

Privacy Policy

Updated November 25, 2017

Our Commitment to Privacy

This Privacy Policy identifies and describes the types of personally identifiable information we may collect from or about you when you visit the StarshipHSA.com Website (the "Website") operated by Brighter Financial, Inc., a Delaware corporation (the "Company"), how we use and safeguard this information and when we share this information with third parties. It is designed to assist you in making informed decisions when using our Website and our Services. This statement will be reviewed regularly to address changing legal obligations, technologies, business practices and our Users' needs. (Capitalized terms not defined in this Privacy Policy will have the meanings given to them in the StarshipHSA.com Website Terms of Use and End User Agreement.)

Your Consent

By visiting and using the StarshipHSA.com Website or registering for a StarshipHSA.com Account or Service, you consent to our collection and use of your personal information as described in this Privacy Policy. Please read this Privacy Policy in its entirety. We reserve the right to modify, alter, or otherwise update this Privacy Policy at any time, and we encourage you to check back periodically so that you are always aware of the most current policies and practices that StarshipHSA has in place to protect your personally identifiable information.

What Information Do We Collect?

When you visit our Website or subscribe to one of our Services, you may provide us with two types of information: personal information you knowingly choose to disclose that is collected on an individual basis and Website use information that is aggregated as you and others browse our Website.

Our Website is not intentionally designed for or directed at children under 18 years of age and all users of our Website and Users who register for an Account are required to be at least 18 years old. It is StarshipHSA's policy never to knowingly collect or maintain personally-identifiable information about anyone under the age of 13.

Personal Information You Choose to Provide

Account Information. When you subscribe to a StarshipHSA Service or Account, or purchase any other products or services from us or our partners, you may need to give personal information necessary to establish your account and provide the Service and to authorize us to obtain information from various credit services in order to collect your payment. For example, you may need to provide the following information:

- Name
- Title
- Employer
- Physical Mailing address
- Email address
- Business phone number(s)
- Business fax number
- Billing address, phone, fax (if different)
- Account password
- Full name on credit card
- Credit card number

- Credit card expiration date
- Credit card security code (on back of card)

Service Profile Information. Some of StarshipHSA's Services may provide you the option of customizing your use of the Services. If you choose to take advantage of these features, it may be necessary to provide additional information necessary for the Service to provide the content according to your preferences. These preferences will not be shared with third parties.

Email Information. If you choose to correspond further with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same protections for these electronic communications that we employ in the maintenance of information received by mail and telephone.

Residents of the European Union. If you are a resident of the European Union, you consent to the onward transfer of any personally-identifiable information you provide to StarshipHSA and the storage and processing of such information by StarshipHSA in the United States in accordance with this Privacy Policy.

Website Use Information; Use of Cookies and other Use-Tracking Devices

We automatically collect Website usage information from you when you visit our Website. Similar to other commercial websites, our Website uses "cookies", "web beacons", and web server logs and Web Traffic Analytic Services to collect information about how our Website is used. The information gathered may include the date and time of visits and page views. We collect specific data about User use of our Services, including the pages accessed by UserID and when they are accessed. This information is collected to ensure individual and corporate compliance with the StarshipHSA Terms of Use and End User Agreement, and to allow you to customize your use of the Website. We may collect information about specific searches with the intention of identifying what features of the Website are frequently accessed but do not correlate it to a specific individual. This ensures we can continue to develop our Website to meet the needs of our users. In addition, we do not track the websites visited by an individual just before our Website but may track a link to an external website referenced in our Services to better understand our Users' interests. The usage information we collect may be compiled into aggregated usage information to manage and improve the Website.

Use of Cookies

Some pages of our Website use cookies. A cookie is a small file containing a string of characters that is sent to your computer or device when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or functionality may not function properly without cookies. By using the Website you consent to our use of cookies as explained in this Privacy Policy. We recommend that when you complete your online transactions, you log off completely before visiting other websites and/or restart your personal computer. This may clear your cookies. We also recommend that you do not visit other websites during your online session with us.

- Most of our cookies are necessary for the operation of the Website or a Service that you request as a user of the Website, such as to remember login information, or text you may have entered when you navigate back to a page in the same session. We also use cookies to provide optional features and functionality that you may access on the Website. For example, a cookie can help us identify whether you have used our Website in the past. We use cookies to customize and personalize the Website based on preferences you may have expressed either directly by selecting an option or setting or indirectly by your prior use. We also use cookies that collect information about how you use the Website to analyze and optimize the

performance of the Website in order to give you a better user experience. In some cases, particularly with respect to measuring and analyzing performance of the Website, cookies may be placed by our third party service providers.

- We and our third party partners may also employ web beacons, also known as clear GIFs or pixel tags, to help better manage content on the Website. Web beacons are tiny, clear graphics that are embedded invisibly on web pages. They are used to understand and monitor online movements of users so that we may better understand and improve their experiences on the Website. In contrast to cookies, which are stored on a user's computer hard drive, web beacons are not stored on a user's computer or device.
- We may partner with a third party ad network to either display our advertising on our Website or to manage our advertising on other sites. Our ad network partner may use cookies, scripts, web beacons or other technology to collect information about your activities on this and other websites to provide you targeted advertising based upon your interests.
- We may analyze and share information collected through cookies with third parties, such as StarshipHSA's affiliates, business partners, service providers, and in marketing materials.
- Most web browsers automatically accept cookies but, if you prefer, you may take certain steps to control the use of cookies by modifying your browser to reject cookies or to notify you whenever a cookie is sent to your hard drive. You can learn more about cookies and ways to manage them at <http://www.allaboutcookies.org/>. Please be aware that restricting cookies on the Website may impair the functionality and performance of the Website.

How Do We Use the Information That You Provide to Us?

Broadly speaking, we use personal information for purposes of administering our business activities, providing customer service and making available other products and services to our customers and prospective customers. Our uses of personal information may include the following:

- To enable us to process, validate, verify and deliver Services that you have ordered.
- To allow us or you to personalize the Services that you obtain based on personal characteristics or preferences.
- To provide Service Notices to you about important changes to our Website.
- To provide information about new or existing products, services or special offers from us or from other companies we believe will be of interest to you or otherwise to contact you.
- To improve StarshipHSA's Services.
- To monitor your compliance with the terms of the StarshipHSA End User Agreement. For example, we automatically collect IP address information from you when you visit our Website, and we may use this information to monitor your compliance with the restrictions in our End User Agreement regarding sharing access to Services.
- To comply with the law.

Do We Disclose Information to Outside Parties?

StarshipHSA only shares personal information with other companies or individuals outside of StarshipHSA in the following limited circumstances:

- We have your consent for a specific purpose, such as to establish an account using a credit card.
- You have registered to participate in an event where we are an organizer in conjunction with a partner or a third party event manager.
- We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties

agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce the terms or conditions of the StarshipHSA End User Agreement, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of StarshipHSA, its customers or the public as required or permitted by applicable law.

Your personal information is not otherwise sold or traded or distributed outside of StarshipHSA.

Sharing Information with Strategic Partners

We may enter into strategic alliances or partnerships with third parties for the purposes of jointly providing additional services. To do so, it may be necessary to share with such third parties limited personal information such as your name, address, telephone number and email addresses for the purpose of providing you information regarding such products and services. If you choose to provide personal information or consent to the use of existing personal information for the purposes of subscribing to such additional products or services, both we and our partner may share ownership of this personal information. In any case, we will require that the privacy policies of such partners provide substantially similar protections to those provided by StarshipHSA.

Third Party and Corporate Subscriptions

If your access to StarshipHSA's Services is provided by your employer or a third party, your employer or that third party may provide us with limited amounts of personal information about you to enable your access to the Services. In addition, your employer or the third party may require us to provide information about your access to the Services, for example to verify that you are using the Services they have purchased on your behalf. In addition, we may be required to provide your employer or third party with personally identifiable information in order to enforce compliance with the StarshipHSA End User Agreement.

Choice/Opt Out

StarshipHSA offers you the choices and means to limit use and disclosure of your personally identifiable information. As such, you will be provided with an opportunity to opt-out of the following situations: (a) having your personally identifiable information disclosed to third parties, other than to the extent legally required or as needed to provide the Services for which you have subscribed or to enable you to attend the events for which you have registered, (b) having your personally identifiable information used by us for a purpose which is incompatible with the purpose for which it was originally collected or subsequently authorized by you, (c) having your personally identifiable information shared, sold to third parties, or used or transferred in other ways, (d) having complementary goods and services marketed to you.

StarshipHSA will provide you with a clear, conspicuous, readily available mechanism to exercise this choice. We will take all reasonable steps to honor your request. To opt out, please [click here](#) and you will be re-directed to our Opt Out Request Form. You may also exercise this opt out choice by contacting us at optout@starshiphsa.com or in writing enumerating your opt out choices to Brighter Financial, Inc., 43 W. 23rd Street, Floor 2, New York, NY 10010. If you have any inquiries, complaints or difficulties in exercising these opt out options set forth above, please direct your inquiry to privacy@starshiphsa.com.

Generally, if you choose to limit the use and disclosure of your personally identifiable information, StarshipHSA may not be able to:

- Provide service notices regarding Website changes, new or existing products, services, special offers, or otherwise contact you.
- Share your information for participation in an event with a partner or third party manager.

Your California Privacy Rights

California Civil Code Section 1798.83 permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we disclosed personal information (if any) for direct marketing purposes during the preceding calendar year. If applicable, this information would include the categories of personal information shared with those third parties. If you are a California resident and wish to make such a request, you may contact us by sending us an email at privacy@starshiphsa.com or write to us at Brighter Financial, Inc., 43 W. 23rd Street, Floor 2, New York, NY 10010, Attn: Privacy.

Children's Privacy Online

We do not knowingly solicit, collect or use personal information from children under 13. For information concerning the Children's Online Privacy Protection Act ("COPPA"), visit the Federal Trade Commission's website at www.ftc.gov.

Transfer to U.S. or Other Countries

Your information may be stored and processed in the United States or any other country where StarshipHSA has facilities, and by subscribing to our Services you consent to the transfer of information outside of your country.

If StarshipHSA becomes involved in a merger, acquisition or any form of sale of a substantial portion of its assets, we will provide notice before personal information is transferred and becomes subject to a different privacy policy.

Your Disclosures to Third Parties

From time to time StarshipHSA's Services or Website may publish notices about events conducted by third parties. In addition, we may offer to our customers and prospective customer's products and services of other companies we believe may be of interest to you. We cannot make any representations about the practices, policies, publications or services of these third parties, however, and your use of such parties' offers are your own responsibility and are not covered by this Privacy Policy.

In addition, we are not responsible for the practices employed by websites linked to or from our Website nor the information or content contained therein. Often links to other websites are provided solely as pointers to information on topics that may be useful to the users of our Website.

Please remember that when you use a link to go from our Website to another website, this Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including websites that have a link to our Website, is subject to that website's own rules and policies. Please read those rules and policies before proceeding.

How Do We Secure Information Transmissions?

From time to time, we may offer you the ability to pay for Services with a credit card using e-commerce software that meets payment card industry data security standards.

Other email that you may send to us may not be secure unless we advise you that security measures will be in place prior to your transmitting the information. For that reason, we ask that you do not send confidential information such as Social Security or credit card account numbers to us through an unsecured email.

How Do We Protect Your Information?

Information Security. Personal information and user-specific settings and preferences are stored using commercially standard database and website security software. User passwords are saved in encrypted form to prevent unauthorized access or disclosure and accidental loss, alteration or destruction.

Evaluation of Information Protection Practices. Periodically, our operations and business practices are reviewed for compliance with corporate policies and procedures governing the security, confidentiality and quality of our information.

Employee Access, Training and Expectations. Our employees are required to protect confidential third party information in general as a condition of employment at StarshipHSA, and our business practices limit the use and disclosure of such information, including personal information, to authorized persons, processes and transactions.

Providing, Correcting and Updating Your Information

When you order a Service, we ask you to provide personal information. If you decline to submit this personal information, StarshipHSA will not be able to provide those Services to you.

This personal information will be used only for the purposes described in this Privacy Policy unless we have obtained your prior consent.

You may modify your Password at any time by going to the Change Password page in the Customer Service area on the StarshipHSA Website. This password is stored in encrypted format so that no one else can change it or use it.

You may contact Subscriber Services to notify StarshipHSA of changes to your personal information, to review and correct your personal data if they are inaccurate, or to delete such data if it is not otherwise required to be retained by law or for some legitimate business purpose.

To process your requests, we may ask you to provide such identification as we deem necessary to protect your personal information from unauthorized access. Also, we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for example, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge during normal business hours of our headquarters corporate office, except if doing so would require a disproportionate effort.

If you have any questions about this Privacy Policy, or concerns about the use of your personal information, please direct your inquiry to privacy@starshiphsa.com.

Modifications to this Policy

StarshipHSA reserves the right to add to, modify, update, or amend this Privacy Policy at any time, simply by posting such addition, modification, update or amendment on this Website. Any such addition, modification, update or amendment will be effective immediately upon posting on the Website. Please check the Policy when you use our Website to ensure that you are aware of any changes in our privacy practices. Our Privacy Policy will always indicate the date it was last updated. Your use of any portion of our Website or Services after any changes will constitute your consent to and acceptance of such changes.