

## WEBSITE PRIVACY POLICY

Last updated: **July 16, 2020**

### 1. INTRODUCTION

Star Buds respects your privacy and we are committed to protecting it through our compliance with this privacy policy (this “**Privacy Policy**”). The terms “we”, “us” and “our” refer to Star Buds. The term “you” refers to the person visiting this Website (as defined below).

This Privacy Policy, including our Cookie Policy, describes the types of information we may collect from you or that you may provide when you visit the website <https://www.starbuds.us> (the “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- (a) On this Website.
- (b) In email and other electronic messages between you and this Website.

It does not apply to information collected by:

- (c) Us offline or through any other means, including on any other website operated by Star Buds or any third party (including our affiliates and subsidiaries); or
- (d) Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Privacy Policy and the Cookie Policy. This Privacy Policy may change from time to time (see Section 11 – “Changes to this Privacy Policy”). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### 2. PERSONS UNDER THE AGE OF 21

Our Website is not intended for persons under 21 years of age. No one under age 21 may provide any information to or on the Website. We do not knowingly collect personal information from persons under 21. If you are under 21, do not use or provide any information on this Website or through any of its features, register on the Website, or provide any information about yourself to us, including your name, address, telephone number, or email address. If we learn we have collected or received personal information from a person under 21, we will delete that information. If you believe we might have any information from or about a person under 21, please contact us at [marketing@starbuds.us](mailto:marketing@starbuds.us).

### 3. TYPE OF DATA WE COLLECT

The personal data that we collect includes, but is not limited to:

- (a) Communication

Identity data, including your first name, last name, e-mail address, telephone number, and records and copies of your correspondence, if you contact us.

(b) Tracking and Usage

Information about your internet connection, the equipment you use to access our Website, and technical and usage data, including data about your use of the Website (e.g. date, time and location of access to our Website, “mouse events”, apps or newsletter, clicked pages/links or entries and comparable data), and the use of other technology on the devices (and the type of devices) you use to access our Website, including information collected through cookies and other tracking technologies. Please see the attached Cookie Policy for more information.

(c) Marketing

Marketing and communications data, including your preferences in receiving marketing from us and/or our third parties and your communication preferences. You maintain the ability to opt out of direct marketing.

#### **4. HOW DO WE COLLECT YOUR INFORMATION**

We collect this information:

- (a) Directly from you when you provide it to us.
- (b) Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies. Please see the attached Cookie Policy for more information.
- (c) From third parties, for example, our business partners.

#### **5. HOW WE USE YOUR INFORMATION**

We may use, or disclose the personal information we collect for one or more of the following purposes:

- (a) To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry.
- (b) When necessary for the performance of our contract with you or your designee.
- (c) To provide, support, personalize, and develop our Website, products, and services.
- (d) To create, maintain, customize, and secure your customer profile with us.
- (e) To process your requests and transactions, and prevent transactional fraud.
- (f) To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- (g) To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- (h) To perform in connection with your roles, responsibilities, and/or status as a job applicant to or an employee, owner, director, officer, or contractor of Star Buds, including

administering payroll, benefits, maintaining compliance with policies and procedures, and to comply with health and safety and occupational health obligations.

- (i) To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- (j) For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- (k) To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- (l) As described to you when collecting your personal information.
- (m) To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers is among the assets transferred.
- (n) For any other purpose with your consent.
- (o) We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

You can object to the processing described above as set forth in Section 8.

## **6. DISCLOSURE OF YOUR INFORMATION**

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

We may disclose personal information that we collect or you provide as described in this Privacy Policy:

- (a) To our subsidiaries and affiliates.
- (b) To contractors, service providers, and other third parties we use to support our business (“**Service Providers**”). The Service Providers are subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the personal data, and to process the personal data only as instructed.
- (c) To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Star Buds' assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Star Buds about our Website users is among the assets transferred.
- (d) To fulfill the purpose for which you provide it.
- (e) For any other purpose disclosed by us when you provide the information.
- (f) With your consent.
- (g) To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

- (h) To enforce or apply our terms of use located on the website and other agreements, including for billing and collection purposes.
- (i) If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Star Buds our customers, or others.

## **7. HOW LONG WILL WE KEEP YOUR DATA**

We intend to keep your personal data for as long as necessary to fulfil the purposes we collected it for, including to satisfy legal and reporting requirements.

To determine the appropriate retention period for personal data, we consider amount, nature, and sensitivity of the personal data, potential risk of harm from unauthorized use or disclosure of your personal data, purposes for which we process your personal data and whether we can achieve those purposes through other means, and applicable legal requirements.

We process and store your data for the duration of the relevant commercial business relationship. This includes the performance of our services.

We are subject to various retention and documentation obligations arising from the relevant local data protection laws. The periods and deadlines for retention and/or documentation set out in some applicable laws/regulations can extend up to ten years beyond the end of the contractual or pre-contractual legal relationship. Special statutory provisions may require longer retention.

In some circumstances you may ask us to delete your personal data. If the data is no longer required to meet contractual or statutory obligations and rights, it is regularly deleted unless its further processing - for a limited period - is necessary to fulfil the purposes listed in this policy, for example, due to an overriding legitimate interest. Such an overriding legitimate interest is deemed to be the case, for example, if it is not possible to delete the data as a result of a special type of storage, or because it is only possible at an unreasonably great expense and processing for other purposes is excluded by appropriate technical and organizational measures.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **8. YOUR RIGHTS WHEN MAKING YOUR PERSONAL DATA AVAILABLE TO US**

### **8.1 Choices About How We Use and Disclose Your Information**

We undertake to keep your personal data confidential and to ensure that you may exercise your rights. Notwithstanding the purpose or legal basis pursuant to which we process your data, you have the following rights.

- (a) Tracking Technologies and Advertising.

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. Please see the attached Cookie Policy for more information.

- (b) Promotional Offers from Star Buds.

If you do not wish to have your contact information used by Star Buds to promote our own or third parties' products or services, you can opt-out by sending us an email stating your request to [marketing@starbuds.us](mailto:marketing@starbuds.us). If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information

provided to Star Buds as a result of a product or service purchase, warranty registration, product service experience or other transactions.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

California residents may have additional personal information rights and choices. Please see the attached California Privacy Notice for more information.

## 8.2 Accessing and Correcting Your Information

You can review and change your personal information by sending us an email at [marketing@starbuds.us](mailto:marketing@starbuds.us) to request access to, correct or delete any personal information that you have provided to us. 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.

California residents may have additional personal information rights and choices. Please see the attached California Privacy Notice for more information.

## **9. COOKIES**

As further described in our Cookie Policy, we use cookies and similar technologies to collect data (e.g., device IDs) to recognize you and your device(s) on, off and across different services and devices where you use the Website. Please see the attached Cookie Policy for more information.

## **10. LINKS TO THIRD PARTY WEBSITE**

This Website may also contain links to websites operated by other companies, including websites operated by our third-party service providers, and unrelated third parties. This Privacy Policy does not apply to personal data collected on any of these other websites. When you access third-party websites through a link on our Websites, please review the Privacy Policy posted on that website.

## **11. DATA SECURITY**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **12. CHANGES TO THIS PRIVACY POLICY**

We may update or revise this Privacy Policy. We reserve the right to do so, at any time and without prior notice, by posting the revised version on our Website. These changes will be effective as of the date we post the revised version on our Website. They will apply only to the personal data we collect after we have posted the revised version. Your use of our Website following any such change constitutes your consent to the terms of the revised privacy policy. For this reason, it is important to review this Privacy Policy regularly.

### **13. YOUR CALIFORNIA PRIVACY RIGHTS**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, see the attached Privacy Notice for California Residents.

### **14. CONTACT INFORMATION**

If you have questions or concerns regarding this Privacy Policy, please contact us at [marketing@starbuds.us](mailto:marketing@starbuds.us).

## COOKIE POLICY

Last updated: **July 16, 2020**

At Star Buds, we believe in being transparent about how we collect and use data. This cookie policy (this “**Cookie Policy**”) is designed to inform you about our use of cookies, local storage objects and similar technologies. For ease of reference, unless otherwise stated below, we will use the term “cookies” in this Cookie Policy to refer to all of these technologies. This Cookie Policy is part of our Privacy Policy, which also includes additional details about our collection and use of information. Capitalized terms used in this Cookie Policy but not defined have the same meaning as in our Privacy Policy.

### **1. OVERVIEW**

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- a. Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- b. Information about your computer and internet connection, including your IP address, operating system, and browser type.

By continuing to visit or use our Website, you are agreeing to the use of cookies and similar technologies for the purposes described in this Cookie Policy.

### **2. WHY DO WE USE COOKIES?**

The information we collect automatically is only statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- a. Estimate our audience size and usage patterns.
- b. Store information about your preferences, allowing us to customize our Website according to your individual interests.
- c. Speed up your searches.
- d. Recognize you when you return to our Website.

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

### **3. WHAT COOKIES DO WE COLLECT?**

A cookie is a small text file that stores Internet settings. Almost every website uses cookie technology. The cookie is downloaded by your Internet browser the first time you visit a website. The next time you visit this website from the same device, the cookie and the information in it are either sent back to the originating website (first-party cookies) or to another website to which it

belongs (third-party cookies). By that, the website can detect that it has already been opened using this browser, and in some cases it will then vary the content it shows.

Some cookies are extremely useful because they can improve your user experience when you return to a website you have already visited. This assumes that you are using the same device and the same browser as before; if so, cookies will remember your preferences, will know how you use the website, and will adapt the content you are shown so that it is more relevant to your personal interests and needs.

Based on what function cookies have and the purpose for which cookies are used, there are different categories of cookies we may use on the Website: strictly necessary cookies, performance cookies, functional cookies, marketing cookies, and web beacons.

### 3.1 Strictly necessary cookies

These are cookies that are essential to fulfil an action requested by you, such as identifying you as being logged in. If you prevent these cookies by adjusting your browser settings we cannot guarantee how our website will perform during your visit. These cookies are essential in order to enable you to move around the website and use its features. Your consent is not required for the use of strictly necessary cookies.

### 3.2 Performance cookies

These are cookies used to improve our website, for example, for analytics that let us see how a website is being used and where to make improvements, including the number of visitors, where visitors have come from to the website and the pages visited. These cookies do not save information that would allow the user to be identified. The collected information is aggregated, and therefore anonymous. These cookies are used exclusively to improve the performance of the website, and with it the user experience.

### 3.3 Functionality cookies

These cookies enable a website to save information which has already been entered (such as user names, languages choices, and your location), so that it can offer you improved and more personalized functions. Functional cookies are also used to enable features you request such as playing videos. These cookies collect anonymous information and cannot track your movements on other websites.

### 3.4 Targeting and advertising cookies

These cookies track browsing habits and are used to deliver targeted (interest-based) advertising. They are also used to limit the number of times you see an advertisement and to help measure the effectiveness of advertising campaigns. They remember whether you have visited a website or not, and this information can be shared with other organizations such as advertisers. Cookies for improving group targeting and advertising will often be linked to site functionality provided by other organizations.

### 3.5 Web Beacons

Web beacons are small, transparent graphic images that are delivered through a web browser or HTML e-mail. Web beacons may include GIF or PNG images, pixels, javascript, or other tags, which are used to track visitor activity on a particular website, or the viewing of a particular e-



mail. We may also use other tracking mechanisms such as web beacons to collect marketing statistics.

#### **4. THIRD-PARTY USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES**

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

#### **5. YOUR CHOICES**

You may at any time "opt out" of Star Buds' use of cookies, web beacons or other tracking mechanisms through your browser settings. However, disabling such features may prevent you from using certain features or taking full advantage of all of our offerings on our website.

#### **6. DO NOT TRACK**

Do Not Track is a concept that has been promoted by regulatory agencies such as the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing Internet users to control the tracking of their online activities across websites by using browser settings. Some newer Internet browsers have incorporated Do Not Track features, and when turned on, they send a signal to the websites you visit, telling the website that you do not want to be tracked while browsing. Our website does not respond to the browser Do Not Track signal. Thus, most cookies will continue to be stored until you choose to delete them.

#### **7. YOUR CALIFORNIA PRIVACY RIGHTS**

Please visit **the Privacy Notice** to learn more about your California privacy rights.

#### **8. GENERAL**

For more information about the cookies we may use, please contact [marketing@starbuds.us](mailto:marketing@starbuds.us).

We store this cookie data until the end of the term of a particular cookie or until the cookies are deleted by you.

## PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Last updated: **July 16, 2020**

This **Privacy Notice for California Residents** (this “**Notice**”) supplements the information contained in Star Buds’ attached Privacy Notice and applies solely to individuals who reside in the State of California (“**consumers**” or “**you**”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and any terms defined in the CCPA have the same meaning when used in this Notice.

### 1. INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer (including consumers who are job applicants to or employees, owners, directors, officers, or contractors of Star Buds), household, or device (“**personal information**”). Personal information does not include:

- (a) Publicly available information from government records.
- (b) Deidentified or aggregated consumer information.
- (c) Information excluded from the CCPA’s scope, like:
  - i. health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and,
  - ii. personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

In particular, we have collected the following categories of personal information from consumers (including consumers who are job applicants to or employees, owners, directors, officers, or contractors of MMT) within the last 12 months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	<b>YES</b>
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some	<b>NO</b>

	personal information included in this category may overlap with other categories.	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	<b>NO</b>
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<b>NO</b>
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	<b>NO</b>
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	<b>NO</b>
G. Geolocation data.	Physical location or movements.	<b>NO</b>
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	<b>NO</b>
I. Professional or employment-related information.	Current or past job history or performance evaluations.	<b>NO</b>
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	<b>NO</b>
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<b>NO</b>

We obtain the categories of personal information listed above from the following categories of sources:

- (d) Directly from you. For example, from forms you complete or products and services you purchase.
- (e) Indirectly from you. For example, from observing your actions on our website.
- (f) Government entities from which public records are maintained and other publicly available sources and unaffiliated service providers, including data resellers.

## **2. USE OF PERSONAL INFORMATION**

We may use, or disclose the personal information we collect for one or more of the following purposes:

- (a) To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry.
- (b) When necessary for the performance of our contract with you or your designee.
- (c) To provide, support, personalize, and develop our website, products, and services.
- (d) To create, maintain, customize, and secure your customer profile with us.
- (e) To process your requests and transactions, and prevent transactional fraud.
- (f) To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- (g) To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and via email or text message (with your consent, where required by law).
- (h) To inform you about Star Buds events, news, and investor-related materials.
- (i) To perform in connection with your roles, responsibilities, and/or status as a job applicant to or an employee, owner, director, officer, or contractor of Star Buds, including administering payroll, benefits, maintaining compliance with policies and procedures, and to comply with health and safety and occupational health obligations;
- (j) To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business.
- (k) For testing, research, analysis, and product development, including to develop and improve our website, products, and services.
- (l) To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- (m) As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- (n) To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of

bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers is among the assets transferred.

- (o) For any other purpose with your consent.
- (p) We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **3. SHARING PERSONAL INFORMATION**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We may share your personal information with the following categories of third parties:

- (a) Our subsidiaries and affiliates.
- (b) Contractors, service providers, and other third parties we use to support our business.
- (c) A buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Star Buds' assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Star Buds about our website users is among the assets transferred.
- (d) To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

#### **3.2 Disclosures of Personal Information for a Business Purpose**

In the preceding twelve (12) months, Star Buds has not disclosed personal information for a business purpose.

#### **3.3 Sales of Personal Information**

In the preceding twelve (12) months, Star Buds had not sold personal information.

### **4. YOUR RIGHTS AND CHOICES**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

#### **4.1 Access to Specific Information and Data Portability Rights**

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- (a) The categories of personal information we collected about you.
- (b) The categories of sources for the personal information we collected about you.
- (c) Our business or commercial purpose for collecting or selling that personal information.
- (d) The categories of third parties with whom we share that personal information.
- (e) The specific pieces of personal information we collected about you (also called a data portability request).
- (f) If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - i. sales, identifying the personal information categories that each category of recipient purchased; and,
  - ii. disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

#### **4.2 Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), 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 provider(s) to:

- (a) 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, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- (b) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- (c) Debug products to identify and repair errors that impair existing intended functionality.
- (d) Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- (e) Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- (f) 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.
- (g) Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- (h) Comply with a legal obligation.

- (i) Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

#### **4.3 Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing us at [marketing@starbuds.us](mailto:marketing@starbuds.us)
- Visiting <https://www.starbuds.us>

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- (a) Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include: first and last name, email address, phone number, mailing address, physical address, company.
- (b) 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 personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

#### **4.4 Response Timing and Format**

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to ninety days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **5. NON-DISCRIMINATION**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- (a) Deny you goods or services.
- (b) Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- (c) Provide you a different level or quality of goods or services.
- (d) Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

## **6. CCPA DATA RIGHTS ARE NOT AVAILABLE FOR CERTAIN PERSONAL INFORMATION**

CCPA data rights are not available for personal information we collect about you in the course of you acting as a job applicant to or an employee, owner, director, officer, or contractor of Star Buds, including, in these contexts, your emergency contact information and personal information that is necessary for us to retain to administer benefits for another person relating to you acting as a job applicant to or an employee, owner, director, officer, or contractor of Star Buds. Any personal information we collect and use will only be used within the context of your role or former role in these capacities.

## **7. CHANGES TO OUR PRIVACY NOTICE**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the website and update the notice's effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

## **8. CONTACT INFORMATION**

If you have questions or concerns regarding this Notice, please contact us at [marketing@starbuds.us](mailto:marketing@starbuds.us).