

PRIVACY POLICY

Valid as of December 1st, 2020

In order to provide you with our service, we need certain information about you. This Privacy Policy explains what information we collect about you for what purpose and what we use it for. It also explains what rights you have with regard to the data processing operations affecting you.

Moonstar Ventures Ltd, registered in England and Wales with company number 12617290, (Moonstar, Us or We) operates via the mobile Moonstar application (App).

Definitions used in this policy are the same as those used in our Terms of Service.

Questions or comments about this Privacy Policy may be submitted by mail to support@moonstar.ai. Many data processing operations are only possible with your express consent. You can revoke an existing consent at any time. An informal message by email to support@moonstar.ai is sufficient. The legality of the data processing carried out until the revocation remains unaffected by the revocation.

1. Information we collect

1.1. We collect and process the following data (Information) when you provide it through the use of our App:

1.1.1. **Information you give us:** Account Holders, Administrators and End-users (you), may give us information about you when downloading or registering to use the App, filling in forms on the App, corresponding with us (for example, by e-mail or chat), sharing data via the App's social media functions and when reporting a problem with the App. Information may include your name, address, email address, phone number, age, username, password, other registration information, personal description, photograph, job title, employer and Moonstar connections.

1.1.2. **Information about you contained within the content you send and receive on the App:** The App is designed to help you work collaboratively with colleagues and across teams. It is inevitable, therefore, that messages you send or receive or content you share on the App may contain personal information about you and other people. We take extra care to store this information securely and in a way that protects your privacy.

1.1.3. **Information provided when you connect the App to your Third Party services:** We receive information about you when you or your administrator link to a third-party service with our Services. We do not mass import data from these 3rd party services, but do access it as needed.

1.1.4. **Information we automatically collect each time you use the App:** When you use the App we collect some information to help us improve our services:

1.1.4.1. **Device and session information:** technical information, including the type of Device you use, a unique Device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network

interface, or the mobile phone number used by the Device), your IP address, your mobile network information, your operating system, the type of browser you use, time zone setting, etc;

1.1.4.2. **Metrics on use of the app:** details of your use of any of the features of the App including how many messages you send, how many times you open the app, when you connect 3rd parties' services and other key events.

1.1.4.3. **Cookies and Other Tracking Technologies:** Along with our third-party partners, such as our analytics partners, we use cookies and other tracking technologies (e.g., device identifiers and pixels) to recognise you across different Services and devices.

2. How we use information

2.1. We use the Information you give us and that we collect in the following ways:

2.1.1. to make the App and the services it provides available to you;

2.1.2. to personalise the service to your needs;

2.1.3. to allow you to participate in interactive features of the App, when you choose to do so;

2.1.4. to send you in App communications and email messages such as those reminding you that you have messages waiting;

2.1.5. to allow you to connect to, or link through to non-App Services;

2.1.6. to provide you with support;

2.1.7. to ensure that the App is presented in the most effective manner for you and for your Device;

2.1.8. to notify you about changes to the App;

2.1.9. to provide you with information about other apps and services we might offer that are similar to those you have already use.

2.2. We may use the Information we collect from your Device:

2.2.1. to administer the App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

2.2.2. to improve the App;

2.2.3. as part of our efforts to keep the App safe and secure.

2.3. We do not use Information contained within content you send and receive on the App for any purpose, although we may occasionally be required to disclose such Information as set out below.

3. Information we share/disclose

3.1. We may share your Information as follows (on occasion this may include Information about you contained within the content you send and receive on the App, but this will only be shared where absolutely necessary):

3.1.1. with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;

- 3.1.2. in the event that we sell or buy any business or assets, in which case we may disclose your Information to the prospective seller or buyer of such business or assets;
- 3.1.3. if Moonstar or substantially all of our assets are acquired by a third party, in which case Information held by us about our customers will be one of the transferred assets;
- 3.1.4. if we are under a legal duty to disclose or share your Information in order to comply with any legal or regulatory obligation or request;
- 3.1.5. in order to enforce or to investigate potential breaches of the Terms or to protect the rights, property or safety of Moonstar, our customers, or others.
- 3.2. We may share End-users Information with the relevant Account Holder and/or Administrator.
- 3.3. We may share disaggregated/anonymised information with selected third parties as appropriate and with analytics and service providers that assist us in fault diagnostics, the improvement or the optimisation of the App.

4. Security

- 4.1. Unfortunately, the transmission of any information via the internet is not completely secure. We will do our best to protect your Information through the use of appropriate technical measures such as encryption but we cannot guarantee the security of Information transmitted; any transmission is at your own risk.
- 4.2. Information in transit between our servers and you over the internet is encrypted using industry wide accepted standards.
- 4.3. Once we have received your Information, we use strict procedures and security features to try to prevent unauthorised access. All Information we hold is stored on secure Microsoft servers.
- 4.4. When you share information, or communicate using the App, you choose the audience who can see what you share. Those people may download or re-share any of your content with anyone on the App or otherwise. We have no control over this so do not share any personal data or information that you do not want to be seen, collected or used by other End-users.

5. Our legitimate interests

- 5.1. For our UK & EEA users, we process your information in furtherance of our legitimate interests, including:
 - 5.1.1. providing the Services, including any personalised Services. We do so as it is necessary to pursue our legitimate interests of providing the App in a way that meets the needs and expectations of our users;
 - 5.1.2. improving the Services, including any personalised Services. We do so as it is necessary to pursue our legitimate interests of developing innovative and tailored offerings to our users on a continually improving basis; and

5.1.3. keeping the Services safe and secure. We do so as it is necessary to pursue the legitimate interests of Moonstar and its members in ensuring the Services are secure, and to protect against fraud, spam and abuse, etc.

6. Where we store your personal data

- 6.1. For our UK & EEA users, the Information we hold on you is typically stored within the European Economic Area (EEA). With some Account Holders we may agree to store data at specific locations requested by them which may be outside of the EEA. In that case we will take all steps reasonably necessary to ensure that data is treated securely and in accordance with this Privacy Policy and regional legal requirements.
- 6.2. Some of the Third Parties and partners we work with, do store their data outside of the European Economic Area (EEA) and as such some identifiable information will be transferred to other countries, predominately to the United States. This information does not include the content (for example, your messages) within your account, which are always held by Moonstar. In all cases, where a third party is transferring your data outside of the European Economic Area (EEA), we have taken reasonable steps to ensure the third party is GDPR compliant.

7. How long we store your data for

- 7.1. We retain information as long as it is necessary to provide the Services to you and others, subject to any legal obligations to further retain such information. Information associated with your account will generally be kept until it is no longer necessary to provide the Services or until you ask us to delete it or your account is deleted, whichever comes first.
- 7.2. When you withdraw your consent to Moonstar processing your data, we will delete all information you provided. Following the deletion of your account, it may take up to 30 days to fully delete all personal information from our systems. Note that content you have shared with others will remain visible to them after your account has been deleted.
- 7.3. Information about you that is no longer necessary and relevant to provide our Services may be anonymised, and aggregated with other non-personal data, to provide insights which could be commercially valuable to Moonstar, such as statistics of the use of the Services. For example, we may retain anonymised data on how people use the app or interact with the sign-up flow.
- 7.4. If your account is provided by your employer, or part of the Organisation, please see the section below.

8. Organisation accounts

- 8.1. If you register or access the Services using an email address within a domain that is owned by your employer or organisation, or if you associate that email address with your existing organisation account and such organisation wishes to establish a Moonstar organisation account, certain information about you including your name,

profile picture, contact info will become under the control to that organisation's administrator.

- 8.2. In the case that the Services are made available to you through an organisation (e.g. your employer), we retain your information as long as required by the administrator of your account. This does not impact your personal rights, but if you choose to exercise certain rights listed below it may result in you being unable to continue using the service as provided via your organisation.

9. Your rights

- 9.1. **You have the right to ask for copies of all the information we hold on you.** This report will include the Personal Data we have about you, provided to you in a structured, commonly used and portable format. Please note that Moonstar may request additional information from you to verify your identity before we disclose any information. If you wish to request a copy of your data, please send us an email at support@moonstar.ai so we can assist you.
- 9.2. **You have the right to have your personal data corrected.** You can correct or change your personal data within the Settings and Profile areas of the app. If you need assistance or find you can't edit the data you'd like to change, please send us an email at support@moonstar.ai so we can assist you.
- 9.3. **You have the right to have your personal data deleted.** You may request that your account is deleted by sending us an email at support@moonstar.ai. Once deleted, your data, (including your account) cannot be accessed. Note that content you have shared with others will remain visible after your account has been deleted.
- 9.4. **You have the right to object to us processing your personal data.** You can ask us to stop using your Personal Data, including when we use your Personal Data to send you marketing emails. You may withdraw your consent at any time by clicking the "Unsubscribe" link found within Moonstar emails. Please note you will continue to receive transactional messages related to our Services, even if you unsubscribe from marketing emails.
- 9.5. We will also send you messages and emails that are of a service or administrative nature, but you may not opt out of these while you have an active account.

10. Third parties

- 10.1. The App may contain links to and from non-Moonstar Services. Please note these non- Moonstar Services may have their own privacy policies and we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these non- Moonstar Services, such as contact and location data. Please check these policies before you submit any personal data to these non-Moonstar Services.

11. Cookies

- 11.1. When you set up or access the App via your browser, we use Cookies to distinguish you from other users of the App. A cookie is a small file of letters and numbers that

we store on your browser or the hard drive of your computer. These cookies help us to provide you with a good experience and also allow us to improve our site.

11.2. We use the following types of cookies:

11.2.1. **Strictly necessary cookies:** These are cookies that are required for the operation of the App via your browser. They include cookies that enable you to log into the App or make use of e-billing services.

11.2.2. **Analytical/performance cookies:** These help us to improve the way the App works; (for example, by ensuring that End-users can find what they are looking for easily).

11.2.3. **Functionality cookies:** These are used to recognise you when you return to the App. This enables us to greet you by name and remember your preferences; (for example, your choice of language or region).

11.3. You may block cookies by activating the setting on your browser that allows you to refuse all or some cookies. However, if you do you may not be able to access all or parts of the App via your browser.

12. Changes to privacy policy

12.1. Any changes we may make to our Privacy Policy in the future will be notified to you by email or when you next start the App. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App.

13. Contact

13.1. Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to support@moonstar.ai.

13.2. For legal purposes the Data Controller/Processor is Moonstar Ventures Ltd, of 18A Fitzjohns Avenue, London, NW3 5NA. This is also our contact address.