

PRIVACY POLICY

This Privacy Policy was last updated on April 15, 2021.

INTRODUCTION

Astaras, Inc. (referred to herein as "we," "us," and "our") is committed to protecting the privacy and security of the personal information we receive and collect from you. We also believe in transparency, and are committed to informing you about how we treat your personal information.

This Privacy Policy (the "Policy"), together with our Terms of Use (http://www.astaras.com/docs/Astaras_Terms_of_use.pdf), apply to www.astaras.com (the "Site"). This Policy describes the ways in which we use and share (1) personal information that users, visitors, and customers ("you" or "your") provide to us when using the Site, and (2) certain information about you that is automatically collected when you access or use the Site. This Policy also describes certain rights and options that you may have with regard to your personal information.

This Policy does **not** apply to (1) information collected by us offline, or (2) information collected through any third party (including our affiliates and subsidiaries) and any third party application, website, or content (including advertising) that may link to or be accessible from or on the Site.

PLEASE READ THIS POLICY CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION. IF YOU DO NOT AGREE WITH THE TERMS AND CONDITIONS OF THIS POLICY, YOU SHOULD NOT ACCESS OR USE THE SITE OR ANY FUNCTIONS RELATED THERETO.

BY USING, ACCESSING, OR VISITING THE SITE, OR BY SUBMITTING YOUR INFORMATION THROUGH IT, YOU CONSENT TO THIS POLICY AND TO OUR COLLECTION AND SHARING OF YOUR INFORMATION IN ACCORDANCE WITH THE TERMS OF THIS POLICY.

WHAT INFORMATION DO WE COLLECT?

We may collect and process the following personal information from you for the purposes set forth below:

Category	Types of Data and Purpose
Use of Site	When you visit or otherwise utilize the Site, we may ask you for your name, address, telephone number, email address, or other contact details in order to offer services and respond to any request or inquiry.
Cookies and Similar Technologies	Please see the Cookies and Similar Technologies section of this Policy below. If you choose to disable cookies and similar technologies, some areas and features of the Site may not work properly.
Automated Information	When you visit our Site, we automatically collect information from your browser or your mobile device, which includes the date and time of your visit, your Internet Protocol (IP) address or unique device identifier, domain server, your browser type, cookies and data about which pages you visit in order to allow us to operate and provide the Site. Different rules may apply if you visit the Site from a location outside the United States. This information is used to understand how you interact with the Site and to provide you with advertising and a more personalized experience. To

	learn more about our collection of technical data, please see the Cookies and Similar Technologies section of this Policy below.
Email Interconnectivity	If you receive email communications from us, we may use certain tools to capture data related to if/when you open our message and if/when you click on any links or banners it contains. Other information collected through this email tracking feature includes: your email address, the date and time of your "click" on the email, a message number, the name of the list from which the message was sent, a tracking URL number, and a destination page. We use this information to enhance our marketing efforts. We do not sell or distribute this information to third parties.
Mailing List, Newsletters, and Materials	In the event we offer any mailing lists, newsletters, or marketing lists or you download or access other materials, including but not limited brochures, data sheets, checklists, and operating instructions, we collect your contact information, including your email address, phone number, and/or postal address, when necessary to contact you in the way(s) that you request.
Feedback / Support / Inquiries	If you provide us with feedback or contact us for support or to ask us questions, such as any contact forms, we may collect your name, address, telephone number, email address, and other information needed to respond to your feedback, or request for support, or to answer your question.
Your Communications	When you communicate with us, we may retain your communications in order to process and respond to them, as well as to improve our services. We may use your email address to communicate with you about our services or send you periodic emails. If at any time you would like to unsubscribe from receiving future emails, you may unsubscribe through the provided method.
Financial and Payment Information	If you or your organization choose to purchase products or services from us, we may collect your or your organization's name, address, telephone number, bank account number, bank routing information, and other data necessary to process payments. By submitting your payment information, you expressly consent to the sharing of your information with third-party payment processors and other third-party services (including but not limited to vendors who provide fraud detection services to us and other third parties). Please note that credit card numbers and similar information may not stored on our servers.
Third Party Information	In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly-available sources.

COOKIES AND SIMILAR TECHNOLOGIES

A "cookie" is a small file created by a web server that can be stored on a user's device for use either during a particular browsing session (a "session" cookie) or a future browsing session (a "persistent" cookie). This file may include information about your IP addresses, browser type, internet service provider (ISP), URLs of any referring or exited webpages, operating system, and/or date and time stamps.

We use cookies to enable certain website functions, develop web browsing analytics, store and track your preferences, and enable the delivery of advertising and marketing, when applicable. For example, we may track the number of "hits" or visits to the Site, the most popular times of day and sections visited, and the range of devices and browsers most commonly used to view the Site. We do not sell or distribute any of this information to third parties.

What similar technologies are in use and why do we use them?

Like most websites, as you navigate through and interact with the Site, we may passively collect information about your browsing activities using cookies and other automatic data collection technologies, such as Internet tags, web beacons (clear gifs., pixel tags, and single-pixel gifs), and navigational data collection (log files, server logs, etc.) in order to improve functionality of the Site and analytics.

- Web beacons: These are tiny graphics with unique identifiers that are used to understand browsing activity. In contrast to cookies, which are stored on a user's computer hard drive, web beacons are rendered invisible on web pages when you open a page.
- Social Widgets: These are buttons or icons provided by third-party providers. If such widgets are implemented in the Site, these social widgets may collect browsing data, which may be received by the third party that provided the widget and are controlled by third parties.
- UTM Codes: These are strings that can appear in a URL (the "Uniform Resource Locator," which is typically the http or https address entered to go to a web page) when a user moves from one web page or website to another, where the string can represent information about browsing, such as which advertisement, page, or publisher sent the user to the receiving website.

The aggregate data collected by these passive technologies typically does not target any personally identifying information, but personal information we store about you may be linked to information stored in and obtained from cookies in order to improve our marketing, analytics, or website functionality.

Google Analytics and Similar Technologies

We may use Google Analytics, Google Maps and similar technologies to collect and process statistical data about the number of people using the Site, and for providing services on the Site. This does not include personally identifiable information, nor do we store or associate such analytics with personally identifiable information collected elsewhere. Any data collected is used in accordance with our Policy and Google's privacy policy. If you do not want to receive any user-based advertising, you can disable the placement of ads by using Google's ad settings.

Other Third Party Technologies

Some third parties may use automated data collection technologies to collect information about you when you browse the Internet. The information they collect about your online browsing activities over time and across different websites and other online services may be associated with your personal information and used to provide you with targeted content. We do not control these third parties' technologies or how they may be used. If you have any questions about targeted content, you should contact the responsible party directly or consult its privacy policy.

Choices About Cookies

We provide you with choices regarding the personal information you provide to us, and we have created ways to give you control over our use of your information. Most web browsers are set by default to accept cookies. If you do not wish to receive cookies, you may set your browser to refuse all or some types of cookies or to alert you when cookies are being sent by website tracking technologies and advertising. Note that, if you decline the use of cookies, you may not have access to the full benefits of the Site.

When you visit the Site, it will prompt you to confirm whether you approve of the use of a cookie. You may adjust your browser settings to opt out of accepting a "persistent" cookie and to only accept "session" cookies, but you will need to log in each time you want to enjoy the full functionality of the Site.

Please be aware that adjusting the cookie settings on the Site may not fully delete all of the cookies that have already been created. To delete them, visit your web browser settings after you have changed your cookie settings on the Site.

HOW WE USE YOUR INFORMATION

We may collect and use the types of personal information listed above in an effort to improve your experience on the Site, to provide services to you, and to communicate with you about the information you have requested. We may also use personal information to help target specific offers to you and to help us develop and improve the Site and our services. Additionally, we may use your personal information in the following ways:

- To provide you with the services you or your organization have requested and to manage our relationship with you or your organization, including administering your account, processing payments, accounting, auditing, billing and collection and taking other steps necessary to the performance of our business relationship with you;
- To present and improve the Site's content and functionality;
- To personalize your experience (Your information helps us to better respond to your individual needs.)
- To improve customer service (Your information helps us to more effectively respond to your customer service requests and support needs.)
- To respond to visitor, subscriber, and customer inquiries;
- To determine user interests, needs, and preferences;
- To provide notice of changes to the Site or the services we offer or provide through it;
- To conduct research and analysis;
- To manage and maintain the security of the Site and our services;
- To market our services and products to you. We will only provide you with marketing-related information after you have, where legally required to do so, opted in to receive those

communications and having provided you with the opportunity to opt-out of such communications at any time. We do not sell or distribute this information to third parties or use it for any other purpose;

- To send periodic emails including information and updates pertaining to your order. We will also use your contact information to respond to your requests or inquiries. We may use your contact information to send you information about our company, including our affiliates, or our products or services, or to contact you when necessary. You may opt out of receiving emails by choosing to opt out on our Website.

SHARING AND DISCLOSING OF YOUR PERSONAL INFORMATION

We may share your information in the following contexts:

Category	Disclosure Contexts
Subsidiaries and Acquisitions	We may share your personal information with our subsidiaries and affiliates and with their respective officers, directors, employees, accountants, attorneys and agents. In addition, we may disclose your personal information in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our company assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about the Site's users is among the assets transferred.
Disclosures With Your Consent	We may ask if you would like us to share your personal information with other unaffiliated third parties who are not described elsewhere in this Policy. We will only disclose your personal information in this context with your consent.
Disclosures Without Your Consent	We may disclose your personal information in response to subpoenas, warrants, court orders or other legal process, or to comply with relevant laws. We may also share your personal information in order to establish or exercise our legal rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property or any other violation.
Service Providers	<p>We may share your personal information with our service providers that need access to your information to provide operational or other support services on our behalf. Among other things, service providers may help us to administer the Site, support our provision of services requested by you; provide technical support; send marketing, promotions and communications to you about our services; provide payment processing; and assist with other legitimate purposes permitted by law.</p> <p>All such third-party service providers are required to maintain the confidentiality of your information and are prohibited from using your personal information except for the purposes for which we disclose it to them or as required by law.</p>
Aggregated Data	We may disclose aggregated information about our users, and information that does not identify any specific individual, such as

	groupings of demographic data and customer preferences, for new product and marketing development.
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HOW LONG DO WE STORE YOUR PERSONAL INFORMATION?

We will retain your personal information as needed to fulfill the purposes for which it was collected. We will retain and use your personal information as long as necessary to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements.

When we no longer have a purpose to retain your personal information, we will securely destroy your personal information in accordance with applicable law and our policies. We take reasonable steps to delete the personal information we collect if your registration to use the Site lapses and you opt out of receiving further communications from us, or if you ask us to delete your information, unless we determine that doing so would violate our existing, legitimate legal, regulatory, dispute resolution, contractual, or similar obligations. To the extent permitted by law, we may retain and use anonymous and aggregated information for performance reporting, benchmarking, and analytic purposes and for product and service improvement.

HOW DO WE PROTECT YOUR INFORMATION?

We have put in place reasonable and appropriate security measures to protect the personal information that you share with us from being accidentally lost, used, altered, or disclosed or accessed in an unauthorized manner. From time to time, we review our security procedures to consider appropriate new technology and methods.

While our security measures seek to protect your personal information in our possession, no security system is perfect, and no data transmission over the Internet can be guaranteed to be completely secure. As a result, while we strive to protect your personal information, we cannot guarantee or warrant the security of any information you transmit to or from our Site, and you do so at your own risk. We cannot promise that your personal information will remain absolutely secure in all circumstances. We are not responsible for circumvention of any privacy settings or security measures we provide.

If a security breach causes an unauthorized intrusion into our Site or systems that compromises your data, we will notify you and any applicable regulator when we are required to do so by applicable law.

RIGHTS AND CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

Please use the Contact Us details at the end of this Policy to exercise your rights and choices under this Policy. If you would like to manage, change, limit, or delete your personal information or if you no longer want to receive any email, postal mail, or telephone contact from us or our affiliates in the future, such requests may be submitted via the Contact Us details at the end of this Policy.

Cookies. As discussed above, you can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Site may then be inaccessible or not function properly.

Disclosure of Your Information for Third-Party Advertising. We do not share your personal information with unaffiliated third parties for promotional purposes.

Updating Your Personal Information. If any of the personal information you have provided to us changes, please let us know. For instance, if your email address changes, you may wish to cancel any request you have made of us; or, if you become aware of inaccurate personal information about you, you may use the "Contact Us" details provided at the end of this Policy to update your information. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

Right of Access. If required by law, upon request, we will grant reasonable access to the personal information that we hold about you.

Accuracy. Our goal is to keep your personal information accurate, current, and complete. Please contact us if you believe your information is not accurate or if it changes.

Right to Object. In certain circumstances, if permitted under applicable law, you have the right to object to processing of your personal information and to ask us to erase or restrict our use of your personal information. If you would like us to stop using your personal information, please contact us, and we will let you know if we are able to agree to your request.

Right to Erasure and Deletion of Your Personal Information. You may have a legal right to request that we delete your personal information when it is no longer necessary for the purposes for which it was collected, or when, among other things, your personal information has been unlawfully processed. All deletion requests should be sent to the address noted in the Contact Us section of this Policy.

We may decide to delete your personal information if we believe it is incomplete, inaccurate, or that our continued storage of your personal information is contrary to our legal obligations or business objectives. When we delete personal information, it will be removed from our active servers and databases and the Site; but, it may remain in our archives when it is not practical or possible to delete it. We may also retain your personal information as needed to comply with our legal obligations, resolve disputes, or enforce any agreements.

Right to Withdraw Consent. If you have provided your consent to the collection, processing, and transfer of your personal information, you may have the right to fully or partially withdraw your consent. To withdraw your consent, please notify us using the information in the Contact Us section of this Policy, and you may follow opt-out links on any marketing communications sent to you. Once we have received notice that you have withdrawn your consent, in whole or in part, we will no longer process your information for the purpose(s) to which you originally consented and have since withdrawn unless there are compelling legitimate grounds for further processing that override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. Withdrawal of consent to receive marketing communications will not affect the processing of personal information for the provision of our services.

Right to Complain. If you believe that your rights relating to your personal information have been violated, you may lodge a complaint with the applicable enforcement authority or seek a remedy through the courts. You may also lodge a complaint with us by contacting us using the information provided in the Contact Us section of this Policy.

Online Tracking. We may not recognize browser settings or signals of tracking preferences, which may include "Do Not Track" instructions. "Do Not Track" is a web browser setting that seeks to disable the tracking of individual users' browsing activities. We adhere to the standards set out in this Policy and do

not currently respond to "Do Not Track" signals on the Site or on third-party websites or online services where we may collect information.

CALIFORNIA RESIDENTS

CCPA Notice at Collection. For purposes of the California Consumer Privacy Act ("CCPA"), in collecting the information described above, we collect the categories of personal information listed below. If your information is collected in the context of a business relationship with us, it may not be covered by the CCPA.

CCPA Category	Description
Identifiers	<p>When collecting user information, we will receive your name, email address, and username.</p> <p>When collecting any other information, we will receive your name and email address.</p> <p>When collecting cookies and similar instruments, we will receive your Internet Protocol (IP) address or unique device identifier.</p>
Categories of personal information described in the California Customer Records statute	<p>When collecting user information, we will receive your name, email address, username, and unique personal identifier.</p> <p>When collecting any other information, we will receive your name and email address.</p> <p>When collecting cookies and similar instruments, we will receive your Internet Protocol (IP) address or unique device identifier.</p>
Internet or other electronic network activity information	<p>We collect cookies and similar instruments as described in under "Cookies and Similar Technologies".</p> <p>When collecting usage information, we will automatically receive information from your browser and your device, which includes the date and time of your visit as well as your location, Internet Protocol (IP) address, domain server, browser type, access time, and data about which pages you visit.</p>
Geolocation data	<p>When collecting cookies and similar instruments and usage information we will receive your location while using the Site.</p>

Personal Information Collected. As described in this Policy, we have collected the categories of personal information listed above during the preceding 12 months.

Personal Information Sold. We have not sold categories of personal information during the preceding 12 months.

CCPA Requests. The CCPA gives consumers the right to request that we (1) disclose what personal information we collect, use, disclose, and sell, and (2) delete certain personal information that we have collected or maintain. You may submit these requests to us as described below, and we honor these rights where they apply.

However, by way of example, these rights do not apply where we collect or sell a consumer's personal information if: (1) we collected that information while the consumer was outside of California, (2) no part of a sale of the consumer's personal information occurred in California, and (3) no personal information collected while the consumer was in California is sold. In addition, de-identified information is not subject to these rights.

If a request is submitted in a manner that is not one of the designated methods for submission, or if the request is deficient in some manner unrelated to our verification process, we will either (1) treat the request as if it had been submitted in accordance with the designated manner, or (2) provide you with specific directions on how to submit the request or remedy any deficiencies with the request, as applicable.

Request to Know. As a California resident, you have the right to request: (1) the specific pieces of personal information we have collected about you; (2) the categories of personal information we have collected about you; (3) the categories of sources from which the personal information is collected; (4) the categories of personal information about you that we have sold and the categories of third parties to whom the personal information was sold; (5) the categories of personal information about you that we disclosed for a business purpose and the categories of third parties to whom the personal information was disclosed for a business purpose; (6) the business or commercial purpose for collecting, disclosing, or selling personal information; and (7) the categories of third parties with whom we share personal information. Our response will cover the 12-month period preceding our receipt of a verifiable request.

Request to Delete. As a California resident, you have a right to request the erasure/deletion of certain personal information collected or maintained by us. As described herein, we will delete your personal information from our records and direct any service providers (as defined under applicable law) to delete your personal information from their records. However, we are not required to honor a deletion request if an exemption applies under the law.

Submission Instructions. You may submit a request to know or to delete by email or via telephone pursuant to then current information listed in this Policy. Regarding requests to delete, we may present you with the choice to delete select portions of your personal information, but a global option to delete all personal information will be offered and more prominently presented.

Verification Process. We are required by law to verify the identities of those who submit requests to know or to delete. To determine whether the individual making the request is the consumer about whom we have collected information, we will verify your identity by matching the identifying information provided by you in the request to the personal information that we already maintain about you. We will inform you if we cannot verify your identity.

If we cannot verify the identity of the person making a request for categories of personal information, we may deny the request. If the request is denied in whole or in part for this reason, we will provide a copy of, or direct you to the Policy.

If we cannot verify the identity of the person making the request for specific pieces of personal information, we are prohibited from disclosing any specific pieces of personal information to the requestor. However, if denied in whole or in part for this reason, we will evaluate the request as if it is seeking the disclosure of categories of personal information about the consumer.

If we cannot verify the identity of the person making a request to delete, we may deny the request.

If there is no reasonable method by which we can verify the identity of the requestor to the degree of certainty required, we will state this in our response and explain why we have no reasonable method by which we can verify the identity of the requestor.

Authorized Agents. Authorized agents may submit requests via the methods identified in this Policy. If you use an authorized agent to submit a request to know or a request to delete, we may require you to: (1) provide the authorized agent with signed permission to do so; (2) verify your identity directly with us; and (3) directly confirm with us that you provided the authorized agent permission to submit the request. However, we will not require these actions if you have provided the authorized agent with power of attorney pursuant to the California Probate Code.

Excessive Requests. If requests from a consumer are manifestly unfounded or excessive, in particular because of their repetitive character, we may either (1) charge a reasonable fee, or (2) refuse to act on the request and notify the consumer of the reason for refusing the request. If we charge a fee, the amount will be based upon the administrative costs of providing the information or communication or taking the action requested.

Non-Discrimination. You have the right not to receive discriminatory treatment by us due to your exercise of the rights provided by the CCPA. We do not offer financial incentives and price or service differences, and we do not discriminate against consumers for exercising their rights under the CCPA.

Shine the Light. Under California Civil Code Section 1798.83, California residents who provide personal information in obtaining products or services for personal, family, or household use may be entitled to request and obtain from us once a calendar year information about the information we shared, if any, with other businesses for direct marketing uses. At present, we do not share your personal information with third parties for those third parties' direct marketing purposes. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing, if any, will be included in our response. As part of the California Online Privacy Protection Act, all users of our Site may make any changes to their information at any time by contacting us at info@astaras.net.

NEVADA RESIDENTS

You may submit a verified request to us at info@astaras.net to request that we not make any sale (as defined under Nevada law) of any covered information (as defined under Nevada law) that we have collected or will collect about you. Please provide your name and contact information in your request, and we will respond to your request in accordance with Nevada law.

THIRD PARTY SITES

This Policy is applicable only to the Site, and it does not apply to any third party websites.

The Site may contain links to, and media and other content from, third-party websites. These links are to external websites and third parties with which we have no relationship. Because of the dynamic media capabilities of the Site, it may not be clear to you which links are to the Site and which are to external, third party websites. If you click on an embedded third-party link, you will be redirected away from the Site to the external third-party website. You can check the URL to confirm that you have left this Site.

We cannot and do not (1) guarantee the adequacy of the privacy and security practices employed by or the content and media provided by any third parties or their websites, (2) control third parties' independent collection or use of your personal information, or (3) endorse any third party information, products, services or websites that may be reached through embedded links on this Site.

Any personal information provided by you or automatically collected from you by a third party will be governed by that party's privacy policy and terms and conditions. If you are unsure whether a website is controlled, affiliated, or managed by us, you should review the privacy policy and practices applicable to each linked website.

CHILDREN'S ONLINE PRIVACY PROTECTION ACT COMPLIANCE

We are committed to protecting the privacy of children. The Children's Online Privacy Protection Act, as well as other data privacy regulations, restrict the collection, use, or disclosure of personal information from and about children on the Internet. Our Site and services are not directed to children aged 18 or younger, nor is information knowingly collected from children under the age of 18. No one under the age of 18 may access, browse, or use the Site or provide any information to or on the Site. If you are under 18, please do not use or provide any information on the Site (including, for example, your name, telephone number, and email address). If we learn that we have collected or received personal information from a child under the age of 18 without a parent's or legal guardian's consent, we will take steps to stop collecting that information and delete it. If you believe we might have any information from or about a child under the age of 18, please contact us using the contact information provided below.

UPDATES AND CHANGES TO THIS POLICY

We reserve the right, at any time and without notice, to add to, change, update, or modify this Policy to reflect any changes to the way in which we treat your personal information or in response to changes in law. Should this Policy change, we will post all changes we make to this Policy on this page. If we make material changes to how we treat your personal information, we will also notify you through a notice on the home page of the Site for a reasonable period of time. Any such changes, updates or modifications shall be effective immediately upon posting on the Site. The date on which this policy was last updated is identified at the beginning of this Policy.

You are expected to, and you acknowledge and agree that it is your responsibility to, carefully review this Policy prior to using the Site, and from time to time, so you are aware of any changes. Your continued use of the Site after the "Last Updated" date will constitute your acceptance of and agreement to such changes and to our collection and sharing of your personal information according to the terms of the then-current Policy. If you do not agree with this Policy and our practices, do not access, view, or use any part of the Site.

OBJECTION TO E-MAIL ADVERTISING

We hereby expressly object to the use of contact details published on this Site for sending advertising and information material, including spam e-mails, unless explicitly requested by us. We reserve the right to exercise any remedies and rights available at law and equity upon an infringement.

CONTACT US

For more information, or if you have any questions regarding this Policy, wish to exercise your rights, or wish to lodge a complaint with us, you may contact us using the information below, and we will do our best to assist you. Please note, if your communication is sensitive, you may wish to contact us by postal mail or telephone.

In Writing: Astaras, Inc.
6901 Bryan Dairy Road
Suite 160
Largo, Florida 33777

By Telephone: (727) 546-9600

By Email: info@astaras.net