

Privacy Policy

Last Updated: November 14, 2025

Introduction

This Privacy Policy ("Policy") explains how **High Star Co Ltd** ("Company," "we," "us," or "our") collects, uses, processes, and shares your personal data when you use our mobile sNova VPN ("App"). Please read this Policy carefully to understand how we handle your personal information and the rights available to you.

Purposes of Processing

What Is Personal Data?

"Personal data" refers to any information that identifies you as an individual, either directly or when combined with other information we hold. This includes, for example, your name, postal address, email address, and phone number, as defined under the **General Data Protection Regulation (GDPR)**.

Why Do We Need Your Personal Data?

We process your personal data only in accordance with applicable data protection and privacy laws. Certain personal data is required to provide you access to and use of our App.

When registering or using our services, you may be asked to provide consent for data collection and processing — this consent forms the legal basis for our processing under applicable law. You may withdraw your consent at any time.

If you do not agree to our processing of your personal data as described in this Policy, please refrain from using the App.

Collecting Your Personal Data

We collect personal data about you in the following ways:

1. Information You Provide

This includes:

- Personal data you provide when registering for the App (e.g., name, postal address, email, phone number, username, password, and demographic details such as gender);
- Data contained in videos, comments, or other materials you upload or post;
- Data submitted in connection with rewards programs, contests, or promotions;
- Data you provide when reporting a problem or requesting support;
- Payment information when making purchases through the App;
- Information shared during any correspondence with us by phone, email, or otherwise.

2. Information from Social Networks

If you connect the App with a social networking site ("SNS"), you authorize us to access, use, and store information that the SNS provides in accordance with your privacy settings on that platform. You may revoke our access at any time by adjusting your SNS account settings.

3. Information Collected Automatically

When you access the App, we automatically collect technical and usage data about your device and activity, such as:

- Device type, operating system, and version;
- Browser type, language, and screen resolution;
- Pages visited, time spent, access times, and referral source.

We collect this information through **cookies** and similar technologies.

4. Automated Decision-Making and Profiling

We do not use your personal data for automated decision-making or profiling, except when required by law. In such cases, you will be notified and given the right to object.

Cookies

What Are Cookies?

Cookies are small data files placed on your computer or mobile device that help us deliver a more personalized and efficient user experience. We use both **session cookies** (which expire when you close your browser) and **persistent cookies** (which remain until deleted).

Cookies are categorized as:

- First-party cookies**, which are set by us directly; and
- Third-party cookies**, which are set by external service providers.

Types of Cookies We Use

Type of cookie	Purpose
<i>Essential Cookies</i>	Enable core functionality such as secure login and fast page loading. Without them, the App cannot function properly.
<i>Functionality Cookies</i>	Remember your preferences (e.g., language, login info) and customization settings to enhance your experience.
<i>Analytics and Performance Cookies</i>	Collect anonymized data about user activity (e.g., visitor count, popular pages, referral sources) to help us improve performance. We use Google Analytics for this purpose. Learn more about Google cookies and Google Privacy Policy . To opt out, install this browser add-on .
<i>Targeted and advertising cookies</i>	Track browsing behavior to display personalized ads. You can manage these cookies via Your Online Choices . Disabling them may result in less relevant ads.
<i>Social Media Cookies</i>	These cookies are used when you share information using a social media sharing button or "like" button on our App or you link your account or engage with our content on or through a social networking App such as Facebook, X or Google+. The social network will record that you have done this.

Disabling Cookies

You may disable or delete cookies through your browser settings (typically under "Settings," "Help," or "Privacy"). Please note that disabling cookies may affect the functionality of the App and require repeated login.

Advertising

We may allow third-party companies to display advertisements within the App. These companies may collect information (such as clickstream data, browser type, or ad interaction) to provide ads more relevant to your interests. Their data use is governed by their respective privacy policies.

Using Your Personal Data

We may use your personal data for the following purposes:

- To operate, maintain, and improve the App, products, and services;
- To manage your account and communicate with you;
- To operate loyalty, rewards, and promotional programs;
- To respond to inquiries and provide customer support;
- To send service-related messages, updates, and alerts;
- With your consent, to send marketing communications about offers and new products (you can opt out anytime);
- To process and verify payments;
- To comply with legal obligations and requests from authorities;
- To conduct analysis and internal studies; and
- As otherwise described in this Policy.

Sharing Your Personal Data

We may share your personal data as follows:

- With Third Parties You Authorize** — When you provide consent for data sharing.
- With Service Providers** — To trusted third parties that perform services such as payment processing, analytics, customer support, and IT infrastructure.

Third-Party Sites

The App may contain links to external websites or features. This Policy does not cover their practices, and we are not responsible for their content or policies. Please review the privacy policies of any third-party sites before submitting personal data.

User-Generated Content

Any content you post on the App (e.g., comments, forums, or reviews) becomes public and may be visible to others. Exercise caution when sharing personal information.

If you provide feedback, we may display it on the App without associating it with your personal data unless you give explicit consent.

International Data Transfers

Your personal data may be transferred, stored, and processed outside your country of residence. By using the App, you consent to such transfers, provided that we ensure an adequate level of protection in accordance with this Policy.

Security

We implement reasonable technical, organizational, and administrative measures to safeguard your personal data. However, no system is completely secure. If you believe your account security has been compromised, please contact us immediately.

Retention

We retain your personal data only as long as necessary to fulfill the purposes described in this Policy, or as required by law. Once you close your account or cancel your subscription, your data will be deleted unless retention is legally required.

Children’s Privacy

Our App is **not intended for children under the age of 16**. If a parent or guardian becomes aware that a child has provided personal data without consent, please contact us and we will promptly delete such information.

Your Rights

You have the following rights regarding your personal data:

- Opt-Out:** From marketing communications, profiling, or transfers outside the EEA.
- Access:** Obtain a copy of the data we hold about you.
- Amend:** Correct or update inaccurate information.
- Portability:** Transfer your data to another service provider.
- Erase ("Right to Be Forgotten"):** Request deletion of data that is no longer relevant or unlawfully processed.

To exercise these rights, please contact us via the details provided in the App. We may verify your identity before fulfilling any request. We aim to respond within **one month** of receipt.

Complaints

We are committed to resolving complaints related to this Policy or our handling of your personal data. You may contact us through the details provided in the App, and we will respond within **30 days**.

If you are unsatisfied with our response, you may file a complaint with your local data protection authority.