

Privacy Policy

I. Introduction

When you use AvatarStarz, you trust us with your personal data. We're committed to keeping that trust. That starts with helping you understand our privacy practices.

This notice describes the personal data we collect, how it's used and shared, and your choices regarding this data.

II. Overview

A. Scope

This notice applies to users of AvatarStarz services anywhere in the world, including users of AvatarStarz apps, websites, features, or other services.

This notice describes how AvatarStarz and its affiliates collect and use personal data. This notice applies to all users of our apps, websites, features, or other services anywhere in the world. This notice specifically applies to:

- Explorers: individuals who request or receive live experiences
- Stars: individuals who provide live experiences

This notice also governs AvatarStarz other collections of personal data in connection with its services. For example, we may collect personal data of those who start but do not complete applications to be Stars or Explorers; or other personal data in connection with our mapping technology and features.

All those subject to this notice are referred to as "users" in this notice.

In addition, please note the following; See “*Your California Privacy Rights*”, “*Your Nevada Privacy Rights*”, and “*Your European Union and UK Privacy Rights*”, for more information about certain legal rights.

Our practices are subject to applicable laws in the places in which we operate. This means that we engage in the practices described in this notice in a particular country or region only if permitted under the laws of those places. Please contact us [here](#) with any questions regarding our practices in a particular country or region.

B. Data controller and transfer

Avatar Starz, Inc. is the data controller for the personal data collected in connection with use of AvatarStarz services.

AvatarStarz operates, and processes personal data, globally. We may also transfer such data to countries other than the one where our users live or use AvatarStarz services. We do so in order to fulfill our agreements with users, such as our Terms of Use, or based on users’ prior consent, adequacy decisions for the relevant countries, or other transfer mechanisms as may be available under applicable law, such as the [Standard Contractual Clauses](#).

Questions, comments, and complaints about AvatarStarz data practices can be submitted [here](#).

III. Data collections and uses

A. The data we collect

AvatarStarz collects personal data:

- *provided by users to AvatarStarz, such as during account creation*
- *created during use of our services, such as location, app usage, and device data*

from other sources, such as other users or account owners, business partners, vendors, insurance and financial solution providers, and governmental authorities

The following personal data is collected by or on behalf of AvatarStarz:

1. Data provided by users. This includes:

- User profile: We collect data when users create or update their AvatarStarz accounts. This may include their name, email, phone number, login name and password, address, profile picture, payment or banking information (including related payment verification information), driver's license and other government identification documents (which may indicate document numbers as well as birth date, gender, and photo). This also includes vehicle or insurance information of Stars, emergency contact information, user settings, and evidence of health or fitness to provide services using AvatarStarz apps where applicable.

We may use the photos submitted by users to verify their identities, such as through facial verification technologies. For more information, please see the section titled "How we use personal data."

- Background check and identity verification: In order to verify stars' eligibility to provide services through the AvatarStarz apps, we may collect information such as criminal record (where permitted by law), license status, known aliases, and right to work. This information may be collected by an authorized vendor on AvatarStarz behalf.
- Demographic data: We may collect demographic data about users, including through user surveys. In some countries, we may also receive demographic data about users from third parties.

We may also infer demographic data from other data collected from users.

- User content: We collect the data submitted by users when they contact AvatarStarz customer support, provide ratings or compliments for other users, restaurants, or merchants, or otherwise contact AvatarStarz. This may include feedback, photographs or other recordings collected by users, including audio or video recordings (such as from dashcams) submitted by users in connection with customer support. This also includes metadata relating to the method you use to communicate with AvatarStarz.

2. Data created during use of our services. This includes:

- Location data (stars): We collect stars' precise and/or approximate location data, including to enable Stars and Explorers, to enable safety features, to prevent and detect fraud, and to satisfy legal requirements. Avatar Starz, Inc.

collects this data when the AvatarStarz app is running in the foreground (app open and on-screen) or background (app open but not on-screen) of their mobile device.

- Location data (Stars and Explorers). We collect Stars and Explorers precise or approximate location data to enable and enhance use of our apps, including to improve services provided, enable safety features, and prevent and detect fraud.

We collect such data from users' mobile devices if they enable us to do so. (See "Choice and transparency" below for information on how users can enable location data collection). AvatarStarz collects such data from the time a live experience is requested until it is finished (and may indicate such collection via an icon or notification on your mobile device depending on your device's operating system), and any time the app is running in the foreground (app open and on-screen) of their mobile device.

Explorers may use the AvatarStarz apps without enabling AvatarStarz to collect precise location data from their mobile devices. However, this may affect features in the AvatarStarz apps. For example, a user who has not enabled location data collection will have to manually enter location information. In addition, the location data collected from a star during a live experience will be linked to the Explorers account, even if the Explorer has not enabled location data to be collected from their device, including for purposes of receipt generation, customer support, fraud detection, insurance, and litigation.

- Transaction information: We collect transaction information related to the use of our services, including the type of services requested or provided, order details, payment transaction information, date and time the service was provided, amount charged, distance traveled, and payment method. Additionally, if someone uses your promotion code, we may associate your name with that person.
- Usage data: We collect data about how users interact with our services. This includes data such as access dates and times, app features or pages viewed, app crashes and other system activity, and type of browser. We may also collect data regarding the third-party sites or services used before interacting with our services, which we use for marketing. (Please see "How We Use Data" below for more information on how we market our services to users).

In some cases, we collect this data through cookies, pixels, tags, and similar

tracking technologies that create and maintain unique identifiers. To learn more about these technologies.

- Device data: We may collect data about the devices used to access our services, including the hardware models, device IP address or other unique device identifiers, operating systems and versions, software, preferred languages, advertising identifiers, device motion data, and mobile network data.
- Communications data: We enable users to communicate with each other and AvatarStarz through AvatarStarz mobile apps and websites. For example, we enable Stars and Explorers to call, text, or send other files to each other (generally without disclosing their telephone numbers to each other). To provide this service, AvatarStarz receives some data regarding the calls, texts, or other communications, including the date and time of the communications and the content of the communications. AvatarStarz may also use this data for customer support services (including to resolve disputes between users), for safety and security purposes, to improve our services and features, and for analytics.

3. Data from other sources. These include:

- Users participating in our referral programs. For example, when a user refers to another person, we receive the referred person's personal data from that user.
- AvatarStarz account owners who request services for or on behalf of other users, or who enable such users to request or receive services through their accounts.
- users or others providing information in connection with claims or disputes.
- AvatarStarz business partners through which users create or access their AvatarStarz account, such as payment providers, social media services, or apps or websites that use AvatarStarz APIs or whose APIs AvatarStarz uses.
- AvatarStarz business partners in connection with debit or credit cards issued by a financial institution in partnership with AvatarStarz to the extent disclosed in the terms and conditions for the card.
- vendors who help us verify users' identity, background information, and eligibility to work, or who screen users in connection with sanctions, anti-money laundering, or know-your-customer requirements
- insurance, vehicle, or financial services providers for Stars
- marketing service providers or data resellers whose data AvatarStarz uses for marketing or research

- law enforcement officials, public health officials, and other government authorities

AvatarStarz may combine the data collected from these sources with other data in its possession.

B. How we use personal data

AvatarStarz uses personal data to enable reliable and convenient products and services.

We also use such data:

- *to enhance the safety and security of our users and services*
- *for customer support*
- *for research and development*
- *to enable communications between users*
- *to send marketing and non-marketing communications to users*
- *in connection with legal proceedings*

AvatarStarz does not sell or share user personal data with third parties for their direct marketing, except with users' consent.

We use personal data we collect:

1. To provide our services. AvatarStarz uses data to provide, personalize, maintain, and improve our services.

This includes using data to:

- create/update accounts
- process payments
- track and share the progress of user interaction (live experiences)
- personalize users' accounts. We may, for example, present an AvatarStarz user with personalized location or activity recommendations based on their prior live experiences and interaction with Stars or other users. Please see the section of this notice titled "Choice and transparency" to learn how to object to this use of personal data.
- perform necessary operations to maintain our services, including to troubleshoot software bugs and operational problems; to conduct data

analysis, testing, and research; and to monitor and analyze usage and activity trends.

AvatarStarz performs the above activities, including the collection and use of location data for purposes of these activities, on the grounds that they are necessary to fulfill our obligations to users under our Terms of Use or other agreements with users.

2. Safety and security. We use personal data to help maintain the safety, security, and integrity of our services and users. This includes:

- verifying users' identity and eligibility to provide live experiences, including through reviews of background checks, where permitted by law, to help prevent use of our services for illegal or illicit activities.
- using device, location, user profile, usage, and other data to prevent, detect, and combat fraud. This includes identifying fraudulent accounts or uses of our services, preventing use of our services by unauthorized Stars or Explorers, verifying user identities in connection with certain payment methods, and preventing and combating unauthorized access to users' accounts.
- using user ratings, reported incidents, and other feedback to encourage compliance with our Community Guidelines and as grounds for deactivating users with low ratings or who otherwise violated such guidelines in certain countries.
- using ratings, usage and other data to prevent matching of Explorers and Stars for whom there is higher risk of conflict (for instance, because one user previously gave the other a one-star rating).

AvatarStarz performs the above activities on the grounds that they are necessary to fulfill our obligations to users under our Terms of Use or other agreements with users, and/or for purposes of the legitimate safety and security interests of AvatarStarz or other parties, including users and members of the general public.

3. Customer support. AvatarStarz uses the information we collect (which may include call recordings) to provide customer support, including to investigate and address user concerns and to monitor and improve our customer support responses and processes.

AvatarStarz performs the above activities on the grounds that they are necessary to fulfill our obligations to users under our Terms of Use or other agreements with users.

4. Research and development. We may use personal data for testing, research, analysis, product development, and machine learning to improve the user experience. This helps us make our services more convenient and easy-to-use, enhance the safety and security of our services, and develop new services and features.

AvatarStarz performs the above activities on the grounds that they are necessary to fulfil our obligations to users under our Terms of Use or other agreements with users in improving our existing services and features, or for purposes of Uber's legitimate interests developing new services and features.

5. Marketing. AvatarStarz may use personal data to market our services to our users. This includes sending users communications about AvatarStarz services, features, promotions, sweepstakes, studies, surveys, news, updates, and events. We may do so through various methods, including email, text messages, push notifications, in app communications and ads, and ads on third party platforms.

We may also inform users about products and services offered by AvatarStarz partners. For example, we may provide recommendations, promotions, or ads for AvatarStarz partners based on users' past user interaction data. Although we inform users about products and services offered by AvatarStarz partners, we do not sell users' personal data to, or share it with, such partners or others for purposes of their own direct marketing or advertising, except with users' consent.

We may use the data we collect, including in combination with advertising partners' data, to personalize and improve the marketing communications (including ads) that we send on and off AvatarStarz apps and websites, including based on user location, use of AvatarStarz services, and user preferences and settings.

For information about how to opt out of certain marketing communications (including ads) from AvatarStarz and its advertising partners, please see the section titled "Marketing choices."

We may also send users communications regarding elections, ballots, referenda, and other political and notice processes that relate to our services. For example,

AvatarStarz may notify some users by email of ballot measures or pending legislation relating to AvatarStarz services in those users' areas.

AvatarStarz performs the above activities on the grounds that they are necessary for purposes of AvatarStarz legitimate interests in informing users about AvatarStarz services and features or those offered by AvatarStarz partners, or on the basis of user consent. See the sections titled "Choice and transparency" and "Marketing choices" for information on your choices regarding AvatarStarz use of your data for marketing.

6. Non-marketing communications. AvatarStarz may use personal data to generate and provide users with receipts; inform them of changes to our terms, services, or policies; or send other communications that aren't for the purpose of marketing the services or products of AvatarStarz or its partners.

AvatarStarz performs the above activities on the grounds that they are necessary to fulfill our obligations to users under our Terms of Use or other agreements with users, or for purposes of AvatarStarz and its users legitimate interests in informing users about events that may have an impact on how they can use AvatarStarz services.

7. Legal proceedings and requirements. We may use personal data to investigate or address claims or disputes relating to use of AvatarStarz services, to satisfy requirements under applicable laws, regulations, or operating licenses or agreements, or pursuant to legal process or governmental request, including from law enforcement.

AvatarStarz performs the above activities on the grounds that they are necessary for purposes of AvatarStarz legitimate interests in investigating and responding to claims and disputes relating to use of AvatarStarz services and features, and/or necessary for compliance with applicable legal requirements.

8. Automated decision-making

We use personal data to make automated decisions relating to use of our services. This includes:

- matching available Stars to Explorers requesting a live experience. Users can be matched based on availability, proximity, and other factors such as

likelihood to accept a live experience request based on their past behavior or preferences.

- determining user ratings, and deactivating users with low ratings. In the European Union or where otherwise required by law, such deactivation occurs only after human review and/or the possibility to appeal. For more information please see the section below titled “Ratings look-up” for further information.
- flagging users who are identified as having engaged in fraud, unsafe activity, or other activities that may harm AvatarStarz, its users, and others. In some cases, such as when a user is determined to be abusing AvatarStarz referral program or has submitted fraudulent documents, such behavior may result in automatic deactivation, or in the European Union or where otherwise required by law, deactivation after human review.
- Using Stars data (such as location, rating and gender) and Explorers data (such as rating, origin and destination) to help avoid pairings of users that may result in increased risk of conflict.

Click the links in this section for more information about these processes. To object to a deactivation resulting from these processes, please contact AvatarStarz customer support.

AvatarStarz performs the above activities on the grounds that they are necessary to fulfill our obligations to users under our Terms of Use or other agreements with users, or on the grounds that they are necessary for purposes of the legitimate interests of AvatarStarz, its users and others.

C. Cookies and third-party technologies

AvatarStarz and its partners use cookies and other identification technologies on our apps, websites, emails, and online ads for purposes described in this notice.

Cookies are small text files that are stored on browsers or devices by websites, apps, online media, and advertisements. AvatarStarz uses cookies and similar technologies for purposes such as:

- authenticating users
- remembering user preferences and settings
- determining the popularity of content
- delivering and measuring the effectiveness of advertising campaigns

- analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services

We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify the devices used by visitors to our websites, as well as when they visit other online sites and services.

D. Data sharing and disclosure

Some of AvatarStarz services and features require that we share personal data with other users or at a user's request. We may also share such data with our affiliates, subsidiaries, and partners, for legal reasons or in connection with claims or disputes.

AvatarStarz may share personal data:

1. With other users

This includes sharing:

- for Explorers, we may share data with the Star, including display name, rating, and requested location and activity to be provided by the Star.
- for Stars, we may share data with the Explorer(s), including display name and photo; location (before and during live experience); average rating provided by users; total number of live experiences; period of time since they signed up to be a Star; and Stars profile, including compliments and other feedback submitted by past users.
- for those who participate in AvatarStarz referral program, we share certain personal data of referred users, such as live experience count and live experience duration, with the user who referred them, to the extent relevant to determining the referral bonus.

2. At the user's request

This includes sharing data with:

- AvatarStarz business partners. For example, if a user requests a service through a partnership or promotional offering made by a third party, AvatarStarz may share certain data with those third parties. This may include, for example, other services, platforms, apps, or websites that integrate with our APIs; vehicle suppliers or services; those with an API or service with which we integrate; or merchants or other AvatarStarz business partners and their users in connection with promotions, contests, or specialized services.
- Emergency services: We offer features that enable users to share their data with police, fire, and ambulance services in the event of an emergency or after certain incidents. For more information, please see the sections below titled “Choice and Transparency” and “Emergency Data Sharing”.

3. With the general public

Questions or comments from users submitted through public forums such as AvatarStarz blogs and AvatarStarz social media pages may be viewable by the public, including any personal data included in the questions or comments submitted by a user.

4. With AvatarStarz service providers and business partners

AvatarStarz provides personal data to vendors, consultants, marketing partners, research firms, and other service providers or business partners. These include:

- payment processors and facilitators
- background check and identity verification providers
- cloud storage providers
- Google, in connection with the use of Google Maps in AvatarStarz apps (see Google’s privacy policy for information on their collection and use of data)
- social media companies, including Facebook and TikTok, in connection with AvatarStarz use of their tools in AvatarStarz apps and websites (see Facebook’s and TikTok’s privacy policies for information on their collection and use of data)
- Marketing partners and marketing platform providers, including social media advertising services, advertising networks, third-party data providers, and other service providers to reach or better understand our users and measure advertising effectiveness
- research partners, including those performing surveys or research projects in partnership with AvatarStarz or on AvatarStarz behalf

- vendors that assist AvatarStarz to enhance the safety and security of its apps
- consultants, lawyers, accountants, and other professional service providers
- insurance and financing partners

5. For legal reasons or in the event of a dispute

AvatarStarz may share users' personal data if we believe it's required by applicable law, regulation, operating license or agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

This includes sharing personal data with law enforcement officials, public health officials, other government authorities, airports (if required by the airport authorities as a condition of operating on airport property), or other third parties as necessary to enforce our Terms of Service, user agreements, or other policies; to protect AvatarStarz rights or property or the rights, safety, or property of others; or in the event of a claim or dispute relating to the use of our services. In the event of a dispute relating to use of another person's credit card, we may be required by law to share your personal data, live experience, or order information, with the owner of that credit card.

This also includes sharing personal data with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

6. With consent

AvatarStarz may share a user's personal data other than as described in this notice if we notify the user and they consent to the sharing.

E. Data retention and deletion

AvatarStarz retains user data for as long as necessary for the purposes described above.

Users may request deletion of their accounts at any time. AvatarStarz may retain user data after a deletion request due to legal or regulatory requirements or for reasons stated in this policy.

AvatarStarz retains user data for as long as necessary for the purposes described above. This means that we retain different categories of data for different periods

of time depending on the type of data, the category of user to whom the data relates, and the purposes for which we collected the data.

Users may request deletion of their account at any time through the Settings > Privacy menus in the AvatarStarz app, or through AvatarStarz website.

Following an account deletion request, AvatarStarz deletes the user's account and data, unless they must be retained due to legal or regulatory requirements, for purposes of safety, security, and fraud prevention, or because of an issue relating to the user's account such as an outstanding credit or an unresolved claim or dispute. Because we are subject to legal and regulatory requirements relating to Stars, this generally means that we retain their account and data for a minimum of 7 years after a deletion request. For Explorers, their data is generally deleted within 90 days of a deletion request, except where retention is necessary for the above reasons.

IV. Choice and transparency

AvatarStarz enables users to access and/or control data that AvatarStarz collects, including through:

- *privacy settings*
- *device permissions*
- *in-app ratings pages*
- *marketing choices*

AvatarStarz also enables users to request access to or copies of their data, changes or updates to their accounts, or deletion of their accounts, or that AvatarStarz restricts its processing of user personal data.

. Privacy settings

- Notifications: discounts and news

Users may enable AvatarStarz to send push notifications about discounts and news from AvatarStarz. Push notifications may be enabled or disabled through the Settings > Privacy menus in the AvatarStarz app.

2. Device permissions

Most mobile device platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without the device owner's permission, and these platforms have different methods for how that permission can be obtained. Please check the available settings on your device or check with your provider.

3. In-app ratings pages

After every live experience, Stars and Explorers are able to rate each other on a scale from 1 to 5. An average of those ratings is associated with a user's account and is displayed to other users for whom they provide or receive services. For example, Explorers ratings are available to Stars from whom they request live experiences, and Star ratings are available to their Explorers.

This 2-way system holds everyone accountable for their behavior. Accountability helps create a respectful, safe environment for Stars and Explorers.

4. Marketing choices

Users may opt out of certain marketing communications (including ads) and use of their data for marketing in the following ways:

- **Ad settings:** These settings enable users to choose whether their data is shared with AvatarStarz advertising partners to deliver personalized ads, and/or to measure the effectiveness of such ads.
- **Marketing emails and messages:** To opt out of receiving marketing emails from AvatarStarz, or for instructions on how to set your preferences regarding whether to receive marketing SMS or push notifications from AvatarStarz. Users may also opt out of receiving emails and other messages from AvatarStarz by following the unsubscribe instructions in those messages. We may still send users who have opted out non-promotional communications, such as receipts for services or information about their account.
- **Cookies and related technologies:** For information on how to opt out of personalized ads using cookies and related technologies.

5. User personal data requests

AvatarStarz provides users with a variety of ways to learn about, control, and submit questions and comments about AvatarStarz handling of their personal data.

- Objections, restrictions, and complaints: Users may request that we stop using all or some of their personal data, or that we limit our use of their data. This includes objecting to our use of personal data that is based on AvatarStarz legitimate interests. AvatarStarz may continue to process data after such objection or request to the extent required or permitted by law.

In addition, depending on their location, users may have the right to file a complaint relating to AvatarStarz handling of their personal data with the data protection authority in their country. For example, users in the European Union and South America may submit such requests to the data protection authorities in the country in which they live.

Users may submit the above requests [here](#).

V. Updates to this notice

We may occasionally update this notice.

We may occasionally update this notice. If we make significant changes, we will notify users in advance of the changes through the AvatarStarz apps or through other means, such as email. We encourage users to periodically review this notice for the latest information on our privacy practices.

Use of our services after an update constitutes consent to the updated notice to the extent permitted by law.