

Styngnr Privacy Policy

EFFECTIVE DATE: SEPTEMBER 1, 2022

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This Privacy Policy explains the practices regarding the collection, use and disclosure of information received by Styngnr Corp. (“**Styngnr**”, “**we**” or “**us**”) that we receive through our platform (the “**Service**”). This Privacy Policy does not apply to any third-party websites, services or applications, even if they are accessible through the Service. Also, please note that, unless we define a term in this Privacy Policy, all capitalized terms used in this Privacy Policy have the same meanings as in our [Terms of Service](#).

1. Revisions to this Privacy Policy

Any information that is collected via our Service is covered by the Privacy Policy in effect at the time such information is collected. We may revise this Privacy Policy from time to time. If we make any material changes to this Privacy Policy, we’ll notify you of those changes by posting them on the Service or by sending you an email or other notification, and we’ll update the “Last Updated” date above to indicate when those changes will become effective.

2. Information Collected or Received from You

a. Account Information

If you create an account through the Service (an “**Account**”), we’ll collect certain information that can be used to identify you, such as your name and email address (“**PII**”). If you create an Account using your login credentials from one of your social networking accounts like Facebook, Twitter, etc. (each, an “**SNS Account**”), we’ll be able to access and collect your name and email address and other PII that your privacy settings on your SNS Account permit us to access. We may also collect your gender, date of birth, zip code, age and other information that is not considered PII because it cannot be used by itself to identify you. We use PII on a limited basis as described below.

b. Information You Voluntarily Provide

You control what information, including PII, you submit via the Service. We will collect all the information that you submit to the Service including, via email queries, online inquiries, and in any other manner.

c. Information Collected Using Cookies and other Web Technologies

Like many website owners and operators, we use automated data collection tools such as Cookies and Web Beacons to collect certain information.

“Cookies” are small text files that are placed on your device by a web server when you access our Service. We may use both session Cookies and persistent Cookies to identify that you’ve logged in to the Service and to tell us how and when you interact with our Service. We may also use Cookies to monitor aggregate usage and web traffic routing on our Service and to customize and improve our Service. Unlike persistent Cookies, session Cookies are deleted when you log off from the Service and close your browser. Although most browsers automatically accept Cookies, you can change your browser options to stop automatically accepting Cookies or to prompt you before accepting Cookies. Please note, however, that if you don’t accept Cookies, you may not be able to access all portions or features of the Service. Some third-party services providers that we engage (including third-party advertisers) may also place their own Cookies on your device. Note that this Privacy Policy covers only our use of Cookies and does not include use of Cookies by such third parties.

“Web Beacons” (also known as web bugs, pixel tags or clear GIFs) are tiny graphics with a unique identifier that may be included on our Service for several purposes, including to deliver or communicate with Cookies, to track and measure the performance of our Service, to monitor how many visitors view our Service, and to monitor the effectiveness of our advertising. Unlike Cookies, which are stored on the device, Web Beacons are typically embedded invisibly on web pages (or in an e-mail).

“Log Data” means certain information about how a person uses our Service, including both Account holders and non-Account holders (both a **“User”**). Log Data may include information such as a User’s Internet Protocol (IP) address, browser type, operating system, the web page that a User was visiting before accessing our Service, the pages or features of our Service to which a User browsed and the time spent on those pages or features, search terms, the links on our Service that a User clicked on and other statistics. We use Log Data to administer the Service and we analyze (and may engage third parties to analyze) Log Data to improve, customize and enhance our Service by expanding their features and functionality and tailoring them to our Users’ needs and preferences. We may use a person’s IP address to generate aggregate, non-identifying information about how our Service are used. We may also correlate your IP address with other information we collect about you.

d. Financial Information

We (or a third party under agreement with us) may collect your payment information such as credit card number, bank account number, expiration date, and billing address in order to charge you for any payments you owe us in connection with the Service.

e. Information Sent by Your Device.

We collect certain information that your device sends when you use our Service, like a device identifier, user settings and the operating system of your device, as well as information about your use of our Service.

f. Location Information

When you use our Service, we may collect and store information about your location by converting your IP address into a rough geo-location.

3. Use of Information Collected

We do not sell your personal information.

Our primary goals in collecting information are to provide and improve our Service, to administer your use of the Service (including your Account, if you are an Account holder), and to enable you to enjoy and easily navigate our Service. We will use your PII to:

- Provide the Service, administer your Account, communicate with you and provide customer support in relation to the Service;
- Resolve disputes and troubleshoot problems;
- Customize your experience and otherwise measure and improve our Service;
- Send you relevant emails and communications (including keeping you informed about our products, offerings, and any promotional offers) that might be of interest to you. If we use your personal information to market to you, you will be able to opt out of such uses as described below;
- Enforce our agreements, terms, conditions, and policies, and send you notices and alerts.

4. Information that We Share with Third Parties

We will not share any PII that we have collected from or regarding you except as described below:

a. Information Shared with Our Service Providers

We may engage third-party services providers to work with us to administer and provide the Service. These third-party services providers have access to your PII only for the purpose of performing services on our behalf. We may share your PII and any necessary payment information, such as credit card number, expiration date and billing address, with our payment processing services providers in order to complete transactions that are initiated through the Service. If you don't want us to use your PII for these purposes, you can opt out by contacting us at support@styngr.com.

b. Information Shared with other Third Parties

We may share anonymized or aggregated data we collect from the use of the Service, such as de-identified demographic information, deidentified location information, information about the computer or device from which you access the Service, market trends and other analysis that we create based on the information we receive from you and other users.

You can opt out of the collection and use of your information by contacting us through the www.styngr.com portal, to limit collection through the Site and VR Site or by configuring the

settings on your device to limit ad tracking through the Service. **d. Information Disclosed in Connection with Business Transactions**

Information that we collect from our users, including PII, is considered to be a business asset. Thus, if we are acquired by a third party as a result of a transaction such as a merger, acquisition or asset sale or if our assets are acquired by a third party in the event we go out of business or enter bankruptcy, some or all of our assets, including your PII, may be disclosed or transferred to a third party acquirer in connection with the transaction.

c. Information Disclosed for Our Protection and the Protection of Others

We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: (i) to respond to claims, legal process (including subpoenas); (ii) to protect our property, rights and safety and the property, rights and safety of a third party or the public in general; and (iii) to stop any activity that we consider illegal, unethical or legally actionable activity.

5. Your Choices

We offer you choices regarding the collection, use and sharing of your PII and we'll respect the choices you make. Please note that if you decide not to provide us with the PII that we request, you may not be able to access all of the features of the Service.

a. Opt-Out

We may periodically send you free e-mails and push notifications that directly promote our Service. We may also contact you to alert you to new features that we've added to our Service. When you receive such promotional communications from us, you will have the opportunity to "opt-out" (either through your Account or by following the unsubscribe instructions provided in the e-mail you receive). We do need to send you certain communications regarding the Service and your Account and you will not be able to opt out of those communications – e.g., communications regarding updates to our Terms of Service or this Privacy Policy, transactional notices, or information about billing.

b. Modifying Your Information

You can access and modify the PII associated with your Account by editing it within your Account. If you want us to delete your PII and your Account, please contact us at support@styngr.com with your request. We'll take steps to delete your information as soon we can, but some information may remain in archived/backup copies for our records or as otherwise required by law.

6. The Security of Your Information

We take reasonable administrative, physical and electronic measures designed to protect the information that we collect from or about you (including your PII) from unauthorized access, use or disclosure. When you enter sensitive information on our forms, we encrypt this data using SSL or other technologies. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information, so information you choose to transmit to Styng and which we store is provided to us at your own risk and Styng does not guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our safeguards.

7. Links to Other Sites

Our Service may contain links to websites and services that are owned or operated by third parties (each, a “**Third-Party Service**”). Any information that you provide on or to a Third-Party Service or that is collected by a Third-Party Service is provided directly to the owner or operator of the Third-Party Service and is subject to the owner’s or operator’s privacy policy. We’re not responsible for the content, privacy or security practices and policies of any Third-Party Service. To protect your information we recommend that you carefully review the privacy policies of all Third-Party Service that you access.

8. International Transfer

Your PII may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you’re located outside the United States and choose to provide your PII to us, we may transfer your PII to the United States and process it there.

9. Our Policy Toward Children

Our Service are not directed to children under 13 and we do not knowingly collect PII from children under 13. If we learn that we have collected PII of a child under 13 we will take steps to delete such information from our files as soon as possible.

10. Your California Privacy Rights

California residents may request and obtain from us, once a year, free of charge, a list of third parties, if any, to which we disclosed their PII for direct marketing purposes during the preceding calendar year and the categories of PII shared with those third parties. If you are a California resident and wish to obtain that information, please submit your request by sending us an email at support@styng.com with “California Privacy Rights” in the subject line or by writing to us at 1653 7th Street, Unit 1558, Santa Monica, CA 90406, USA. Additionally, the CCPA provides California residents with specific rights regarding their personal information. If you are a resident of California, you have the following rights:

- **The right to notice.** You have the right to be notified which categories of PII are being collected and the purposes for which the PII is being used.

- **The right to request.** Under CCPA, you have the right to request that we disclose information to you about our collection, use, sale, disclosure for business purposes and share of personal information.
- **The right to say no to the sale of PII (opt-out).** You have the right to direct us to not sell your personal information. We do not sell your personal information.
- **The right to delete PII.** You have the right to request the deletion of your PII, subject to certain exceptions. Once we receive and confirm your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our service providers to:
 - Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - Debug products to identify and repair errors that impair existing intended functionality.
 - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
 - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
 - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
 - Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
 - Comply with a legal obligation.
 - Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of your consumer's rights, including by:
 - Denying goods or services to you
 - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
 - Providing a different level or quality of goods or services to you
 - Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services

11. Exercising Your CCPA Data Protection Rights

In order to exercise any of Your rights under the CCPA, and if you are a California resident, you can contact us by email at support@styngr.com

Only you may make a verifiable request related to your personal information. Your request to us must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it

We cannot respond to your request or provide you with the required information if we cannot:

- Verify your identity or authority to make the request; and
- Confirm that the personal information relates to you

We will disclose and deliver the required information free of charge within 45 days of receiving your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonable necessary and with prior notice.

Any disclosures we provide will only cover the 12-month period preceding the verifiable request's receipt.

12. Important Information for EU Residents

If you are a resident of the European Union (“**EU**”), you may have additional rights under the EU General Data Protection Regulation (the “**GDPR**”).

This section applies only to EU residents and is immediately effective at the time this Privacy Policy is posted. It describes how we collect, use and share Personal Data (defined below) of EU residents in operating our business, and their rights with respect to that Personal Data.

For purposes of this section, “**Personal Data**” has the meaning given to it in the GDPR but does not include information exempted from the scope of the GDPR. Styngr Corp. is the controller of your Personal Data in connection with the Service.

13. Personal Information We Collect and Process

The information in the section entitled “Information Collected or Received from You” above details the Personal Data we collect from you.

The “Use of Information Collected” section above explains how we use your Personal Data.

We will only process your Personal Data if we have a valid legal reason for doing so, including your consent, contractual necessity, and our “legitimate interests” or the legitimate interests of others.

We process all categories of information described in the section entitled “Information that We Share with Third Parties” as a matter of “contractual necessity”, in order to deliver the Service.

We process all categories of information described in the section entitled “Information that We Share with Third Parties” when we believe it furthers the legitimate interest of us or third parties. Examples of these legitimate interests include operating and improving the services, providing effective support, protecting against fraud or security threats, marketing our products or services, complying with legal obligations, or completing corporate transactions.

14. Your Rights under GDPR

- **Opt Out.** You may opt out of marketing communications or otherwise object to the disclosure of your Personal Data for other purposes.
- **Access.** You can request a copy of the Personal Data we have about you in our systems.
- **Update.** You can log into your account and update your Personal Data or you can ask us to correct or supplement any Personal Data you believe is incorrect.
- **Delete.** You can ask us to remove some or all of your Personal Data from our systems.
- **Right to File Complaint.** You have the right to file a complaint about our handling of your Personal Data with the supervisory authority of your country or EU Member State.
- **Right to Withdraw Consent.** Where applicable, you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

By using the Service, you acknowledge that any Personal Data about you is being provided to us in the United States and you authorize us to transfer, store, and process your information to and in the United States (and possibly other countries).

15. Exercising Your GDRP Rights.

You may exercise your EU privacy rights described above by contacting us at support@styngr.com. We reserve the right to confirm your EU address and will need to confirm your identity to process your requests. As part of this process, government identification may be required.

16. Questions?

Please contact us at support@styngr.com if you have any questions about our Privacy Policy.