

# Stannp Privacy and Cookies Policy

This Privacy and Cookies Policy (the "**Policy**") applies to Stannp, Inc., a Delaware corporation with its principal office at 6312 Fiddlers Green Cir, Suite 350E, Greenwood Village, CO 80111 ("**Stannp**," "**we**," "**us**," or "**our**"). This Policy describes how we collect, use, share, and protect personal information when you visit our website at stannp.com (the "**Website**") or use our direct mail platform and services (the "**Platform**" or "**Services**").

## About Our Services

Stannp provides a Software-as-a-Service (SaaS) direct mail platform that enables businesses to create, manage, and send physical mail campaigns through a fully digital, integrated solution. Our Services include the websites under the stannp.com domain, the Stannp Direct Mail Platform, and related applications and portals. We collect and process personal information as necessary to deliver these direct mail services to our business customers and their recipients.

## Your Acceptance of this Policy

By accessing or using our Website, Platform, or Services in any manner, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree with our practices, please do not use our Services.

**This Policy was last updated on: 1<sup>st</sup> September 2025.**

## 1. Scope and Authority for Data Processing

For the purposes of US data protection legislation, Stannp is a **Data Controller** in relation to our own business operations, and a **Data Processor** when handling customer data through our Platform services.

This Policy covers our treatment of personally identifiable information as defined by US Federal and State privacy laws, including the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), Virginia Consumer Data Protection Act (VCDPA), Colorado Privacy Act (CPA), Connecticut Data Privacy Act (CTDPA), Utah Consumer Privacy Act (UCPA), New York SHIELD Act, and other applicable US state privacy laws.

We collect and use personal information based on one or more of the following:

- Your consent when you use our Services
- To fulfil our contractual obligations to provide Services to you
- To comply with legal requirements
- For our business purposes as described in this Policy

When you provide us with personal information about others, you represent that you have obtained any necessary consents or have another lawful basis for sharing that information with us.

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Except as noted in this Privacy Policy, our collection and use of Personal Information is not a contractual or statutory requirement or a requirement necessary to enter into a contract. You can always opt not to disclose information to us. If you elect to do so, that decision will affect our ability to communicate with, provide Services to, employ, or otherwise interact with you.

When serving Canadian customers, we also comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy laws to the extent they apply to our cross-border business activities.

## 2. Information We Collect and Use

### 2.1 Information We Collect

We collect and process the following information from you via the Platform:

Category of Information	Examples	Sources	Business/ Commercial Purpose	Disclosed to
<b>Identifiers &amp; Contact Information</b>	First name, last name, email address, business address, phone number, company name, job title	<ul style="list-style-type: none"> <li>Directly from you</li> <li>Third party data providers</li> </ul>	<ul style="list-style-type: none"> <li>Account creation and management</li> <li>Customer service</li> <li>Billing and payments</li> <li>Marketing communications</li> <li>Legal compliance</li> </ul>	<ul style="list-style-type: none"> <li>Service providers</li> <li>Payment processors</li> <li>Marketing partners (with consent)</li> <li>Legal authorities (if required)</li> </ul>
<b>Financial Information</b>	Credit card details, billing address, payment history	<ul style="list-style-type: none"> <li>Directly from you</li> <li>Payment processors</li> </ul>	<ul style="list-style-type: none"> <li>Payment processing</li> <li>Fraud prevention</li> <li>Account administration</li> <li>Legal and tax compliance</li> </ul>	<ul style="list-style-type: none"> <li>Payment processors</li> <li>Financial institutions</li> <li>Legal authorities (if required)</li> </ul>
<b>Commercial Information</b>	Purchase history, account usage, service preferences	<ul style="list-style-type: none"> <li>Your use of our Platform</li> </ul>	<ul style="list-style-type: none"> <li>Service delivery</li> <li>Account personalization</li> <li>Product improvement</li> <li>Analytics</li> </ul>	<ul style="list-style-type: none"> <li>Service providers</li> <li>Analytics providers</li> </ul>
<b>Internet/ Network Activity</b>	IP address, browser type, device information, operating system, cookies, usage data	<ul style="list-style-type: none"> <li>Automatically collected via Website/Platform</li> </ul>	<ul style="list-style-type: none"> <li>Platform functionality</li> <li>Security and fraud prevention</li> <li>Analytics and improvement</li> <li>Troubleshooting</li> </ul>	<ul style="list-style-type: none"> <li>Hosting providers</li> <li>Security services</li> <li>Analytics providers</li> </ul>
<b>Professional Information</b>	Company name, job title, business contact details	<ul style="list-style-type: none"> <li>Directly from you</li> <li>Third party data providers</li> </ul>	<ul style="list-style-type: none"> <li>B2B communications</li> <li>Service customization</li> <li>Marketing (where permitted)</li> </ul>	<ul style="list-style-type: none"> <li>Service providers</li> <li>Marketing partners (with consent)</li> </ul>
<b>Customer Support Data</b>	Support tickets, issue descriptions, communications with support team	<ul style="list-style-type: none"> <li>Directly from you</li> </ul>	<ul style="list-style-type: none"> <li>Issue resolution</li> <li>Service improvement</li> <li>Training and quality assurance</li> </ul>	<ul style="list-style-type: none"> <li>Customer support platforms</li> <li>Service providers</li> </ul>

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<b>Preferences &amp; Settings</b>	Dashboard configuration, communication preferences, marketing opt-in/opt-out choices	• Directly from you	<ul style="list-style-type: none"> <li>• Service customization</li> <li>• Compliance with preferences</li> <li>• User experience improvement</li> </ul>	• Service providers
<b>Employment Application Data</b>	Name, contact details, resume, education history, employment history, references, interview notes, background check results (where permitted), work authorization status	<ul style="list-style-type: none"> <li>• Directly from applicants</li> <li>• Recruitment platforms</li> <li>• Background check providers</li> <li>• References</li> </ul>	<ul style="list-style-type: none"> <li>• Evaluating qualifications</li> <li>• Conducting interviews</li> <li>• Background verification</li> <li>• Legal compliance</li> <li>• Equal opportunity monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• HR service providers</li> <li>• Background check services</li> <li>• Payroll processors (if hired)</li> <li>• Legal authorities (if required)</li> </ul>

## 2.2 Additional Uses of Information

In addition to the purposes outlined in the table above and those set forth in our Terms of Service, we may use the information we collect for the following purposes:

- **Employment and Recruitment:** Evaluating job applications, conducting interviews, performing background checks where permitted by law, making hiring decisions, and maintaining records for equal opportunity compliance
- **Events and Communications:** Organizing and managing webinars, conferences, or other events you register for, and sending service-related announcements and administrative messages
- **Research and Development:** Analyzing usage patterns to improve our Platform, developing new features and services, and conducting internal research for technological development and demonstration
- **No Financial Incentives:** We do not offer financial incentives, payments or other compensation in exchange for providing personal information
- **Other Lawful Purposes:** Any other lawful purpose for which you provide consent, or as otherwise permitted or required by applicable law

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose.

For information about how we use data for business operations, legal compliance, business transactions, and security purposes, please refer to our Terms of Service.

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## 2.3 Information We Do Not Collect

We do not knowingly collect sensitive personal information as defined under CPRA, including social security numbers, driver's license numbers, account passwords, precise geolocation, racial or ethnic origin, religious beliefs, union membership, genetic or biometric data, health information, or sexual orientation data. We also do not knowingly collect personal information from children under 13.

## 2.4 Marketing Communications

We may track email opens and clicks to improve our services. To opt out of marketing emails, click the unsubscribe link in any email or contact us using the information below. To opt out of marketing SMS, reply STOP to the message or contact us.

Please note that, if you do not want to receive emails or notices from Stannp, those notices will still govern your interactions with Stannp, and you remain responsible for reviewing and adhering to such notices, including this Privacy Policy and the Terms of Service on the Websites and Portals.

We comply with Canada's Anti-Spam Legislation (CASL) when sending commercial electronic messages to Canadian addresses. This includes obtaining appropriate consent and providing unsubscribe mechanisms in every message. Unsubscribe requests from Canadian recipients are processed within 10 business days.

## 3. Data Processing for our Customers

When you use our Platform to send mailings to your customers, you are the business under US privacy laws, and we act as your service provider. In this capacity:

### 3.1 Data We Process on Your Behalf

Category of Information	Examples	Sources	Business/ Commercial Purpose
<b>Recipient Data</b>	Names, addresses, email addresses, phone numbers, and other identifiers you provide	To fulfil your mailing campaigns through printing, mailing, and delivery tracking	You must ensure compliance with CAN-SPAM, state privacy laws, and obtain necessary consents
<b>Campaign Content</b>	Marketing materials, letters, personalization fields, images, and variable data	To produce and deliver your mailings	You are responsible for content compliance and accuracy
<b>Your Uploaded Databases</b>	CRM exports, suppression lists, custom data fields	To store for future campaigns and apply suppressions	You control retention and must ensure data accuracy
<b>Campaign Analytics</b>	Delivery confirmations, response tracking, QR code scans (if enabled)	To provide performance reports	You determine how to use analytics for future targeting

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### 3.2 Important Service Provider Commitments

As your service provider, we process personal data solely based on your documented instructions and do not use it for our own independent purposes. We do not sell or share your customers' data outside of fulfilling your service requests. We provide assistance with your compliance obligations as outlined in our Terms of Service, including support for consumer rights requests when contractually required. We maintain appropriate security measures in accordance with applicable US privacy laws and industry standards to protect the personal data you entrust to us.

### 3.3 Your Obligations as the Business

As the business/controller, you are responsible for:

**As the business/controller, you are responsible for:**

- **Obtaining proper authorization** - Ensuring you have obtained all required consents, opt-in permissions, or other lawful authorization from recipients before including them in any mailing campaigns, including compliance with CASL when sending to Canadian addresses
- **Honoring rights requests** - Responding to all consumer rights requests from your recipients, including requests to access, delete, or opt-out of future communications
- **Providing privacy notices** - Giving clear and conspicuous privacy notices to your recipients explaining how their data is collected, used, and shared
- **Maintaining legal compliance** - Following all applicable laws including CAN-SPAM, TCPA, CASL for Canadian recipients, PIPEDA for Canadian personal information, and relevant state marketing and privacy laws
- **Managing suppression lists** - Maintaining accurate Do Not Contact and suppression lists and ensuring they are applied to all campaigns
- **Ensuring data accuracy** - Verifying the accuracy of all data you upload to our platform and confirming you have lawful rights to use any third-party data sources for your marketing purposes

## 4. Sharing Your Information with Third Parties

We share your information with carefully selected service providers to deliver our Services. These include:

- **Operational Partners:** United States Postal Service and other mail carriers for delivery and address validation; printing and fulfillment services; cloud hosting and infrastructure providers
- **Business Services:** Payment processors for secure transaction handling; customer support platforms; analytics and security services

We may also share your information:

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- a. **Group companies:** With any group companies or affiliates for business purposes
- b. **Anonymized insights:** We may share anonymized, aggregated data with third parties for analytics and performance measurement (this data cannot identify you)
- c. **As set out in our Terms of Service:** Including business transfers, regulatory requirements, and law enforcement requests as detailed in our Terms of Service

We will not disclose your personal information to other third parties beyond those described above without obtaining your consent, except as required by law or to protect our rights, property, or safety, or that of others.

## 5. Sale and Sharing of Personal Information

We do not sell your personal information to third parties. We share personal information only as described in Section 4 above and to provide our Services.

When facilitating mail campaigns, we share delivery confirmations and mailing status information with our customers who initiated those campaigns.

**Your Right to Opt Out:** If you wish to opt out of any data sharing as defined under state privacy laws, please contact us:

- Email: [privacy@stannp.com](mailto:privacy@stannp.com)
- Phone: 888-321-2148
- Mail: Stannp Compliance Team, 6312 S Fiddlers Green Cir, Suite 350E, Greenwood Village, CO 80111

We will process opt-out requests within 15 days.

## 6. Links to Third Party Websites

Stannp is not responsible for privacy policies of other sites accessed via our Website or Platform. Check each site's policy and contact owners with concerns or questions.

## 7. Security

Stannp employs appropriate technological, physical, and administrative measures to safeguard the confidentiality, integrity, and availability of personal information from unauthorized access and improper use.

Our technical security measures include encryption of personal data both in transit and at rest. We implement access controls to restrict data access to authorized personnel only. Our systems undergo regular security monitoring, supported by network security infrastructure including firewalls and intrusion detection systems.

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Physical security protections encompass secure data centers with restricted access controls and secure procedures for disposal of physical media containing personal information. Access to facilities housing personal data is controlled and monitored.

Administrative safeguards include employee security training, regular reviews and updates of security policies and procedures, established incident response and breach notification procedures, and security assessments of vendors and contractors who may access personal information.

We maintain these security measures in accordance with applicable US privacy laws and industry standards. However, no security system is completely impenetrable, and we cannot guarantee absolute security. Individuals seeking additional information about our specific safeguards may contact us using the information in Section 15 below.

**Payment Card Security:** We do not directly store or process full payment card numbers on our systems. All payment transactions are handled securely by PCI DSS-compliant payment processors. These processors are contractually required to maintain strict safeguards in accordance with the Payment Card Industry Data Security Standard (PCI DSS) to protect your financial information.

## 8. Storage and Data Retention

We retain your data for no longer than is reasonable in line with the purposes for which it was originally collected. The default retention period for sensitive assets will be 3 years.

Any user with an account can request their personal data to be removed at any time, however please note that any personal data appearing on sales invoices will be retained by Stannp for at least 7 years for legal compliance.

## 9. Cookies and Similar Technologies

### 9.1 What are Cookies?

Cookies are small text files that are placed on your device when you use the Website or Platform. Session cookies enable you to move from page to page within the Website and Platform and any information you enter will be remembered but is deleted when you close the page or after a short time. Persistent cookies allow us to remember your preferences and settings when you use the Website or Platform in the future.

### 9.2 Types of Cookies We Use

#### Strictly Necessary Cookies

These cookies are essential for Platform operation and include:

- Authentication tokens to keep you logged in
- Dashboard configuration preferences

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- Security and fraud prevention
- Load balancing and platform functionality

### **Analytics Cookies (with your consent)**

These cookies help us understand and improve our services through:

- Understanding how visitors use our site
- Tracking if advertising or referral links were effective
- Analysing user behaviour to improve Platform functionality

### **Marketing Cookies (with your consent)**

These cookies are used for marketing purposes including:

- Advertising optimisation
- Marketing campaign effectiveness
- Showing relevant advertisements

## 9.3 Managing Your Cookie Preferences

You can control cookie settings through our cookie consent banner when you first visit our website, your account settings if you're a logged-in user, or directly through your browser settings. If you do not want cookies to be served on your device, you can disable them through these settings; however, please note that disabling necessary cookies may prevent you from accessing some Platform features.

## 9.4 Third Party Cookies

Third party advertisers may place or read cookies on your browser when you use our website or Platform. This Policy applies only to Stannp's use of cookies and does not cover third party cookies. For more information about managing cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

# 10. Your Rights

Under US privacy laws, you have several rights regarding your personal information:

## 10.1 General Rights

You have the right to access and request copies of any personal information we hold about you. You can request that we correct any inaccurate or incomplete information in our records. You may request the deletion of your personal information from our systems. Additionally, you have the right to opt out and stop us from sharing your information for marketing purposes. Canadian residents also have rights under PIPEDA to access and correct their personal information, and may file complaints with the Office of the Privacy Commissioner of Canada at [priv.gc.ca](http://priv.gc.ca).

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## 10.2 California Residents (CCPA/CPRA)

If you are a California resident, you have specific rights under state law. You have the right to know the categories and sources of personal information we have collected about you. You can request information about the business purposes for which we collect your data. You have the right to limit how we use your sensitive personal information. Furthermore, you are protected by the right to non-discrimination, meaning we cannot treat you differently for exercising any of these privacy rights.

## 10.3 Other State Residents

Residents of Virginia, Colorado, Connecticut, and Utah have similar rights to those described above under their respective state privacy laws.

## 10.4 Specific Request Types

You may request the following regarding your personal information:

- The categories and specific pieces of personal information we've collected
- The sources from which we collected your information
- Our business or commercial purposes for collecting or sharing
- The categories of third parties with whom we've shared your information
- Information about our sale or disclosure of your data for business purposes
- Data portability in a structured, commonly used format

## 10.5 Verification Process

We will verify your identity before processing requests by:

- Matching information provided in your request against our records
- Requesting additional information if needed for verification
- Using a tiered approach based on the sensitivity and risk of the request

We will acknowledge receipt within 2 business days and respond substantively within 30 days (extendable to 60 days with notice for complex requests).

## 10.6 Exercising Rights - Contact Methods

To exercise your privacy rights, you may contact us via email at [privacy@stannp.com](mailto:privacy@stannp.com) or by mail to Stannp Compliance Team at 6312 S Fiddlers Green Cir, Suite 350E, Greenwood Village, CO 80111. When making a request, please include your name, email address, and a specific description of your request. We will verify your identity before processing any request and will respond within 45 days, though we may extend this to 90 days for complex requests with notice to you.

If you wish to designate an authorized agent to act on your behalf, they must provide:

- Written authorization signed by you
- Proof of the agent's identity

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- We may also contact you directly to confirm the agent's authority to act on your behalf

## 10.7 Additional Rights and Protections

The following additional rights and protections apply to your personal information under various US state and federal privacy laws.

- **Withdrawal of Consent:** Where we process your data based on consent, you may withdraw that consent at any time by contacting us. This won't affect the lawfulness of processing before withdrawal.
- **Right to Object:** You may object to our processing of your personal information for direct marketing or based on our business purposes. Contact us using the information in Section 15.
- **Non-Discrimination:** We will not discriminate against you for exercising any privacy rights, including by denying services, charging different prices, or providing different service levels, unless permitted by law.
- **Accessibility:** If you need this Privacy Policy in an alternative format due to a disability, please contact us to request accommodation.

## 10.8 Filing Complaints

If you're unsatisfied with our response to your privacy concerns, you may file a complaint with:

- **California residents:** California Attorney General at [oag.ca.gov/privacy](https://oag.ca.gov/privacy)
- **Other states:** Your state's Attorney General's office

## 10.9 Automated Decision-Making

We do not use automated decision-making that produces legal or similarly significant effects. All decisions affecting your account or services involve human review.

## 11. Children's Privacy

Our services are not directed to children under 13 years of age, and we do not knowingly collect personal information from children under 13 in compliance with COPPA (Children's Online Privacy Protection Act). If we learn that we have collected such information from a child under 13, we will delete it promptly.

In accordance with state law compliance requirements, we do not knowingly sell or share personal information of consumers under 16 years of age without proper authorization. If you believe we have collected information from a child, please contact us immediately so we can address the situation.

## 12. Data Breach Notification

For breaches affecting data we process on your behalf, we notify you without undue delay per applicable law, providing breach details, affected categories, consequences, and remedial measures.

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# Stannp.com

The Communications Platform

## 13. International Data Transfers

If and to the extent that Stannp transfers Personal Information from another country into the United States, Stannp does so in compliance with the Privacy Laws of the originating country.

## 14. Changes to This Policy

Stannp may amend this Privacy Policy from time to time. Use of Personal Information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we use Personal Information, we will notify you by posting an announcement on the Websites or sending you an email. You are bound by any changes to the Privacy Policy when you use the Websites, Portals, other applications, or the Services after such changes have been first posted.

## 15. Contact Information

All questions, concerns, or requests about or under this Privacy Policy or about Stannp's collection and use of Personal Information should be directed to Stannp as follows:

Laura Manning

6312 S Fiddlers Green Cir, Suite 350E, Greenwood Village, CO 80111

888-321-2148

[privacy@stannp.com](mailto:privacy@stannp.com)

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[www.stannp.com](http://www.stannp.com)



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