

Website Privacy Policy

Effective Date: April 22, 2024.

Starfront Observatories (“Starfront”, “our,” “us” or “we”) is committed to protecting your privacy. This privacy policy (this “Privacy Policy”) describes the types of personal data that we collect from you through our website located at starfront.space (the “Website”), how we use that personal data and the circumstances under which we may disclose it to others. This Privacy Policy does not apply to any other platforms, services, publications or events that we provide.

PLEASE REVIEW THIS PRIVACY POLICY CAREFULLY. BY USING THE WEBSITE, YOU CONSENT TO THE PRIVACY PRACTICES SET FORTH HEREIN. IF YOU DO NOT AGREE WITH THESE PRIVACY PRACTICES, YOU MUST EXIT THE WEBSITE IMMEDIATELY.

Data Collection

Personal Data You Provide to Us

We collect the personal data that you choose to provide to us through the Website, including the personal data that you provide to us when you subscribe to our waitlist to receive news and information regarding our upcoming products and services, request that we connect with you by completing the form on the Contact section of the Website or complete a request form on the Website. This personal data may include your name, e-mail address, physical address, phone number, and other data that by itself, or in combination with other data, reveals your identity.

Usage Data We Automatically Collect

We also automatically collect usage data when you use the Website. “Usage data” is information about your activity on the Website that, by itself, does not identify you as an individual — for example, the operating system that you are using, the date and time stamp of your visit, the referring URL and your internet service provider. We collect usage data through the use of “cookies” and other data collection tools. For more information about these data collection tools, please see the section of this Privacy Policy titled “Cookies and Other Data Collection Tools.”

If we combine any usage data with personal data, we will treat the combined data as personal data in accordance with this Privacy Policy.

Using Your Personal Data

We may use your personal data as described at the point of collection or as follows:

- To operate and improve the Website.
- To deliver the services that you have requested.
- To contact you about events, publications and services that we provide.

- To better understand how you interact with the Website.
- To tailor the content and information that we provide to you through the Website.
- For customer service purposes.
- For security purposes.
- To enforce and protect our rights and the rights of others.
- For research and analysis purposes.

Sharing Your Personal Data

We may share your personal data as described at the point of collection or as follows:

- With third-party service providers whom we engage to provide services on our behalf, solely to the extent necessary for the third party to provide us with those services – for example, we may use third parties to host the Website or assist us in providing functionality on the Website, assist us in sending emails and other communications to you, and to provide research and analysis services.
- In connection with a merger, sale, acquisition or other change of ownership or control by or of us.
- In response to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process.
- To enforce and protect our rights and the rights of others.
- To support external auditing, compliance and corporate governance functions.
- Other than as described above, we do not share your personal data with third parties, including with third parties for their marketing purposes.

Updating Your Information

The Website may allow you to update or delete the information that we collect from you, such as the contact information that you provide when you sign up for our mailing list. You may also request that we update or delete your information by sending an e-mail to us at legal@starfront.space. The Website may also allow you to update your e-mail preferences. If you would prefer not to receive e-mail newsletters or other messages from us, you may use the “unsubscribe” features that are included in such messages or contact us at legal@starfront.space.

Protecting Your Personal Data

We use commercially reasonable security measures, including technical, physical and administrative practices and procedures, to protect your personal data against unauthorized access, loss, misuse and alteration. We also limit access to your personal information to those who have a genuine business need to access it. Nevertheless, no system is perfect. Therefore, we cannot guarantee the absolute security of your personal data, and we make no representations or warranties with respect to the sufficiency of those security measures nor will be responsible for any direct or indirect damages that you may incur as a result of a security breach or technical malfunction.

Transfer of Information to the United States

If you are from a non-U.S. country, please be aware that the personal information you submit, including information provided through the Website, is being sent to a location in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your personal information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By providing such personal information, you are consenting to (and represent that you have authority to consent to), the transfer of such information to the United States for the uses and purposes described in this Privacy Policy. Without limiting the above, for the avoidance of doubt we do not have an establishment or target people in the EEA or UK.

Third-Party Websites

We may include links on the Website to third-party websites that we do not operate or control (“Third-Party Websites”). We are not responsible for the collection, use or disclosure of your personal data collected through the Third-Party Websites, and we expressly disclaim any and all liability related to such collection, use and disclosure. Therefore, before interacting with the Third-Party Websites, you should consult the privacy policies of those websites to learn more about their privacy practices.

Children’s Privacy

We do not knowingly collect or maintain personal data from anyone under the age of thirteen, and no part of the Website are directed towards or designed to attract anyone under that age. In accordance with the Child Online Privacy Protection Act, in the event that we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any personal information from or about a child, please contact us at legal@starfront.space.

Cookies and Other Data Collection Tools

What is a cookie?

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website or use an online service. When you visit the website again, the cookie allows that website or online service to recognize your browser. Cookies may store unique identifiers, user preferences and other data.

Why do we use them?

Cookies help us improve the Website by providing us with data about which parts of the Website are most popular, enabling us to analyze technical and navigational data about the Website and helping us to detect and prevent fraud. We also use cookies and other data collection tools, such as Google Analytics, Pardot and Salesforce, to help improve your experience with the Website.

How do I control cookies?

Web browsers allow some control of most cookies through the browser settings. Some web browsers provide settings that allow a user to reject cookies or to alert a user when a cookie is placed on the user's computer, tablet or mobile device. Most mobile devices also offer settings to reject mobile device identifiers. Although you are not required to accept cookies or mobile device identifiers, blocking or rejecting them may prevent access to some parts of the Website. To find out more about cookies, including how to manage and delete cookies, visit all about www.allaboutcookies.org.

Do Not Track

The Website does not support Do Not Track ("DNT"). DNT is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your online activities collected. For more information about DNT, please visit www.donottrack.us.

Additional Information for EU Visitors

With respect to "personal data" as defined by Regulation (EU) 2016/679 ("GDPR") that you may provide to us through the Website, we serve as the "controller."

We provide the Website from servers located in the United States. If you are accessing the Website from the European Union, by providing your personal information, you are consenting to (and represent that you have authority to consent to), the transfer of such information to the United States for the uses and purposes described in this Privacy Policy. We process personal data to provide the services you request, to pursue our legitimate business interest to operate and improve the Website, to comply with our legal and regulatory obligations, to prevent and detect criminal activity that could be damaging for us and for you, and as described in the section of this Privacy Policy titled "Using Your Personal Data." To learn more about with whom we share your personal data, please refer to the section of this Privacy Policy titled "Sharing Your Personal Data."

We retain your personal data for as long as necessary to fulfill the purpose for which it was collected, namely until you inform us that you no longer want to receive information and communications from Starfront regarding our products and services, or as required by applicable laws or regulations. Copies of information that you have updated, modified or deleted will remain in our systems if applicable law requires us to retain it.

You have the right to access your personal data, rectify inaccuracies in your personal data, request the erasure of your personal data, request that we restrict the processing of your personal data in certain circumstances, and to receive your personal data in a machine readable format and or have it transmitted to a third party, in certain situations. For further information on each of those rights, including the circumstances in which they apply, see the guidance from your local supervisory authority in the European Union (or European Economic Area) state where you work or normally live. If you wish to exercise any of these rights with

respect to your personal data, please contact us at legal@starfront.space, and allow reasonable time for your request to be processed.

You also have the right to lodge a complaint with a supervisory authority in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

Additional Rights Under Certain State Laws

If you are a resident of California, Virginia, Colorado, or another state that has enacted a similar privacy law, you may have the following additional rights: the right to know the categories of information collected, the sources of such information, how the information is used, the categories of third parties receiving your personal data within the last twelve months, the right to access and obtain a copy of your personal data collected within the last twelve months by us, the right to ask us not to sell your personal data to third parties, the right not to be discriminated against for exercising your rights, and under certain circumstances the right to have us delete your personal data. In order to exercise your rights under an applicable state law, you can email us at [legal@starfront.space]. We do not sell your personal data so there is no need to opt out of any such sale. We cannot respond to your request or provide you with your personal data if we cannot verify your identity or authority to make the request and confirm the personal data relates to you.

Modifications to this Privacy Policy

We reserve the right, in our sole discretion, to modify this Privacy Policy at any time without notice to you. We will post all modifications to this Privacy Policy on the Website and they will become effective immediately upon being posted to the Website. Your continued use of the Website following the posting of modifications to this Privacy Policy constitutes your acceptance of those modifications. We reserve the right to apply the amended terms to the information that we have already collected, subject to any legal constraints. Therefore, you should check the Effective Date of this Privacy Policy each time that you visit the Website and review any modifications made since the last time that you visited it. Notwithstanding the foregoing, to the extent required by law, we will seek your consent to any material changes to this Privacy Policy.

Contact

We welcome questions and comments about this Privacy Policy. Please send your questions and comments to us at legal@starfront.space.