

STARPORT PRIVACY POLICY

This Privacy Policy shall be effective starting on February 1, 2021.

Last updated: February 1, 2021

Starport ("StarPort", "we", "us" and "our") respect and protect the privacy of visitors to our websites and the counterparties with whom we trade. To ensure transparency, this Privacy Policy describes our information handling practices when you access content we own or operate on the websites located at strprt.com (<http://www.strprt.com>), or any other websites, pages, features, or content we own or operate (collectively, the "Site(s)") and/or when you use the StarPort mobile app, any StarPort API or third party applications relying on such an API, and related services (referred to collectively hereinafter as "Services").

Please take a moment to read this Privacy Policy carefully. If you have any questions about this Privacy Notice, please contact us at support@strprt.com.

ACCEPTANCE OF PRIVACY POLICY

By accessing and using our Services, you signify acceptance to the terms of this Privacy Policy and consent to the collection, use, and disclosure of your personal information as described further below. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our Services.

CHANGES TO THIS PRIVACY POLICY

StarPort reserves the right to modify this Privacy Policy at any time, and when required by law, we will notify you of changes to this Privacy Policy. If we make any material changes we will notify you by email (sent to the e-mail address specified in your profile) or by means of a notice on our Services prior to the change becoming effective.

StarPort may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. These notices may supplement or clarify StarPort's privacy practices or may provide you with additional choices about how StarPort processes your personal information.

THE PERSONAL INFORMATION WE COLLECT

Personal information is data that can be used to identify you directly or indirectly, or to contact you. Our Privacy Policy covers all personal information that you voluntarily submit to us and that

we obtain from our partners. This Privacy Policy does not apply to anonymized data as it cannot be used to identify you.

Except as described in this Privacy Policy, StarPort will not give, sell, rent or loan any personal Information to any third party.

We collect personal information to provide you with our Services. When we require certain personal information from users it is because we are required by applicable law to collect this information or it is relevant for specified purposes. Any information you provide to us that is not required is voluntary. You are free to choose whether to provide us with the types of personal information requested, but we may not be able to serve you as effectively or offer you all of our Services when you do choose not to share certain information with us. We collect personal information when you use or request information about our Services, subscribe to marketing communications, request support, complete surveys, or sign up for a StarPort event. We may also collect personal information from you offline, such as when you attend one of our events, or when you contact support. We may use this information in combination with other information we collect about you, as set forth in this Notice.

Here are some specific examples of the types of personal information StarPort may collect and how we may use it:

- When you create a profile or use StarPort Services, we, or our affiliates vendors acting on our behalf may collect the following types of information to meet our legal obligations: your name, date of birth, social security number, driver number ID, personal ID, address, phone, email, full bank account details and/or credit card numbers that you link to your StarPort profile or input when you use StarPort Services. StarPort will use this information to fulfill your requests and provide the relevant Services.
- If you seek permissions to raise Digital Currency buy and sell limits associated with your StarPort profile, we may require you to provide additional information which we may use in collaboration with service providers acting on our behalf to verify your identity or address, and/or to manage risk as required under applicable law. This information may include your date of birth, taxpayer or government identification number, a copy of your government-issued identification, or other personal information. We may also obtain information about you from third parties such as credit bureaus and identity verification services.
- Whenever you contact us or respond to our communications (e.g., email, telephone, written), we receive your contact information and any other personal information you choose to provide us. StarPort will use such information to fulfill your requests or to provide services.
- You may choose to provide us with access to certain personal information stored by third parties such as social media sites (such as Facebook and Twitter). The information we

have access to varies by site and is controlled by your privacy settings on that site and your authorization.

In addition, we may collect personal information disclosed by you on our message boards, chat features, blogs and our other services to which you are able to post information and materials. Any information that is disclosed in those forums becomes public information and may therefore appear in public ways, such as through search engines or other publicly available platforms, and may be "crawled" or searched by third parties. It could also be read, collected or used by other users to send you unsolicited messages. Please do not post any information that you do not want to reveal to the public at large.

HOW YOUR PERSONAL INFORMATION IS USED

Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customized experience. In general, we use personal information to create, develop, operate, deliver, and improve our Services, content and advertising, and for loss prevention and anti-fraud purposes. Examples of how we may use this information include:

- To comply with our legal obligations.
- To prevent and investigate potentially prohibited or illegal activities, and/or violations of our posted user terms.
- To verify your identity by comparing your personal information against third-party databases.
- To send administrative or account-related information to you.
- To enforce our agreements with third parties.
- To resolve disputes, collect fees, and troubleshoot problems.
- For quality control and staff training.
- To enhance security, monitor and verify identity or service access, combat spam or other malware or security risks.
- To provide you with StarPort Services and support that you request.
- To better understand our end-users and the way they use and interact with StarPort Services.
- To provide a personalized experience, and implement the preferences you request.
- To communicate with you about our events or our partner events.
- To customize, measure, and improve StarPort Services and the content and layout of our website and applications.
- To deliver targeted marketing, service update notices, and promotional offers based on your communication preferences (where this is in accordance with the law).

We will not use your personal information for purposes other than those purposes we have disclosed to you, without your permission. From time to time we may request your permission to allow us to share your personal information with third parties. You may opt out of having your personal information shared with third parties, or from allowing us to use your personal information for any purpose that is incompatible with the purposes for which we originally collected it or subsequently obtained your authorization. If you choose to so limit the use of

your personal information, certain features or StarPort Services may not be available to you.

INFORMATION FROM THIRD PARTY SOURCES

From time to time, we may obtain information about you from third party sources as require or permitted by applicable law, such as public databases, credit bureaus, ID verification partners, resellers and channel partners, joint marketing partners, and social media platforms.

Public Databases, Credit Bureaus & ID Verification Partners

We obtain information about you from public databases and ID verification partners for purposes of verifying your identity. ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, address, job role, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data. We obtain such information to comply with our legal obligations, such as anti-money laundering laws. In some cases, we may process additional data about you based on public interest grounds to ensure our Services are not used fraudulently or for other illicit activities.

Resellers, Channel Partners, Joint Marketing Partners, and Social Media Platforms

We collect information about your publicly available social media profile, interests or preferences, and pageview information from some business partners with which we operate co-branded services or joint offerings. There are multiple purposes for collecting this information. First, we process such information to better understand you and/or maintain and improve the accuracy of the records we hold about you as well as to position, promote or optimize our Services. In addition, we may also use this information in conjunction with your browsing habits / preferences (as obtained from our data partners) and your contact details, professional information and StarPort transaction history to deliver targeted advertising and marketing to you, where permitted by applicable law and in accordance with your advertising / marketing preferences. Second, we also process such information to provide support to you as part of our contractual obligations to you. Lastly, we process such information in the public interest because it helps us monitor, prevent and detect fraud. Once we obtain such information from third parties, we do not subsequently share it with any other third parties except as described in this Policy. This information is shared with StarPort's processors and corporate group as necessary to perform the Services.

WHY WE SHARE PERSONAL INFORMATION WITH OTHER PARTIES

We take care to allow your personal information to be accessed only by those who really need to in order to perform their tasks and duties, and to share with third parties who have a legitimate purpose for accessing it. StarPort will never sell or rent your personal information. We will only share your information in the following circumstances:

- We share your information with third party identity verification services in order to prevent fraud. This allows StarPort to confirm your identity by comparing the information you provide us to public records and other third party databases. These service providers may create derivative data based on your personal information that can be used solely in connection with provision of identity verification and fraud prevention services.
- We may share your information with companies or other entities that we plan to merge with or be acquired by. Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. You will receive prior notice of any change in applicable policies.
- We may share your information with companies or other entities that purchase StarPort assets pursuant to a court-approved sale under U.S. Bankruptcy law;
- We may share your information with law enforcement, and officials, or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedure, or when we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our Counterparty Agreement or any other applicable policies.

If you establish a StarPort profile indirectly on a third party website or via a third party application, any information that you enter on that website or application (and not directly on a StarPort website) will be shared with the owner of the third party website or application and your information will be subject to their privacy policies.

HOW WE PROTECT AND STORE PERSONAL INFORMATION

We understand how important your privacy is, which is why StarPort maintains appropriate physical, technical and administrative safeguards to protect the security and confidentiality of the personal information you entrust to us.

We may store and process all or part of your personal and transactional information, including certain payment information, such as your encrypted bank account and/or routing numbers, in the United States and elsewhere in the world where our facilities or our service providers are located. We protect your personal information by maintaining physical, electronic, and procedural safeguards in compliance with the applicable laws and regulations.

For example, we use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorize access to personal information only for those employees who require it to fulfill their job responsibilities.

However, we cannot guarantee that loss, misuse, unauthorized acquisition, or alteration of your data will not occur. Please recognize that you play a vital role in protecting your own personal information. When registering with our Services, it is important to choose a password of sufficient length and complexity, to not reveal this password to any third-parties, and to immediately notify us if you become aware of any unauthorized access to or use of your account.

Furthermore, we cannot ensure or warrant the security or confidentiality of information you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us at the email address, mailing address or telephone number listed at the end of this Privacy Policy.

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

As a global entity, StarPort may store, transfer, and otherwise process your personal information in countries outside of the country of your residence, including the United States and possibly other countries.

StarPort participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. StarPort is committed to subjecting all personal information received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List at <https://www.privacyshield.gov> (<https://www.privacyshield.gov>).

StarPort is responsible for the processing of personal information it receives under the Privacy Shield Framework and subsequently transfers to a third party acting as an agent on its behalf. Pursuant to the Privacy Shield Principles, StarPort will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. We will take all reasonable steps to ensure that personal information we process is limited to only what is relevant to the purposes for which it was collected and that it is accurate, complete, and up-to-date.

StarPort complies with the Privacy Shield Principles for all onward transfers of personal information from the EU, including the onward transfer liability provisions. Consequently, before Coinbase shares your information with any third party that is not also certified under the E.U.-U.S. Privacy Shield Framework, Coinbase, Inc. will enter into a written agreement that the third party provides at least the same level of privacy safeguard as required under

those Frameworks, and assures the same level of protection for the personal information as required under applicable data protection laws.

StarPort commits to resolve European data subjects' complaints about their privacy and our collection, use or disclosure of their personal information in compliance with the EU-U.S. Privacy Shield Principles. European data subjects with inquiries or complaints regarding this Privacy Policy should first contact StarPort at support@strprt.com.

If you are a European data subject with an unresolved complaint or dispute arising under the requirements of the Privacy Shield Framework, we agree to refer your complaint under the Framework to an independent dispute resolution mechanism. Our independent dispute resolution mechanism is the International Centre for Dispute Resolution ("ICDR"), operated by the American Arbitration Association ("AAA"). For more information and to file a complaint, you may contact the International Centre for Dispute Resolution by phone at +1.212.484.4181, or by visiting the website <http://info.adr.org/safeharbor> (<http://info.adr.org/safeharbor>).

We are also subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission with respect to the Framework. Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel. In certain situations, Coinbase may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

HOW YOU CAN ACCESS OR CHANGE YOUR PERSONAL INFORMATION

You are entitled to review, correct, or amend your personal information, or to delete that information where it is inaccurate. You may do this at any time by logging in to your profile and clicking the My Profile tab. This right shall only be limited where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, or where the rights of persons other than you would be violated.

If you close your StarPort profile, we will mark your profile in our database as "Closed," but will keep your profile information in our database for a period of time described above. This is necessary in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account. However, if you close your account, your personal information will not be used by us for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

RETENTION OF PERSONAL INFORMATION

StarPort will retain your personal information for a minimum of five years or as necessary to comply with our legal obligations or to resolve disputes.

COLLECTION & USE OF INFORMATION COLLECTED AUTOMATICALLY

We receive and store certain types of information automatically, such as whenever you interact with the Sites or use the Services. This information does not necessarily reveal your identity directly but may include information about the specific device you are using, such as the hardware model, operating system version, web-browser software (such as Firefox, Safari, or Internet Explorer) and your Internet Protocol (IP) address/MAC address/device identifier.

For example, we automatically receive and record information on our server logs from your browser, including how you came to and used the Services; your IP address; device type and unique device identification numbers, device event information (such as crashes, system activity and hardware settings, browser type, browser language, the date and time of your request and referral URL), broad geographic location (e.g. country or city level location) and other technical data collected through cookies, pixel tags and other similar technologies that uniquely identify your browser. We may also collect information about how your device has interacted with our website, including pages accessed and links clicked. We may use identifiers to recognize you when you arrive at the Site via an external link, such as a link appearing on a third party site.

Please refer to the StarPort Cookie Policy for more information about our use of cookies.

CHILDREN'S PERSONAL INFORMATION

We do not knowingly request to collect personal information from any person under the age of 18. If a user submitting personal information is suspected of being younger than 18 years of age, StarPort will require the user to close his or her profile and will not allow buying or selling digital currencies. We will also take steps to delete the information as soon as possible. Please notify us if you know of any individuals under the age of 18 using our Services so we can take action to prevent access to our Services.

California Privacy Rights

If you are a California resident, you have the right to request information from us regarding the manner in which we share certain categories of your personal information with third parties for the third parties' direct marketing purposes. California law provides that you have the right to submit a request to us at our designated address and receive the following information: (a) the

categories of information we disclosed to third parties for the third parties' direct marketing purposes during the preceding calendar year; and (b) the names and addresses of third parties that received such information, or if the nature of their business cannot be determined from the name, then examples of the products or services marketed.

You are entitled to receive a copy of this information in a standardized format and the information will not be specific to you individually. You may make such a request by emailing support@strprt.com

HOW TO CONTACT US

If you have questions or concerns regarding this Privacy Policy, or if you have a complaint, you should contact us by emailing us at support@strprt.com.