Effective Date: [07/07/2025]

"This policy defines the end-to-end framework for user account creation, management, and security across SimStar Asia Limited digital platforms"

1. Registration Requirements

1.1 Eligibility Criteria

- Minimum age: 18 years
- Corporate accounts require valid business registration documents

1.2 Mandatory Information

Basic Registration

Field Category	Required Data	
Personal Information	First name, Last name, Email, Mobile number, Username	
Business Information	Company name, Business type, Full address (Country/State/City/Zip)	
Referral Details	Two referral contacts (Name, Company, Phone)	
Documentation	Photo ID proof, Business ID proof	

1.3 Verification Methods

Data Type	Verification Process	
Email	OTP sent via email (mandatory)	
Mobile Number Collected but not verified		
Government IDs	Visual inspection of uploaded documents	

2. Account Security

2.1 Credential Requirements

- Password: Minimum 8 characters
- No 2FA/MFA implemented currently

2.2 Session Controls

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- No device/login attempt restrictions
- No automatic logout due to inactivity

3. Data Collection & Use

3.1 Collected Data

- Personal: Name, email, mobile, ID copies
- Behavioral: Page visits, search history (for internal analytics only)

3.2 Marketing

- Opt-in only for promotional communications
- Unsubscribe option in all marketing emails

4. Compliance & Verification

4.1 KYC Process

All users must submit:

- 1 Personal ID (Passport/Driver's License)
- 1 Business ID (Trade License/Company Registration)
- Or any other document as required by case to case basis

4.2 Data Retention

- Active accounts: Retained indefinitely
- Inactive accounts: No automatic deletion

5. User Rights

5.1 Data Access & Deletion

- Data download: Not available
- Account deletion: Request via email to <u>[info@simstar.co</u>]

5.2 Marketing Preferences

- Manage subscriptions via email footer links
- Can be cancelled through email to <u>linfo@simstar.co</u>]

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6. Security Protocols

6.1 Encryption Standards

• Data in transit: TLS 1.2+ (Web)

• Data at rest: AES-128 (To be upgraded to AES-256)

6.2 Breach Response

Notification timeline: Within 72 hours of confirmation

7. Platform-Specific Rules

7.1 Mobile Apps

- Follows iOS App Store and Google Play Store guidelines
- No biometric authentication (depends on the device used and the authentication kept)

7.2 Web Portal

- Browser support: Chrome, Firefox, Safari (latest versions)
- No CAPTCHA or cookie consent management

8. Prohibited Activities

8.1 Banned Actions

- Fake accounts or fraudulent information
- Automated data scraping
- Account sharing/reselling

**Violations result in immediate account termination.



9. Policy Updates and Version Control

We maintain a public changelog of policy revisions:

Version: 01

Date: 07-07-2025

Material changes will be notified via:

WhatsApp business messages

- Email announcements
- Website banners (30 days prior)

10. Contact Information and Complaints

Support: Ms Vyoma Patel

Email: vyoma.patel@simgems.com

Phone: [+91 95100 24836]

Registered Office: SimStar Asia Limited 18/F, The Cameron, 33 Cameron Street, TST, Kowloon, **Hong Kong**

This comprehensive policy ensures full transparency about our data practices while meeting the highest standards of global compliance. For any clarification, please contact at [info@simstar.co].

VERSION	1
DATE	07-07-2025
CREATED BY	YASHWANTH RAVI
APPROVAL DATE	07-07-2025
APPROVED BY	AJAY PAUL