

# Stirdie Privacy Policy

Last modified on 2nd May 2024

## Introduction

Security, transparency, and trust are core values of Stirdie. This policy explains how we collect and use your data and how you can control the information you share online.

Stirdie is strongly committed to maintaining the privacy and integrity of our customers and user's information. We will not disclose or sell your information to any other person or organization unless required by law.

This policy covers all products provided by Stirdie. Any reference to "Services" in this policy, refers to products and services Stirdie provides. Any reference to "Terms" refers to our Business Terms and Conditions or App Terms and Conditions which you agree to when creating a Stirdie account and/or using the Stirdie app.

## Information Collection and Use

At Stirdie, to provide our services and/or to improve our users' and visitors' experience (see our Cookie Policy), we may collect personal information from visitors, enquiries, and customers on our website and apps. Personal information, including but not limited to, name, company name, company number or identified, email, phone numbers, address, and credit card details may be requested through secure and appropriate channels such as telephone, email, website enquiry forms, website free trial or beta offers, or during secure online account registration and purchasing. Account usernames, passwords, tokens, pins or keys for relevant services may also be collected and securely stored enabling users to access our websites or apps. If you do not provide us with your personal information, we may not be able to provide you with our services, communicate with you, or respond to your enquiries.

For Stirdie to provide its services, information on account usage, reports and message transmission details may be stored securely online for a limited period of time or as required by law. See Terms and Conditions for relevant service. Such information will only be used to provide user's relevant Stirdie services and/or to provide support or improve our services to our customers. We will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under privacy laws.

We will be open and clear about the information we collect and what we do with the information you provide. If you do not wish to receive information from Stirdie, you can opt out at any time. If you have an active account and/or subscription, there may be certain

types of information you are unable to opt out of as we need to communicate important information such as billing and product-specific details relating to your account and usage.

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us otherwise. Where you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

## **Data We Receive From Others**

To provide Stirdie services, data may be received from others such as Stirdie users, our affiliates and third parties. This may include but is not limited to third-party information from security and identity checks we perform or data you have agreed to share via our affiliates.

Information vetted and endorsed by other users within the Stirdie verified network is tracked by Stirdie and forms part of the services we provide.

## **Other Permission-Based Information**

Additionally, there may be instances when you interact with our Services that we will ask your permission to collect additional information. For example, before accessing your device's camera roll or Contact Book.

Children Under Age of 16

Our services or apps are not intended for children under 16 years of age, and we do not knowingly collect personal information from children under 16. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at the contact information below.

## **Security of Information**

We have adopted guidelines to ensure our users' and customers' information is protected, including but not limited to, secure websites for collecting and storing information, secure hosting sites requiring authorized access, dedicated processes for information collection and data management, and robust training policies.

To the extent that we have control over your information, we will keep such information confidential. However, due to the nature of online communication, we cannot guarantee the security of transmissions, which occur beyond our security control limitations.

In line with the Terms and Conditions of Stirdie services, account holders and users are responsible for securely managing their account access and login details. Stirdie will take no responsibility for the mismanagement or disclosure of account access or login details on the user's behalf.

**Access to update your details:** You can access and edit most of your personal information that we hold about you by updating these within your Stirdie account. In the event you request any document or material that contains the personal information of others, we will not provide you such documents or materials unless required to by law. There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

**Object to processing:** Depending on where you live and the type of data we are processing, you may have the right to object to our processing of that information. Contact us for further information.

**Deleting information:** You may choose to delete your account, learn more in our Help Centre. Some information such as message metadata may be required to be kept to meet legal data retention obligations. Where possible, Stirdie will provide controls to enable file and/or message deletion to delete content if you choose to do so.

## **Stirdie Network and Directory**

When using Stirdie, you will need to provide a limited amount of information to be identified and connect with other verified Stirdie users. This information may include but is not limited to business name, first name, last name, account location and Stirdie ID. Once a Stirdie user is verified, these details will become available to search and connect using the Stirdie Directory.

### **Accuracy of Information**

Stirdie users are responsible for ensuring all information remains accurate, up-to-date and complete. We may also, from time to time, through numerous methods of contact, request up-to-date information to meet regulatory requirements on service provisioning.

## **External Links**

Where there are links on our website to external sites, unless through direct supply of our services, Stirdie is not responsible for the information or data collection processes these external sites manage.

## **Customer Access**

Customer accounts are secured by personal username and password and multi-factor authentication if enabled. Customers can request a change of password or new password by the registered email address, securely online using the Stirdie app.

Account change requests will require email verification and/or proof of account ownership.

No information change requests or account transfers will be undertaken without the authorized consent of the primary account holder.

We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

## **Customer Information Obtained for Account**

Due to the nature of the services provided, there are minimum details required to gain access to Stirdie services, including but not limited to, the following:

- First Name
- Last Name
- Company Name
- Business Number or ID
- Email
- Phone
- Country

Wherever possible, we will only collect and retain necessary personal information.

## **How we disclose your information**

We may disclose your information to third parties who provide services to us, including organizations and contractors that assist us with the purposes for which we use your information. These services include customer enquiries; mailing operations, billing, and debt-recovery functions; and information technology and network services.

We may also disclose your information:

- i. to your authorized representatives or advisers, or when you ask us to do so;
- ii. to other telecommunication and information service providers to provide porting and/or information regarding your existing contracts or services;
- iii. to law enforcement and national security agencies, and other government and regulatory authorities as required or authorized by law;
- iv. to third parties who assist us to manage or develop our business and corporate strategies and functions, including our corporate risk or funding functions;
- v. for the purposes of facilitating or implementing a transfer or sale of all or part of our assets or business; and
- vi. where otherwise required by law.

We may use and disclose aggregated information about our users, and information that does not identify any individual or device, without restriction.

## **Analytics and Research**

To better understand and improve Stirdie services, we may monitor metadata trends and the overall usage of our services. As part of ongoing security and fraud protection, research may also be conducted to further understand our users and industry requirements. This information will, among other things, allow Stirdie to enhance its services and build new features to combat fraud, and scams amongst other information exchange requirements.

## **Complaints**

If you have a complaint about how we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

## **Contact details**

If you have any questions, comments, or concerns, please email us:

[compliance@stirdie.com](mailto:compliance@stirdie.com)

## **Changes to this Policy**

From time to time, we may change our policy on how we handle personal information or the types of personal information we hold. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy by downloading a copy or by contacting us at the contact details above.