third parties. In addition, we may offer to our customers and prospective customers products and services of other companies we believe may be of interest to You. We cannot make any representations about the practices, policies, publications, or services of these third parties, however, and Your use of such parties' offers are Your own responsibility and are not covered by this Privacy Policy.

In addition, we are not responsible for the practices employed by websites linked to or from our Website or Application nor the information or content contained therein. Often links to other websites are provided solely as pointers to information on topics that may be useful to the Users of our Website or Application.

Please remember that when You use a link to go from our Website or Application to another website, this Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including websites that have a link to our Website, is subject to that website's own rules and policies regarding personally identifiable information, tracking, and privacy. Please read those rules and policies before proceeding.

14. How Do We Secure Information Transmissions?

Other email that You may send to us may not be secure unless we advise You that security measures will be in place prior to Your transmitting the information. For that reason, we ask that You do not send

confidential information such as Social Security or credit card account numbers to us through an unsecured email.

15. How Do We Protect Your Information?

Information Security. Personal information and User-specific settings and preferences are stored using commercially standard database and website security software. User passwords and other sensitive User information are saved in encrypted form to prevent unauthorized access or disclosure and accidental loss, alteration, or destruction.

Evaluation of Information Protection Practices. Periodically, our operations and business practices are reviewed for compliance with corporate policies and procedures governing the security, confidentiality, and quality of our information.

Employee Access, Training and Expectations. Our employees are required to protect confidential Third Party information in general as a condition of employment at Starship, and our business practices limit the use and disclosure of such information, including personal information, to authorized persons, processes, and transactions.

16. Providing, Correcting and Updating Your Information

When You order a Service, we ask You to provide personal information. If You decline to submit this personal information, Starship will not be able to provide those Services to You.

This personal information will be used only for the purposes described in this Privacy Policy unless we have obtained Your prior consent.

You may modify Your Password at any time by going to the Forgot Password page from the Login page on the Starship Website or Application. This password is stored in encrypted format so that no one else can change it or use it.

You may contact Starship Support at support@starshiphsa.com to notify Starship of changes to Your personal information, to review and correct Your personal data if they are inaccurate, or to delete such data if it is not otherwise required to be retained by law or for some legitimate business purpose.

To process Your requests, we may ask You to provide such identification as we deem necessary to protect Your personal information from unauthorized access. Also, we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for example, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge during normal business hours of our headquarters corporate office, except if doing so would require a disproportionate effort.

If You have any questions about this Privacy Policy, or concerns about the use of Your personal information, please direct Your inquiry to support@starshiphsa.com.

17. Modifications to this Policy

Starship reserves the right to add, modify, update, or amend this Privacy Policy at any time, simply by posting such addition, modification, update, or amendment on the Website or Application. Any such addition, modification, update, or amendment will be effective immediately upon posting on the Website or Application. Please check the Privacy Policy when You use our Website or Application to ensure that You are aware of any changes in our privacy practices. Our Privacy Policy will always indicate the date it was last updated. Your use of any portion of our Website or Application after any changes will constitute Your consent to and acceptance of such changes.

California Privacy Statement and Other California Law Provisions

This California Privacy Statement is for California Residents only and supplements the Privacy Notice above. This policy is provided to comply with the California Consumer Privacy Act (CCPA). This policy describes the personal information that the Company (“we,” “our,” or “us”) collects in the course of its business, explains how this information is shared, disclosed, and sold, describes rights provided by the CCPA to California Residents (“consumers” or “You”) regarding their personal information, and explains how consumers can exercise those rights.

California Residents include every individual who is in California for other than a temporary or transitory purpose, and every individual who is domiciled in California but who is outside of California for a temporary or transitory purpose.

18. Information We Collect

We may collect information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with You or Your household (“personal information”). “Personal information” does not include publicly available information, de-identified or aggregate consumer information, and information exempted from the CCPA, such as information covered by or collected under certain industry-specific laws including the Health Insurance Portability and Accountability Act of 1996, the California Confidentiality of Medical Information Act, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994.

The CCPA requires us to disclose certain information regarding our collection, sale, and sharing of personal information. The following table outlines the categories of personal information that we have collected about consumers in the last 12 months, whether we have sold this personal information in the last 12 months, and whether we have shared the personal information for a business purpose in the last 12 months.

Categories of Personal Information	Examples of Specific Pieces of Personal Information Included Within This Category	Have We Collected This Personal Information in the Last 12 Months?	Have We Sold This Personal Information in the Last 12 Months?	Have We Shared This Personal Information for a Business Purpose in the Last 12 Months?
Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes	No	Yes
Personal information described in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any	Yes	No	Yes

	other financial information, medical information, or health insurance information.			
Characteristics of Protected Classification under California or Federal Law.	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes	No	Yes
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes	No	No
Biometric information.	Genetic, physiological, biological, or behavioral characteristics that can be used, singly or in combination with each other or with other identifying data, to establish Your identity, including deoxyribonucleic acid (DNA), fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No	No	No
Internet or other similar network activity.	Browsing history, search history, or information on a consumer's interaction with a website, application, or advertisement.	Yes	No	No
Geolocation data.	Physical location or movements.	Yes	No	No
Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No	No	No
Professional or employment-related information.	Current or past job history or performance evaluations.	Yes	No	Yes
Non-public education	Education records directly related to a student	No	No	No

information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)).	maintained by an educational institution or party acting on its behalf, such as report cards, transcripts, class lists, student schedules, student identification codes, student financial information, and student disciplinary records.			
Inferences drawn from other personal information.	Information, data, assumptions, or conclusions derived from facts, evidence, or another source of information or data reflecting Your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	Yes	No	No

19. How We Collect Your Personal Information

We may obtain Your personal information in the following ways:

- Personal Information You Provide Us Directly.** When You subscribe to a Starship Service or Account, or purchase any other products or services from us or our partners, You may need to give personal information necessary to establish Your account and provide the Service and to authorize us to obtain information from various credit services in order to collect Your payment. We collect and may retain personal information (such as Your first and last name, telephone number, mailing address, email address, date of birth, and other general information) that You voluntarily provide us through Your interaction with us by phone, by mail, by e-mail, by fax, at our offices, and through our Website or Application in order to provide You with the service(s) we offer, and to operate and maintain Your account, or products or service provided (e.g., when You call us or visit our Website or Application with questions, when You open an account or engage in transactions).
- Personal Information We Receive From You When You Visit Our Website or Application.** When You visit our Website or Application, we collect personal information on the efficiency and working of our site (e.g., cookies, IP addresses). Similar to other commercial websites, our Website uses “cookies”, “web beacons”, and web server logs and Web Traffic Analytic Services to collect information about how our Website is used. The information gathered may include the date and time of visits and page views. We collect specific data about User use of our Services, including the pages accessed by UserID and when they are accessed. This information is collected to ensure individual and corporate compliance with the Starship Terms of Use, and to allow You to customize Your use of the Website or Application. We may collect information about specific searches with the intention of identifying what features of the Website are frequently accessed but do not correlate it to a specific individual. This ensures we can continue to develop our Website to meet the needs of our Users.
- Personal Information We Receive Directly Or Indirectly From Other Parties.** We also collect Your personal information directly or indirectly from others, such as consumer reporting agencies (credit and debit bureaus), affiliates, agents, or other companies.

20. How We Use Your Personal Information

We may use or disclose the personal information we collect for one or more of the following business or commercial purposes:

- To fulfill or meet the reason for which the personal information was provided. For example, if You have provided personal information to us in order to open an HSA or investment account, we will use that information to determine if You qualify for an account and, if so, to open such an account.
- To provide You with information, products, or services that You request from us.
- Performing services such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- For short-term, transient use.
- Internal research for technological development and demonstration.
- Verification, maintenance, or improvement of the quality of our services and devices.
- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- If the personal information is part of a merger, acquisition, bankruptcy, or other transaction where a Third Party assumes control of us, the information will be shared as permitted by the CCPA.
- To advance our commercial or economic interest not otherwise identified above.

The CCPA also does not restrict our ability to:

- Comply with federal, state, or local laws.
- Comply with civil, criminal, or regulatory inquiries, investigations, subpoenas, or summonses by federal, state, or local authorities.
- Cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or Third Party reasonably and in good faith believes may violate federal, state, or local law.
- Exercise or defend legal claims.
- Collect, use, retain, sell, or disclose deidentified consumer information or aggregate consumer information.
- Collect or sell Your personal information if every aspect of that commercial conduct takes place wholly outside of California. "Commercial conduct takes place wholly outside of California" if we collect Your personal information while You are outside of California, no part of the sale of Your personal information occurs in California, and no personal information collected while You are in California is sold. Notwithstanding, we are not permitted to store, including on a device, Your personal information when You are in California and then collect that personal information when You and the stored personal information are outside of California.

21. When We Use and Share Your Information

We may disclose Your personal information with third parties in order to carry out specific business purposes. In the preceding 12 months, we have disclosed consumers' personal information for business purposes to the following categories of third parties:

- Our subsidiaries and affiliates.

- Our contractors, service providers, and other third parties we use to enable us to process, validate, verify and deliver Services that consumers have ordered and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- If You provide Your consent for a specific purpose, such as to establish an account using a credit card.
- For our events where individuals have registered to participate and where we are an organizer in conjunction with a partner or a third party event manager, information has been disclosed to these partners or event managers who have been directed to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- We may enter into strategic alliances or partnerships with third parties for the purposes of jointly providing additional services. To do so, it may be necessary to share with such third parties limited personal information such as Your name, address, telephone number and email addresses for the purpose of providing You information regarding such products and services. If You choose to provide personal information or consent to the use of existing personal information for the purposes of subscribing to such additional products or services, both we and our partner may share ownership of this personal information. In any case, we will require that the privacy policies of such partners provide substantially similar protections to those provided by Starship.
- If Your access to our Services is provided by Your employer or a third party, Your employer or the third party may require us to provide information about Your access to the Services, for example to verify that You are using the Services they have purchased on Your behalf. In addition, we may be required to provide Your employer or third party with personally identifiable information in order to enforce compliance with the Starship Terms of Use.
- 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 or Application users is among the assets transferred.

We may also sell Your personal information to a third party. As explained further below, You have the right to opt out of the sale of Your personal information at any time by submitting a verifiable request to us.

In the preceding twelve (12) months, we have not sold any personal information.

22. Your Rights under the CCPA

The CCPA provides You with certain rights, described below, with respect to the collection, sale, retention, and disclosure of Your personal information.

The Right to Access Information.

You have the right to request that we provide You with certain information about the personal information we collect about You as well as the categories and specific pieces of information that we have collected about You in the 12 months preceding Your verifiable consumer request. Specifically, You have the right to request the following information:

- The categories of personal information we have collected about You.
- The categories of sources from which we have collected personal information about You.
- Our business or commercial purpose for collecting or selling Your personal information.
- The categories of third parties with whom we share Your personal information.
- The specific pieces of personal information we collected about You.
- If we disclosed Your personal information for a business purpose:
 - The categories of personal information that we collected about You;
 - The categories of personal information that we disclosed about You for a business purpose; and

- The categories of third parties to whom Your personal information was disclosed for a business purpose, and which category of personal information was disclosed to that third party.
- If we sold Your personal information:
 - The categories of personal information that we collected about You;
 - The categories of Your personal information that we have sold about You by referencing the category; and
 - The categories of third parties to whom we have sold the information, and which category of personal information was sold to that third party.

Once we receive and confirm Your verifiable consumer request, we will disclose the requested information to You.

When You request information, we will provide the information requested in a format that is readily useable and that will allow You to transmit the information from one entity to another entity without hindrance. If You request access to the categories and specific personal information that we have collected about You, we will provide Your personal information in a format that is portable, readily usable, and that will allow You to transmit the information to another entity without hindrance (Data Portability request).

This right does not require us to retain any personal information collected from You for a single, one-time transaction, if we do not sell or retain the personal information, or to reidentify or otherwise link information that is not maintained in a manner that would be considered personal information.

The Right to Deletion.

You have the right to request that we delete any personal information that we have collected from You. Once we receive and confirm Your verifiable consumer request, if we determine that we must comply with a deletion request and delete Your personal information from our records, we will also direct any service providers we work with to also delete Your personal information from their records.

However, we may deny Your deletion request if we or our service providers need Your personal information to:

- Complete the transaction for which we collected Your personal information, provide a good or service You have requested or that is reasonably anticipated within the context of our ongoing business relationship with You, or otherwise perform our contract with You.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Cal. Penal Code § 1546 *et seq.*
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the personal information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
- To enable solely internal uses that reasonably align with Your expectations based on Your relationship with us.
- Comply with a legal obligation.
- Otherwise use Your personal information, internally, in a lawful manner that is compatible with the context in which You provided us with the information.

23. How to Exercise Your CCPA Rights

Making a Request

To exercise Your Right to Access or Right to Deletion, or to make a Data Portability request, please submit a verifiable consumer request to us by either:

- Calling us at (415) 662-0381
- Contact us at support@starshiphsa.com

Only You (or a natural person or a person registered with the California Secretary of State that You authorize to act on Your behalf and that we can reasonably verify) may make a verifiable consumer request for Your personal information. You may also make a verifiable consumer request on behalf of Your minor child.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify You are the person about whom we collected personal information or an authorized representative. We will use any personal information collected from You in connection with our verification of Your request solely for purposes of verification.
- Describe Your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to Your request or provide You with personal information if we cannot verify Your identity or Your authority to make the request on behalf of another person. Making a verifiable consumer request does not require You to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Please note that we will only respond to a verifiable consumer request for access or data for personal information twice (2) within a 12-month period.

When and How You Will Receive a Response

Once we receive a consumer request, we will promptly take steps to determine whether the request is a verifiable consumer request, and disclose and deliver the requested personal information. Our goal is to respond to Your verifiable consumer request within 45 days of receiving it. However, in the event that we need more time (up to 90 days) to respond to Your request, we will inform You of the need for an extension in writing along with the reasons for the extension. If You have an account with us, we will deliver Your requested personal information to that account. If You do not have an account with us, You are not required to create an account with us to make a verifiable consumer request and we will deliver the requested personal information by mail or electronically, at Your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt.

When You request information, we will provide the information requested in a format that is readily useable and that will allow You to transmit the information from one entity to another entity without hindrance. If You request access to the categories and specific personal information that we have collected about You, we will provide Your personal information in a format that is portable, readily usable, and that will allow You to transmit the information to another entity without hindrance (Data Portability request).

If we are unable to comply with a given request, we will provide You with a response within 45 days (or if more time is needed, up to 90 days) explaining why we have not taken action on Your request and identifying any rights You may have to appeal the decision.

Cost to You

We will not charge You to process or respond to Your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell You why we made that decision and provide You with a cost estimate before completing Your request.

24. Non-Discrimination

We will not discriminate against You for exercising any of Your CCPA rights. For example, unless otherwise permitted by the CCPA, we will not:

- Deny You goods or services.
- Charge You different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide You with a different level or quality of goods or services.
- Suggest that You will receive a different price or rate for goods or services or a different level or quality of goods or services.

25. Changes to Our California Privacy Statement

We are required by law to update this California Privacy Statement at least once each year. We will notify You by email or through a notice on our Website homepage when we make changes to this privacy notice.

26. Contact Information

If You have any questions regarding our California Privacy Statement, the ways in which we collect, use, and sell Your personal information, or how to exercise Your rights under the CCPA, please do not hesitate to contact us at:

Phone: (415) 662-0381

Website: <https://www.starshiphsa.com>

Email: support@starshiphsa.com

Postal Address: Starship, 54 King Street, New York, NY 10014, Attn: Privacy.

27. Additional California Privacy Rights

California Civil Code Section 1798.83 permits users who are California residents to request and obtain from us once a year, free of charge, a list of the names and addresses of all of the third parties to whom we disclosed personal information (if any) for direct marketing purposes during the preceding calendar year. If applicable, this information would include the categories of personal information shared with those third parties. If You are a California resident and wish to make such a request, You may contact us by sending us an email at support@starshiphsa.com or write to us at Starship, 54 King Street, New York, NY 10014, Attn: Privacy.