



Customer Privacy Notice

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Owner: Jamie Saveall (VP Operations, ESG & Compliance Lead)

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Who We Are: Stratavor (the "Company") is committed to protecting the privacy and security of our customers' personal information. Stratavor is a registered business entity in Ireland. You may contact us at info@stratavor.com for any questions regarding this notice or your personal data. For the purposes of data protection law (such as the EU General Data Protection Regulation (GDPR) where applicable), Stratavor acts as the "data controller" of your personal information, determining how and why it is processed.

Purpose of this Notice: This Customer Privacy Notice explains how Stratavor collects, uses, and safeguards personal data about you when you interact with our websites, products, and services, or otherwise communicate with us. It is important that you read this notice, together with any other privacy notice or fair processing notice we may provide on specific occasions (for example, if we run a particular program or survey involving your data), so that you are fully aware of how and why we are using your information. This notice supplements any other notices and is not intended to override them.

Data We Collect: Stratavor may collect various types of personal data ("Data") from customers and users of our services, including: contact details (such as name, email address, phone number, billing/shipping address), account login credentials, payment information (handled via secure payment processors), and any information you provide to us directly (e.g., through customer support inquiries or feedback forms). We also collect technical data when you use our website or app, such as IP address, browser type, and usage analytics via cookies, in accordance with our Cookie Policy. If our services involve specific data collection (for instance, if we offer personalized content or track usage), we will inform you at the time of data collection.

How We Use Your Data: We use customer data only for legitimate business purposes and in accordance with applicable data protection laws. Common purposes for which Stratavor processes your data include:

Providing Services: To fulfill our obligations to you, such as creating and managing your user account, delivering the products or services you have requested, and processing transactions. For example, we use your contact and payment details to process orders and send you service-related communications (like confirmations or updates).

Customer Support: To communicate with you about your inquiries, support tickets, or feedback. We may use your name and email to respond to questions or issues you raise about our services.

Personalization and Improvements: To personalize your experience (for instance, remembering preferences) and to improve our services. We analyze usage data and feedback to fix bugs, enhance features, and inform our product development.

Marketing Communications: To send you updates, newsletters, or promotional materials if you have consented to such communications or if otherwise permitted by law (e.g., for existing customers, we may send product updates relevant to your use). You can opt out of marketing emails at any time by using the unsubscribe link provided in marketing emails or contacting us directly.

Legal Compliance and Security: To comply with legal obligations (such as tax, accounting, or regulatory requirements) and to enforce our terms of service. We may also process data as necessary to detect, prevent, and address fraud or security issues. For example, we might use certain data to monitor account logins for suspicious activity and ensure the security of our platform.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

Legal Basis for Processing: Depending on the context, Stratavor processes personal data on one or more of the following legal bases: (1) Contractual necessity – processing is needed to provide you with our services or products (e.g., using your payment info to complete a transaction); (2) Legitimate interests – we have a legitimate interest in processing data for certain business or security purposes, and this does not override your rights (for instance, improving our services or preventing fraud may fall under this basis); (3) Consent – where we ask for your consent, such as for sending marketing emails or using certain cookies, and you have the right to withdraw consent at any time; (4) Legal obligation – to comply with laws or regulations (e.g., keeping records for tax purposes or responding to lawful requests by public authorities).

Disclosure of Data: Stratavor does not sell your personal data to third parties. We may share your data with select third parties under the following circumstances:

Service Providers: We use trusted third-party service providers to perform certain functions on our behalf, such as payment processing, cloud data storage, analytics, or email distribution. These providers are given access only to the data necessary to perform their specific services and are contractually required to protect your information and use it only for our instructed purposes, consistent with this notice.

Business Partners: If Stratavor engages in partnerships or joint promotions, and you choose to participate or request information, we might share contact info as needed (with your consent, if required). For example, if we co-host an event with a partner and you sign up, we may share your name/email with that partner for coordination.

Legal Requirements: We will disclose personal data if required to do so by law or in response to valid requests by public authorities (e.g., law enforcement or regulatory body). We may also disclose information in order to protect our rights or the rights and safety of others, such as in connection with investigations of fraud, harassment, or other legal violations.

Business Transfers: In the event Stratavor goes through a business transition such as a merger, acquisition, or sale of assets, customer data may be transferred as part of that deal. We will ensure any new owner is bound to respect the terms of this privacy notice or inform you of any changes and, where required, obtain your consent.

In all cases, Stratavor will strive to share the minimum information necessary and ensure appropriate safeguards (such as data processing agreements) are in place when sharing data with third parties.

Data Security: We take the security of your personal data seriously. Stratavor implements technical and organizational measures to protect your data against unauthorized access, loss, alteration, or destruction. This includes using encryption where appropriate, secure cloud infrastructure, regular software updates, access controls to limit who in our company can access your information, and training staff on data protection. However, please note that no transmission of data over the internet can be guaranteed as 100% secure. We therefore encourage you to also take precautions, such as using strong passwords and keeping your login credentials confidential.

Data Retention: Stratavor will retain your personal data only as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. For example, we may retain your account information while your account is active and for a reasonable period after if you delete your account, in case you reactivate or for record-keeping obligations. We regularly review the data we hold and securely delete or anonymize information that is no longer needed. If legal requirements stipulate certain data to be kept for a minimum time (e.g., financial transaction records), we adhere to those laws.

Your Rights: Depending on the laws applicable to your personal data (for instance, GDPR in the European Union), you may have certain rights regarding your data. These may include:

Right of Access: You can request a copy of the personal data Stratavor holds about you, and information on how we process it.

Right of Rectification: If any personal data we have is inaccurate or incomplete, you have the right to have it corrected or updated.

Right to Erasure: You can request that we delete your personal data if it's no longer necessary for the purposes it was collected, or if you withdraw consent (where applicable), or if you object to processing and we have no overriding legitimate grounds, or if we are required to erase it to comply with a legal obligation.

Right to Restrict Processing: You may ask us to suspend the processing of certain data about you, for example if you want us to establish its accuracy or the reason for processing it.

Right to Data Portability: Where processing is based on consent or contract and done by automated means, you can request a copy of your data in a commonly used machine-readable format to transfer to another service provider.

Right to Object: Where we process your data based on legitimate interests, you have the right to object to that processing in certain circumstances. If you object, we will stop processing your information unless we have compelling legitimate grounds or it is needed for legal reasons. You also have an unconditional right to object to your data being used for direct marketing.

Right to Withdraw Consent: If we rely on your consent for any processing, you can withdraw that consent at any time (this will not affect the legality of processing done before consent was withdrawn).

Right to Complain: You have the right to lodge a complaint with a data protection authority or regulator if you believe we are mishandling your personal data.

To exercise any of these rights, please contact us at info@stratavor.com. We will respond to your request in accordance with applicable data protection laws, typically within one month. We may need to verify your identity before fulfilling certain requests to ensure we do not disclose data to an unauthorized person.

International Data Transfers: Stratavor's operations and service providers may be spread across multiple countries. If we transfer personal data from the European Economic Area (EEA) or other regions with data transfer restrictions to a location outside such area, we will ensure appropriate safeguards are in place. This might involve using standard contractual clauses approved by the EU Commission, or ensuring the recipient is certified under frameworks like the EU-U.S. Data Privacy Framework (if applicable), or other legal transfer mechanisms. Our goal is to ensure your data receives a level of protection equivalent to that provided in your home jurisdiction.

Cookies and Tracking: Our websites use cookies and similar tracking technologies to provide and improve our services (e.g., to keep you logged in, remember preferences, and analyze usage). You can control cookies through your browser settings and other tools; however, disabling certain cookies may affect functionality of our site.

Third-Party Websites: Our services might contain links to third-party websites or services (for example, a link to a partner's site or social media share buttons). This privacy notice does not cover how those third parties process your data. We encourage you to read the privacy policies of any third-party sites or services you visit via links from Stratavor's platforms.

Changes to this Privacy Notice: Stratavor may update this Customer Privacy Notice from time to time. We will notify you of any significant changes by appropriate means (e.g., via a notice on our website or an email notification). The "Last Updated" date at the top of the notice will indicate when it was most recently revised. We encourage you to review this notice periodically to stay informed about how we are protecting your information.

By using Stratavor's services or interacting with us, you acknowledge that you have read and understood this Customer Privacy Notice. We are committed to protecting your privacy and ensuring that your personal data is handled in a transparent and secure way, in line with our legal obligations and best practices