

STEM GLOBAL INC

GLOBAL PRIVACY POLICY & COOKIE NOTICE

Effective Date: [Insert Date]

Applies To: United States, Canada, Mexico, India, and other jurisdictions where applicable

Company: Stem Global Inc. ("Stem Global," "we," "us," "our")

This Global Privacy Policy and Cookie Notice explains how Stem Global Inc. collects, uses, discloses, and protects personal information when you visit our website, interact with us, or engage in our services.

PART I — GLOBAL PRIVACY POLICY

1. Scope

This Privacy Policy applies to website visitors, business contacts, customers, suppliers, and other individuals whose personal data we process in connection with our business.

2. Personal Data We Collect

We may collect the following categories of personal data: - Identifiers (name, email address, company name, phone number) - Business contact information - Technical data (IP address, browser type, device information) - Usage data (pages visited, interactions) - Communications and inquiries

3. How We Use Personal Data

We use personal data to: - Operate and improve our website - Respond to inquiries and provide services - Manage business relationships - Comply with legal obligations - Protect security and prevent fraud

4. Legal Bases for Processing (Where Applicable)

Processing is based on one or more of the following: - Consent - Performance of a contract - Compliance with legal obligations - Legitimate business interests

5. Data Sharing

We may share personal data with: - Service providers and subprocessors - Professional advisors - Government authorities when legally required

We do not sell personal data.

6. Data Retention

Personal data is retained only for as long as necessary to fulfill the purposes described or as required by law.

7. Data Security

We implement reasonable administrative, technical, and physical safeguards aligned with industry standards to protect personal data.

PART II — REGIONAL PRIVACY RIGHTS

United States

We comply with applicable U.S. privacy laws. Individuals may request access or correction of their personal data where required by law.

Canada (PIPEDA)

We comply with the Personal Information Protection and Electronic Documents Act (PIPEDA). Canadian residents may request access to and correction of their personal information.

Mexico (LFPDPPP)

We comply with Mexico's Federal Law on Protection of Personal Data Held by Private Parties. Individuals may exercise ARCO rights (access, rectification, cancellation, objection).

India (DPDP Act, 2023)

We comply with India's Digital Personal Data Protection Act, 2023. Individuals may request access, correction, or erasure of personal data as permitted by law.

PART III — COOKIE POLICY / COOKIE NOTICE

1. What Are Cookies

Cookies are small text files stored on your device when you visit a website.

2. Types of Cookies We Use

- Essential cookies (required for website functionality)
- Analytics cookies (to understand website usage)
- Functional cookies (to improve user experience)

3. Cookie Consent

Where required by law, we obtain consent before placing non-essential cookies. You may manage cookie preferences through your browser settings.

4. Third-Party Cookies

Third-party service providers (e.g., analytics providers) may place cookies subject to their own privacy policies.

5. Managing Cookies

You may block or delete cookies through browser settings. Disabling cookies may affect website functionality.

PART IV — CONTACT INFORMATION

For privacy-related questions or requests, contact:

Email: privacy@stemglobal.com

PART V — UPDATES

We may update this Policy periodically. Changes will be posted on this page with an updated effective date.

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