

Website Privacy Notice

1 Background

Last updated: March 18, 2024.

This notice tells you how we look after your personal data when you visit our website at www.stellarone.biz (Website) or where you engage us to provide services, where you are a prospective customer of our business, or where you are another type of business contact, such as a supplier or service provider to our business.

This notice sets out what information we collect about you, what we use it for and whom we share it with. It also explains your rights and what to do if you have any concerns about your personal data.

We may sometimes need to update this notice, to reflect any changes to the way the Goods and Services are provided or to comply with new business practices or legal requirements. You should check this Privacy Notice to see whether any changes have occurred.

2 Who we are and other important information

We are StellarOne Ltd, registered in England and Wales with company number 12149495 whose registered address is 124 City Road, London, EC1V 2NX (we / us /our). We are the controller of your information, which means we decide what information we collect and how it is used. We are registered with the Information Commissioner's Office (ICO), the UK regulator for data protection matters, under number ZB112551.

3 Contact details

If you have any questions about this privacy notice or the way that we use information, please get in touch using the following details:

Email address: info@stellarone.biz

Postal address: StellarOne Ltd, 124 City Road, London, EC1V 2NX

4 The information we collect about you

Personal data means any information which does (or could be used to) identify a living person. We have grouped together the types of personal data that we collect and where we receive it from below:

Type of Personal Data:

- Identity Data – your first and last name or title.
- Contact Data – your email address, telephone numbers, home address, business address
- Financial Data – where you provide this to us for any purpose including where you engage us to provide services.
- Location Data – your device location if you log into our systems remotely.
- Feedback – information and responses you provide when completing surveys and questionnaires

- Photo and Image Data – profile picture, images, videos and audio.
- Marketing and Communication Data - includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Technical Data - internet protocol (IP) address, browser type and version, time zone setting and generic location, browser plug-in types and versions, operating system and platform on the devices you use to access our systems
- Usage Data - information about how you use our Website and other technical systems

5 How we use your information

We are required to identify a legal justification (also known as a lawful basis) for collecting and using your personal data. There are six legal justifications which organisations can rely on. The most relevant of these to us are where we use your personal data to:

- fulfil our contract with you
- pursue our legitimate interests (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (e.g. your right to privacy)
- comply with a legal obligation that we have
- do something for which you have given your consent

The table below sets out the lawful basis we rely on when we use your personal data. If we intend to use your personal data for a new reason that is not listed in the table, we will update our privacy notice.

Lawful Basis	Purpose for using your personal data
Contract	<ul style="list-style-type: none"> • To administrate or perform our contract with you. • To process your payment information in connection with any contract we have with you. • To send you updates about the services you have bought (e.g. confirmation of order, arrival time).
Legal Obligation	<ul style="list-style-type: none"> • Recording your preferences (e.g. marketing) to ensure that we comply with data protection laws. • Where we send you information to comply with a legal obligations (e.g. where we send you information about your legal rights). • Where we retain information to enable us to bring or defend legal claims.
Legitimate Interests	<p>Where using your information is necessary to pursue our legitimate business interests to:</p> <ul style="list-style-type: none"> • improve and optimise our Website;

	<ul style="list-style-type: none"> • monitor and make improvements to our Website to enhance security and prevent fraud; • to provide our services to you and ensure the proper functioning of our Website; and • to protect our business and defend ourselves against legal claims. <p>Where we use your information for our legitimate interests, we have assessed whether such use is necessary and that such use will not infringe on your other rights and freedoms.</p>
Consent	<ul style="list-style-type: none"> • Where you have provided your consent to providing us with information or allowing us to use or share your information. • Where you have consented to receive marketing material from us.

We may anonymise the personal data we collect (so it can no longer identify you) and then combine it with other anonymous information so it becomes aggregated data. Aggregated data helps us identify trends (e.g. what percentage of users responded to a specific survey). Data protection law does not govern the use of aggregated data and the various rights described below do not apply to it.

Where we need to collect your personal data (for example, in order to fulfil a contract we have with you), failure to provide us with your personal data may mean that we are not able to provide you with the services. Where we do not have the information required about you to fulfil an order, we may have to cancel the service ordered.

6 When we send you marketing messages

If you have consented to receiving marketing messages from us, you can opt out of these at any time. Just let us know at info@stellarone.biz.

Opting out of marketing will not affect our processing of your personal data in relation to any order you have with us and where we are required to use your personal data to fulfil that order or provide you with certain information.

7 Who we share your information with

We share (or may share) your personal data with:

- **Our personnel:** our employees (or other types of workers) who have contracts containing confidentiality and data protection obligations.
- **Our supply chain:** other organisations that help us provide our Services. We ensure these organisations only have access to the information required to provide the support we use them and have a contract with them that contains confidentiality and data protection obligations.
- **Regulatory authorities:** such as HM Revenue & Customs.

- **Our professional advisers:** such as our accountants or legal advisors where we require specialist advice to help us conduct our business.
- Any actual or potential buyer of our business.

If we were asked to provide personal data in response to a court order or legal request (e.g. from the police), we would seek legal advice before disclosing any information and carefully consider the impact on your rights when providing a response.

8 Where your information is located or transferred to

We will only transfer information outside of the UK where we have a valid legal mechanism in place (to make sure that your personal data is guaranteed a level of protection, regardless of where in the world it is located, e.g. by using contracts approved by the European Commission or UK Secretary of State).

If you access our Website, engage us to provide services or contact us whilst abroad then your personal data may be stored on servers located in the same country as you or your organisation.

9 How we keep your information safe

We have implemented security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include:

- access controls and user authentication (including multi-factor authentication);
- internal IT and network security;
- regular testing and review of our security measures;
- staff policies and training;
- incident and breach reporting processes;
- business continuity and disaster recovery processes;
- other industry standard safeguards

If there is an incident which has affected your personal data and we are the controller, we will notify the regulator and keep you informed (where required under data protection law). Where we act as the processor for the affected personal data, we notify the controller and support them with investigating and responding to the incident.

If you notice any unusual activity on the Website, please contact us info@stellarone.biz.

10 How long we keep your information

Where we act as the controller, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To decide how long to keep personal data (also known as its retention period), we consider the volume, nature, and sensitivity of the personal data, the potential risk of harm to you if an incident were to happen, whether we require the personal data to achieve the purposes we have identified or whether we can achieve those purposes through other means (e.g. by using aggregated data

instead), and any applicable legal requirements (e.g. minimum accounting records for HM Revenue & Customs).

We may keep Identity Data, Contact Data and certain other data (specifically, any exchanges between us by email or any other means) for up to seven years after the end of our contractual relationship with you.

If you browse our Website, we keep personal data collected through our analytics tools for only as long as necessary to fulfil the purposes we collected it for.

If you have asked for information from us or you have subscribed to our mailing list, we keep your details until you ask us to stop contacting you.

11 Your legal rights

You have specific legal rights in relation to your personal data.

We can decide not to take any action in relation to a request where we have been unable to confirm your identity (this is one of our security processes to make sure we keep information safe) or if we feel the request is unfounded or excessive. We may charge a fee where we decide to proceed with a request that we believe is unfounded or excessive. If this happens we will always inform you in writing.

We do not respond directly to requests which relate to personal data for which we act as the processor. In this situation, we forward your request to the relevant controller and await their instruction before we take any action.

If you wish to make any of the right requests listed above, you can reach us at info@stellarone.biz.

- **Access:** You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how we are using it to make sure we are abiding by the law.
- **Correction:** You can ask us to correct your personal data if it is inaccurate or incomplete. We might need to verify the new information before we make any changes.
- **Deletion:** You can ask us to delete or remove your personal data if there is no good reason for us to continue holding it or if you have asked us to stop using it (see below). If we think there is a good reason to keep the information you have asked us to delete (e.g. to comply with regulatory requirements), we will let you know and explain our decision.
- **Restriction:** You can ask us to restrict how we use your personal data and temporarily limit the way we use it.
- **Objection:** You can object to us using your personal data if you want us to stop using it. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision.
- **Portability:** You can ask us to send you or another organisation an electronic copy of your personal data.
- **Complaints:** If you are unhappy with the way we collect and use your personal data, you can complain to the ICO or another relevant supervisory body, but we hope that we can respond to your concerns before it reaches that stage. Please contact us at info@stellarone.biz.