
STARIX INNOVATIVE SOLUTIONS LIMITED PRIVACY POLICY

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This Privacy Notice for STARIX INNOVATIVE SOLUTIONS LIMITED hereinafter also referred to as "we," "us," or "our", describes and regulates **our** interaction with data; how and why we might access, collect, store, use, and/or share ("process") your personal information when you use our services. For most processing described in this Privacy Notice, we act as a data controller (or equivalent role under applicable law). Where we process personal information on behalf of a business customer or brand partner in connection with a specific campaign or engagement, we may act as a processor/service provider (or equivalent role) and will process such information only on documented instructions and for the purposes described.

Some of these services include, but are not limited to:

- Visiting our website at “starixapp.com” or any website of ours that links to this Privacy Notice.
- Use of Starix.
Starix is a technology platform that provides data-driven insights, analytics, and trust signals for digital creators, brands, and online platforms. The service collates, aggregates and analyzes publicly available and user-authorized data from social media platforms and other third-party services to generate trust scores, performance Insights, and trend intelligence. Simply put, Starix sorts relevant data in the public domain, and utilizes this data as a tool to generate performance insights and trend intelligence for the benefit of brands and creators alike.
Starix uses automated systems, including algorithms and artificial intelligence, to evaluate engagement patterns, detect anomalies, and support transparency and informed decision-making. **Specifically, we use AI to analyze public social media engagement and create "trust scores" for creators. These scores are based on engagement frequency, sentiment analysis, and consistency metrics. These scores may influence brand collaboration opportunities.** The platform may include web and mobile applications, APIs, dashboards, and related tools.
- Engage with us in other related ways, including any marketing or events.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Note: We at Starix do not access personal information from your connected accounts beyond what you voluntarily provide to us or explicitly authorize through the relevant platform's consent (OAuth) flow.

The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses
- Job titles
- Usernames
- Passwords
- Contact Preferences
- Billing Addresses
- Contact or Authentication Data
- Debit/Credit Card Numbers
- Brand Details
- Brand Website/URL
- Creator Account Details
- Account Details

Sensitive Information. We do not process sensitive information.

Payment Data. We may collect data necessary to process your payment if you choose to make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is handled and stored by Paystack. You may find their privacy notice link(s) here: <https://paystack.com/compliance>.

SOCIAL MEDIA INTEGRATION DATA

When you connect your social media accounts (**Instagram, Facebook, TikTok, YouTube**), we collect public profile information and performance metrics via official platform APIs using OAuth 2.0 authorization.

Some of the information collected via API's include:

- Profile information (username, follower counts, bio, profile picture)
- Content metrics (post-performance, engagement rates, reach, impressions)
- Audience insights (demographics - aggregated and anonymized)
- Growth trends and posting consistency data

We collect only data you explicitly authorize during the OAuth consent flow.

See Section 7A for comprehensive details about social media data collection, usage, and your control options.

Information that we do not process:

- Private messages or direct communications

- Private/draft content
- Passwords or login credentials
- Personal contact lists
- Non-public account information

Information automatically collected

Some information such as your Internet Protocol (IP) address and/or browser and device characteristics is collected automatically when you visit our Services.

2. HOW DO WE PROCESS YOUR INFORMATION?

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law. If you are in the EU, UK or Africa, we rely on **Consent, Performance of a Contract, Legitimate Interests** (specifically to analyze usage and diagnose problems), and **Legal Obligations**.

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may share information in specific situations and with specific categories of third parties, such as Vendors, Consultants, and Other Third-Party Service Providers (i.e Cloud Computing Services, Data Analytics Services, Payment Processors like Paystack).

We share minimal data with social media platforms (Instagram, Facebook, [TikTok](#), [YouTube](#)) only as necessary to:

- Authenticate your account via OAuth
- Retrieve authorized data via their APIs
- Comply with their platform terms

We do NOT share your Starix data (scores, challenge participation, earnings) back to these platforms. Data flow is one-way: from platforms to Starix only.

Brands & Campaign Partners

When you participate in brand challenges or apply for partnerships:

- Brands can view your public creator portfolio (which includes social media metrics you've chosen to display)
- Brands can see your Starix Score and leaderboard ranking
- Brands CANNOT see raw social media data, private information, or detailed analytics beyond what you publicly display (for example, we do not provide brands with API responses, post-level raw export files, or follower/audience lists).

You control what appears in your public portfolio through your profile settings.

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. Specific information about how we use such technologies is set out in our Cookie Notice: <https://www.starixapp.com/cookies>.

6. DO WE OFFER ARTIFICIAL INTELLIGENCE-BASED PRODUCTS?

Yes. We use artificial intelligence, machine learning, and automated decision-making systems to enable key AI-Powered Features:

Starix Score Calculation:

We use algorithms and machine learning to calculate your Starix Score by analyzing:

- Engagement patterns across social media platforms
- Content performance trends over time
- Audience growth and consistency
- Authenticity signals and fraud indicators

Fraud Detection:

We use AI to detect artificial engagement, purchased followers, and suspicious activity patterns that may indicate inauthentic influence. This helps ensure that followership, account growth, and progress are organic.

Content Analysis:

We use automated systems to categorize content, identify trends, and match creators with relevant brand opportunities.

Leaderboard Rankings:

We use algorithms to rank creators fairly based on performance data, normalizing platform differences and creator niche.

How AI Affects You:

- ✓ Automated Decisions:

Your Starix Score and leaderboard rankings are generated automatically using AI. These scores may significantly affect your opportunities, as brands use scores to evaluate and select creators for campaigns.

- ✓ Transparency & Explanation:

When AI makes decisions that affect you (such as fraud flags or score reductions), we will:

- ✓ Notify you of the decision
- ✓ Explain the key factors that influenced the decision in plain language
- ✓ Provide information about the data sources used (e.g., "sudden follower spike detected on Instagram")
- ✓ Human Review Right:

If you believe an AI-generated score, ranking, or fraud flag is inaccurate, you have the right to:

- ✓ Request human review of the automated decision
- ✓ Submit evidence supporting your case
- ✓ Receive a response within 14 business days
- ✓ Appeal the decision if you disagree

To request human review, contact: support@starixapp.com with subject line "AI Decision Review Request"

✓ **AI Data Handling:**

All personal information processed by our AI systems is handled according to this Privacy Policy. We:

- ✓ Use only data you've provided or authorized us to collect
- ✓ Do not train AI models on your private data without consent
- ✓ Regularly audit AI models for bias, fairness, and accuracy
- ✓ Update algorithms to improve fairness and reduce discriminatory outcomes

✓ **Third-Party AI Services:**

We may use third-party AI services for:

- ✓ Natural language processing (content categorization)
- ✓ Image analysis (content quality assessment)
- ✓ Fraud detection (pattern recognition)

These providers are contractually required to:

- ✓ Process data only according to our instructions
- ✓ Maintain security and privacy standards equivalent to ours
- ✓ Not use your data for their own purposes

7. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

If you choose to register or log in to our Services using a social media account, we may have access to certain information about you. We will use the information we receive only for the purposes that are described in this Privacy Notice.

7A. SOCIAL MEDIA INTEGRATIONS & DATA COLLECTION.

Starix integrates with multiple social media platforms to provide comprehensive creator performance analytics. When you connect your social media accounts to Starix, we access and process publicly available data and data you explicitly authorize us to access through official platform APIs.

Supported Platforms:

- Instagram (via Meta Graph API)
- Facebook (via Meta Graph API)
- TikTok (via TikTok API for Developers)
- YouTube (via YouTube Data API)
- Additional platforms may be added in the future

How Integration Works: All social media connections use OAuth 2.0 authorization, which means:

- ✓ You are redirected to the social media platform's official authorization page
- ✓ You explicitly grant Starix permission to access specific data scopes
- ✓ The platform provides us with a secure access token (never your password)
- ✓ We use this token to retrieve only the data you authorized
- ✓ You can revoke access at any time through your Starix settings or directly through the platform's app authorization settings

General Principles (All Platforms):

- We collect only public data and explicitly authorized data
- We NEVER access private messages, contacts, or non-public content
- We NEVER post, publish, or modify content without your explicit permission
- We use data solely for Starix Score calculation, portfolios, and platform functionality
- You can disconnect any platform at any time
- Data from disconnected platforms is deleted within 90 days.

7A.2 Instagram Integration (Meta Graph API)

What Instagram Data We Collect:

Profile Information:

- Instagram username and display name
- Public profile picture
- Follower count and following count
- Public bio and website URL
- Account type (personal, creator, business)
- Verification status
- *Content & Performance Metrics:*
- List of your public posts (photos, videos, Reels, Stories highlights)
- Post performance metrics (likes, comments, shares, saves, reach, impressions)
- Post dates, timestamps, and captions
- Hashtags used
- Engagement rates and trends
- Reel-specific metrics (plays, average watch time)
- *Insights Data (for Creator/Business accounts):*
- Audience demographics (age, gender, location - aggregated only)
- Reach and impressions
- Profile views
- Website clicks

We DO NOT Collect:

- Private or draft content
- Direct messages (DMs)
- Personal contact information beyond public profile
- Private account content (if your account is private)
- Stories (unless saved as highlights)
- Information about your followers or following beyond counts
- **How We Use Instagram Data:**
- Calculate your Starix Score based on engagement quality
- Display best-performing content in your creator portfolio
- Rank you on challenge leaderboards
- Detect artificial engagement or fraud patterns
- Show brands your content performance and audience reach
- Generate aggregate market insights (non-personal)

Instagram API Compliance: We comply with Meta's Platform Terms and Instagram API Terms, including: (a) using Instagram data only to provide and improve Starix functionality requested by you (for example, Starix Score calculation, portfolio display, and fraud detection), (b) not selling, renting, licensing, or otherwise commercializing Instagram data, (c) not using Instagram data for advertising targeting or to build advertising profiles, (d) not providing brands or other third parties with raw Instagram API data (we show only the metrics and content you choose to display in your public portfolio and summarized outputs such as scores/aggregates), and (e) honoring your ability to disconnect and control what is displayed.

Meta's Privacy Policy: Your use of Instagram is subject to Meta's Privacy Policy: <https://www.facebook.com/privacy/policy>

7A.3 Facebook Integration (Meta Graph API)

What Facebook Data We Collect:

Profile Information:

- Facebook name and profile picture
- Public profile information you choose to share
- Page information (if you manage a Facebook Page)

Page Performance (for Page Admins):

- Page likes and followers
- Post performance metrics (likes, comments, shares, reach)
- Page insights and analytics
- Audience demographics (aggregated)

We DO NOT Collect:

- Personal timeline posts (unless you manage a public Page)
- Private messages
- Friend list
- Personal life events or private information

How We Use Facebook Data:

- Calculate Starix Score for Facebook Page managers
- Display Page performance in creator portfolios
- Rank Page performance on leaderboards
- Verify Page ownership and authenticity

Note: Facebook integration is primarily for creators who manage Facebook Pages (not personal profiles). Personal profile data is not used for Starix Score calculation.

Meta's Privacy Policy: Your use of Facebook is subject to Meta's Privacy Policy: <https://www.facebook.com/privacy/policy>.

7A.4 TikTok Integration (TikTok API)

What TikTok Data We Collect:

Profile Information:

- TikTok username and display name
- Public profile picture
- Follower count and following count
- Public bio information
- Account verification status

Content & Performance Metrics:

- List of your public videos
- Video performance metrics (views, likes, shares, comments)
- Video posting dates and timestamps
- Engagement rates and trends over time
- Content categories and hashtags used
- Video completion rates (if available via API)

We DO NOT Collect:

- Private or draft videos
- Direct messages
- Personal contact information from TikTok
- Information about your followers or following list (beyond counts)
- TikTok LIVE data
- Private account information

How We Use TikTok Data:

- Calculate your Starix Score based on video performance
- Display best-performing TikTok videos in your portfolio
- Rank you on challenge leaderboards
- Analyze engagement patterns for authenticity
- Show brands your content virality and engagement quality
- Track performance trends over time

TikTok API Compliance: We comply with TikTok's API Terms of Service and Developer Policies, including:

- Data usage and storage limitations
- User privacy and consent requirements
- Rate limiting and API restrictions
- Prohibited use cases

TikTok's Privacy Policy: Your use of TikTok is subject to TikTok's Privacy Policy: <https://www.tiktok.com/legal/privacy-policy>.

7A.5 YouTube Integration (YouTube Data API)

What YouTube Data We Collect:

Channel Information:

- Channel name and handle
- Channel profile picture and banner

- Subscriber count
- Channel description
- Verification status
- Channel creation date

Content & Performance Metrics:

- List of your public videos
- Video performance metrics (views, likes, dislikes, comments)
- Video titles, descriptions, and tags
- Upload dates and video duration
- Engagement rates and watch time (if available)
- Subscriber growth trends

We DO NOT Collect:

- Private or unlisted videos (unless you specifically grant access)
- YouTube Studio analytics (detailed revenue, demographics) unless explicitly authorized
- Comments content (only comment count)
- Private messages
- Watch history

How We Use YouTube Data:

- Calculate your Starix Score based on video performance
- Display channel metrics and best videos in your portfolio
- Rank you on leaderboards
- Verify channel authenticity
- Show brands your audience reach and engagement
- Track subscriber growth and content consistency

YouTube API Compliance: We comply with YouTube's API Services Terms and Google API Services User Data Policy, including:

- Limited use requirements (data used only for Starix functionality)
- Data retention limitations
- User privacy and consent requirements
- Prohibition on storing video content

Google's Privacy Policy: Your use of YouTube is subject to Google's Privacy Policy: <https://policies.google.com/privacy>

7A.6 How We Calculate Starix Score Using Social Media Data

Your Starix Score is calculated by analyzing multiple performance dimensions across your connected social media accounts:

Performance Dimensions Analyzed:

- ✓ **Engagement Quality:** Likes, comments, shares relative to reach
- ✓ **Growth Trends:** Follower/subscriber growth patterns over time
- ✓ **Content Consistency:** Posting frequency and regularity
- ✓ **Audience Authenticity:** Detection of artificial engagement patterns
- ✓ **Cross-Platform Presence:** Performance across multiple platforms (bonus)

Methodology: We use automated algorithms and artificial intelligence to:

- Normalize metrics across different platforms (fair comparison)
- Weight recent performance more heavily than historical data
- Detect and flag suspicious engagement patterns
- Compare your performance to similar creators in your niche
- Generate a composite score (0-100 scale)

Important Notes:

- Exact formulas and weights may evolve to improve accuracy
- Scores are recalculated every 24 hours for active creators
- Connecting multiple platforms improves score accuracy
- Disconnecting a platform recalculates your score without that data

7A.7 Fraud Detection & Authenticity Analysis

We analyze social media data to detect:

- Artificial engagement (bots, engagement pods, purchased likes)
- Suspicious follower growth patterns
- Inconsistent engagement rates
- Content authenticity issues

How We Detect Fraud:

- Pattern analysis using machine learning
- Historical data trend analysis
- Cross-platform consistency checks
- Engagement rate benchmarking

Effect on Starix Score:

- Authentic engagement increases your score
- Detected artificial engagement decreases your score
- Repeated fraud patterns may result in account suspension

Your Right to Review: If you believe your authenticity score is incorrect, you can request human review by contacting support@starixapp.com.

7A.8 Your Control Over Social Media Data

Connecting Platforms: You can connect or disconnect any social media platform at any time through your Starix Account Settings → Connected Accounts.

Data Refresh:

- We refresh your social media data every 24 hours for active users
- You can manually trigger a refresh from your profile settings
- Historical data (last 90 days) is used for trend analysis

Disconnecting Platforms: When you disconnect a platform:

- We immediately stop collecting new data from that platform
- Your Starix Score is recalculated without that platform's data
- Existing data is retained for 90 days, then permanently deleted (unless required by law for disputes or compliance)
- You can reconnect the platform at any time

Data Access & Deletion: You can request:

- A copy of all social media data we've collected about you
- Correction of inaccurate data

- Immediate deletion of all your social media data (results in score recalculation)

Submit requests to: dpo@starixapp.com

7A.9 Security of Social Media Data

Social media data is protected using the same security measures described in Section 9:

- **Encryption:** AES-256 encryption at rest, TLS 1.3 in transit
- **Access Controls:** Only authorized Starix systems can access data
- **API Token Security:** OAuth tokens are encrypted and never exposed
- **Regular Audits:** Security assessments and penetration testing
- **Data Minimization:** We collect only necessary data, delete when no longer needed

7A.10 Third-Party Access to Social Media Data

We do NOT share your social media data with third parties except:

- **Brands:** When you apply to or win a challenge, brands can see your public portfolio (which includes social media metrics you've chosen to display)
- **Payment Processors:** Minimal data needed for identity verification (e.g., account name matching)
- **Legal Requirements:** If required by law or to protect our rights

We NEVER:

- Sell your social media data to data brokers
- Share your data with advertisers for targeting (including by uploading, matching, or using platform-derived data to build advertising audiences)
- Provide raw data to brands (only portfolio/score summaries)

7A.11 Updates to Social Media Integrations

If we add new social media platforms or change how we use data:

- We will update this Privacy Policy and notify you via email
- You will be asked to explicitly authorize any new data collection
- You can choose not to connect new platforms without affecting existing integrations

8. HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, **generally for a period of 5 years after account deactivation**, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

Note that for Social Media Data; Data collected from social media platforms (Instagram, TikTok, YouTube, Facebook) is deleted within 90 days after disconnecting the platform, unless it is:

- ✓ Required for ongoing legal disputes
- ✓ Required for tax/financial compliance (In the case of payment records only)
- ✓ Aggregated and fully anonymized for analytics (no personal identifiers)

9. HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process.

10. DO WE COLLECT INFORMATION FROM MINORS?

Our Services are not intended for children under 16, and we do not knowingly collect, use, or disclose personal information from children under 16. If we learn that we have collected personal information from a child under 16, we will take reasonable steps to delete such information. If you are 16 or 17 years old, you may use the Services only to the extent permitted by applicable law, and where required by applicable law your parent or legal guardian must consent to your use of the Services and to our processing of your personal information.

11. WHAT ARE YOUR PRIVACY RIGHTS?

Depending on your region, you have rights that allow you greater access to and control over your personal information. These may include the right to request access, rectification, erasure, and **data portability**.

If a decision that produces legal or similarly significant effects is made solely by automated means (such as an AI-generated trust score), we will inform you, explain the main factors, and offer a simple way to request human review. If you believe an automated trust score is inaccurate, you have the right to request human review of that specific score.

Automated Decision-Making & AI Scores

If decisions that produce legal or similarly significant effects (such as exclusion from brand opportunities based on low Starix Score or fraud flags) are made solely by automated means:

Your Rights:

- ✓ **Right to be Informed:** We will notify you when automated decisions affect you and explain the main factors considered.
- ✓ **Right to Human Review:** You can request that a human reviews the automated decision.
- ✓ **Right to Challenge:** You can contest the decision and provide evidence.
- ✓ **Right to Explanation:** We will explain our decision-making logic in understandable terms.

How to Exercise These Rights:

Submit requests to: support@starixapp.com or dpo@starixapp.com

Response time: Within 14 business days

Include: Your account details and specific decision you're contesting

Fraud Flag Appeals:

If your account is flagged for suspected fraud or artificial engagement:

1. We will notify you via email with specific reasons
2. You can request human review within 30 days
3. You can submit evidence (screenshots, analytics, explanations)
4. A human reviewer will assess your case within 14 business days
5. You will receive a detailed explanation of the final decision

Data Protection Officer (DPO): You may contact our DPO at dpo@starixapp.com for any questions regarding this policy.

12. CONTROLS FOR DO-NOT-TRACK FEATURES

We do not currently respond to DNT browser signals.

13. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

If you are a resident of certain US states, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information.

14. PLATFORM DATA & INTELLECTUAL PROPERTY

User Data Usage & Ownership

Your Data Remains Yours:

All personal information, social media data, and content you provide or authorize us to access remains your property. For processing described in this Privacy Notice, we generally act as a data controller (or equivalent role under applicable law). In limited circumstances (for example, where we process personal information on behalf of a business customer for a specific campaign), we may act as a processor/service provider and will process such personal information only on documented instructions.

How We Use Your Data:

- ✓ Provide Starix platform functionality (scores, portfolios, leaderboards)
- ✓ Calculate Starix Scores and performance rankings
- ✓ Facilitate connections between creators and brands
- ✓ Detect fraud and maintain platform integrity
- ✓ Improve our algorithms and services.
- ✓ Generate aggregate, anonymized market insights
- ✓ Comply with legal obligations

We Do NOT:

- ✓ Sell your personal information to third parties
- ✓ Use your data for purposes beyond Starix functionality
- ✓ Share your data with advertisers for ad targeting
- ✓ Train AI models on your private data without consent

Content & Intellectual Property Rights

Social Media Content:

Content accessed from your connected social media accounts (Instagram, TikTok, YouTube, Facebook) remains your property and is subject to the terms of those platforms.

License Grant to Starix:

By connecting social media accounts, you grant Starix a limited, non-exclusive, worldwide license to:

- ✓ Display your public social media content in your Starix portfolio.
- ✓ Show your content to brands when you apply to challenges.
- ✓ Use aggregate, anonymized metrics for platform analytics.
- ✓ Cache content temporarily for performance optimization.

You Retain Full Rights:

- ✓ You can disconnect platforms and revoke this license at any time.
- ✓ You maintain all ownership and can use your content elsewhere.
- ✓ We do not claim ownership of your creative work.

User-Generated Content on Starix:

Content you create directly within Starix (profile bio, challenge submissions, Circle descriptions) remains your intellectual property. By submitting this content, you grant Starix a license to display and distribute it within the platform for the purpose of facilitating brand partnerships.

Platform Technology & IP:

All Starix platform technology, algorithms, scoring systems, software, and features are the exclusive intellectual property of STARIX INNOVATIVE SOLUTIONS LIMITED and are protected by intellectual property laws.

Prohibited Actions:

You may not:

- ✓ Reverse engineer our algorithms or scoring systems.
- ✓ Scrape or extract data from the platform without authorization.
- ✓ Reproduce or copy platform features without permission.
- ✓ Use our intellectual property without explicit license.

Data Selling Prohibition

We do not and will never sell, rent, or trade your personal information to third parties for their marketing or advertising purposes. Any sharing of data occurs only as explicitly described in Section 4 of this Privacy Policy.

15. DO WE MAKE UPDATES TO THIS NOTICE?

Yes, we will update this notice as necessary to stay compliant with relevant laws. In the event of an update, We will ensure to put notice of these updates on our platform to ensure that users are well informed.

16. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at contact@starixapp.com,

17. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

To request to review, update, or delete your personal information, please fill out and submit a data subject access request to dpo@starixapp.com.

18. PLATFORM-SPECIFIC TERMS & COMPLIANCE

Data Deletion Instructions (Meta/Instagram/Facebook)

You can request deletion of data we received from Meta platforms (Instagram and Facebook) at any time by using one (or both) of the following methods:

Option 1 (Recommended): Disconnect Meta Access (Self-Service)

1. In Starix, go to Account Settings → Connected Accounts.
2. Select Instagram or Facebook and click Disconnect/Remove Access.
3. (Optional) Also remove Starix from Meta: in Facebook/Instagram, review your connected apps and remove Starix access.

Once disconnected, we stop collecting new Meta data immediately and delete Meta-derived data within 90 days, unless retention is required by law (for example, for disputes or compliance).

Option 2: Email Deletion Request

Send an email to dpo@starixapp.com with the subject line: “Meta Data Deletion Request”. Please include the following identifiers so we can locate your data and verify your request:

- Your Starix account email address (or Starix username)
- The platform(s) to delete: Instagram and/or Facebook
- Your Instagram username and/or Facebook Page name/ID connected to Starix (as applicable)

We will acknowledge your request and may ask for additional information to verify your identity. After verification, we will complete deletion of Meta-derived data without undue delay and in any event within 90 days (unless a longer period is required by law). If you request deletion sooner, we will delete sooner where technically feasible and lawful.

Instagram/Facebook Integration Data Minimization (Permissions, Data Elements, Purpose, Retention)

When you connect Instagram or Facebook, we request only the minimum permissions/scopes needed to provide Starix functionality. The specific scopes shown to you may vary depending on your account type (e.g., Creator/Business) and available APIs, but we apply the following minimization controls:

- Authentication (OAuth token): Used to authenticate your connection and retrieve authorized data; token is stored encrypted and is revoked/invalidated upon disconnect; deleted within 90 days of disconnect (or sooner if technically feasible).
- Basic profile identifiers (e.g., username, display name, profile picture, verification status, account type): Used to display your connected account inside Starix and populate your creator portfolio (only if you choose to display it); deleted within 90 days of disconnect.
- Aggregate counts and performance metrics (e.g., follower/page-like counts; reach/impressions; likes/comments/shares/saves; engagement rates): Used to calculate Starix Scores, generate analytics, and rank leaderboards; deleted within 90 days of disconnect, except metrics may be retained only in aggregated, fully anonymized form for analytics.
- Content identifiers/metadata for public posts (e.g., post IDs/URLs, timestamps, captions, hashtags) where available via API: Used to identify and display best-performing public content in your portfolio (if you choose to display it) and to compute trends; deleted within 90 days of disconnect; we do not store private messages or private content.
- Insights (creator/business accounts only) in aggregated form (e.g., audience demographic breakdowns as provided by Meta): Used to present high-level audience insights to you and

to provide summarized portfolio insights to brands only where you choose to display; deleted within 90 days of disconnect; we do not disclose raw audience-level data to brands.

Meta Limited Use Commitments (Instagram/Facebook)

With respect to data received from Meta platforms (Instagram/Facebook): (a) we use such data only to provide Starix features requested by you (including score calculation, portfolio display, fraud detection, and analytics); (b) we do not sell, rent, license, or otherwise commercialize Meta data; (c) we do not use Meta data for advertising targeting, retargeting, or to build advertising audiences; (d) we do not provide brands or other third parties with raw Meta API data or raw API responses; and (e) you control what Meta-derived metrics/content appear in your public portfolio through your profile settings, and you can disconnect at any time.

Meta Platforms (Instagram, Facebook)

Our use of Meta's APIs is subject to:

- ✓ Meta Platform Terms: <https://www.facebook.com/terms.php>
- ✓ Meta Platform Policy: <https://developers.facebook.com/docs/development/release/policies>
- ✓ Instagram API Terms of Use: <https://developers.facebook.com/terms>

We comply with Meta's requirements including:

- ✓ Limited use of Instagram/Facebook data (only ~~for~~to provide Starix functionality requested by you, such as scores, portfolios, fraud detection, and analytics)
- ✓ Data deletion within 90 days of user account deletion or platform disconnect
- ✓ No selling, renting, trading, or licensing of Instagram/Facebook data to third parties-
- ✓ Compliance with Instagram's Brand Guidelines

Meta's Responsibility:

Meta is not responsible for Starix's data practices. Our relationship with Meta is limited to API access. Your use of Instagram and Facebook is governed by Meta's terms, not Starix's.

TikTok

Our use of TikTok's API is subject to:

- ✓ TikTok API Terms of Service
- ✓ TikTok Developer Policies
- ✓ TikTok Community Guidelines

We comply with TikTok's requirements including:

- ✓ Limited use of TikTok data per API terms
- ✓ Respect for user privacy and data protection
- ✓ No use of TikTok data for purposes prohibited by TikTok policies

TikTok's Responsibility:

TikTok is not responsible for Starix's data practices. Your use of TikTok is governed by TikTok's terms, not Starix's.

YouTube (Google)

Our use of YouTube's API is subject to:

- ✓ YouTube API Services Terms: <https://developers.google.com/youtube/terms/api-services-terms-of-service>
- ✓ Google API Services User Data Policy: <https://developers.google.com/terms/api-services-user-data-policy>
- ✓ YouTube Terms of Service

We comply with Google's requirements including:

- ✓ Limited use of YouTube data (only for explicit Starix functionality)
- ✓ No storage of YouTube video content or audio
- ✓ Compliance with YouTube's attribution requirements
- ✓ User control over YouTube data access

Google's Responsibility:

Google is not responsible for Starix's data practices. Your use of YouTube is governed by Google's terms, not Starix's.

Revoking YouTube Access:

You can revoke Starix's access to your YouTube data at any time via the Google security settings page: <https://security.google.com/settings/security/permissions>

API Terms Conflicts

If any terms of this Privacy Policy conflict with the requirements of social media platform APIs, the platform's terms take precedence for data from that specific platform.

Platform Changes

Social media platforms may change their APIs, terms, or data access policies. If such changes affect our ability to provide Starix services or require changes to our data practices, we will:

- ✓ Update this Privacy Policy
- ✓ Notify affected users via email
- ✓ Provide at least 30 days notice before implementing changes
- ✓ Offer alternative options where possible (e.g., alternative platforms or manual data entry.)

COMPLIANCE ADDENDUM TO STARIX PRIVACY POLICY

This Addendum supplements the STARIX Privacy Policy to ensure full compliance with **GDPR (EU/UK)**, **CCPA/CPRA (California, US)**, and **Nigeria's NDPA 2023**.

Annex A: GDPR (EU/UK) Compliance

1. **Subject Access Requests (SARs):** STARIX will respond to all data subject requests (access, rectification, erasure, portability) within **30 days**.
2. **Records of Processing Activities (ROPA):** STARIX maintains detailed records of all processing activities, including categories of data, purposes, recipients, and retention periods.
3. **Data Protection Impact Assessments (DPIAs):** STARIX conducts DPIAs for high-risk processing, including AI-driven trust scoring, to evaluate risks and ensure fairness.
4. **Automated Decision-Making:** Where trust scores may produce significant effects, STARIX provides clear explanations of the logic involved and ensures a simple mechanism for requesting human review.
5. **Data Protection Officer (DPO):** STARIX has appointed a DPO, reachable at dpo@starixapp.com.

Annex B: CCPA/CPRA (California, US) Compliance

1. **Do Not Sell or Share My Personal Information:** STARIX does not sell personal data. However, a **“Do Not Sell or Share My Personal Information”** link is provided on our website for California residents to exercise opt-out rights.
2. **Consumer Requests:** California residents may request access, correction, deletion, or portability of their personal data. STARIX will respond within **45 days** of receiving a verifiable request.
3. **Verification Process:** STARIX requires identity verification before fulfilling consumer requests to protect privacy.
4. **Sensitive Personal Information:** STARIX does not use sensitive personal information for purposes beyond those permitted under CPRA.

Annex C: Nigeria NDPA 2023 Compliance

1. **Registration with NDPC:** STARIX is registered with the **Nigeria Data Protection Commission (NDPC)** as required for controllers processing data of more than 2,000 individuals annually.
2. **Annual Data Protection Compliance Audit (DPCA):** STARIX conducts annual audits to ensure ongoing compliance with NDPA 2023 and submits reports to the NDPC.
3. **Lawful Basis:** STARIX processes personal data under lawful bases including consent, contract, legitimate interest, and legal obligation, consistent with NDPA requirements.
4. **Minors' Data:** STARIX does not knowingly collect data from individuals under **16 years of age**. Where parental consent is required for users aged 16 or 17 under applicable law, STARIX ensures compliance before processing.
5. **Data Subject Rights:** Nigerian residents may exercise rights of access, rectification, erasure, portability, and restriction of processing. Requests will be handled within **30 days**.

Annex D: Security & Accountability

1. **Security Measures:** STARIX employs encryption, access controls, and regular security audits to safeguard personal data.
2. **Third-Party Processors:** STARIX ensures that third-party processors (e.g., Paystack) comply with equivalent data protection standards.
3. **Policy Updates:** STARIX commits to regular reviews and updates of this Addendum to reflect evolving legal requirements.

If you have questions or comments about this notice, you may email us at contact@starixapp.com.