

## **PRIVACY POLICY**

This Privacy Policy applies to: Sterling Stock Picker

Last update: September 12, 2019

The respect of of your private life is of the utmost importance for Sterling Stock Picker and affiliates, who is responsible for this website.

This Privacy Policy aims to lay out :

- the way your personal information is collected and processed. "Personal information" means any information that could identify you, such as your name, your mailing address, your email address, your location and your IP address;
- your rights regarding your personal information;
- who is responsible for the processing of the collected and processed information;
- to whom the information is transmitted;
- if applicable, the website's policy regarding cookies.

This Privacy Policy complement the Terms and Conditions that you may find at the following address:

[sterlingstockpicker/terms-and-conditions](http://sterlingstockpicker/terms-and-conditions)

### **1. COLLECTION OF PERSONAL INFORMATION**

We do not collect your personal information.

### **2. COOKIES AND LOG FILES**

We collect information through log files and cookies. These allow us to process statistics and information on traffic on the Website, to ease navigation and improve your experience for your comfort.

#### **a) Cookies used by the Website**

The cookie files used by the Website are the following:

- IP address
- Operating system

- Pages visited and queries
- Day and time of connection

The use of such files allows us to achieve the following purposes:

- Improvement of the service and personalized welcome
- Order tracking
- Statistical surveys

#### **b) Objection to the use of cookies and log files by the Website**

You have the right to object to the recording of these cookies and log files by configuring your web browser.

Once you have deactivated cookies and log files, you may continue your use of the Website. However, any malfunction resulting from this deactivation may not be considered of our making.

### **3. SHARING OF PERSONAL INFORMATION**

We are committed to not selling to third parties or otherwise commercialize the personal information we collect. However, we may share this information with third parties for the following reasons:

- Posting in chat forums and social media profiles

If you do wish that we not share your personal information with third parties, you may object at time of collection or at any time thereafter, as described in the "Right of objection and of withdrawal" section.

### **4. STORAGE PERIOD OF PERSONAL INFORMATION**

The controller will keep in its computer systems, in reasonable security conditions, the entirety of the personal information collected for the following duration: 1 year.

### **5. HOSTING OF PERSONAL INFORMATION**

Our website is hosted by: Zcat Systems LLC, located at the following address:

2017 S 2nd Ave Fortuna, CA 95540.

The host may be contacted at the following phone number: (707) 440-9316.

Personal information we collect and process is transferred to the following countries: USA.

## **6. CONTROLLER**

### **a) Controller**

The "Controller" is: Zcatsystems. The Controller may be contacted as follows:

The controller may be joined by email at [zcatsystems@gmail.com](mailto:zcatsystems@gmail.com)

The Controller is in charge of determining the purposes for which personal information is processed and the means at the service of such processing.

### **b) Obligations of the Controller**

The Controller is committed to protecting the personal information collected, to not transmit it to third parties without informing you, and to respect the purposes for which personal information was collected.

In the event that the integrity, confidentiality or security of your personal information is compromised, the Controller is committed to notify you.

## **7. RIGHT OF OBJECTION AND OF WITHDRAWAL**

You have the right to object to the processing of your personal information by the website ("right to object"). You also have the right to request that your personal information does not appear, for example, on a mailing list ("right to withdraw").

If you wish to exercise the right to object or the right to withdraw, you must follow the procedure described hereinafter:

The user must submit a request to the email above.

## **8. RIGHT OF ACCESS, OF RECTIFICATION AND OF REMOVAL**

You have the right to consult, update, modify or request the removal of information about you by following the procedure described hereinafter:

The user must submit a request to the controller at the email above.

## **9. SECURITY**

Personal information we collect is stored in a secured environment. People working for us are obligated to respect the confidentiality of your personal information.

To ensure the security of you personal information, we use the following methods:

- SSL (Security Sockets Layer) Protocol
- SET (Secure Electronic Transaction) Protocol
- Access management - person authorized
- Access management - person concerned
- Network surveillance software
- Automatic backup
- Digital certificate
- Username/password
- Firewalls

We are committed to maintaining a high degree of confidentiality by integrating the latest technological innovations that allow us to ensure the confidentiality of your transactions. Nevertheless, no mechanism can ensure a complete security and transmitting personal informations on the Internet always entail a part of risk.

## **10. CHANGES TO OUR PRIVACY POLICY**

Our Privacy Policy may be viewed at all times at the following address:

[sterlingstockpicker.com/privacy-policy](http://sterlingstockpicker.com/privacy-policy)

We reserve the right to modify our Privacy Policy in order to guarantee its compliance with the applicable law.

You are therefore invited to regularly consult our Privacy Policy to be informed of the latest changes.

However, in the event of a substantial change to our Privacy Policy, we will notify you as follows:

Email will be sent to the users account in the event of a change to the Privacy Policy.

## **11. ACCEPTANCE OF OUR PRIVACY POLICY**

By using our Website, you certify that you have read and understood this Privacy Policy and accept its conditions, more specifically conditions relating to the collection and processing of personal information, and the use of cookies.

## **12. APPLICABLE LAW**

We are committed to respect the legislative provisions as specified in:

*Personal Information Protection and Electronic Documents Act, SC 2000, c 5; and/or*

*Act Respecting the Protection of Personal Information in the Private Sector, CQLR cP-39.1.*