

PRIVACY NOTICE

www.stromboli.in

Version1.0 Date: June 13, 2023

1. GENERAL

Stromboli Storage Systems ("Company" or "we" or "us" or "our") respects the privacy of everyone ("Sites' visitor" "user" or "you") that uses our website www.stromboli.in, as well as other device or online applications related or connected thereto (collectively, the "Sites").

The following Company Privacy Notice ("Privacy Notice") is designed to inform you, as a user of the Sites, about the types of personal information that Company may gather about or collect from you in connection with your use of the Sites. It also is intended to explain the conditions under which Company uses and discloses that personal information, and your rights in relation to that personal information.

The Sites are hosted: (Check one)

In the United States. The Sites are subject to U.S. state and federal law. If you are accessing our Sites from other jurisdictions, please be advised that you are transferring your personal information to us in the United States, and by using our Sites, you are agreeing to that transfer and use of your personal information in accordance with this Privacy Notice. You also agree to abide by the applicable laws of the State of California and U.S. federal law concerning your use of the Sites and your agreements with us.

Outside the United States. The Sites are hosted in _____ [Country] and are subject to _____ [Country] law. If you are accessing our Sites from other jurisdictions, please be advised that you are transferring your personal information to us in _____ [Country], and by using our Sites, you are agreeing to that transfer and use of your personal information in accordance with this Privacy Notice. You also agree to abide to the applicable laws of _____ [Country] concerning your use of the Sites and your agreements with us.

If your use of the Sites would be unlawful in your jurisdiction, please do not use the Sites.



Company Information

Company Name: Stromboli Storage Systems

Address: 29/1 Chandramouly Farms, Laxmipura, Bannerghatta Road, Bangalore 560083, India.

Email: ky@stromboli.in

Phone: +91-91481-50778

Fax: +91-91481-50779

2. HOW WE COLLECT AND USE YOUR PERSONAL INFORMATION

Company gathers personal information from users of the Sites. When you browse our Sites, subscribe to our services or contact us through various social or web forms you are voluntarily sharing personal information with us. This personal information also includes various data that we collect automatically. This may be the user's Internet Protocol (IP) address, operating system, browser type and the locations of the Sites the user views right before arriving at, while navigating and immediately after leaving the Sites. It may also include various technical aspects of user's computer or browser and users browsing habits that are collected through cookies. Company may analyze various mentioned personal information gathered from or about users to help Company better understand how the Sites are used and how to make them better. By identifying patterns and trends in usage, Company is able to better design the Sites to improve users' experiences, both in terms of content and ease of use. From time to time, Company may also release the anonymized information gathered from the users in the aggregate, such as by publishing a report on trends in the usage of the Sites.

When we believe disclosure is appropriate, we may disclose your information to help investigate, prevent or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of Company, our users, our employees or others; to comply with applicable law or cooperate with law enforcement; to enforce our Terms of Use or other agreements or policies, in response to a subpoena or similar investigative demand, a court order or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us. We will notify you if permitted before undertaking such disclosures.

Company reserves the right to transfer all information in its possession to a successor organization in the event of a merger, acquisition, bankruptcy or other sale of all or a portion of Company's assets. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred information will be subject to this Privacy Notice, or to a new privacy notice if you are given notice of that new privacy notice and are given an opportunity to affirmatively opt-out of it.



3. DO WE USE COOKIES? (Check one)

We do NOT use cookies.

We use cookies and have a Cookie Notice. Please read our Notice on cookies here:
_____ [Cookie Notice URL].

We use cookies and have listed them here.

A “Cookie” is a string of information which assigns you a unique identification that a website stores on a user’s computer, and that the user’s browser provides to the website each time the user submits a query to the website. We use cookies on the Sites to keep track of services you have used, to record registration information regarding your login name and password, to record your user preferences, to keep you logged into the Sites and to facilitate purchase procedures. Company also uses Cookies to track the pages that users visit during each of the Sites’ sessions, both to help Company improve users’ experiences and to help Company understand how the Sites is being used. As with other personal information gathered from users of the Sites, Company analyzes and discloses in aggregated form information gathered using Cookies, so as to help Company, its partners and others better understand how the Sites is being used. SITES’ USERS WHO DO NOT WISH TO HAVE COOKIES PLACED ON THEIR COMPUTERS SHOULD SET THEIR BROWSERS TO REFUSE COOKIES BEFORE ACCESSING THE SITES, WITH THE UNDERSTANDING THAT CERTAIN FEATURES OF THE SITES MAY NOT FUNCTION PROPERLY WITHOUT THE AID OF COOKIES. SITES’ USERS WHO REFUSE COOKIES ASSUME ALL RESPONSIBILITY FOR ANY RESULTING LOSS OF FUNCTIONALITY.

Company currently uses the following cookies on the Sites: [List cookies according to each category]

• **Strictly Necessary Cookies:** _____

• **Performance Cookies:** _____

• **Functional Cookies:** _____

• **Targeting or Advertising Cookies:** _____



4. DO WE SHARE YOUR PERSONAL INFORMATION?

General Provisions

Company contractually prohibits its contractors, affiliates, vendors and suppliers from disclosing any personal information received from Company, other than in accordance with this Privacy Notice. These third parties may include advertisers, providers of games, utilities, widgets and a variety of other third-party applications accessible through the Sites. Company neither owns nor controls the third-party websites and applications accessible through the Sites. Thus, this Privacy Notice does not apply to personal information provided to or gathered by the third parties that operate them. Before visiting a third party, or using a third-party application, whether by means of a link on the Sites, directly through the Sites or otherwise, and before providing any personal information to any such third party, users should inform themselves of the privacy policies and practices (if any) of the third party responsible for those Sites or applications, and should take those steps necessary to, in those users' discretion, protect their privacy.

Third-Party Advertisers (Check one)

- We do NOT allow third-party advertising companies to serve ads when you visit the Sites.**
- We may use third-party advertising companies to serve ads when you visit the Sites.** These companies may use information about your visits to the Sites that are contained in Cookies in order to provide advertisements about goods and services of interest to you. Using a tool created by the [Network Advertising Initiative](#), you can [opt out](#) of several third-party ad servers' and networks' Cookies simultaneously. If you would like more personal information about this practice and to know your choices about not having this personal information used by these companies, please follow the following links: http://networkadvertising.org/managing/opt_out.asp, <http://preferences-mgr.truste.com/>, or <http://www.aboutads.info/choices/>.

Analytics (Check one)

- We use Google Analytics.** We may use third-party vendors, including Google, who use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize and serve ads based on your past activity on the Sites, including Google Analytics for Display Advertising. The personal information collected may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. If you do not want any personal information to be collected and used by Google Analytics, you can install an opt-out in your web browser (<https://tools.google.com/dlpage/gaoptout/>) and/or opt out from Google Analytics for Display Advertising or the Google Display Network by using Google's Ads Settings (www.google.com/settings/ads).
- We do NOT use Google Analytics but we may partner with selected third parties to allow tracking technology on the Sites,** which will enable them to collect data about how you interact with the Sites and our services over time. This personal information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity.



Social Media (Check all that apply)

Users can connect their accounts to their social media accounts. We may provide you the option to connect your account on the Sites to your account on some social networking sites for the purpose of logging in, uploading personal information or enabling certain features on the Sites. When logging in using your social network credentials, we may collect the personal information you have made publicly available on the social networking site, such as your name, profile picture, cover photo, username, gender, friends network, age range, locale, friend list and any other personal information you have made public. Once connected, other users may also be able to see information about your social network, such as the size of your network and your friends, including common friends. By connecting your account on the Sites to your account on any social networking site. We will not send any of your account personal information to the connected social networking site without first disclosing that to you. Each social network may further allow you to set privacy controls around your personal information on their system, and our collection of personal information will always follow such controls and permissions. This feature is subject to continuous change and improvement by us and each social networking site involved, and therefore the available features and shared personal information are subject to change. Please visit our Privacy Notice for any updates.

The Sites have hyperlinks to social media networks. We may use hyperlinks on the Sites which will redirect you to a social network if you click on the respective link. However, when you click on a social plug-in, such as Facebook's "Like" button or Twitter's "tweet" button that particular social network's plugin will be activated and your browser will directly connect to that provider's servers. If you do not use these buttons none of your data will be sent to the respective social network's plugin providers. To illustrate this further, imagine the scenario where you click on the Facebook's "Like" button on the Sites. Facebook will receive your IP address, the browser version and screen resolution, and the operating system of the device you have used to access the Sites. Settings regarding privacy protection can be found on the websites of these social networks and are not within our control.

Third-Party Service Providers (Check one)

We do NOT use third-party service providers on the Sites.

We use third-party service providers on the Sites. We may share your personal information, which may include your name and contact information (including email address) with our authorized service providers that perform certain services on our behalf. These services may include fulfilling orders, providing customer service and marketing assistance, performing business and sales analysis, supporting the Sites' functionality and supporting contests, sweepstakes, surveys and other features offered through the Sites. We may also share your name, contact personal information and credit card personal information with our authorized service providers who process credit card payments. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such personal information for any other purpose. (Check one) You can contact us to receive our current list of providers. The following are the third-party service providers we use on the Sites: _____.



Marketing communication (Check one)

- We do NOT send marketing emails to users.**
- We send marketing emails to users.** If you have opted in to receiving marketing communication from us then Company may provide your personal information to third parties, with your consent, so that those third parties may directly contact you about additional products and services. To cease having your personal information used for marketing communication purposes, you can: (Check all that apply)
- Email us at ky@stromboli.in
- Opt out by clicking on the Unsubscribe button found in the footer of our emails
- Other: _____

5. MOBILE DEVICE ADDITIONAL TERMS (Check one)

- This Privacy Notice is NOT for a mobile application.
- This Privacy Notice is used for a mobile application.

- **Mobile Device.** If you use a mobile device to access the Sites or download any of our applications, we may collect device personal information (such as your mobile device ID, model and manufacturer), operating system, version personal information and IP address.
- **Geo-Location Personal Information.** Unless we have received your prior consent, we do not access or track any location-based personal information from your mobile device at any time while downloading or using our mobile application or our services, except that it may be possible for Company to determine from an IP address the geographic location of your point of connectivity, in which case we may gather and use such general location data.
- **Push Notifications.** We send you push notifications if you choose to receive them, letting you know when someone has sent you a message or for other service-related matters. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.
- **Mobile Analytics.** We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record personal information, such as how often you use the application, the events that occur within the application, aggregated usage, performance data and where the application was downloaded from. We do not link the personal information we store within the analytics software to any personal information you submit within the mobile application.

6. SECURITY

We take the security of your personal information seriously and use reasonable electronic, personnel and physical measures to protect it from loss, theft, alteration or misuse. However, please be advised that even the best security measures cannot fully eliminate all risks. We cannot guarantee that only authorized persons will view your personal information. We are not responsible for third-party circumvention of any privacy settings or security measures.



We are dedicated to protect all personal information on the Sites as is necessary. However, you are responsible for maintaining the confidentiality of your personal information by keeping your password and computer/mobile device access confidential. If you have an account with Company and believe someone has gained unauthorized access to it or your account please change your password as soon as possible. If you lose control of your account, you should notify us immediately.

7. PRIVACY RIGHTS - EU USERS

- We do NOT have EU users.
- We comply with the General Data Protection Regulation (GDPR).

If you reside in the European Union (EU), United Kingdom (UK), Switzerland, Norway, Lichtenstein, or Iceland, you have certain data protection rights under your local laws.

These rights may include:

- The right to request access and obtain a copy of your personal information
- The right to request edits or erasure of your personal information
- The right to limit the processing of your personal information
- Data portability right (if applicable)
- The right to object to the processing of your personal information

If Company relies on your consent to process your personal information, you have the right to withdraw your consent at any time. However, please note that this will not alter the validity of the processing before its withdrawal.

If you wish to exercise any of the mentioned rights please contact us by: (Check all that apply)

- Email at _____ [Email]
- Calling _____ [Phone number]
- Other: _____

or by referring to the contact details at the bottom of this Privacy Notice. Company has 30 days to respond to your request.

If you are not satisfied with Company's handling of your privacy concerns please note that you have the right to complain to your local data protection supervisory authority.

List of EU supervisory authorities: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

Switzerland supervisory authority: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you have any questions or comments about your privacy rights, you may email us at _____ [Email].



8. PRIVACY RIGHTS - CALIFORNIA USERS

Do Not Sell My Personal Information Notice - California Consumer Privacy Act (CCPA) (Check one)

Not applicable.

We comply with the California Consumer Privacy Act (CCPA). Under the CCPA, you have the right to:

- Request that Company disclose the categories and specific pieces of personal information that Company has collected about you
- Request that Company delete any personal information that was collected about you
- Request Company to not sell your personal information

Company has 45 days to respond to your request.

Personal Information (Check one)

Company has NOT disclosed or sold any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. Company will not sell personal information in the future belonging to Sites' visitors, users and other consumers.

Company has disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding twelve (12) months: (Check all that apply)

- Category A. Identifiers, such as contact details, like your real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name.
- Category B. Personal information, as defined in the California Customer Records law, such as your name, contact information, education, employment, employment history and financial information.
- Category C. Characteristics of protected classifications under California or federal law, such as gender or date of birth.
- Category D. Commercial information, such as transaction information, purchase history, financial details and payment information.
- Category E. Biometric information, such as fingerprints and voiceprints.
- Category F. Internet or other electronic network activity information, such as browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements.
- Category G. Geolocation data, such as device location.
- Category H. Audio, electronic, visual and similar information, such as images and audio, video or call recordings created in connection with our business activities.
- Category I. Professional or employment-related information, such as business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply for a job with us.
- Category J. Education information, such as student records and directory information.
- Category K. Inferences drawn from any of the personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.



If you wish to exercise any of the mentioned rights please contact us by: (Check all that apply)

- Email at ky@stromboli.in
- Calling toll-free at _____ [Phone number]
- Other: _____

or by referring to the contact details at the bottom of this Privacy Notice. We will answer as soon as possible.

If you are under 18 years of age

If you have registered account with Company, you have the right to request the removal of unwanted personal information that you publicly post on our Sites. To request the removal of such information, please contact us using the contact information provided below. Make sure to include your account's email address and a statement that you reside in California.

"Shine the Light Law"

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, personal information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this personal information would include a list of the categories of the personal information that was shared and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to the address listed below.

9. CHILDREN (Check one)

- Users under the age of 13 may NOT register and/or provide personal information to the Sites.**
- Users under the age of 13 may register and/or provide personal information to the Sites.** The Children's Online Privacy Protection Act ("COPPA") protects the online privacy of children under 13 years of age. We do not knowingly collect or maintain personal information from anyone under the age of 13, unless or except as permitted by law. Any person who provides personal information through the Sites represents to us that he or she is 13 years of age or older. If we learn that personal information has been collected from a user under 13 years of age on or through the Sites, then we will take the appropriate steps to cause this personal information to be deleted. If you are the parent or legal guardian of a child under 13 who has become a member of the Sites or has otherwise transferred personal information to the Sites, please contact Company using our contact personal information below to have that child's account terminated and personal information deleted.



10. DO-NOT-TRACK NOTICE (Check one)

The Sites do NOT respond to do-not-track-signals. Most web browsers and some mobile operating systems include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. Because there is not yet a common understanding of how to interpret the DNT signal, the Sites currently do not respond to DNT browser signals or mechanisms.

The Sites respond to do-not-track-signals. Most web browsers and some mobile operating systems include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. The Sites currently do respond to DNT browser signals or mechanisms.

11. GOVERNING LAW

Disputes over privacy issues contained in this Privacy Notice will be governed by the law of the State of Karnataka, INDIA. You also agree to abide by any limitation on damages contained in our Terms of Use, or other agreement that we have with you.

12. PRIVACY NOTICE CHANGES

Company may, in its sole discretion, change this Privacy Notice from time to time. Any and all changes to Company's Privacy Notice will be reflected on this page and the date of the new version will be stated at the top of this Privacy Notice. Unless stated otherwise, our current Privacy Notice applies to all personal information that we have about you and your account. Users should regularly check this page for any changes to this Privacy Notice. Company will always post new versions of the Privacy Notice on the Sites. However, Company may, as determined in its discretion, decide to notify users of changes made to this Privacy Notice via email or otherwise. Accordingly, it is important that users always maintain and update their contact personal information.

13. CONTACT

If you have any questions regarding our Privacy Notice, please contact us at:

Company Name: Stromboli Storage Systems

Address: 29/1 Chandramouly Farms, Laxmipura, Bannerghatta Road, Bangalore 560083, India.

Email: ky@stromboli.in

Phone: +91-91481-50778

Fax: +91-91481-50779

Data Protection Officer Name: Mr. K. Y. Philip

Address: 14 Spring Valley, Bannerghatta Road, Bangalore 560083, India.

Email: ky@stromboli.in

Phone: +91-99805-10061

