

Confidentiality Policy of Stardust Consulting

Stardust Consulting is committed to protecting and respecting your privacy. This Privacy Policy tells you what to expect when we collect personal data. By visiting our website and/or using our services, you agree that we can use your personal data for the purposes described in this Privacy Policy.

Article 1: General Information

Stardust Consulting is a commercial name without legal reality used by Virginie Chantry as an independent entrepreneur (freelancer), with its head office located Avenue du Petit Bourgogne, 88 in 4000 Liège and which is registered at the Banque Carrefour des Entreprises in Belgium under number BE 0545.805.241, hereinafter referred to as Stardust Consulting.

Definitions

When we refer to 'we', 'us', and 'our', we mean Stardust Consulting. Except for when the text is between quotes.

When does it apply?

Our Privacy Policy applies to all of the services offered by Stardust Consulting but excludes services of subcontractors which are supposed have their own separate privacy policy.

What is personal data?

« Personal data » means any information about an individual from which that person can be identified. It does not include anonymous data, i.e. where the identity has been removed.

Please, be also aware that Stardust Consulting respects, amongst others, the following principles whenever personal data is processed:

- Data processing is lawful within the framework of Stardust Consulting's activities and services;
- The purposes of data collection and processing are described in this Privacy Policy;
- The processing and collection of personal data is minimized to what is necessary for the activities of Stardust Consulting.

Article 2: Wix platform

As the website of Stardust Consulting has been created with the Wix.com platform (herafter Wix), we strongly recommend that you read the privacy policy of Wix: https://www.wix.com/about/privacy.

Here are some important extracts for the visitors of Stardust Consulting's website.

Preliminary remark: Stardust Consulting is considered by Wix a user, which makes any visitor of Stardust Consulting's website a User-of-User.

Sharing personal information with third parties

Third party services

« Wix has partnered with a number of selected service providers, whose services and solutions complement, facilitate and enhance our own. These include hosting and server co-location services, communications and content delivery networks (CDNs), data and cyber security services, billing and payment processing services, domain name registrars, fraud detection and prevention services, Web analytics, e-mail distribution and monitoring services, session recording and remote access services, performance measurement, data optimization and marketing services, content providers, and our legal and financial advisors (collectively, "Third Party Service(s)").

Such Third Party Services may receive or otherwise have access to our Visitors' and Users' Personal Information and/or Users-of-Users' Personal Information, in its entirety or in part – depending on each of their particular roles and purposes in facilitating and enhancing our Services and business, and may only use it for such purposes. »

Protecting Rights and Safety:

« Wix may share your Personal Information with others if we believe in good faith that this will help protect the rights, property or personal safety of Wix, any of our Users, any Users-of-Users, or any member of the general public, with or without notice to you. »

Social Media Features and Framed Pages:

« Our Services include certain Social Media features and widgets, single sign on features, such as the "Facebook Connect" or "Google Sign-in", the "Facebook Like" button, the "Share this" button or other interactive mini-programs ("Social Media Features"). These Social Media Features may collect information such as your IP address or which page you are visiting on our Website, and may set a cookie to enable them to function properly. Social Media Features are either hosted by a third party or hosted directly on our Services. Your interactions with these third parties' Social Media Features are governed by their policies and not ours. [...] »

« To clarify, Wix may share your Personal Information in manners other than as described above, pursuant to your explicit approval, or if we are legally obligated to do so. Moreover, Wix may transfer, share, disclose or otherwise use Non-personal Information in its sole discretion and without the need for further approval. »

Article 3: Collect and use of information

When you contact us by email, you may provide us with personal data that allow to identify you: name, surname, title, phone numbers, personal email addresses, etc. We use this information to identify you, to provide you with the services requested and to communicate with you in the framework of these services, on the lawful basis of the performance of our contract to you. None of this information is sold, exchanged, transferred or simply disclosed to third parties or used for any other purpose, outside of what is necessary to respond to your request and provide you with the services requested.

If you would like to: access, correct, amend or delete any personal information we have about you, you are invited to address your request to virginie.chantry@gmail.com or send us mail to:

Virginie Chantry - Stardust Consulting

Avenue du Petit Bourgogne 88

4000 Liège

Belgium

Any request must be dated and signed, accompanied by a copy / scan of your identity card. We will respond within one month accounted from the date of receipt of the request.

How the data are collected

Direct: We collect person information by telephone, by email or possibly using paper or electronic registration forms.

Subcontractors & third parties: We collect personal data through our subcontractors and third parties, where you have given your consent for us to contact you regarding our services.

Online: We collect personal data when you use our website or possibly complete an online form. We also capture automated sessional data using cookies (see below).

Sensitive personal data

We do not ask you for sensitive personal data.

Article 4: Use of cookies on Stardust Consulting's website

Sites created with Wix, like many others nowadays, use cookies. Information (files or other data) is downloaded or stored on your computer or other connected device through your browser (commonly known as cookies). These cookies are processed by the Wix platform to personalize your experience, to meet your individual needs, to improve our website, to analyze the use of the site as well as for security reasons and to help with the authentication of the session and of the user. None of these data are used by Stardust Consulting to identify you. These cookies give us information, in particular, on how you use our site (including certain third-party services and features offered on our site).

By clicking on "I accept" you accept the use of cookies. You can always disable them later. Please note that if you delete or disable our cookies, you may encounter service interruptions or access issues to certain parts of the site.

Extract from WIX privacy policy:

« Wix, together with its marketing, analytics and technology partners, uses certain monitoring and tracking technologies (such as cookies, beacons, pixels, tags and scripts). These technologies are used in order to maintain, provide and improve our Services on an ongoing basis, and in order to provide our Visitors, our Users and their Users-of-Users with a better experience. For example, thanks to these technologies, we are able to maintain and keep track of our Visitor's and Users' preferences and authenticated sessions, to better secure our Services, to identify technical issues, user trends and effectiveness of campaigns, and to monitor and improve the overall performance of our Services.

Please note that Third Party Services placing cookies or utilizing other tracking technologies through our Services may have their own policies regarding how they collect and store information. Such practices are not covered by our Privacy Policy and we do not have any control over them.

Cookies: In order for some of these technologies to work properly, a small data file ("cookie") must be downloaded and stored on your device. By default, we use several persistent cookies for purposes of session and user authentication, security, keeping the User's preferences (e.g., regarding default language and settings), connection stability (e.g., for uploading media, using e-Commerce features, etc.), monitoring performance of our services and marketing campaigns, and generally providing and improving our Services.

If you want to delete or block any cookies, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies. Information on deleting or controlling cookies is also available at www.aboutcookie.org (note that this website is not provided by Wix, and we therefore cannot ensure its accuracy, completeness or availability). Please note that deleting our cookies or disabling future cookies or tracking technologies may prevent you from accessing certain areas or features of our Services, or may otherwise adversely affect your user experience. »

List of the cookies used on every website created with Wix

Cookie name	Life span	Purpose
svSession*	Permanent	Communication between site owner and visitor (Wix
		Chat)
hs*	Session	Security
XSRF-TOKEN*	Persistent cookie	Security

Moreover, the website of Stardust Consulting also uses the following cookies

Cookie name	Life span	Purpose
PHPSESSID**	Session	Preserves user session state across page requests
CookieConsent*	1 year	Stores the user's cookie consent state for the current domain
TS#***	Permanent	Security
@@History/@@scroll #**	Session	Anonymous statistics
@@History/@@scroll #***	Persistent cookie	Anonymous statistics
@@History/@@scroll #*	Persistent cookie	Anonymous statistics

^{*}Provider: <u>www.stardust-consulting.com</u>

These results have been obtained, amongst others, with www.cookiebot.com. Note that this website is not provided by Stardust Consulting, and therefore we cannot guarantee its accuracy, completeness, or availability, even if, in good faith, we deem it reliable.

Note: A session cookie enables certain features of the website and our service and is deleted from your computer when you disconnect from or leave the site. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Site. Wix uses both. Some of them allow Stardust Consulting to know how many people have visited the website (anonymously). Most Internet browsers automatically accept cookies.

Third party cookies

When you visit our website, you may receive cookies that are set by third parties. For example, you may receive a cookie set by Twitter, as our website contains an icon that allows you to connect to our Twitter account. We do not control the setting of these third party cookies, so we suggest you to check the third party websites for more information about their use of cookies and how to manage them.

To delete or block cookies

If you wish to delete or block cookies from your Internet browser in the future, refer to the help and support section of this Internet browser to find the file or directory that stores the cookies on your computer. The instructions for removing cookies from your computer or electronic device depend on the operating system and Web browser you use.

The links below provide instructions on how to control cookies in some browsers:

Google Chrome: https://support.google.com/chrome/answer/95647?hl=en-GB
Microsoft Internet Explorer: https://support.microsoft.com/en-us/kb/278835

Mozilla Firefox: https://support.mozilla.org/en-US/kb/enable-and-disable-Cookies-website-preferences

Safari (mac OS X): https://support.apple.com/kb/PH21411?viewlocale=en_GB&locale=en_GB

^{**}Provider: eurocookie.galilcloud.wixapps.net

^{***}Provider: wix.com

^{****}Provider: gs.wixapps.net

Information on deleting or controlling cookies is also available on www.AboutCookie.org. The website www.AboutCookie.org is not provided by Stardust Consulting that thus cannot guarantee its accuracy, completeness or availability.

Please note, however, that deleting cookies or disabling future cookies or tracking tools may prevent you from accessing certain areas or features of the website of Stardust Consulting or may affect your user experience.

Article 5: Data retention

We will retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, audit, reporting, management or operational requirements. We may also retain your personal data for a reasonable period afterwards to allow us to respond to any follow up enquiries or complaints.

This means your personal data is to be deleted e.g. when:

- you have withdrawn consent to processing;
- the data is no longer up to date;
- you have requested the erasure of data or the restriction of processing.

Exceptions may apply to the processing for historical or statistical purposes.

For example, emails are stored in Stardust Consulting's email management software, as well as on the corresponding webmail. Both are protected with password.

Please note that the website of Stardust Consulting is hosted on the Wix platform. Wix provides us with the online platform that allows us to propose our services to you. Your data may be stored through Wix's data storage, databases and the general Wix applications. They store your possible data on secure servers behind a firewall, located in the EU (Ireland).

Extract from Wix privacy policy:

« We may retain your Personal Information (as well as your Users-of-Users' Information) for as long as your User Account is active, as indicated in this Privacy Policy or as otherwise needed to provide you with our Services.

We may continue to retain such Personal Information even after you deactivate your User Account and/or cease to use any particular Services, as reasonably necessary to comply with our legal obligations, to resolve disputes regarding our Users or their Users-of-Users, prevent fraud and abuse, enforce our agreements and/or protect our legitimate interests.

We maintain a data retention policy which we apply to information in our care. Where your Personal Information is no longer required we will ensure it is securely deleted. »

Article 6: Disclosure of personal data to third parties

We do not sell, trade, or transfer your personally identifiable information to third parties. This does not include trusted third parties who help us operate our website or conduct our business, as long as these parties agree to keep this information confidential.

We believe that it is necessary to share information in order to investigate, prevent or take action regarding illegal activities, alleged fraud, situations involving potential threats to the physical security of any person, violations of our general conditions of sales, or when the law compels us to do so.

Article 7: Data protection

Stardust Consulting takes reasonable technical and organizational steps to ensure the security of all information it collects, including protection of the information from misuse and loss and from unauthorized access, modification or disclosure. For example, your personal information may be stored and maintained in a secure cloud-based environment, which can be accessed only by authorized personnel. Some of these services are hosted by third parties located in the United States. However, as no data transmission over the internet or information stored on servers accessible through the internet can be guaranteed to be fully secure, we cannot ensure or warrant the security of any information you send to us or receive from us online.

In addition, only employees or partners of Stardust Consulting who need to perform specific work (for example, billing or customer service) have access to personally identifiable information. The computers and servers used to access personally identifiable information, including access to the servers on the Wix platform, are kept in a secure environment and protected by passwords.

Extract from Wix privacy policy:

« Wix has implemented security measures designed to protect the Personal Information you share with us, including physical, electronic and procedural measures. Among other things, we offer HTTPS secure access to most areas on our Services; the transmission of sensitive payment information (such as a credit card number) through our designated purchase forms is protected by an industry standard SSL/TLS encrypted connection; and we regularly maintain a PCI DSS (Payment Card Industry Data Security

Standards) certification. We also regularly monitor our systems for possible vulnerabilities and attacks, and regularly seek new ways and Third Party Services for further enhancing the security of our Services and protection of our Visitors' and Users' privacy. Regardless of the measures and efforts taken by Wix, we cannot and do not guarantee the absolute protection and security of your Personal Information, your Users-of-Users' Information or any other User Content you upload, publish or otherwise share with Wix or anyone else.

We therefore encourage you to set strong passwords for your User Account and User Website, and avoid providing us or anyone with any sensitive information of which you believe its disclosure could cause you substantial or irreparable harm. Furthermore, because certain areas on our Services are less secure than others (for example, if you set your Support forum ticket to be "Public" instead of "Private", or if you browse to a non-SSL page), and since e-mail and instant messaging are not recognized as secure forms of communications, we request and encourage you not to share any Personal Information on any of these areas or via any of these methods.

If you have any questions regarding the security of our Services, you are welcome to contact us at privacy@wix.com. »

Article 8: Links to other websites

Stardust Consulting's website has links to various external websites that we think might be useful or of interest to you. Stardust Consulting, however, cannot be responsible for and does not endorse the privacy practices or the content of its linked websites. Stardust Consulting urges you to review the privacy policies of any website you visit once you leave Stardust Consulting's website, in order to determine for yourself the precision, accuracy and reliability of the information they contain. Links to various non-Stardust Consulting websites do not constitute or imply endorsement by Stardust Consulting of these websites, any products or services described on these sites, or of any other material contained in them.

Article 9: Lawful basis for data processing

For most processing of personal data we will be asking for your consent. However, some processing will be based on legitimate interests or for the purposes of concluding a contract, e.g. when we require certain personal data in order to provide a service you choose to use or simply to answer to your request, or to contact you. We only rely on the lawful basis of legitimate mutual interests where we are assured that we will not be using your data in a way you would not expect taking into account your rights and interests. That is, for instance, the case with the cookies used on our website.

In general, we use your personal data:

- In the context of the performance of a contract or in the framework of pre-contractual measures;
- When you have contacted us directly, either by mail or by phone;
- When we have got your consent;
- > To comply with the legal and regulatory provisions to which we are subject;
- Or several of the cases reported above.

Article 10: Your rights in relation to personal information

Your rights in relation to how organizations process your personal data have been significantly enhanced under the new General Data Protection Regulation 2018:

- 1. The right to be informed about the personal data as set out in this Privacy Policy.
- 2. The right of access: You may request access to your personal information collected by Stardust Consulting.
- 3. The right to rectification: If you think any of your personal information held by Stardust Consulting is not accurate, complete or up-to-date, let us know and we will correct the information.
- 4. The right to be forgotten: You can request for your personal data processed and held by us to be erased, unless there is another legal requirement for us to continue to process that data, in which case this will be explained to you in response to your request.
- <u>5. The right to restrict processing:</u> You can request we restrict processing when you have issues with the content of the information we hold or with how we have processed your data.
- 6. The right to data portability: When technically feasible we will endeavor to provide you with a copy of your personal data in a format that can easily be transferred to another organization. Please note this right only applies to information which you initially provided consent for us to use or when we used the information to perform a contract with you or to contact you.
- <u>7. The right to object:</u> You have the right to object to us using your data for marketing purposes or where the processing is based on legitimate interests. Please note that Stardust Consulting does not use your data for marketing purposes.
- 8. Rights in relation to profiling: Stardust Consulting does not process any personal data for profiling as defined by the Regulation.

Article 11: This Policy is subject to change

We reserve the right to modify this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make consequent changes to this Policy, we will notify you here, in this Policy, that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

Article 12: Consent

By using our website and/or our services, you consent to our Privacy Policy.

Article 13: For more information or complaints

If you have any questions, comments or complaints about this Policy, feel free to contact us at <u>virginie.chantry@gmail.com</u>. If you are not satisfied by our response you also have the right to make a complaint to the rightful authority.